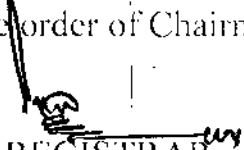


FORM OF ORDER SHEET

Court of _____

Case No.- 105/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/1/2023	<p>The appeal of Mst. Imrana Ghafoor presented today by Mr. Bilal Ahmad Kakaizai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

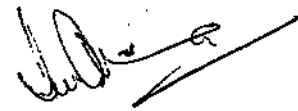
BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: 105 / 2023

IMRANA GHAFOR vs Government of Khyber Pakhtunkhwa etc

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Affidavit		7
Addresses Sheet		8
<i>Annexure-A</i>	Staff Statement (in which Appellant has been shown as Principal).	9
<i>Annexure-B</i>	Appointment Order dated 01.04.2010 as Associate Professor.	10-11
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<i>Annexure-G</i>	Leave Application along with Courier Receipts.	17-18
<i>Annexure-H</i>	Impugned Notification dated 06.02.2015.	19
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<i>Annexure-K</i>	Departmental Appeals & Representations dated 29.09.2022 along with Courier Receipts.	22-27
Wakalatnama		nil



Appellant

Through:

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.
213, Sunehri Masjid Road, Peshawar
Cantt. 0300-9020098.

**BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No: 105 / 2023

IMRANA GHAFOOR

Ex-Associate Professor, Higher Education, Archives and Libraries
Department, Government of Khyber Pakhtunkhwa, Peshawar.
R/o H # 1.3, St # 1, Rafi Block, Safari Valley, Phase-8,
Bahria Town, Rawalpindi.

..... APPELLANT

Versus

1. **GOVERNMENT OF KHYBER PAKHTUNKHWA,**
Through Chief Secretary,
Civil Secretariat, Peshawar.

2. **SECRETARY, HIGHER EDUCATION DEPARTMENT,**
Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

..... RESPONDENTS

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST ORDER NO. SO(COI)/HED/2-
135/05/IMRANA GHAFOOR DATED 06.02.2015 COMMUNICATED BY
HAND ON 01.09.2022 WHEREBY APPELLANT HAS BEEN REMOVED
FROM SERVICE DUE TO HER ALLEGED ABSENCE.**

Prayer: On acceptance of this Appeal, the subject mentioned
Order may please be set aside and any proceedings
done at the back of the Appellant, without
communicating the same to the Appellant be declared

illegal and unlawful in consequence whereof the Appellant be reinstated in service with all back wages and benefits, with such other relief, as may deem fit in the circumstances of the case, may also be granted.

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

1. That, Appellant joined the Department in May 1999, as Lecturer and was lastly working as Associate Professor of Zoology in Higher Education Department, copies of one Staff Statement (in which Appellant has been shown as Principal), Appointment Order dated 01.04.2010 as Associate Professor, Charge Report dated 15.04.2010, Training Letter dated 17.09.2010 and one Pay Slip are attached as Annexure A to E.
2. That, during the course of employment, husband of the Appellant i.e. Dr. Shakeel Afridi, Agency Surgeon Khyber, disappeared in May 2011.
3. That, Appellant came to know through print & electronic media regarding fate of her husband that allegedly he has been booked for aiding foreign agencies and he is under custody of Law Enforcement Agencies of Pakistan.
4. That, after couple of days, the Appellant and her family were forced to vacate the residence at Hayatabad, Peshawar and directed by the Law Enforcement Agencies to leave Peshawar / Khyber Pakhtunkhwa, due to unavoidable security reasons.
5. That, the Appellant and her family members were also not allowed to contact anyone including relatives and for this purpose the Mobile Phones of the Appellant and her family members were also taken from them.
6. That, since Appellant was not allowed to contact any one and was under the strict security observance / watch right from her

leaving Peshawar / Khyber Pakhtunkhwa, hence she was also unable to contact her office / place of duty.

7. That, due to unavoidable and risky circumstances as narrated above, the Appellant was inadvertently not able to perform or continue her job in the Department.
8. That, Appellant was given a residence at a place, which was also unknown to her. It merits mentioning here that on behalf of the Department no notice was ever served upon the Appellant nor she was having any access to local newspapers in which Absence Notice was allegedly published for information of the Appellant.
9. That, as per provided documents, two Absence Notices were issued and published by the Department in Newspapers, probably somewhere in August 2012, in order to complete the proceedings of Rule 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, copies of the Absence Notices published in Newspapers are attached as Annexure F.
10. That, the Appellant was not aware of issuance of Absence Notices in August 2012, however through her own sources she managed to send an Application dated 14.10.2012, in which Appellant requested for granting her leave for two years from 12.07.2011, copies of the Leave Application along with Courier Receipts are attached as Annexure G.
11. That, the Leave Application of the Appellant was not responded by the Department, however on 06.02.2015 Impugned Notification of Removal from Service was issued by the Department, at the back of the Appellant, copy of the Impugned Notification dated 06.02.2015 is attached as Annexure H.
12. That, neither the Absence Notices ever reached the Appellant nor the Impugned Notification of Removal from Service was ever communicated to the Appellant.

13. That, in October 2020, when the restrictions imposed by the Law Enforcement Agencies were relaxed to some extent, Appellant managed to write a letter to the Director Higher Education Department, Government of Khyber Pakhtunkhwa, Peshawar in which Appellant requested for early retirement because by that time too, she was not aware of issuance of Impugned Removal Order by the Department moreover in the said Application, the Appellant also referred her earlier Application dated 14.10.2012 for grant of leave, copies of the Application dated 20.10.2020 along with Courier Receipts are attached as Annexure J.
14. That, recently, i.e. in the month of September 2022, the security agencies allowed the Appellant to travel to Peshawar and when she contacted her Department regarding the fate of his service, she was informed about the issuance of Absence Notices and Impugned Notification of Removal from Service dated 06.02.2015.
15. That, after getting knowledge of the issuance of Impugned Notification dated 06.02.2015 in the month of September 2022, as per law applicable, the Appellant submitted her Departmental Appeal / Representation on 29.09.2022 before the Worthy Chief Minister and Chief Secretary Khyber Pakhtunkhwa, copies of the Departmental Appeals / Representations dated 29.09.2022 along with Courier Receipts are attached as Annexure K.
16. That, the Department / Respondents failed to communicate the fate of the Departmental Appeals / Representations within requisite statutory period of 90 days, hence this Service Appeal on the following amongst other grounds: -

GROUNDS:

1. That, the Impugned Notification of Removal is illegal, unlawful, void and ineffective.
2. That, same is against the principals of Natural Justice, also.

3. That, neither Notice, Explanation, Charge Sheet nor Statement of Allegations were ever served or received by the Appellant moreover the Appellant, otherwise, was not having any access to local newspapers in which the absence notices were published. It is worth to mention here that the Department has got no proof of serving or communicating the subject Removal Order or any other Letter to the Appellant.
4. That, as per law and Rules on the subject, if the Competent Authority proposes to inflict major punishment upon any incumbent, the formal and regular enquiry, to that effect, is mandatory, in which the allegedly delinquent officer has the right to state the facts and circumstances of her case, which forced her to vacate her house at Peshawar.
5. That, apart from all the legal and factual grounds agitated in the instant Appeal, the case of the Appellant is a special case which needs special attention as the circumstances and conditions which prevailed in May 2011, after which the Appellant was directed to vacate and leave her residence at Peshawar and curtail all the contacts etc, were so sketchy, dangerous, risky and threatening that Appellant, being in helpless conditions, has to abide by those instructions given to her by the Security Agencies in order to save her life and lives of her children.
6. That, in the instant case the Department has arbitrarily and knowingly issued all the communications in the name of the Appellant without ascertaining a fact that not even a single communication has been received / could be reached or seen by the Appellant, personally.
7. That, the Appellant has been victimized due to no fault on her part.
8. That, all the proceedings initiated against the Appellant were malafide and malicious and purportedly were initiated in order to inflict maximum reputation loss to the Appellant.

6

9. That, the punishment as imposed is too harsh.

It is, therefore, requested that Appeal be accepted as prayed for.



Appellant

Through:

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.
213, Sunehri Masjid Road, Peshawar
Cantt. 0300-9020098.

7

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2023

IMRANA GHAFOOR vs Government of Khyber Pakhtunkhwa etc.

AFFIDAVIT

I, **IMRANA GHAFOOR**, Ex-Associate Professor, Higher Education, Archives and Libraries Department, Government of Khyber Pakhtunkhwa, Peshawar. R/o H # 13, St # 1, Rafi Block, Safari Valley, Phase-8, Bahria Town, Rawalpindi, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.



Deponent

Identified by:

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.

BEFORE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2023

IMRANA GHAFOOR Vs Government of Khyber Pakhtunkhwa etc

ADDRESSES OF PARTIES.

APPELLANT:

IMRANA GHAFOOR, Ex-Associate Professor, Higher Education, Archives and Libraries Department, Government of Khyber Pakhtunkhwa, Peshawar. R/o H # 13, St # 1, Rafi Block, Safari Valley, Phase-8, Bahria Town, Rawalpindi.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa, Through Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary, Higher Education Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.



Appellant

Through:

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.
213, Sunehri Masjid Road, Peshawar
Cantt. 0300-9020098.

GOVERNMENT OF NWFP
HIGHER EDUCATION, ARCHIVES
AND LIBRARIES DEPARTMENT

Dated Peshawar the 01-04-2010

NOTIFICATION:

No.SO(FC)HE/3-2/09/Recruit of F.Associate Pro. Consequent upon the recommendation of NWFP Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as female Associate Professors (BS-19) in College Cadre of Higher Education Department with immediate effect and to post them in the Colleges noted against each:-

S. #	Name / FATHER'S NAME / ADDRESS	SUBJECT	PROPOSED AT	REMARKS
1.	Mst Imrana Ghafoor D/O Abdul Ghafoor Postal Address: House #115, Street # 8, Sector H-3, Phase-2, Hayatabad Peshawar. Permanent Address: Village Zangae Terah Post Office Bara Khyber Agency.	Zoology	At disposal of FATA Directorate	-
2.	Mst. Seema Gul D/O Musanif Shah Postal Address: College Road, Marghuz Tehsil & District Swabi. Permanent Address: As above.	Zoology	GGC Marghuz (Swabi)	Against vacant post of Principal BS-19

TERMS AND CONDITIONS:

- i) They shall, for all intents and purposes be Civil Servants, except for the purpose of Pension and Gratuity. In lieu of the same, they shall be entitled to receive Contributory Provident Fund.
- ii) They will have all rights/privileges contained in NWFP Civil Servants Act, 1973 with all amendments made therein including NWFP, Civil Servants (Amendment) Act.2005 and Rules made there under.
- iii) In case of resignation, the officers will have to give one month prior notice. In absence of such notice their one month's pay/allowances shall be forfeited to Government.

Staff Statement

(9)

A

OFFICE OF THE PRINCIPAL GOVT GIRLS DEGREE COLLEGE BKKA GHUND MOHMAND AGENCY MONTHLY STAFF STATEMENT FOR

S/No.	Name.	Father Name.	Designation.	BPS.	D/O Birth.	Domicile.	Qualif.	D/O First App:	D/O Tak Over Ct
11.	Ibrana Ghafeer	Abdull Ghafeer	Principal	19	25.04.1968	Khyber	M.Sc Zool	19.05.1999	15.04.
12.	Zubina	Niamat Ullah	Asst:Prof:2	18	06.05.1968	Peshawer.	M.A Hist	02.05.1995	29.12.
13.	Shaima Islam	Islam Uddin	-do-	18	24.04.1973	Charsada.	M.Sc Phy	01.07.2001	28.02.
14.	Aliya Mustafa	Mustafa	-do-	18	16.10.1974	Mohmand	M.A Isl	19.01.2002	28.02.
15.	Vacant Post	-	-do-	18	-	-	-	-	-
16.	Farveen Alas	Mir Alan	Lec in Eng	17	23.03.1983	Mohmand	M.A Eng	08.09.2009	28.09.
17.	Farhana	Sayed Urrokhman	Lec in Urdu.	17	03.11.1975	Charsada	M.A Urdu.	01.01.2009	01.01.
18.	Farida	Sher Muhammad	Lec in Islamiat	17	04.07.1977	Mohmand	M.A Isl	24.12.2009	24.12.
19.	Sadia Khan	Zar Muhammad	Lec in Maths(Vij)	17	01.01.1981	Mohmand	M.A Eng	01.01.2009	01.01.
20.	Noelam Sardar	Muhammad Sardar	Lec in Paki:Stud	17	02.04.1981	Buzdar	M.A P/Ed	01.01.2009	22.01.
21.	Saima Bibi	Nisak Jan	Lec in History	17	04.03.1980	Malakand.	M.A Hist	10.10.2008	01.01.
22.	Wahida Irtua	Ghulam Muhammad	Lec in Pol:Sci	17	01.04.1980	Peshawer.	M.A Isl:Sc	07.10.2009	27.10.
23.	Saima Jamil	Jamil Khan	Lec in Chemistry	17	01-01-1985	Mohmand.	M.Sc Chem	01.12.2010	01.01.
24.	Gulnaris Sireesh	Muhammad Ashiq	Lec in Physics	17	04.04.1988	D.I Khan	M.Sc Phy	01.12.2010	01.12.
25.	Raxia Afradi	Muhammad Amir	Lec in Botany	17	05.01.2000	Kohat	M.Sc Bot	15.04.2010	15.04.
26.	Shakila Sunzel	Fazla Rubi	Lec in Zoology	17	15.03.1985	Mohmand	M.Sc Zool	07.06.2009	03.06.
27.	Farzana	Ahmed Muhammad	Lec in Urdu	17	1.07.1979	Peshawer	M.A Isl	01.09.2009	01.01.
28.	Sana Nazir	Musa Malik	Lec in New Test	17	25.06.1985	Bansu	M.A B.Sc	25.03.2000	25.03.
29.	Vacant Post	-	Lec in Law.	17	-	-	-	-	-
30.	Farida Nayyar	Farveez Muhammad	Lec in State	17	10.04.1977	Peshawer	M.A State	01.01.2009	01.01.
31.	Kiran Seneen	Ghadii Khan	Lec in Urdu	17	14.08.1983	Charsada	M.A Pasht	01.04.2008	01.04.
32.	Sudayat	Ghulam Muhammad	Lec in Geogr.(Vij)	17	01.01.1975	Sawabi	M.Sc Zool	01.01.2009	01.01.
33.	Nadia Jamshed	Jamshed	Lec in C/Science	17	26.11.1988	Mohmand	M.Cs	01.11.2003	01.11.
34.	Vacant Post	-	Laborian	16	-	-	-	-	-
35.	Levatis Gul	Shahzada	D.P.E	17	05.03.1985	Mardan.	M.A	12.02.2008	12.02.
36.				17	01.03.1956	Mardan			

- (11)
- iv) The selectees should join their posts within 30-days of the issue of this notification otherwise it shall be presumed that the selectee has no intentions of joining the service and options of joining the service after expiry of one month shall stand forfeited.
 - v) In case of disciplinary matters, NWFP, Civil Servants Act, 1973 and NWFP, Civil Servants Removal from service (special Powers) Ordinance 2000 shall be applicable.
 - vi) The selectee will remain on probation for a period of 02 years which may be extended up to 03 years.

SECRETARY TO GOVT. OF NWFP
HIGHER EDUCATION DEPARTMENT

Endst: NO.& Dated Even

Copy is forwarded to the:-

1. Secretary, Public Service Commission, Peshawar.
2. The Accountant General NWFP.
3. Secretary to Government of NWFP, Establishment Department.
4. Director Higher Education, NWFP, Peshawar.
5. Director Education, FATA.
6. Deputy Director (IT) Planning Cell, Higher Education Department.
7. Principals of the Colleges concerned.
8. District Account Officer concerned.
9. P.S to Minister Higher Education NWFP, Peshawar.
10. P.S to Secretary Higher Education Arch: & Lib: Deptt; NWFP.
11. Officers concerned.

(ZUBIA QAMAR)
SECTION OFFICER (Female Colleges)

① C

CERTIFICATE OF TRANSFER OF CHARGES.

1. Certified that I/we have on this fore/afternoon of this day 15-04-2010 respectively made over and receive charge of this office of the Principal Government Girls Degree College Ekkaghund Mohmand Agency.
2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:-

Sabiha Zeb

Signature of the
Relieved Govt: Servant.

Station G.G.D.C Ekkaghund.

Designation Asstt: Prof: (Inch: Principal).

Name. Sabiha Zeb.

Imrana Ghafoor

Signature of the
Relieving Govt: Servant.

Designation: Principal G.G.D.C. Ekkaghund

Name: Imrana Ghafoor.

OFFICE OF THE PRINCIPAL GOVT: DEGREE COLLEGE PESHAWAR.

Endst: No. 72-74 / GGDC Ekkaghund. Dated 15/4 / 2010.

Copy forwarded to the:

1. Director Higher Education N.W.F.P. Peshawar.
2. Director of Education FATA N.W.F.P. Peshawar.
- ✓ 3. Agency Accounts Officer Mohmand Agency at Ghallani.

Imrana Ghafoor

Principal,
Govt: Girls Degree College,
Ekkaghund.



(13) D

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

K.P.K. WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

No. _____/AD(Training)

Dated Pesh:the 17/9/2010

To

Mr.Shakeel Kaka Khel
Institutional Capacity Building Advisor
FATA Capacity Building Peshawar.

Subject:- **TRAINING ON DISASTER PREPAREDNESS FOR FEMALE STAFF OF FATA SECRETARIAT AND ATTACHED OFFICES PESHAWAR W.E.F 27.9.2010 TO 30.9.2010.**

Memo:-

I am directed to refer your letter dated 15.9.2010, on the above subject and to nominate the following officers for the subject training at Rivoli Guest House University Town Peshawar.

S.No.	Name of Officers.	Designation
1.	Mrs.Neelam Azam	Deputy Directress NEAS
2.	Mrs.Yasrab Nayab	Asstt:Directress EMIS
3.	Mrs.Khalida Adeeb Khanam	Principal GCET (F)Jamrud.
4.	Mrs.Naseem Afridi.	Headmistress GGHS.Waris Khan Killi FR Peshawar.
5.	Mrs.Zahid Begum	AAEO (F) Khyber Agency
6.	Ms.Gul Rukh.	Statistical Officer Local Directorate.
7.	Mrs.Samina Yousaf.	I/C Principal GGHS.Subhan Khwar Mohmand Agency.
8.	Mrs.Samia Zaib.	Principal GGHS.Kalanga Khyber Agency.
9.	Mrs.Khadija Inayat	Deputy Project Manager QEOP, FATA.
10.	Mrs.Imrana Ghafoor.	GGDC.Yakka Ghund Mohmand Agency.

Those officers requiring accommodation at Peshawar should read Rivoli Guest House University Town Abdara Road Peshawar by Sunday 26th September, 2010 at 4.00 PM.

Deputy Director (E)

Endst:No. 19920-36

Copy forwarded to the:-

1. Dr.Fakhri Alam Director General Projects FATA Secretariat Peshawar.
2. Agency Education Officers concerned
3. Arshad Khan Director General Disaster Management Authority Peshawar.
4. Mr.Miraj Muhammad R.O Training (A&C) Deptt: FATA Secretariat.
- 5-14.All Nominees with the remarks to attend the training a scheduled date and venue.
15. P.A to Director Education FATA.

Deputy Director (E)

(13)

Handwritten signature: *Paul Smith*

2002 27011 2002 FHS Grand National Meet
0034590 Japan Sheraton
P A Y O E X I S
A N D U N I P I
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A N D U N I P I
P A Y O L I S T I O N S
P R I N C I P A L
2010
Page 1 of 1
Date 22/05/2010

14

E

Account Name	Debit	Credit	Balance
001 Cash		21,436.00	21,436.00
1000 Bank of America	5,000.00		16,436.00
1001 Bank of America	5,000.00		11,436.00
1002 Bank of America	7,000.00		4,436.00
1003 Bank of America	1,441.00		3,000.00
1004 Bank of America	1,441.00		1,559.00
1005 Bank of America	1,441.00		1,118.00
1006 Bank of America	1,441.00		0.00
1007 Bank of America	1,441.00		(1,441.00)
1008 Bank of America	1,441.00		(2,882.00)
1009 Bank of America	1,441.00		(4,323.00)
1010 Bank of America	1,441.00		(5,764.00)
1011 Bank of America	1,441.00		(7,205.00)
1012 Bank of America	1,441.00		(8,646.00)
1013 Bank of America	1,441.00		(10,087.00)
1014 Bank of America	1,441.00		(11,528.00)
1015 Bank of America	1,441.00		(12,969.00)
1016 Bank of America	1,441.00		(14,410.00)
1017 Bank of America	1,441.00		(15,851.00)
1018 Bank of America	1,441.00		(17,292.00)
1019 Bank of America	1,441.00		(18,733.00)
1020 Bank of America	1,441.00		(20,174.00)
1021 Bank of America	1,441.00		(21,615.00)
1022 Bank of America	1,441.00		(23,056.00)
1023 Bank of America	1,441.00		(24,497.00)
1024 Bank of America	1,441.00		(25,938.00)
1025 Bank of America	1,441.00		(27,379.00)
1026 Bank of America	1,441.00		(28,820.00)
1027 Bank of America	1,441.00		(30,261.00)
1028 Bank of America	1,441.00		(31,702.00)
1029 Bank of America	1,441.00		(33,143.00)
1030 Bank of America	1,441.00		(34,584.00)
1031 Bank of America	1,441.00		(36,025.00)
1032 Bank of America	1,441.00		(37,466.00)
1033 Bank of America	1,441.00		(38,907.00)
1034 Bank of America	1,441.00		(40,348.00)
1035 Bank of America	1,441.00		(41,789.00)
1036 Bank of America	1,441.00		(43,230.00)
1037 Bank of America	1,441.00		(44,671.00)
1038 Bank of America	1,441.00		(46,112.00)
1039 Bank of America	1,441.00		(47,553.00)
1040 Bank of America	1,441.00		(48,994.00)
1041 Bank of America	1,441.00		(50,435.00)
1042 Bank of America	1,441.00		(51,876.00)
1043 Bank of America	1,441.00		(53,317.00)
1044 Bank of America	1,441.00		(54,758.00)
1045 Bank of America	1,441.00		(56,199.00)
1046 Bank of America	1,441.00		(57,640.00)
1047 Bank of America	1,441.00		(59,081.00)
1048 Bank of America	1,441.00		(60,522.00)
1049 Bank of America	1,441.00		(61,963.00)
1050 Bank of America	1,441.00		(63,404.00)
1051 Bank of America	1,441.00		(64,845.00)
1052 Bank of America	1,441.00		(66,286.00)
1053 Bank of America	1,441.00		(67,727.00)
1054 Bank of America	1,441.00		(69,168.00)
1055 Bank of America	1,441.00		(70,609.00)
1056 Bank of America	1,441.00		(72,050.00)
1057 Bank of America	1,441.00		(73,491.00)
1058 Bank of America	1,441.00		(74,932.00)
1059 Bank of America	1,441.00		(76,373.00)
1060 Bank of America	1,441.00		(77,814.00)
1061 Bank of America	1,441.00		(79,255.00)
1062 Bank of America	1,441.00		(80,696.00)
1063 Bank of America	1,441.00		(82,137.00)
1064 Bank of America	1,441.00		(83,578.00)
1065 Bank of America	1,441.00		(85,019.00)
1066 Bank of America	1,441.00		(86,460.00)
1067 Bank of America	1,441.00		(87,901.00)
1068 Bank of America	1,441.00		(89,342.00)
1069 Bank of America	1,441.00		(90,783.00)
1070 Bank of America	1,441.00		(92,224.00)
1071 Bank of America	1,441.00		(93,665.00)
1072 Bank of America	1,441.00		(95,106.00)
1073 Bank of America	1,441.00		(96,547.00)
1074 Bank of America	1,441.00		(97,988.00)
1075 Bank of America	1,441.00		(99,429.00)
1076 Bank of America	1,441.00		(100,870.00)
1077 Bank of America	1,441.00		(102,311.00)
1078 Bank of America	1,441.00		(103,752.00)
1079 Bank of America	1,441.00		(105,193.00)
1080 Bank of America	1,441.00		(106,634.00)
1081 Bank of America	1,441.00		(108,075.00)
1082 Bank of America	1,441.00		(109,516.00)
1083 Bank of America	1,441.00		(110,957.00)
1084 Bank of America	1,441.00		(112,398.00)
1085 Bank of America	1,441.00		(113,839.00)
1086 Bank of America	1,441.00		(115,280.00)
1087 Bank of America	1,441.00		(116,721.00)
1088 Bank of America	1,441.00		(118,162.00)
1089 Bank of America	1,441.00		(119,603.00)
1090 Bank of America	1,441.00		(121,044.00)
1091 Bank of America	1,441.00		(122,485.00)
1092 Bank of America	1,441.00		(123,926.00)
1093 Bank of America	1,441.00		(125,367.00)
1094 Bank of America	1,441.00		(126,808.00)
1095 Bank of America	1,441.00		(128,249.00)
1096 Bank of America	1,441.00		(129,690.00)
1097 Bank of America	1,441.00		(131,131.00)
1098 Bank of America	1,441.00		(132,572.00)
1099 Bank of America	1,441.00		(134,013.00)
1100 Bank of America	1,441.00		(135,454.00)
1101 Bank of America	1,441.00		(136,895.00)
1102 Bank of America	1,441.00		(138,336.00)
1103 Bank of America	1,441.00		(139,777.00)
1104 Bank of America	1,441.00		(141,218.00)
1105 Bank of America	1,441.00		(142,659.00)
1106 Bank of America	1,441.00		(144,100.00)
1107 Bank of America	1,441.00		(145,541.00)
1108 Bank of America	1,441.00		(146,982.00)
1109 Bank of America	1,441.00		(148,423.00)
1110 Bank of America	1,441.00		(149,864.00)
1111 Bank of America	1,441.00		(151,305.00)
1112 Bank of America	1,441.00		(152,746.00)
1113 Bank of America	1,441.00		(154,187.00)
1114 Bank of America	1,441.00		(155,628.00)
1115 Bank of America	1,441.00		(157,069.00)
1116 Bank of America	1,441.00		(158,510.00)
1117 Bank of America	1,441.00		(159,951.00)
1118 Bank of America	1,441.00		(161,392.00)
1119 Bank of America	1,441.00		(162,833.00)
1120 Bank of America	1,441.00		(164,274.00)
1121 Bank of America	1,441.00		(165,715.00)
1122 Bank of America	1,441.00		(167,156.00)
1123 Bank of America	1,441.00		(168,597.00)
1124 Bank of America	1,441.00		(170,038.00)
1125 Bank of America	1,441.00		(171,479.00)
1126 Bank of America	1,441.00		(172,920.00)
1127 Bank of America	1,441.00		(174,361.00)
1128 Bank of America	1,441.00		(175,802.00)
1129 Bank of America	1,441.00		(177,243.00)
1130 Bank of America	1,441.00		(178,684.00)
1131 Bank of America	1,441.00		(180,125.00)
1132 Bank of America	1,441.00		(181,566.00)
1133 Bank of America	1,441.00		(183,007.00)
1134 Bank of America	1,441.00		(184,448.00)
1135 Bank of America	1,441.00		(185,889.00)
1136 Bank of America	1,441.00		(187,330.00)
1137 Bank of America	1,441.00		(188,771.00)
1138 Bank of America	1,441.00		(190,212.00)
1139 Bank of America	1,441.00		(191,653.00)
1140 Bank of America	1,441.00		(193,094.00)
1141 Bank of America	1,441.00		(194,535.00)
1142 Bank of America	1,441.00		(195,976.00)
1143 Bank of America	1,441.00		(197,417.00)
1144 Bank of America	1,441.00		(198,858.00)
1145 Bank of America	1,441.00		(200,299.00)
1146 Bank of America	1,441.00		(201,740.00)
1147 Bank of America	1,441.00		(203,181.00)
1148 Bank of America	1,441.00		(204,622.00)
1149 Bank of America	1,441.00		(206,063.00)
1150 Bank of America	1,441.00		(207,504.00)
1151 Bank of America	1,441.00		(208,945.00)
1152 Bank of America	1,441.00		(210,386.00)
1153 Bank of America	1,441.00		(211,827.00)
1154 Bank of America	1,441.00		(213,268.00)
1155 Bank of America	1,441.00		(214,709.00)
1156 Bank of America	1,441.00		(216,150.00)
1157 Bank of America	1,441.00		(217,591.00)
1158 Bank of America	1,441.00		(219,032.00)
1159 Bank of America	1,441.00		(220,473.00)
1160 Bank of America	1,441.00		(221,914.00)
1161 Bank of America	1,441.00		(223,355.00)
1162 Bank of America	1,441.00		(224,796.00)
1163 Bank of America	1,441.00		(226,237.00)
1164 Bank of America	1,441.00		(227,678.00)
1165 Bank of America	1,441.00		(229,119.00)
1166 Bank of America	1,441.00		(230,560.00)
1167 Bank of America	1,441.00		(232,001.00)
1168 Bank of America	1,441.00		(233,442.00)
1169 Bank of America	1,441.00		(234,883.00)
1170 Bank of America	1,441.00		(236,324.00)
1171 Bank of America	1,441.00		(237,765.00)
1172 Bank of America	1,441.00		(239,206.00)
1173 Bank of America	1,441.00		(240,647.00)
1174 Bank of America	1,441.00		(242,088.00)
1175 Bank of America	1,441.00		(243,529.00)
1176 Bank of America	1,441.00		(244,970.00)
1177 Bank of America	1,441.00		(246,411.00)
1178 Bank of America	1,441.00		(247,852.00)
1179 Bank of America	1,441.00		(249,293.00)
1180 Bank of America	1,441.00		(250,734.00)
1181 Bank of America	1,441.00		(252,175.00)
1182 Bank of America	1,441.00		(253,616.00)
1183 Bank of America	1,441.00		(255,057.00)
1184 Bank of America	1,441.00		(256,498.00)
1185 Bank of America	1,441.00		(257,939.00)
1186 Bank of America	1,441.00		(259,380.00)
1187 Bank of America	1,441.00		(260,821.00)
1188 Bank of America	1,441.00		(262,262.00)
1189 Bank of America	1,441.00		(263,703.00)
1190 Bank of America	1,441.00		(265,144.00)
1191 Bank of America	1,441.00		(266,585.00)
1192 Bank of America	1,441.00		(268,026.00)
1193 Bank of America	1,441.00		(269,467.00)
1194 Bank of America	1,441.00		(270,908.00)
1195 Bank of America	1,441.00		(272,349.00)
1196 Bank of America	1,441.00		(273,790.00)
1197 Bank of America	1,441.00		(275,231.00)
1198 Bank of America	1,441.00		(276,672.00)
1199 Bank of America	1,441.00		(278,113.00)
1200 Bank of America	1,441.00		(279,554.00)

2002 27011 2002 FHS Grand National Meet
 0034590 Japan Sheraton
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 Date 22/05/2010

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 P R I N C I P A L
 2010
 Page 1 of 1
 Date 22/05/2010

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15



SHAYKH ZAYED ISLAMIC CENTRE
UNIVERSITY OF PESHAWAR



ADMISSION NOTICE 2012

BS (CS) 4 YEARS SELF-SUPPORT (EVENING) PROGRAMME

Applications on prescribed Form available on payment of Rs. 600/- from office of the Centre's Academic Assistant for Bachelor of Science (Computer Science) BS(CS) 4 years degree self-support (Evening) program are invited from the suitable candidates; details are as under:

- * F.Sc. (Pre-Engg.), F.C.S or equivalent qualification having at least 45% marks in aggregate.
- * Candidates will have to pass the Entrance Test for the said program which will be held on October 11, 2012 at 9:00 A.M.
- * Both male and female candidates can apply.

ADMISSION SCHEDULE:

* Last Date for submission of Admission Forms	31/08/2012
* Entry Test (Maths 50%, English & General 30% Interview 20%)	11/09/2012
* Display of Merit List	14/09/2012
* Commencement of Regular Classes	01/10/2012

IMPORTANT NOTE:

- a) Attested photo copies of the following documents must be submitted with Application Form
1. SSC Certificate
 2. F.Sc. Part-I & Part-II DMC's
 3. Domicile Certificate
 4. C.N.I.C (Personal/Parent/Guardian)
 5. Two Recent Photographs
- b) Candidates having A-Level can apply on the basis of equivalent certificate issued by IBCC.
- c) Application Form received by Mail or after due date shall not be entertained.

The Shaykh Zayed Islamic Centre, University of Peshawar reserve the right to make necessary amendments in the programme.

Prof Dr. Dost Muhammad
DIRECTOR

Phone: 091-9216746 Fax: (091) 9216747
E-mail: szic@upesh.edu.pk

فائنا سیکرٹریٹ
سوشل سیکرٹریٹ

نوٹس غیر حاضری

آپ سہ ماہی عمرانہ غفور پرنسپل گورنمنٹ گراڈگری کالج درہ آدم خیل ایف آر کواہٹ مورخہ 12/07/2011 سے ڈیوٹی سے غیر حاضری ہیں۔ تمام تر کوششوں کے باوجود آپ ڈیوٹی پر حاضری نہیں ہوئی۔ آپ کی سہولت کی خاطر سیکشن آفیسر (اسٹیشنمنٹ - 11) ایڈمن ایڈوکیٹرز ایسوسی ایشن ڈیپارٹمنٹ فائنا سیکرٹریٹ پشاور نے بذریعہ چھٹی نمبر فائنا سیکرٹریٹ ای - 11/11-14158-84 مورخہ 12/09/2011 آپ کی سروس ڈائریکٹر ایجوکیشن فائنا کے حوالے کی تاکہ آپ ڈیوٹی پر حاضر ہو جائیں۔ مگر آپ ڈیوٹی پر حاضری دینے میں ناکام رہی۔ آخر کار آپ کی ماہانہ تنخواہ روک دی گئی مگر آپ بدستور ڈیوٹی سے غیر حاضر ہیں۔

لہذا آپ کو مطلع کیا جاتا ہے۔ کہ اشتہار خذا کی اشاعت کے بعد 15 دن کے اندر اندر دفتر خذا میں رپورٹ کر دیں۔ بصورت دیگر حاکم مجاز روڈ 8 (A) گورنمنٹ سروس (E&AD) روڈ 1973ء کے تحت یک طرفہ اگاردائی کر کے آپ کو مورخہ 12/07/2011 سے نوکری سے برطرف کیا جائیگا۔
آختساب: آئی آر ڈرام
PID(P): 222/12

سوشل سیکرٹریٹ
فائنا سیکرٹریٹ
درہ آدم خیل پشاور

**FATA SECRETARIAT
SOCIAL SECTORS DEPARTMENT
PESHAWAR**

(16)

ABSENCE NOTICE.

You, Mrs Imrana Ghafoor, Principal Govt: Girls Degree College Darra Adam Khel FR Kohat have been willfully absent from duty since 12.7.2011. Despite all out efforts, you neither resumed your duty nor gave any report regarding your whereabouts. In order to provide an ample opportunity for resumption of duty, your services were placed at the disposal of the Directorate of Education FATA vide Section Officer (Etab-II), Admnl & Coordn: Department FATA Secretariat Order bearing Endstt: No. FATA Secretariat/E-II/1-1/14158-64, dated 12.9.2011 but you failed to report your arrival to the Directorate. Consequently your salary was stopped but even then you didn't respond and still remain absent from your duty.

You are, therefore, directed through this notice to report to the undersigned within 15 days of the publication of this notice, failing which the Competent Authority may take ex-parte decision under Rules 8(A), of the Govt: Servants (E&AD) Rules 1973, which may lead to your removal from service with effect from 12.7.2011.


Secretary Social Sectors
Deptt: FATA Secretariat

(17) 6

To
The Director Higher Education
FATA KPK

Subject: Leave Application

Sir,

Respectfully it is stated that in view of the peculiar circumstances, I am facing due to the case of my husband (Dr.Shakeel Afridi), it is not possible for me to attend my duty forthwith. However as and when I am advised by security agencies, I shall report to my duty without further delay. Furthermore, an intimation report about my position has already been received in your office on 26-09-2011. (Copy of the receipt is attached herewith).

In the light of above mentioned facts it is requested to kindly grant me leave for the period of two years w.e.f 12-07-2011.

Thanking you in anticipation



Mrs.Imrana Shakeel
Associate Professor Zoology

DATED:14-10-2012

COPY TO:

- (1) The PS to Secretary education.
- (2) Deputy Director female colleges FATA

18

1221 For Insurance Notices see reverse. R. Ps

Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Delivered a registered letter to _____ Date Stamp

of Receiving Officer Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before when necessary (In figures) (In words)

Insurance fee Rs. _____ Name and address of sender

Receipt of leave applications

1222 For Insurance Notices see reverse. R. Ps

Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Delivered a registered letter to _____ Date Stamp

of Receiving Officer Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before when necessary (In figures) (In words)

Insurance fee Rs. _____ Name and address of sender

No. 1220 For Insurance Notices see reverse. R. Ps

Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Delivered a registered letter to _____ Date Stamp

of Receiving Officer Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before when necessary (In figures) (In words)

Insurance fee Rs. _____ Name and address of sender



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

(19)

H
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Dated Peshawar the 06/02/2015

2743-6

NOTIFICATION

NO.SO(C-I)/HED/2-135/05/Imrana Ghafoor. The Competent Authority is pleased to order the "Removal from Government Service" of Ms. Imrana Ghafoor, Associate Professor (BPS-19)/ Principal, Government Girls Degree College, Dara Adam Khel (F.R. Kohat), with immediate effect, on account of her long willful absence from duties.

Note: The absence period w.e.f 12.07.2011 will be treated as un-authorized absence from duties without pay.

SECRETARY
HIGHER EDUCATION DEPARTMENT

Endst. No. & Date even.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. The Director of Education FATA, Warsak Road Peshawar.
4. The Principal, Government Girls Degree College, Dara Adam Khel (FR Kohat). She is requested to make sure that her salaries are stopped with effect from the date of her absence.
5. The District Accounts Officer, Kohat.
6. The Manager, Government Printing Press Peshawar.
7. The Assistant Director (EMIS) Higher Education Department.
8. The officer, concerned.

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ADD F X

Jalil Sarwar Jabbari
Section Officer (C-I)

RECEIVED ON
11 FEB 2015
PAGE #

Dated: 20th Oct 2020

To

The director Higher Education
Govt. of KPK Pakistan

Subject: Grant of Benefits with Early Retirement

Sir,

Respectfully it is stated that I was working as associate professor of zoology in education department. I joined the department in May 1999 as lecturer. I served for about 12 years. My husband Dr. Shakeel Afridi performing duties as agency surgeon Khyber suddenly disappeared on May 21 2011. Through media reports we came to know that he has been convicted of aiding foreign agencies and he is under custody of Law Enforcement Agencies (LEAs). Later on we were also asked to evacuate our house in Hayatabad Peshawar in which we were residing, not only to evacuate our house but also we were asked to leave Peshawar city right away for security reasons. Since then we are almost living in hiding situation.

I was working as principal Govt. Girl's Degree College (GGDC) Darradam khel at that time. I was not able to continue my services in the department. Although I performed my duties with full dedication to my profession and was not willing to discontinue my job but I had to due to my unavoidable and highly risky circumstances. Mean while I also submitted my leave application in the department but did not get any response.

I want to request the concerned authorities to kindly grant me my early retirement and I will be very grateful if all my post retirement benefits are granted as well.

Copies of my leave application along with the copies of receipts are attached here with.

Waiting for your Prompt response

Yours Sincerely
Mrs. Imrana Shakeel
03137949433

Receipts
of leave
applications

(41)

SPUD DIVERS Family

College. Gove of

Rhyler Park in Prince

Farm Service

Washington and

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Farm Service

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To

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1. HONORABLE CHIEF MINISTER,
Government of Khyber Pakhtunkhwa,
Chief Minister House, Peshawar.
2. CHIEF SECRETARY,
Government of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.

Through Proper Channel:

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION AGAINST ORDER NO. SO(COI)/HED/2-135/05/IMRANA GHAFOOR DATED 06.02.2015 COMMUNICATED BY HAND ON 01.09.2022 WHEREBY APPELLANT HAS BEEN REMOVED FROM SERVICE DUE TO HER ALLEGED ABSENCE.

Prayer: On acceptance of this Departmental Appeal / Representation, the subject mentioned Order may please be set aside and Appellant be reinstated in service with all back wages and benefits.

Respected Sir,

I, IMRANA GHAFOOR, Ex- Associate Professor, Higher Education, Archives and Libraries Department, Government of Khyber Pakhtunkhwa, Peshawar, R/o H # 13, St # 1, Rafi Block, Safari Valley Phase-8, Bahria Town, Rawalpindi, Appellant, submit instant Departmental Appeal / Representation for your honors sympathetic and benevolent considerations, as under:

1. That, Appellant joined the Department in May 1999, as Lecturer and was lastly working as Associate Professor of Zoology in Higher Education Department.

2. That, during the course of employment, husband of the Appellant i.e. Dr. Shakeel Afridi, Agency Surgeon Khyber, disappeared in May 2011. (23)
3. That, Appellant came to know through print & electronic media regarding fate of her husband that allegedly he has been booked for aiding foreign agencies and he is under custody of Law Enforcement Agencies of Pakistan.
4. That, after couple of days, the Appellant and her family were forced to vacate the residence at Hayatabad, Peshawar and directed by same Agencies to leave Peshawar city, due to security reasons.
5. That, the Appellant and her family members were also not allowed to contact anyone including relatives and for this purpose the Mobile Phones of the Appellant and her family members were also taken from them.
6. That, since Appellant was not allowed to contact any one and was under the strict security watch right from her leaving Peshawar hence was also unable to contact her office / place of duty.
7. That, due to unavoidable and risky circumstances the Appellant was inadvertently not able to perform or continue her job in Peshawar.
8. That, Appellant was given a residence at a place which was also unknown to her. It merits mentioning here that on behalf of the Department no notice was ever served upon the Appellant nor she was having any access to local newspapers in which Absence Notice was ever published.
9. That, in October 2020, Appellant managed to write a letter to the Director Higher Education Department, Government of Khyber Pakhtunkhwa, Peshawar in which Appellant requested for early retirement because by that time too, she was not aware of the issuance of Removal Order by the Department.

10. That, now in the recent past, the security agencies allowed her to travel to Peshawar and when she contacted her Department, she was informed about the issuance of subject Removal Order, in absentia. (24)
11. That, the Removal Order is illegal, unlawful, void and ineffective.
12. That, same is against the principals of Natural Justice, also.
13. That, neither Notice, Explanation, Charge Sheet nor Statement of Allegations were ever served or received by the Appellant moreover the Appellant was not having any access to local newspapers in which the absence notice was published. It is worth to mention here that the Department has got no proof of serving or communicating the subject Removal Order or any other Letter to the Appellant.
14. That, as per law and Rules on the subject, if the Competent Authority proposes to inflict major punishment upon any incumbent, the formal and regular enquiry, to that effect, is mandatory, in which the allegedly delinquent officer has the right to state the facts and circumstances of her case, which forced her to vacate her house at Peshawar.
15. That, apart from all the legal and factual grounds agitated in the instant Departmental Appeal / Representation, the case of the Appellant is a special case which needs special attention as the circumstances and conditions which prevailed in the month of May 2011, when the Appellant was directed to leave her residence at Peshawar and curtail all the contacts etc, were so sketchy, dangerous, risky and threatening that Appellant has to abide by those given to her by the Security Agencies in order to save her life and life of her children.
16. That, in the instant case the Department has arbitrarily issued all the communications in the name of the Appellant without ascertaining a fact that not even a single communication has been received or seen by the Appellant, personally.


25

17. That, the Appellant has been victimized due to no fault on her part.
18. That, all the proceedings initiated against the Appellant were malafide and malicious and purportedly were initiated in order to inflict maximum reputation loss to the Appellant.
19. That, the punishment as imposed is too harsh.
20. That, Appellant also seeks condonation of delay in filing this Department Appeal / Representation before your honor due to special circumstances mentioned in above Para(s).

It is, therefore, requested that Appeal be accepted as prayed for.

Thanking you,

Yours Faithfully



29-09-2022

(IMRANA GHAFOOR)

Ex- Associate Professor,
Higher Education, Archives and Libraries
Department, Government of Khyber
Pakhtunkhwa, Peshawar,
R/o R/o H # 13, St # 1, Rafi Block, Safari
Valley Phase-8, Bahria Town, Rawalpindi.



06

CN : 5069069735

Product : G Service Type : 0

Payment Mode : CASH Date-Time : 2022-09-29 14:44

ORGANISATION : RNP-PEW Piece(s) : 1Pcs - 0.5
Staff : 90954 Route : X25231

Shipper Details

Name : IMRANA GHAFDOR
Phone : 03000576207
Address : BAHRIA TOWN PH 8

Consignee Details

Name : CHIEF SECRETARY GOVT
Phone : 000000000000
Address : OF KHYBER PAKHTANKHUAW CIVIL
PESHAWAR

Invoice Value

Rs. 0

Payment Details

Service CHG : 216
Fuel Surcharge : 0
Other Amount : 0.0
VAS : 0
Insurance CHG : 0
GST : 34
Premium : 0

TOTAL : 250.0

Remarks

Instructions

Customer Signature

2

For Terms & Conditions Visit
www.tcs couriers.com/tnc
TCS Headquarters, 101-104, Civil Aviation
Club Road Karachi, - 75202, Pakistan
UAN : 111 123456 Web : tcs.com.pk
(Duplicate Copy) V-1.79

TRUST A LEADER TO DELIVER



GST No. 12-009808-002-73



17

CN: 5069069736

Service Type

G 0

Payment Mode

CASH 2022-09-29 14:44

ORIG DEST Piece(s) WEIGHT

RWP-PEW 1Pcs - 0.5

Staff: 90954 Route: X25231

Shipper Details

Name : IMRANA GHAFOR

Phone : 03000576207

Address : BAHRIA TOWN PH 8

Consignee Details

Name : CHIEF MINISTER

Phone : 00000000000

Address : GOVT OF KHYBER PAKHTANKHWA CHIEF MINIST
PESHAWAR

Insurance Value

Rs. 0

Payment Details

Service CHG	216
Fuel Surcharge	0
Other Amount	0.0
VAS	0
Insurance CHG	0
GST	34
Premium	0

TOTAL 250.0

Remarks

Product Code

Customer Signature

2

For Terms & Conditions Visit

www.tcs.com/enc

TCS Headquarters, 141-104, Civil Avia

Club Road Karachi - 75202, Pakistan

UAN : 111 123456 Web : tcs.com.pk

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GST No. 12-009808-002-73

بعدالت خیبر پختونخواہ سروس ٹریبیونل، پشاور

Appellant

مجاناب

2023

مورثہ

Govt. of KPK etc.

بنام

Imrana Ghaffar

مقدمہ

دعویٰ

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور کے لیے،
بلال احمد کے زنی ایڈووکیٹ مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل موصوف کو مقدمہ کی کل کاروائی کا کامل
اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے، جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط
کرنے 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 ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی 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 دہر جانہ التوائے مقدمہ کے سبب سے ہوگا یا
کوئی تازخ 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۔

2023

ماہ

الرقوم

کے لیے منظور ہوا۔

بمقام

Attested &
Accepted

واہ

د