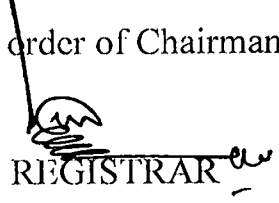


FORM OF ORDER SHEET

Court of _____

Case No.- 1659/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/11/2022	<p>The appeal of Mr. Abid Zaman presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. 1659 /2022

ABID ZAMAN

VS

LOCAL GOVT. DEPTT:

INDEX

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7.	Vakalatnama		15


APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. _____/2022

Mr. Abid Zaman, Assistant Director (BPS-17),
Local Government, Election & Rural Development Department, Hangu.

..... APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2- The Secretary, (LG&RD) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director General Local Government & Rural Development Department, Khyber Pakhtunkhwa, Peshawar.

..... RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 14.07.2022 WHEREBY PENALTY OF REDUCTION TO A LOWER STAGE FOR ONE YEAR WAS IMPOSED UPON THE APPELLANT AND AGAINST THE IMPUGNED APPELLATE ORDER DATED 02.11.2022 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS

PRAYER:

That on acceptance of this appeal the impugned notification dated 14.07.2022 and appellate order dated 02.11.2022 may very kindly be set aside and the appellant may kindly be restored on his original pay scale/ stage with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant with all back benefits.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:-

1. That the appellant is the employee of the respondent department and was performing his duties as Assistant Director LG&RDD Bannu quite efficiently up to the entire satisfaction of his superiors.
2. That the appellant was transferred to the office of LG&RRD Hangu vide order dated 05.08.2020 whereafter the appellant assumed charge on 07.08.2020. Copy of the transferred order and Assumption Charge Report are attached as Annexure **A & B.**
3. That astonishingly a show cause notice dated 16.02.2022 was served upon the appellant whereby baseless allegations were levelled against him. that in response the appellant submitted his reply of the ibid show cause notice and denied the allegations levelled against him. Copies of the show cause and reply are attached as annexure **C & D.**

4. That it is worth mentioning that the inquiry committee was constituted to probe into the matter and investigate against the accused/appellant on the day on which the appellant was transferred i.e. on 5.8.2020. Copy of notification dated 05.08.2020 is attached as Annexure..... E.
5. That astonishingly penalty of reduction to a lower stage for one year was imposed upon the appellant vide impugned order dated 14.07.2022. Copy of the impugned order dated 14.07.2022 is attached as AnnexureF.
6. That appellant feeling aggrieved from the impugned order dated 14.07.2022 preferred departmental appeal dated 03.08.2022 before the respondent No.1 which has been rejected through appellate order 02.11.2022 on no good grounds. Copies of the departmental appeal dated 19.08.2022 and appellate order 02.11.2022 are attached as annexure G & H.
7. That appellant having no other efficacious remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:

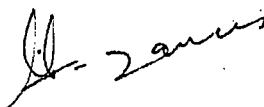
- A- That the impugned notification dated 14.07.2022 and impugned appellate order dated 02.11.2022 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated in accordance with law and rules by the respondent department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That neither charge sheet nor statement of allegations has been served on the appellant before issuance of the impugned order 14.07.2022.
- D- That no regular inquiry has been conducted in to the matter which is necessary to dig out the real facts.
- E- That no chance of personal hearing and defense has been provided to the appellant before imposing the penalty.
- F- That the appellant was falsely alleged of misconduct and inefficiency because the charges levelled against the appellant relate to the tenure before his charge assumption.
- G- That the impugned notification dated 14.07.2022 and impugned appellate order dated 02.11.2022 has been issued by the respondents in arbitrary and mala fide manner, therefore, the same is not tenable in the eye of law and liable to be struck down.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the Service appeal may kindly be accepted as prayed for.

-3-

Dated: 22-11-22

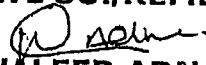
APPELLANT



ABID ZAMAN

Through:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


WALEED ADNAN


UMAR FAROOQ MOMAND


MUHAMMAD AYUB

& 
**KHANZAD GUL
ADVOCATES**

AFFIDAVIT

I Mr. Abid Zaman, Assistant Director, Local Government, Election & Rural Development Department, Hangu, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


Deponent



Government Of Khyber Pakhtunkhwa
Local Government, Elections & Rural
Development Department

WAB

-4-

NOTIFICATION

Dated Peshawar, the 05th August, 2020

No. SO(ELG/4-116/P.T/2020/KC). The postings / transfers of the following Officers of LG&RDD are hereby ordered with immediate effect, in public interest:-

Sl. No.	Name of Officer	From	To
1.	Mr. Abid Zaman	Assistant Director (BPS-17) LG&RDD Banru	Assistant Director (BPS-17) LG&RDD Hangu vice Sl. No. 02
2.	Mr. Dilawar Khan Barki	Assistant Director (BPS-17) LG&RDD Hangu	Assistant Director (BPS-17) LG&RDD Tribal District Mohmand vice Sl. No. 03
3.	Mr. Habib Nawaz	Assistant Director (BPS-17) LG&RDD Tribal District Mohmand	Assistant Director (BPS-17) LG&RDD Banru vice Sl. No. 01

SECRETARY TO GOVERNMENT OF
KHYBER PAKHTUNKHWA, LG, E&RDD

Encl. No. & Date Even

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The AGPR, Sub-Office, Peshawar.
3. The Director General, LG&RDD Khyber Pakhtunkhwa, Peshawar.
4. The Deputy Commissioners, Hangu, Banru & Mohmand.
5. All Assistant Directors, LG&RDD in Khyber Pakhtunkhwa.
6. The District Accounts Officers, Hangu, Banru & Mohmand.
7. The Officers concerned.
8. The PS to Secretary LG, E&RDD Peshawar.
9. The PS to Special Secretary LG, E&RDD Peshawar.
10. PFs of the Officers concerned.
11. The Office order file.

SECTION OFFICER (ESTAD)
Phone # 091-9213224

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**OFFICE OF THE
ASSISTANT DIRECTOR, LG&RDD
HANGU.**

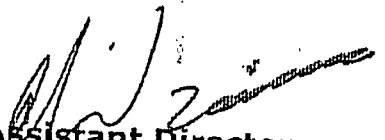
No. 440 /AD/LG&RDD (H)

Dated: 07 / 08 /2020

ASSUMPTION OF CHARGE.

In pursuance of Government of Khyber Pakhtunkhwa Local Government, Elections & Rural Development Department Notification No.SO(E)LG 4116/P.T/2020/KC:- dated 05/08/2020, I, Mr. Abid Zaman, hereby assumed the charge of the post of Assistant Director,(BPS-17) LG&RDD Hangu on 07/08/2020 (F.N).

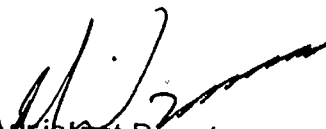
(Abid Zaman)

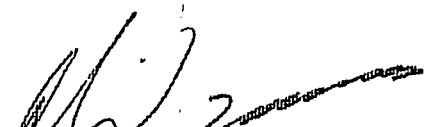

Assistant Director,
LG & RDD, Hangu.

Even No. & Date:

Copy for information to the:

1. Secretary to Government of Khyber Pakhtunkhwa, LG,E&RDD.
2. Director General, LG&RDD, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commissioner, Hangu.
4. Chairman, DDAC, Hangu.
5. District Accounts Officer, District Hangu.
6. Accountant/Assistant, LG&RDD, Hangu.
7. Managers NBP Hangu, HBL Raisan, HBL Bus Adda Hangu, HBL Togh Serai, HBL Doaba, HBL Naryab, HBL Torawari, BOK Hangu, BOK Thall, UBL Dallan.


Assistant Director
LG&RDD, Hangu.


Assistant Director,
LG & RDD, Hangu.

57/26



GOVERNMENT OF KHYBER PAKHTUNKHWA
LOCAL GOVERNMENT, ELECTIONS AND RURAL DEVELOPMENT
DEPARTMENT

No.SOE (LG)/3-5/Gandari Dallar Hangu/2021
Dated the Peshawar 16th Feb, 2022

To

1. Mr. Dilawar Khan,
Assistant Director, LG&RDD
D.I.Khan.
2. Mr. Abid Zaman,
Assistant Director, LG&RDD
Hangu.
3. Mr. Irfan Ullah,
Assistant Engineer
Office of Assistant Director, LG&RDD
Hangu.

Subject: **SHOW CAUSE NOTICE.**

I am directed to refer to the subject noted above and to enclose herewith Show Cause notice duly signed by the competent authority with the direction to submit reply to the show cause notice within the stipulated time period of seven (07) days on receipt of this communication for perusal of the competent authority. In case of failure, ex-parte action will be taken against you.

Encls: as stated.
Endst: No & Date eve.

Copy to:

1. Director General, LG&RD, Khyber Pakhtunkhwa.
2. PS to Secretary LG,E&RDD

Dilawar Khan
SECTION OFFICER (ESTAB)

Dilawar Khan
SECTION OFFICER (ESTAB)

R.O.
17-2-22

7- 227-

SHOW CAUSE NOTICE

I, Dr. Shahzad Khan Bangash, Chief Secretary, Khyber Pakhtunkhwa, Peshawar in exercise of the powers under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve upon you, Mr. Abid Zaman, Assistant Director (BS-17), Local Govt. & Rural Dev: Hangu, as follows:-

- (i) That consequent upon the completion of enquiry conducted against you by the Enquiry Officer Mr. Smai Ullah, Additional Deputy Commissioner (F&P) Kohat on the basis of fact finding inquiry of Deputy Commissioner, Hangu and Provincial Inspection Team on account of charges of not properly processing files for payment, misuse of government cheques, submitting of works and misplacement of works files in the Developmental Schemes namely " WSS Ganderi Dallan" and WSS Karbogha Sharif" under 10% Oil and Gas Royalty Fund 2014-15, for which you were given opportunity of hearing and
- (ii) On going through the findings and recommendations of the Enquiry Officer, the material on record and other connected papers including your defense before the said Enquiry Officer;

I am satisfied that you have committed the following acts/omissions specified in Rule-3 of the said Rules:

- a. Mis-conduct
- b. In-efficiency.

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of Reduction to a lower stage for one year under Rule-4 of the said rules.

3. You are, thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within seven days of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case exparte action shall be taken against you.

5. A copy of findings of the Enquiry Officer is enclosed.


(Dr. Shahzad-Khan Bangash)
Chief Secretary

Mr. Abid Zaman
Assistant Director (BS-17),
Local Govt. & Rural Dev: Hangu.

11/D/1
-8-

**BEFORE THE ENQUIRY OFFICER / ADDITIONAL DEPUTY COMMISSIONER
KOHAT
REPLIES TO THE ALLEGATIONS LEVELED IN THE CHARGE SHEET**

Para wise replies to the allegations leveled against the undersigned Mr. Abid Zaman, Assistant Director, LG & RDD, Hangu are submitted a under:-

S. No	Allegations	Replies
i.	You are responsible for missing of original file/ record of the schemes namely Sanitation scheme at Mishto Banda Bagato and WSS Karbogha which was not available in the LG & RDD Office Hangu to know the factual position pertaining to forgery / fraudulent signature of Assistant Director LG & RDD Hangu;	The issue of missing of original file / record of the schemes relates to the tenure of Mr. Dilawar Khan, the then Assistant Director as he was the sitting officer. Transfer order of u/s to Bannu Anex A Transfer order of u/s to Hangu Anex B Misc correspondence of Mr. Dilawar Khan regarding misplaced files. Anex C, D, E, F
ii.	As per available record, 1 st running bill to the tune of Rs. 1.20 Million was paid during the Financial Year 2014-15 and after that no fund was utilized. In Financial Year 2019-20, Rs. 7.750/- Million was sanctioned by DC Hangu on the recommendation of AD LG & RDD Hangu but later on, on his request, the issued cheque was dishonoured and was deposited in Govt; Treasury by AD LG & RDD Hangu vide Challan No. 23, dated 23.07.2020 due to non-pursuit of the case;	As mentioned in para No 1, the subject case was pursued by Mr. Dilawar Khan, the then sitting A.D Hangu. Correspondence made in that connection is attached as Annexures G, H, I, J, K, L, M, N.
iii.	Record shows that numerous applications have been submitted by the Contractor to the AD LG Office for payment of the said 2 nd running bill and timely completion of balance work according;	No such applications were submitted by the contractor concerned. The factors /reasons for delay / non -payment of 2nd running bill prepared by Mr. Sajid Ali, Sub Engineer / Assistant Engineer & forwarded to DC Hangu for payment, during tenure of undersigned, in the month of June, 2019 are as under:- Measurement Book Annexure O Court cases Annexure P Time Extension Annexure Q Technical Sanction Revised identification list by DC / MPA Hangu submitted at end of FY 2018-19 Annexure R
iv	Cross-examination (questions with Mr. Abid Zaman (AD in the FY 2018-19) and Mr. Dilawar Khan (AD in FY 2019-20) show that you are even unaware of the site engineer of this mega on-going project despite being heads of the said executing agency;	The site engineer of the subject scheme was Mr. Sajid Ali. Annexure S
v.	Neither Mr. Abid Zaman nor Mr. Dilawar Khan (being heads of the executing agency) has randomly visited any sites of the said on-going project in their posting periods.	It is pointed out that Technical staff is responsible to supervise over ongoing schemes. However, general supervision is the responsibility of Assistant Director, Local Government to check the ground reality of the scheme at final stage/ payment, being non-technical hand.

vi.	The record shows that funds to the tune of Rs. 0.959193/- Million has been utilized in the Financial year 2018-19 and Rs. 4.598101/- Million in the FY 2019-20 till January 2020. File of the said schemes along-with the schemes mentioned has been misplaced in the office of the AD LG Hangu.	9- Already explained in para 1.
vii.	The said site is located at walking distance from the AD LG Hangu office but no significant progress has been achieved in the last 02 financial years as evident from the above utilization statement. Record shows that funds were available during the last 02 financial years;	The site located at walking distance from office of LG & RDD Hangu, namely, Sanitation scheme at Mishto Banda Bagatoo, was completed in the year 2019-20 on the work done basis by the Technical staff. The remaining amount was declared / considered as saving in the tenure of Ex AD, Hangu.
viii.	Available record shows that the Deputy Commissioner Hangu office has time and again strictly directed you during your posting period to complete the scheme at all costs but you ignored the directions each time;	Already explained in para 3.
ix	The record reveals that despite being responsible you never raised any issue in the scheme to high-ups nor any notice for completion of the said work has been given to the contractor but the scheme is still due to be completed;	The job of Assistant Engineer is to issue work orders of the developmental schemes and fully responsible for timely completion / issuance of notices in case of delay and bring issues / disputes into the notice of Assistant Director / High ups to resolve the issues, if any.

Keeping in view of above, it is requested that the allegation leveled against the undersigned may please be dropped and exonerated of the charge levelled.

Furthermore, it is stated that the case under reference relates to the tenure of Ex Assistant Director, LG&RD Hangu namely, Mr. Dilawar Khan (sitting AD D.I.Khan). As the files of schemes are missing before assumption of my charge as Assistant Director, LG& RDD, Hangu. The undersigned may please be exempted / exonerated of charges leveled in the charge sheet.


(ABID ZAMAN)
ASSISTANT DIRECTOR
LG & RDD HANGU



NOTIFICATION:

Deputy Commissioner Hangu
Tel: 0925/621175-621466-622366-623968
Fax: 0925/620050, Email: dcoghangu@gmail.com
No. 245/1151 PHE/ADC/F&P/DC (H)
Dated: 05/08/2020

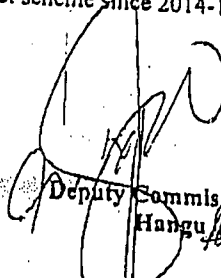
"E"
-10-

In order to investigate the facts and figures regarding Fraudulent / forged signature recommendation of payment in developmental scheme / file namely, "WSS /Installation of Hand Pumps at various places village Ganderi & Dallan UC Dallan" amounting to Rs. 10.00 million under 10% Oil & Gas Royalty 2014-15 the District Administration, Hangu is pleased to constitute the following inquiry committee with direction to probe into the matter and submit detailed report alongwith recommendations to the undersigned within 15 days for further legal process.

- | | | |
|------|---|----------|
| i. | Additional Deputy Commissioner (F&P), Hangu | chairman |
| ii. | Additional Assistant Commissioner, Thall | member |
| iii. | Sub-Divisional Officer, PHE, Division, Thall. | member |

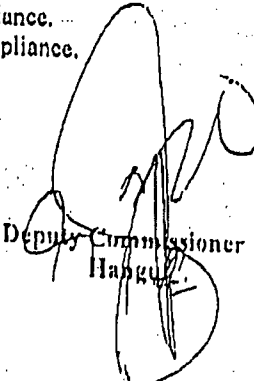
ToRs:

- i. The committee will probe into the matter to find the reason behind the forgery / fraudulent signatures of the AD, LG&RDD Hangu.
- ii. Reasons for low utilization of funds under the subject scheme since 2014-15.
- iii. Processing of developmental files for payments.
- iv. Miss-use of government cheques.
- v. Sub-letting of works under proper rules.


Deputy Commissioner
Hangu

Even No. & Date:
Copy the:

- i. Secretary to Government of Khyber Pakhtunkhwa, LG&RD Department, Peshawar.
- ii. Commissioner, Kohat Division, Kohat.
- iii. Additional Deputy Commissioner, F&P, Hangu for compliance.
- iv. Executive Engineer, PHE Division, Hangu.
- v. Additional Assistant Commissioner, Thall for compliance.
- vi. Sub-Divisional Officer, PHE Division, Thall for compliance.
- vii. District Accounts Officer, Hangu.


Deputy Commissioner
Hangu



11- "F"
Government of Khyber Pakhtunkhwa
Local Government, Elections & Rural
Development Department

Dated Peshawar the 14-07-2022) -
481

NOTIFICATION

No. SOE/LG/3-5/Hangu/Ganderi Dallan /2020. WHEREAS, the following Assistant Directors (BPS-17) and Assistant Engineer (BPS-17) were proceeded against under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of inefficiency and misconduct due to misuse of official cheques and loss of work files in the Development Schemes of WSS Ganderi Dallan and WSS Karboghla Sharif under 10% Oil & Gas royalty fund 2014-15:

1. Mr. Dilawar Khan, Assistant Director (BPS-17), LG&RDD
2. Mr. Abid Zaman, Assistant Director (BPS-17), LG&RDD
3. Mr. Irfan Ullah, Assistant Engineer (BPS-17), LG&RDD

2. AND WHEREAS, the Competent Authority conducted proper inquiry under Rule 5(b) of the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011.

3. AND WHEREAS, the Inquiry Officer after having examined the charges, evidence on record and explanation of the accused officers, submitted the report wherein the charges mentioned in the Charge Sheet against Mr. Dilawar Khan, Assistant Director (BPS-17), Mr. Abid Zaman, Assistant Director (BPS-17) and Mr. Irfan Ullah, Assistant Engineer (BPS-17), Local Government & Rural Development Department have been proved.

4. NOW THEREFORE, the Competent Authority after having considered the charges, evidence, finding of the Inquiry Report and explanation of the accused officers during personal hearing held on 16-06-2022 and exercising his powers under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 hereby imposed penalty of "Reduction to a lower stage for One Year" upon Mr. Dilawar Khan, Assistant Director (BPS-17), Mr. Abid Zaman, Assistant Director (BPS-17) and Mr. Irfan Ullah, Assistant Engineer (BPS-17), Local Government & Rural Development Department.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA / COMPETENT AUTHORITY

Endst. No. & Date Even

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General, Local Government & Rural Development Department, Peshawar.
3. Deputy Commissioner, Hangu.
4. District Accounts Officers Hangu and D.I Khan
5. Director (IT), LG&RDD.
6. Officers concerned.
7. PS to Secretary, LG,E&RD Department.

o/c
SECTION OFFICER (E-II)

BEFORE THE HONORABLE CHIEF MINISTER,
B HAYBER PAKHTUNKHWA, PESHAWAR

115" -12- ~~11/12/2022~~

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE ORDER NO. SOE/LG/3-5/Hangu/Ganderi Dallan/2020 dated Peshawar the 14-07-2022/481

Respected Sir,

With due regards, it is submitted that I was transferred vide Notification No. SO(E) LG/4-16/PT/2020/KC dated 05th August, 2020, and reported arrival on 08th August 2020 (copies attached as Annexure A).

- i. That the appellant was performing his duties as Assistant Director LG & RDD Bannu.
- ii. That during all his service career, the performance of the appellant remained excellent and on many occasions the performance of the appellant was duly acknowledged.
- iii. That a show cause notice was served upon the appellant dated 16/02/2022 which was properly replied explaining all the facts and circumstances of the cases (copy of the letter, show cause notice and reply there to are attached as Annexure B, C & D).
- iv. That the appellant was shocked to know that the appellant has been awarded minor penalty of "Reduction to a lower stage for one year" vide order No. SOE/LG/3-5/Hangu/Ganderi Dallan/2020 dated Peshawar the 14-07-2022/481 (copy enclosed as Annexure E).
- v. That being aggrieved by the impugned order dated Peshawar the 14-07-2022/481 the appellant approached your good-self through the instant appeal/representation on the following grounds:

Grounds:

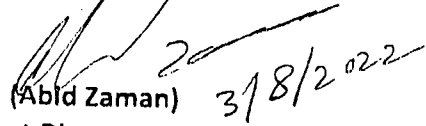
- A. That the penalty awarded through the impugned order dated Peshawar the 14-07-2022/481 is harsh, unjustified without lawful authority and Void ab-initio.
- B. That no charge sheet or statement or allegations was ever prepared or served upon the appellant which is sine qua for non-imposing any type of penalty, hence the impugned order or penalty is nullity in the eyes of law on this score alone.
- C. Proper inquiry has been conducted in the matter as the same was allegedly dispensed without informing appellant regarding the dispensation of proper inquiry, therefore, the impugned penalty order is harsh and bad in law and against the norms of natural justice.
- D. That the imposition of the said penalty upon me will cause hindrance in my career progression and will result in a huge collective financial loss to me during whole of my career.

Mr. Abid Zaman, Assistant Director, Local Government and Rural Development
Peshawar, Khyber Pakhtunkhwa, Pakistan.
Subject: Impugned order dated 14-07-2022 regarding imposition of penalty of "reduction to a lower stage for one year".

- (c) That the appellant may please be afforded a chance of personal hearing during which the appellant will explain his position before your good honor.

It is, therefore, prayed that the impugned order dated Peshawar 14-07-2022/481 regarding imposition of penalty of "reduction to a lower stage for one year" may kindly be set aside and obliged.

Your Obedient Servant,


(Abid Zaman) 31/8/2022

Assistant Director,
LG&RDD Hangu

Cc:

- i. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.

GOVERNMENT OF KHYBER PAKHTUNKHWA
LOCAL GOVERNMENT, ELECTIONS & RURAL
DEVELOPMENT DEPARTMENT



No. SO(E-II)LG/3-5/Hangu/Ganderi Dallan/2020
Dated Peshawar the 02-11-2022

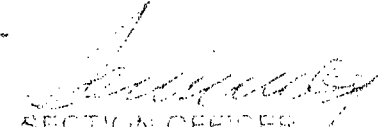
~~104~~
VH"
-14-

To

1. Mr. Abid Zaman, Assistant Director (BPS-17)
Local Government & RD Department
2. Mr. Dilawar Khan, Assistant Director (BPS-17),
Local Government & RD Department
3. Mr. Ifrah Ullah, Assistant Engineer (BPS-17),
Local Government & RD Department

Subject - DEPARTMENTAL APPEAL / REPRESENTATION AGAINST THE
ORDER NO. SO(LG)/3-5/HANGU/GANDERI DALLAN/2020/4813
DATED 14TH JULY, 2022


I am directed to refer to your departmental representations on the above
subject have been considered as under:-


SECTION OFFICER
(ESTABLISHMENT-II)

Endst. Even No. & Date

Copy is forwarded to the

1. Director General, Local Government & RD
2. PS to Secretary, LG & RD Department Peshawar


SECTION OFFICER
(ESTABLISHMENT-II)

-15-

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2022

Abid zamar

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

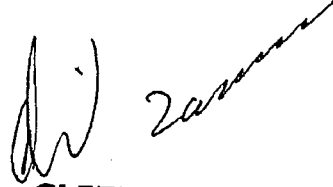
Local Govt

(RESPONDENT)
(DEFENDANT)

I/We (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 21 / 11 / 2022




CLIENT

ACCEPTED


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

(BC-10-0853)

(15401-0705985-5)


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

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