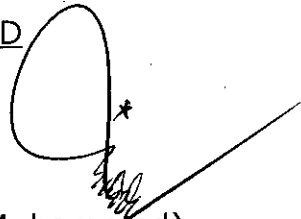


O R D E R
28.04.2022

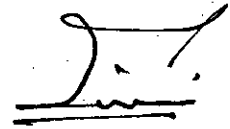
Learned counsel for the appellant present. Mr. Safiullah, Focal Person alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, placed on file of Service Appeal bearing No. 541/2019 titled "Dr. Mustafa Versus Government of Khyber Pakhtunkhwa through Chief Secretary and four others", the appeal in hand stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
28.04.2022



(Mian Muhammad)
Member (Executive)



(Salah-ud-Din)
Member (Judicial)

27.04.2022

Syed Noman Ali Bukhari, Advocate for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Syed Noman Ali Bukhari, Advocate stated at the bar that as Mr. Malik Akhtar Ali, Advocate is co-counsel in the instant appeal and he was under the impression that the same will be argued by the said counsel, however the said counsel has informed him that he is unable to appear before the Tribunal today due to illness. Syed Noman Ali Bukhari, Advocate requested that an adjournment may be granted so as to enable him to argue the instant appeal. Adjourned. To come up for arguments on 28.04.2022 before the D.B.



(Mian Muhammad)
Member (E)

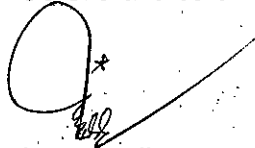


(Salah-ud-Din)
Member (J)

31.03.2022

Counsel for the appellant and Mr. Muhammad Adeel Addl. A.G for the respondents present.

Learned AAG states that similar nature of appeals have been decided by a Bench comprising of Mr. Salah-ud-Din, learned Member (Judicial) and Mr. Mian Muhammad, learned Member(Executive). Therefore, this appeal is also placed before the said Bench. To come up for arguments on 25.04.2022 before the said D.B.



(Mian Muhammad)
Member(Executive)



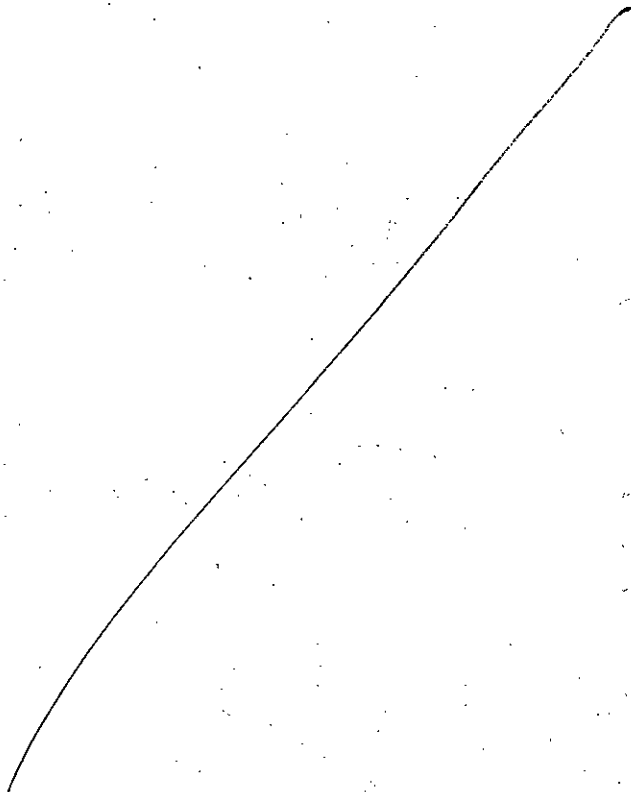
Chairman

25.04.2022

Proper D.B is not available, therefore, case to come up for proper D.B on 27.04.2022.



READER



20.09.2021

Counsel for the appellant and Mr. Javaidullah, DDA for the respondents present.

Learned counsel for the appellant seeks adjournment for preparation and assistance. Request is accorded. To come up for arguments on 20.10.2021 before the D.B.



(Rozina Rehman)
Member(Judicial)



Chairman

20.10.2021

Counsel for the appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 31.01.2022 before D.B.



(Atiq-Ur-Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

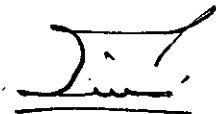
31.01.2022

Learned counsel for the appellant present. Mr. Naseer ud Din Shah Assistant Advocate General for the respondents present.

File to come up alongwith connected Service Appeal bearing No.541/2019 titled Dr. Mustafa Vs. Government of Khyber Pakhtunkhwa on 31.03.2022 before the D.B.



(Rozina Rehman)
Member (J)




(Salah-Ud-Din)
Member (J)

17.11.2020

Counsel for appellant present.

Zara Tajwar learned Deputy District Attorney for respondents present.

A request for adjournment was made. Request is acceded. To come up for arguments on 01.02.2021 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

01.02.2021

Due to COVID-19, the case is adjourned to 12.04.2021 for the same.

12.4.21

Due to COVID-19, the case is adjourned to 28.7.21 for the same.

Reader

Reader

28.07.2021

Clerk of counsel for the appellant present. Mr. Javed Ullah Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned. To come up for arguments before the D.B. on 20.09.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

15.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 09.07.2020 for the same. To come up for the same as before S.B.


Reader

09.07.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Hazrat Shah Superintendent, for the respondents present.

Written reply on behalf of respondents is still awaited. Again, a request was made for adjournment in order to furnish written reply/comments. Last opportunity is granted. To come up for written reply/comments on 10.09.2020 before S.B.




Member (J)

10.09.2020

Counsel for the appellant and Addl. AG alongwith Hazrat Shah, S.O for the respondents present.

The respondents have not furnished reply/comments despite last opportunity granted to them on previous date of hearing. The matter is, therefore, posted to D.B for arguments on 17.11.2020.


Chairman

25.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Amjad Ali, Assistant and Muhammad Sajid, Superintendent for the respondents present.

Representatives of the respondents seek time to furnish the reply/comments. Adjourned to 07.01.2020 on which date the requisite reply/comments shall positively be submitted.


Chairman

07.01.2020

Counsel for the appellant and Addl. AG alongwith Sher Baz, SO for the respondents present.

Representative of the respondents seeks time to furnish reply/comments. Adjourned to 06.03.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman

06.03.2020

Counsel for the appellant present. Mr. Kabirullah Khattak learned Additional AG alongwith Saleem Javed Litigation Officer for respondent No. 1 to 4 and Sajid Superintendent for respondent No.5 present. Written reply not submitted. Representatives of respondent No. 1 to 5 seeks time to furnish written reply/comments. Adjourned. To come up for written reply/comments on 15.04.2020 before S.B.


(Hussain Shah)
Member

12.09.2019

Counsel for the appellant present.

Contends that the appellant was appointed initially on contract basis on 18.12.1995. Subsequently through notification dated 17.10.2017 his service was regularized but with effect from 01.07.2001. In the said manner the intervening period between 18.12.1995 and 01.07.2001 was not counted towards the service benefits in favour of the appellant. Further contends that it has been settled by now that the period of service put in on adhoc or contract basis is to be reckoned for the purpose of seniority and other benefits upon subsequent regularization of a civil servant. Relies on judgment reported as 2018-SCMR-380.

In view of the arguments of learned counsel instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 25.11.2019 before S.B.

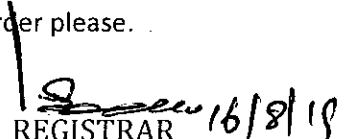
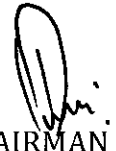
Appellant Deposited
Security & Process Fee
12/9/19


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 1054/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/08/2019	<p>The appeal of Dr. Sadreef Kumar resubmitted today by Mr. Malik Akhtar Ali Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 16/8/19</p>
2-	20/08/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/09/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Dr. Sardeef Kumar s/o Hukam Chand received to-day i.e. on 17-07-2019 is incomplete on the following score, which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- ✓ Annexures of appeal may be properly flagged.
- 2- ✓ Copy of judgement of Hon'ble Peshawar High Court Peshawar mentioned in para-5 of appeal is not attached which may be placed on it.
- 3- ✓ Memorandum of appeal should be got signed by counsel.
- 4- ✓ Properly fill the affidavit.
- 5- ✓ Annexure at page 4, 5, & 6 are illegible which may be replaced with legible/better one.
- 6- ✓ All the annexure should be attested.
- 7- ✓ One copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted.

No. 1233 /S.T,

Dt. 19-7-2019.

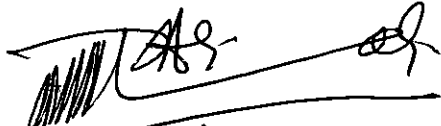

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Malak Akhtar Ali Khan,
Adv, Mardan.

Resubmitted after completion of judgment of High Court is attached alongwith - (2) that the Appellant was appointed on 5.12.1995 on Contract Basis & was regularized on 1.7.2007. The intervening period w.e.f. 5.12.1995 was ~~not~~ till 1.7.2007 was not considered for promotion & Back Benefits. Departmental appeal was filed on 18-3-2019. Above appeal was filed on 17-7-2019 within time.

Moreover Appeal of Dr. Mustafa (5) ^{others} vs. Govt of KPK Health Deptt is admitted to Regular Hearing. Date of Hearing is 12.9.2019 Before this Hon'ble Court.

may please be clubbed with 12.9.2019


9/8/2019.

Sir,

The objection of this office and
reply of counsel for the appellant
is sub-~~mitted~~ for order pls

9/8/18

Hon'ble
Chairman

Referred before an S.B. for preliminary
hearing of the office objections.

9/8/18

BEFORE THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR

Appeal No. 1054 /2019

Dy. Sardeef Kumar.. Versus Govt. of KPK Health Department

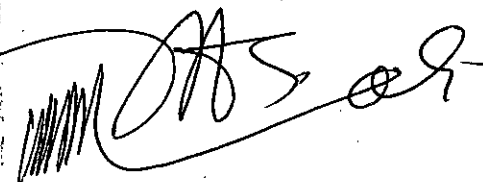
INDEX

S. No.	Description	Page Number
1	Ground of Appeal	1-3
2	Appointment Order	4
3	Regularization Notification	5-6
4	High Court Judgment Department Appeal	6A 6-D
5	Wakalatnama	8

Deponent

Ahse

Identified by



Malak Akhtar Ali Khan Advocate
Mardan

①

BEFORE THE PROVINCIAL SERVICE TRIBUNAL PESHAWAR

Appeal No. 1054 /2018/

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1006

Dated 17/7/19

Sardeef Kumar S/O Hukam Chand resident of Pir Baba,
District Bunir.. .. Appellant.
Dr. Sardeef Kumar SMO/TO Pacha Killay Distt: Buner
Versus

1. Govt. of KPK through Chief Secretary.
2. Secretary to Govt. of KPK, Health Department Khyber Pakhtunkhwa, Peshawar.
3. Secretary of Govt. of KPK, Law & Parliamentary Affairs Department Civil Secretariat Peshawar.
4. Secretary of Govt. of KPK, Establishment Department Civil Secretariat Peshawar.
5. Secretary to Finance Department KPK, Civil Secretariat Peshawar.

APPEAL U/S SECTION-4 OF THE SERVICE TRIBUNAL ACT 1974 AGAINST THE DECISION OF RESPONDENTS NO.1-4 WHEREBY THEY HAD NOT CONSIDERED THE CONTRACT PERIOD OF PETITIONER SERVICES W.E.F 1995 TO 2001 WHEREBY THEIR CONTRACT PERIOD ABOUT 5/6 YEARS WERE NOT CONSIDER FOR SENIORITY MOVE OVER IN VIOLATION OF THE JUDGMENT OF HONORABLE SUPREME COURT AS LAID DOWN IN 2008 SCMR PAGE-380.

Filed to-day
Registrar
17/7/19

FACTS:

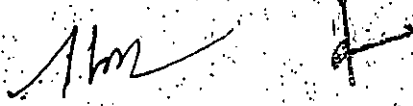
1. That the appellants No.1 were appointed on contract basis in the Health Department under supervision of Respondent No.1 Medical Officer BPS-17 in the year 18.12.1995
2. That the appointment on contract basis as stop gap arrangement.
3. That in Govt. of KPK Civil Secretariat Amendment Act 2013. The appellants were regularization W.E.F 01.07.2001.
4. That the intervening period w.e.f 18.12.1995 upto 01.07.2001 were not considered for seniority, more over. To the next grade etc.

Re-submitted to-day
and filed.

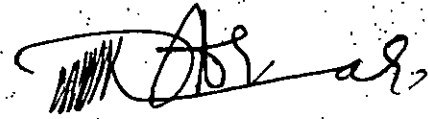
Registrar
16/8/19

5. That the appellants filed W.P No.35/8/2017 before Peshawar High Court Peshawar, whereby appellants were directed to approach service tribunal for their grievances, which may kindly be considered as department appeal.
6. That the appellants in directions of Honourable Peshawar High Court filed. This appeal on the following grounds inter alia grounds:
 1. That the acts of respondent No.1 is illegal, against wrong & clear violation of authoritative judgment of Honorable Supreme Court needs to strick down.
 2. That respondents No.1 while the intervening period of appellants w.e.f 18-12-1995 till 01.07.2001 for the purpose of seniority is unjustified, illegal as there was no break in their services no adverse remarks. As the appellants were performing the similar duty, same responsibility, same obligation no difference in their duties, responsibility obligation to that of regular employee. Doctors duly appointed by competent authority. Such ignorance of intervening period is not permissible in the eye of law reliance be placed PLD 1970 Queta 115.
 3. That in view of 2014 SMR 1289 seniority will be reckoned from the initial appointment.
 4. That in view of 2018 SMR 380 that any civil servant works on temporary adhoc contract basis for 10 years in BPS-17 shall be entitled to be promoted to BPS-18. Meaning thereby contract period shall be considered from seniority, moreover etc. but respondents No.10 rais ignored such authoritative judgment of apex court has committed gross illegalities.
 5. That the judgments of Apex court is binding on all organ of the country and are under legal obligation to follow the verdict of Apex court.
 6. That the Appellants seeks leave of this court Honorable Tribunal to agitate further grounds als.


It is therefore humbly prayed that on acceptance of this appeal, this Honorable Tribunal may be kindly considered the intervening period w.e.f. 18-12-1998 till 2001 for the purpose seniority move over along with back benefits otherwise the junior most will become senior to the appellants.

Appellant: 


Through


Malak Akhtar Ali Khan Advocate
Mardan.

AFFIDAVIT

I, Dr. Sardar Ruman S.M.O.T.S. Pasha  for the appellant do

hereby declare on oath that the contents of this review petition are correct and nothing has been concealed from this Honorable Court.

Deponent: 

Oath Commissioner
Faza Ghafoor
Advocate
COURTS MARDAN

17/19

9

No. 32369 / 1-1 12/1/11

Fr. Sandeep Kumar S/o
Hukam Chand

Attached to be true
copy
[Signature]

Subject:- OFFER OF APPOINTMENT ON CONTRACT BASIS.

MEMORANDUM:

Reference your application on the above subject, of Medical Officer/Women Medical Officer/Dental Surgeon.

1. The competent authority is hereby appoint you as Medical Officer/Women Medical Officer/Dental Surgeon in the Department Government of NWFP, on contract basis for a period of one year or till the availability of Service Commission selectee/return of casual leave from leave/deputation whichever is earlier, on the conditions laid down in the attached Agreement. This contract appointment is subject to the conditions of this contract appointment is subject to the conditions laid down in the attached Agreement.
2. This contract appointment is subject to the conditions laid down in the attached Agreement for which you will appear before the Medical Officer/Dental Surgeon.
3. If you accept the offer of appointment on contract basis as a Medical Officer/Women Medical Officer/Dental Surgeon in the attached Agreement Dated should be filed in the file of you and should report at your own expense.
4. If you fail to report for duty at the date specified in para-3 above, within Ten(10) days, the offer of appointment on contract basis will be deemed to be declined automatically and no further correspondence will be entertained in this respect.

~~BHAL~~ ~~SOKAND, DISTT BUNNER~~

[Signature]

/E-I dated Peshawar the _____/12/11

Copy forwarded to the:-

- Secretary to Government of NWFP, Health Department, Peshawar.
- Information with reference to his letter No. SCH-17/11.
- Medical Superintendent, _____
- Divisional Director Health Services, Malakand Agency, _____
- District Health Officer/Agency Surgeon, _____
- Accountant General NWFP, Peshawar.
- District/Agency Accounts Officer, _____

for information and necessary action.

[Signature]

(E. I. dated Peshawar the _____/12/11)

(3)

Allowed to be
me copy.
M. A. A.

Faint, illegible text, possibly bleed-through from the reverse side of the page.

S. No. 10
Ahmed
MMA



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 17th October, 2017

NOTIFICATION

NO SO/ESH-III/3-18/2016: In pursuance of Judgment of Peshawar High Court Peshawar dated 18-11-2008 in Writ Petition No. 1510 of 2007 read with sub section 2of Section 2 of the Khyber Pakhtunkhwa Civil Servant (Amendment) Act, 2005 (Khyber-Pakhtunkhwa Act no. IX of 2005) and provision under sub section 4 of section 19 of Civil Servant (Amendment) Act 2013 coupled with the regularization order of appellants and similarly placed w.e.T. 2005, the services of following doctors (appellants as well as similarly placed) are hereby regularized with effect from dates as mentioned against each:

S. #	Name of Doctor	D.O.B / Domicile	Date of Initial Appointment on contract basis	Date of Regularization under Act 2005
1.	Dr. Bakht Zada S/O Gul Muhammad, MBBS	01.01.1959 / Swat	23.11.1995	01-07-2001
2.	Dr. Qawa Khan S/O Badshah Khan MBBS	01.09.1951 / Swat	23.11.1995	01-07-2001
3.	Dr. Hardon Nasir Khattak S/O Rab Nawaz MBBS	Karak / 1.3.1988	23.11.1995	01-07-2001
4.	Dr. Yousaf Khan S/O Said Rehman MBBS	Mardan / 14.3.1968	23.11.1995	01-07-2001
5.	Dr. Riaz Ahmed S/O Rehmatullah MBBS	Mohmand / 15.8.1951	23.11.1995	01-07-2001
6.	Dr. Alamgir Khan S/O Darvesh Khan, MBBS	16.04.1962 / Mohmand A	23.11.1995	01-07-2001
7.	Dr. Muhammad Ajmal Khan S/O Zarin Khan MBBS	Mohmand ag / 10.04.67	23.11.1995	01-07-2001
8.	Dr. Fazal Rehman S/O Muhammad Amir Khan MBBS/ MPH	28.04.1966 / Mohmand Agency	23.11.1995	01-07-2001
9.	Dr. Mustafa S/O Behramand, MD	01.03.1961 / Swat	24.11.1995	01-07-2001

Inspected
Health Department
Peshawar

(6)

Amir
11/11/01

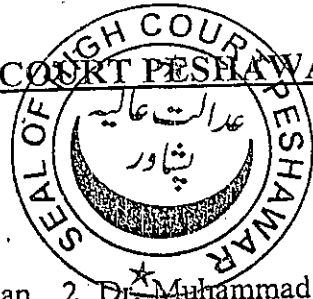
502 Dr. Gulzar Iqbal
 Durrani U/O Nawaz
 Ahmad Durrani
 503 Dr. Gulshan Laddi
 D/O
 Lijal Ali Shah
 504 Dr. Shazia Iqbal

11/11/01
 04/04/01

(1) (5) 6-A

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

W.P No. 3518 RP/ 2017



1. Dr. Hanif Afzal DHQ, DHQ Hospital Mardan, 2. Dr. Muhammad Tahir, DHQ Hospital Mardan, 3. Dr. Muhammad Aziz, DHQ Hospital, Mardan, 4. Dr. Akbar Khan, THQ Hospital Takht Bhai, 5. Dr. Arshad Khan, DHQ Hospital Mardan, 6. Dr. Shah Jehan S/o 7. Dr. Muhammad Kamal, DHQ Hospital Mardan, 8. Dr. Fayaz Ali, DHQ Hospital Mardan, 9. Dr. Muhammad Parvez Durrani, DHQ Hospital Mardan, 10. Dr. Saeed ur Rehman R/o House No.113, Canal Road, Afghan Colony Peshawar, 11. Dr. Sardeef Kumar C/o Muhammad Saeed Batt, Gurh Mandi Peshawar, 12. Dr. Abdul Ghafoor, C.M Hospital Totalai Buner, 13. Dr. Sajid Khan DHQ Hospital Mardan, 14. Dr. Mustafa District Swat, 15. Dr. Abdul Wahab District Mardan, 16. Dr. Muhammad Riaz District Mardan, and 17 Dr. Muhammad Ayaz District Mardan.

Versus

1. Province of KPK, Through Chief Secretary Civil Secretariat Peshawar.
2. Secretary to Govt. of KPK, Establishment Department Civil Secretariat Peshawar.
3. Secretary to Govt. of KPK, Law & parliamentary affairs Department Civil Secretariat Peshawar.
4. Secretary to Govt. of KPK, Health Department KPK, Peshawar.

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

PRAYER:

By acceptance of this W.P writ be issued to respondent No.4 to consider the period initial appointment i.e. 1995, 1998, 1999) for the purpose of seniority salary & pensionary benefit although directed by this Honourable

FILED TODAY
Deputy Registrar ATTESTED
EXAMINER
Peshawar High Court
31 AUG 2017 07 JAN 2019

(6) 6-B

JUDGMENT SHEET
PESHAWAR HIGH COURT, PESHAWAR
(JUDICIAL DEPARTMENT)

WP No. 3518-P/2017

Dr. Hanif Afzal and others

Versus

Province of KPK through Chief Secretary Peshwar and others

JUDGMENT.

Date of hearing: 30.10.2018

Petitioner (s): By: Malik Akbar Ali Khan Odeh.

Respondent (s): By: Mr. Waqar Ahmad ADL.

WAQAR AHMAD SETH, CJ:- Through the

instant Writ Petition, petitioners have prayed for issuance of an appropriate writ with the following prayer:-

"It is therefore humbly prayed that by acceptance of this W.P. respondent No.4 be directed to consider the intervening period (1995-2001) for seniority, promotion movers after approval of Governor KPK to give retrospective effect to their regularization 2001 & it is further prayed that respondent No.4 be restrained from the preparation of Seniority list U/S 8 of Civil Servant Act 1973. Any further relief may deem fit may please be granted".

2. Brief facts of the case are that the petitioners were appointed in Health Department on contract basis in the year, 1995, however, subsequently, when Civil Servant (Amendment) Act, 2005 was promulgated, services of the

ATTESTED
EXAMINER
Peshawar High Court

07 JAN 2019

(7) b-c

petitioners were regularized from 2001. According to the petitioners, respondent No.4 is trying to prepare seniority list, in which, their intervening period in between 1995 to 2001 has been ignored for seniority purpose, which will result the junior most will become senior to them although their services are without break. Moreover, the act of respondent No.4 is based on discrimination as Dr. Muhammad Iqbal was appointed on regular basis w.c.f. date of his initial appointment; hence, feeling aggrieved, the petitioner has filed the instant Writ Petition.

3. Arguments heard and record perused.

4. Admittedly, the grievance of petitioners relates to '*terms and conditions*' of their service, the appropriate remedy for seeking their redressal, would surely be the Services Tribunal.

5. This Court is barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 to take cognizance of any matter relating to '*terms and conditions*' of service of a civil servant. The Apex Court in Ali Azhar Khan

Baloch's case (2015 SCMR 456), has again laid down that

ATTESTED
EXAMINER
Peshawar High Court

JAN 2019

(8)

6-D

the issue relating to the 'terms and conditions' of service cannot be entertained by a High Court either in its constitutional jurisdiction or in its original civil jurisdiction being barred under Article 212 of the Constitution.

6. In view of the above, this Writ Petition being not maintainable is hereby dismissed. However, the petitioners may approach the Services Tribunal for redressal of their grievance.

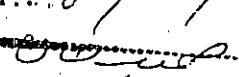
ANNOUNCED.
Dated: 30.10.2018


Chief Justice


Judge

=====

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
The Qanun-e-Shahadat Order 1984
07 JAN 2019

No.....	326
Date of Preparation.....	5-1-19
No of Pages.....	49
Copying Fee.....	
Urgent Fee.....	
Total.....	16
Date of Preparation of Copy.....	07-1-19
Date of Delivery of Copy.....	07-1-19
Received By.....	

Cilendom

(7)

The Secretary to Health Department
Civil Secretariat Peshawar

Advised
M. A. J. ar

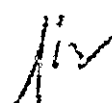
Through: Proper Channel

Subject: DEPARTMENTAL APPEAL/REPRESENTATION

R/SIR

- 1 That the appellant was appointed in Health Department as Medical Officer on 18-12-1995 on contract basis
- 2 That the appellant served the Department without any break on contract basis till dated
- 3 That there is no adverse remarks or any complaint against the present appellant.
- 4 That on the appellant was regularized with effect from 1-07-2001.
- 5 That the appellant was serving since 18-12-1995 therefore appellant should have been regularized from initial appointment i.e 18-12-1995
- 6 That in view of judgment of APEX Court 2014 SCMR 1289, 2018 SCMR 380 Seniority will be reckoned from initial appointment whether that appointment is on adhoc basis, contract or temporary basis.

It is therefore humbly prayed that on acceptance on this appeal the appellant intervening period of Contract may kindly be consider for seniority and other benefits available under the law to the petitioner.


DR SARDEEP KUMAR

SMO THQ Pacha Kalay Distt; Buner

18/2/19

(8)

بعدالت

کورٹ فیس

20 منجانب رسلت

نام حکومت گلگت بلتستان

ڈاکٹر مسعود علی خان

رسلت

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام کسٹمر سے لے کر منبہ العتد علی خان اور وکیل رسلت مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دیے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمد ہوگی اور منسوخ دائر کرنے کی اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مذکور کے عمل یا جزوی کارروائی کے واسطے اور وکیل یا مختار تانوی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برداشت منظور و تہا ہوگا اور دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا اسکے استحقاق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت منسوخ ہوگئے وکیل مندر ہے۔

المزقوم 20 ماہ

العبد گواہ شہادہ العبد

بمقام کے لئے منظور ہے۔

Handwritten signature

17/7/2019

VAKALATNAMA

NO. 1055 /2019

IN THE COURT OF JP Service Tribunal, Reston

Dr. Sardeef Kumor

Appellant
Petitioner
Plaintiff

VERSUS

Govt of KP

Respondent (s)
Defendants (s)

I/WE Dr. Sardeef Kumor

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____ /20

Ahaz

(CLIENT)

ACCEPTED

[Signature]

**SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT**

CELL NO: 0306-5109438