

7372/2021

13th May, 2022

Appellant with counsel present.

Learned counsel for the appellant states that grievance of the appellant has been redressed by the respondent department and the present appeal has become fruitless. He submitted an application for withdrawal of the appeal. Application placed on file. Dismissed as withdrawn. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 13th day of May, 2022.*




(Kalim Arshad Khan)
Chairman

Before The honorable Service Tribunal
Khyber Pakhtunkhwa Peshawar.

In Reference to Appeal No. 7352/2021

Hajid Ali Khan . . . vs . . . DQ Live Stock etc.

Subject: Application for withdrawal of the
titled appeal.

Respectfully Sheweth:

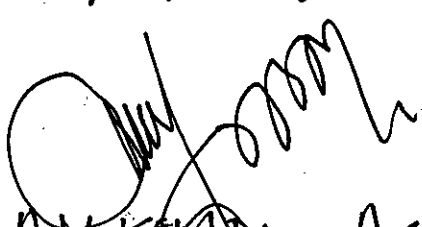
That the titled appeal is
Pending adjudication before this august
Tribunal which is fixed for to-day
for want of reply from the respondents.

That since the Grievances of
the appellant has been redressed and
has been reinstated in service, hence
request for the withdrawal of the appeal.

It is, therefore, requested that the
subject appeal may be disposed of as
withdrawn.

Through: Appellant.

Dated: 13-5-2022


M. USMAN KHAN A.S.C
counsel for appellant


29.10.2021

Counsel for the appellant present. Preliminary arguments heard. Memorandum of appeal and the copies of record annexed there with have been perused.

This appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 24.02.2022 before the D.B.

Appellant Deposited
Security & Process Fee

28/10/21


Chairman

24.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 13.05.2022 for the same as before.

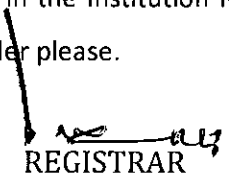


Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2372 /2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 2 | 3 |
| 1- | 07/09/2021 | <p>The appeal of Mr. Wajid Ali presented today by Mr. Muhammad Usman Khan Turlandi 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 for preliminary hearing to be put up there on <u>29/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| 2- | | |

⑦

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Wajid Ali

Versus

Secretary LEC & others

..... Appellant

..... Respondents

| S NO | CONTENTS | YES | NO |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|
| 1. | This petition has been presented by: <u>Advocate</u> <u>Court</u> | √ | - |
| 2. | Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents? | √ | X |
| 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? | √ | |
| 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:- *Muhammad Usman Khan*

Signature:- *[Signature]*

Dated:- 7/9/21

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

In Ref; to Appeal No. _____ of 2021

Wajid Ali.....Versus.....Secretary LFC Dett: etc.

INDEX

| S# | DESCRIPTION OF DOCUMENTS | ANNEX | PAGE# |
|----|-----------------------------------------------------|-------|-------|
| 1. | Main Appeal. | | 1-6 |
| 2. | Affidavit. | | 7 |
| 3. | Copy of the appointment order Dated 19/09/2012 | "A" | 8 |
| 4. | Copy of the original impugned order dated 02/07/21. | "B" | 9 |
| 5. | Copy of the Departmental Appeal dated 06-07-2021. | "C" | 10-11 |
| 6. | Copy of the final impugned order dated 16-08-2021. | "D" | 12 |
| 7. | Vokalatnama in original. | | 13 |

APPELLANT.

Through

Muhammad Usman Khan
Turlandi
Advocate Peshawar.

Dated; 4/09/2021. (Saturday)

OFFICE: FLATE NO. 1-C MURAD PLAZA DALAZAK ROAD PESHAWAR.
PHONE NO.091-2247444 Mob-# 03339153699.

(2)

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

7372

Diary No. 7534

In Ref; to S. Appeal No. _____ / of 2021.

Dated 07-9-2021

Wajid Ali S/O Khan Zaman, presently working and posted as
Chowkidar (BPS-3) Directorate of Livestock Research & Dairy
Development Department, Khyber Pakhtunkhwa, Peshawar.

.....**APPELLANT.**

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary
Agriculture, Livestock, Fisheries and Cooperative Department.
2. Director General Research, Livestock & Dairy Development
Department, Khyber Pakhtunkhwa, Peshawar.
3. Director Livestock Research & Development, Khyber
Pakhtunkhwa, Peshawar.....**RESPONDENTS.**

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT, AGAINST
THE FINAL IMPUGNED ORDER BEARING NO. SO (LFC)/AD/3-
23/2020 DATED PESHAWAR THE AUGUST 16,2021 PASSED BY THE
RESPONDENT NO. 1, ENDORSED BY THE RESPONDENT NO. 2
DATED 23-08-2021 WHEREBY THE DEPARTMENTAL APPEAL OF
THE APPELLANT DATED 06-07-2021 FOR HIS REINSTATEMENT IN
SERVICE WAS REJECTED AND THE FIRST IMPUGNED ORDER OF
REMOVAL FROM SERVICE PASSED BY THE RESPONDENT NO. 2
DATED 02-07-2021. WAS UPHELD.**

Filed to-day

Registrar ^W

07/9/2021

PRAYERS:-

**On acceptance of the instant appeal, the final impugned
order passed by the respondent No. 1 dated 16/08/2021,
rejecting the departmental appeal of the appellant and
upholding the first/original impugned order of "Removal
from Service" dated 02-07-2021, passed by the respondent
No. 2 may be set-aside and the appellant may be reinstated
in services with all consequential back benefits.**

RESPECTFULLY SHEWETH:-

1. That the Appellant was initially appointed as Chowkidar in BPS-1 vide office Order bearing No. DG(R) L&DD /Est: II (83)/2006/6645-49 Dated 19/09/2012 and served the Respondent Department as such with great zeal, zest and enthusiasm and no adverse remarks whatsoever were ever attributed/assigned to him from any quarter. (Copy of the initial appointment order Dated 19/09/2012 is annexure "A").
2. That astound to become aware and by handing over the termination letter by the Respondent No. 2, the Appellant, on the whimsical and biased considerations was terminated from services vide first impugned order bearing No. DG (Res)/L&DD/ Est-II /PF (269) 2021/5513-19, dated 02/07/21. (Copy of the original impugned order dated 02/07/21 is annexure "B").
3. That the Appellant while availing the departmental remedy, moved a departmental representation dated 06/07/21 before the respondent No. 1 but to no avail and rejected vide Final impugned order dated 16/08/21, endorsed by the respondent No. 2 dated Peshawar the 23/08/21. (Copy of the departmental representation dated 06/07/21 and final impugned order thereon dated 16/08/21 is annexure "C" & "D" respectively).
4. That while having been aggrieved of the colorful authority exercised by the respondents and while having no efficacious remedy been available in the circumstances of the case, the Appellant being a civil servant approaches this honorable Tribunal inter-alia on the following grounds.

GROUND S:-

- a) **Because** the impugned order has been passed in the exercise of colorful authority which is unlawful, without lawful authority, without jurisdiction, un-Islamic, un-constitutional, against the

law on the subject and against the norms of equity and natural justice.

- b) **Because** the allegation leveled against the Appellant of “failing to perform assigned duties efficiently by deliberately allowing the official/Chokudar to come and stay in the chowkidars room who, one day prior, was terminated from service despite the ban on his entry into campus” is illogical and self-nugatory as the appellant was never directed as such nor the fact of termination was ever brought to the notice of the appellant and in furtherance to prohibit his entrance therein.
- c) **Because** AUDI ALTERAM PARTEM has not be resorted to which is the fundamental natural justice rule that no one should be condemned unheard but conversely on the back of the appellant, the major penalty was imposed fo no fault on his part.
- d) **Because** the incumbent essentialities of proper legal regular inquiry have been overlooked and a self-concocted drama was engineered and demise of all the legal norms sanctioned by the prevalent service law have been set at naught which has the liability to be brushed aside as such.
- e) **Because** Coram non judice has vehemently been ignored and all the laws, rules and regulations while having proceeding against the appellant amid the so called enquiry have been overlooked and major penalty has been imposed in a slip- shod manner.
- f) **Because** admittedly the first impugned order of “Removal from Service” was passed by the respondent No. 2 Appellant has been terminated from services by the respondent No. 2 who is neither the appointing authority in the case of the appellant nor legally so competent authority to pass such order and hence this sole fact is sufficient for nullifying the impugned orders.

- g) **Because** the act of the respondents in neglecting and refusing the right of fair and transparent regular enquiry and as such condemned unheard is also against the divine ordain of Allah Almighty as under the principle of natural justice and fundamental human rights of the appellant, the respondents have usurped the right of a human being and have thus bypassed the divine rule to give everyone his due right.
- h) **Because** the respondents are bound to provide equal protection of law and must not discriminate the appellant in service which clearly smacks with nepotism and malafide on part of the respondents whereas to enjoy the protection of law is the inviolable and jealously guarded right of the appellant under the Constitution of Islamic of Pakistan 1973.
- i) **Because** the impugned act of the respondents is highly unjust and against the principle of Natural Justice and if allowed to remain in field then the same would perpetuate more injustice and certainly result in complete deprivation of Constitutional right of the appellant.
- j) **Because** the act of the respondents are also violative of Article 03, 04, 08, 09, 25 and 27 of the Constitution of Islamic of Pakistan 1973.
- k) **Because** the respondents while passing the harsher penalty vide impugned orders have never bothered to see the unblemished service record of the appellant and at least should see the length of spot-less service for about more than 08 years rendered by the appellant and in such a circumstances the penalty and subsequent final impugned order having no value in the eyes of law, is liable to be set-aside.
- l) That valuable right was accrued to the appellant whereas his fundamental valuable rights have been encroached by the respondents No.1 & 2 on their personal whims & wishes and such encroachment is hit by the law on the subject and the

6

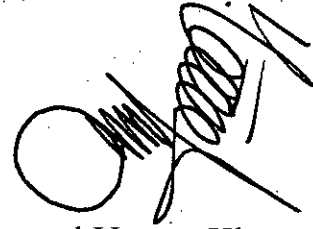
command of the constitution of the Islamic Republic of Pakistan 1973.

m) That further submissions will be advanced at the time of hearing the appellant at the bar.

In view of the foregoing facts, circumstances and submissions, it is therefore humbly prayed that on acceptance of instant appeal, the final impugned order passed by the respondent No. 1 dated 16/08/2021, rejecting the departmental appeal of the appellant and upholding the first/original impugned order of "Removal from Service" dated 02-07-2021, passed by the respondent No. 2 may be set-aside and the appellant may be reinstated in services with all consequential back benefits.

وہ اپیل
APPELLANT.

Through



Muhammad Usman Khan
Turlandi
Advocate Peshawar

Dated; 04/09/2021
(Saturday).

7

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

In Ref; to Appeal No. _____ of 2021

Wajid Ali.....Versus.....Secretary LFC Dett: etc.

AFFIDAVIT.

I, Wajid Ali S/O Khan Zaman, presently working and posted as Chowkidar (BPS-3) Directorate of Livestock Research & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare on oath that contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret or concealed therein.

واید علی

DEPONENT

(Wajid Ali Appellant)

CNIC NO. 17301-3197188-5

Contact# 0311-9998831

IDENTIFIED BY:

[Handwritten signature]
14/9/21

Muhammad Usman Khan
Turlandi
Advocate Peshawar

[Handwritten signature]
ATTESTED
Oath Commission Peshawar
[Handwritten signature]



8

ANNEXURE A

DIRECTORATE OF LIVESTOCK RESEARCH & DEVELOPMENT
KHYBER PAKHTUNKHWA, PESHAWAR

ORDER

Consequent upon on the recommendation of the Departmental Selection Committee, Mr. Wajid Ali S/O Khān Zaman is hereby appointed as Chowkidar (BPS 01) plus usual allowances as admissible under the rules on regular basis against the vacant post at Livestock Research & Development Khyber Pakhtunkhwa, Peshawar with immediate effect subject to his willingness to the following terms and conditions:-

Terms & Conditions

1. His service will be considered regular but with out pension or gratuity. He will however be entitled to contributory provident fund (CPF) in such a manner and at such rates as may be prescribed by the Government.
2. His service will be liable to termination on one month prior notice in case of resignation without notice; one month pay/allowances shall be forfeited to Government ex-chequer.
3. The appointee should join his post within 30 days of the issue of this order.
4. His appointment will be subject to medical fitness and verification of antecedent/ character from Police Department.
5. He will be on probation for a period of one year extendable for another one year.
6. He will be governed under such rules and regulations as may be issued from time to time by the Government.
7. His services can be terminated at any time, incase his performance is found un satisfactory during probationary period. In case of misconduct, he will be preceded against the Khyber Pakhtunkhwa, Efficiency & Disciplinary Rules 2011 and the rules framed from time to time.
8. His pay will be fixed under the normal rules of the Government of Khyber Pakhtunkhwa, on joining his duty.
9. His appointment will be stand cancelled and he will have to refund all emoluments drawn from Government ex-chequer if at any stage his documents are found Fake/Bogus.
10. He will have to produce medical certificate from the medical superintendent
11. No TADA will be allowed to the appointees for joining his duty.

If the above terms & conditions of the appointment are acceptable to him, he should submit arrival report to the undersigned for duty within 30 days from the date of issue of this order.

(DR. SAJJAD AHMED)
DIRECTOR

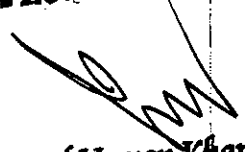
Dated Peshawar the 79 /09/2012

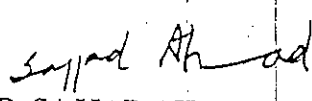
No. DG(R) L&DD /Est: II (83)/2006/ 6645-49


Copy of the above is forwarded to:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Superintendent Budget & Accounts Veterinary Research Institute, Peshawar.
3. Mr. Wajid Ali S/O Khan Zaman, Village Charpariza, Hariyana Bala Tube Well Korona peshawar.
4. Personal Files of the officials concerned.
5. Office order file.

ATTESTED TO BE
TRUE COPY


Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan. No: 5045


(DR. SAJJAD AHMED)
DIRECTOR


19/9/12

19/9/12



(9)

ANNEXURE B

**DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR**

Bacha Khan Chowk Khyber Pakhtunkhwa Peshawar
@livestockres.kp.gov.pk

☎ 091-9210218
☎ 091-9210220

Facebook.com/livestockresearchkp
Twitter.com/livestockreskp
dg.ldr@kp.gov.pk

Dated Peshawar the ___/07/2021

NOTIFICATION

No. DG(Res)/L&DD/Est-II/PF(269)/2021/ WHEREAS disciplinary proceedings initiated against one of the Chowkidar of this office under Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011 culminated in service termination of the accused official and imposing complete ban on his entry into the campus vide Notification No. DG(R)/L&DD/Est-II/PF(34)/2017/5374-78 dated 28.06.2021.

2. WHEREAS Mr. Wajid Ali, Chowkidar (BPS-03), deputed on main gate on 30.06.2021 failed to perform assigned duties efficiently by deliberately allowing the terminated official to come & stay in the Chowkidar's Room despite ban on his entry into campus.

3. WHEREAS the official thus committing gross misconduct and proving to be an accomplice of the Ex-Official in all of his subversive and immoral activities. Based on my own knowledge, information placed before me and having been personally satisfied of the willful acts of omissions by the accused official, there are sufficient grounds for initiating proceedings against Mr. Wajid Ali, Chowkidar (BPS-03) and there is no need to conduct further inquiry hence necessitating appropriate action under the E&D Rules accordingly.

4. NOW THEREFORE the undersigned being Competent Authority in this case, after considering all the charges, evidence on record subsequent failure of the accused to comply instructions and exercising powers under Rules 4(1)(b)(ii) of the Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011 has been pleased to impose Major penalty of "Removal from service" on Mr. Wajid Ali, Chowkidar (BPS-03) with immediate effect.

5. The entry of Mr. Wajid Ali S/O Khan Zaman to the campus is banned.

Director General
(Research)

No. DG(Res)/L&DD/Est-II/PF(269)/2021/SS/3-19

Dated Peshawar the 02/07/2021

Copy of the above is forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Livestock Research & Development, Khyber Pakhtunkhwa, Peshawar.
3. The Estate Manager, Directorate General (Research) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar with directives to improve security at the campus.
4. The Incharge Police Station, Sharqi, Khyber Road, Peshawar for information and necessary action in reference to my telephone report and subsequent visit of Police Mobile Team headed by ASI Mr. Dilshad on 27/06/2021.
5. The Director General (Extension) Livestock & Dairy Development Department, Khyber Pakhtunkhwa, Peshawar with the request to enhance security at the main gate of old Directorate of Livestock Extension.
7. Mr. Wajid Ali S/O Khan Zaman, Charpareeza Haryana Bala, Tehsil & District Peshawar.
8. Office order file.

ATTESTED TO BE
TRUE COPY

Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan No: 5045

Director General
(Research)

To

The Worthy Secretary,
Govt of Khyber Pakhtunkhwa,
Agriculture, Livestock & Dairy Development Deptt.,
Peshawar.

Subject:- APPEAL FOR RESTORATION OF SERVICE:

Respected Sir,

I am constraint to refer to the subject captioned above and to place the following grievances on your esteemed table and to enclose here with an irrelevant blames lodged against me without any cogent reasons, with the expectations that my request will not be blinked Sir.

That I was deputed on main gate on 30-06-2021 in place of one terminated Ex-Chowkidar of the Office of DG(L& DDD, KP, Peshawar, however, the High-Ups issued the attached notification where in it has been narrated that I being failed to perform my duties while allowing the terminated official to come & stay in the Chowkidar's Duty Room despite ban on his entry into Campus.

Sir, in this regard, neither I allowed the terminated official to duty room nor accomplice/accompanied him, nor provided any kind of support to the accused chowkidar, however I being mentally turchured and blindly targeted in this case, I am not guilty Sir.

Therefore, it is humbly requested that the attached notification of removal from my services may kindly be withdraw and I may please be exonerated of the charges lodged against me on humanitarian basis and obliged.

Encl: as above.

Yours sincerely,

Secretary Agriculture

Distt

No. 5188

Date 6/7/21

6/7/21

(WAJID ALI)

Chowkidar,

O/O Director General (Research)
Livestock & Dairy Dev: Deptt.,
Khyber Pakhtunkhwa, Peshawar.

Dated: 6th July, 2021.

Copy of the above is forwarded to Director General (Research) Livestock & Dairy Dev: Deptt., Khyber Pakhtunkhwa, Peshawar.

ATTESTED TO BE
TRUE COPY

Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan. No. 5045



11

GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE, LIVESTOCK, FISHERIES & COOPERATIVE
DEPARTMENT

No. SO (LFC)/AD/3-23/2020
Dated Peshawar the July 08, 2021

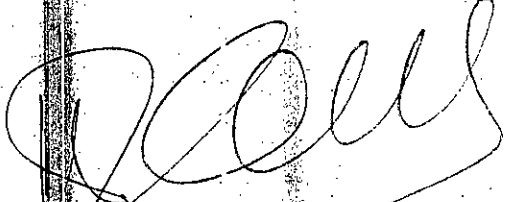
To

The Director General (Research),
Livestock & Dairy Development Department,
Khyber Pakhtunkhwa

Subject: APPEAL FOR RESTORATION OF SERVICE.

I am directed to refer to the subject noted above and to enclose herewith a copy of an appeal dated 06-07-2021 submitted by Mr. Wajid Ali, Chowkidar which is self explanatory for views / comments, please.

Encl: As Above.



AHMAD HUSSAIN
SECTION OFFICER (LFC)

Endst: No. & date even:


Copy forward to:

1. PS to Secretary Agriculture, Livestock, Fisheries & Cooperatives Department.
2. Master File.

ATTESTED TO BE
TRUE COPY



Muhammad Usman Khan
Tribunal
Appellate Court
of Peshawar, No: 5015


SECTION OFFICER (LFC)



19

ANNEXURE D

GOVERNMENT OF KHYBER PAKHTUNKHWA
AGRICULTURE, LIVESTOCK, FISHERIES & COOPERATIVE
DEPARTMENT

No. SO (LFC)/AD / 3-23 / 2020
Dated Peshawar the August 16, 2021

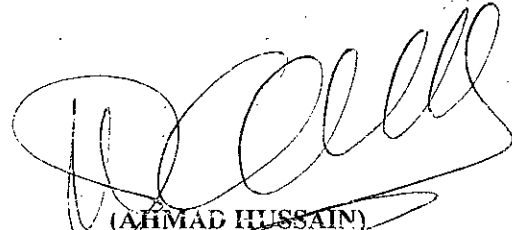
To

Mr. Waji Ali,
Chowkidar,
O/O Director General (Research),
L&DD Peshawar.



Subject: APPEAL FOR RESTORATION OF SERVICE.

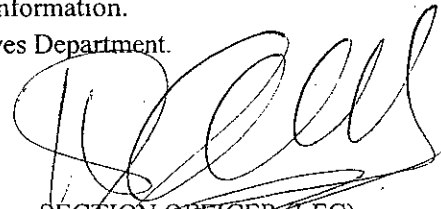
I am directed to refer to your appeal dated 06-07-2021 addressed to Worthy Secretary Agriculture on the subject noted above and to state that the appeal has been processed in light of relevant law / rules of the Govt and rejected by the appellate authority being devoid of merit.


(AHMAD HUSSAIN)
SECTION OFFICER (LFC)

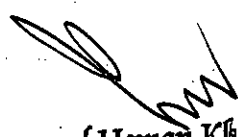
Endst: No. & date even:

Copy forward to the:

1. Director General (Research), L&DD, Peshawar for information.
2. PS to Secretary Agriculture, Livestock & Cooperatives Department.
3. Master File.


SECTION OFFICER (LFC)

ATTESTED TO BE
TRUE COPY


Muhammad Usman Khan
Turkandi
Advocate Supreme Court
of Pakistan. No: 5045

OSCE)

13

4



**DIRECTORATE GENERAL (RESEARCH)
LIVESTOCK & DAIRY DEVELOPMENT DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR**



Bacha Khan Chowk Khyber Pakhtunkhwa Peshawar
livestockres.kp.gov.pk

091-9210218,
091-9210220

Facebook.com/livestockresearchkp
Twitter.com/livestockreskp
dg.ldr@kp.gov.pk

No. DG(Res)/L&DD/Est-II/PF(269)/2021/6640-41

Dated Peshawar the 23/08/2021

Copy of the overleaf is forwarded for information to:-

1. The Director, Livestock Research & Development, Khyber Pakhtunkhwa, Peshawar.
2. Mr. Wajid Ali S/O Khan Zaman, Charpareeza Haryana Bala, Tehsil & District Peshawar.

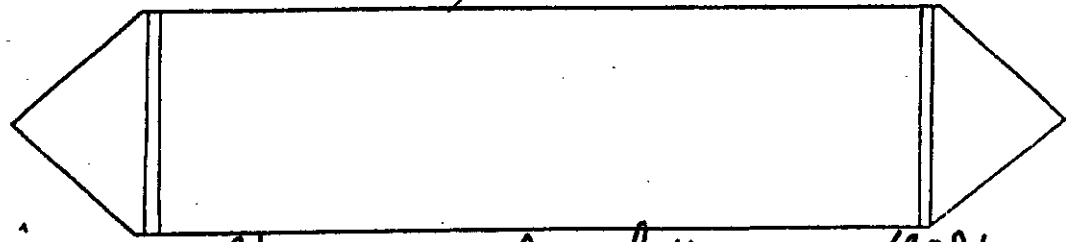
**ATTESTED TO BE
TRUE COPY**

**Muhammad Usman Khan
Turlandi
Advocate Supreme Court
of Pakistan. No: 5045**

Director General
(Research)

20/8/2021

بعدالت خیر کنوخوا سرویس ٹریبونل، ایساور



Service Appeal No. 12021 2021ء پنجاب ایبلنٹ

موزخہ
مقدمہ
دعویٰ
جرم

عواہدی ولد فائزہ
سابقہ پولیڈر GPS-3
فہمہ لائیو سٹاک، ڈیری ڈیولپمنٹ
ڈیپارٹمنٹ، خیر کنوخوا، ایساور
باعت تحریر آئیکہ ایبلنٹ

Respondents

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکل کارروائی متعلقہ
آن مقام KP-ST Peshawar کیلئے محمد عثمان خان ترلانڈی

ایڈووکیٹ پریئم کورٹ آف پاکستان
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کا 50% کا انتخاب ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی 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 تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوکالت نامہ لکھد یا کہ سندر ہے۔

المقوم محمد عثمان خان 2021

ATTESTED & ACCEPTED

وہ العب گ العب
کے لئے منظور ہے۔

محمد عثمان خان ترلانڈی
ایڈووکیٹ پریئم کورٹ آف پاکستان
No: 5045

KP ST Peshawar. بمقام
Dawood Khan
Adv.

محمد عثمان خان