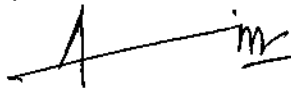


Form- A

FORM OF ORDER SHEET

Court of _____

Execution Petition No. 32/2023

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 17.01.2023 | <p>The execution petition of Mr. Mukhtar Ahmad Khan submitted today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on - _____ . Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p> |

NAG

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

EP No. 32/2023

Service Appeal No. 1464/2018

Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi Badhen Post Office Lassan Nawab, Tehsil & District Mansehra.

...APPELLANT

VERSUS

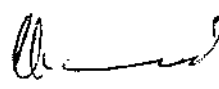
District Education Officer (Male) District Torghar.

...RESPONDENT

APPLICATION FOR IMPLEADMENT

INDEX

| S.# | Description | Page No. | Annexure |
|-----|--|----------|----------|
| 1. | Implementation Application | 1 to 2 | |
| 2. | Copy of removal from service dated 22/09/2015 | 3 | "A" |
| 3. | Copy of service appeal No. 1464/2018 and Judgment dated 20/09/2022 | 4-18 | "B" |
| 4. | Copy of application of petitioner | 19 | "C" |


...APPLICANT /PETITIONER

Dated: _____/2023

Through


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

MA9

E.P. NO. 32/2023

Service Appeal No. 1464/2018

Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra.

...APPELLANT

VERSUS

District Education Officer (Male) District Torghar.

...RESPONDENT

SERVICE APPEAL

APPLICATION FOR IMPLEMENTATION OF
JUDGMENT DATED 20/09/2022 WHEREIN
RESPONDENT WAS DIRECTED TO
REINSTATE THE PETITIONER/APPELLANT
IN SERVICE BUT NO ACTION IN THIS
REGARD HAS SO FAR BEEN TAKEN BY THE
RESPONDENT.

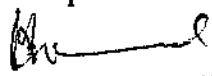
Respectfully Sheweth:-

That the facts forming the backgrounds of the
instant application are arrayed as under;-

1. That the applicant/appellant was removed
from service vide impugned removal from
service order dated 20/09/2015. Copy of
removal from service dated 22/09/2015 is
attached as annexure "A".

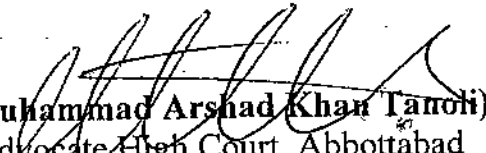
2. That the applicant/appellant filed service appeal No. 1464/2018 before this Honourable Tribunal which was allowed by the Honourable Tribunal vide Judgment dated 20/09/2022. Copy of service appeal No. 1464/2018 and Judgment dated 20/09/2022 is attached as Annexure "B".
3. That, this Honourable Tribunal directed the respondent to reinstate the petitioner/appellant in service with all service back benefits. In this regard, the petitioner/appellant filed application for his reinstatement in service but of no avail. Copy of application of petitioner is attached as Annexure "C".
4. That the respondent with malafide intentions did not implement the judgment dated 20/09/2022 of this Honourable Tribunal which amount to the contempt of this Honourable Tribunal.

In view of the above, it is prayed that respondent may graciously be directed to reinstate the petitioner/appellant in service falling which contempt of court proceedings may be initiated to punish him.


...APPLICANT /PETITIONER

Dated: _____/2023

Through


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

3

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1464/2018

Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra.

...APPELLANT

VERSUS

District Education Officer (Male) District Torghar.

...RESPONDENT

APPLICATION FOR IMPLEADMENT

AFFIDAVIT

I, *Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra*, do hereby
solemnly affirm and declare that the contents of foregoing application are
true and correct to the best of my knowledge and belief and nothing has been
concealed therein from this Honourable Court.


DEPONENT



14.11.23

Annex-A

P-18

REGISTERED

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TOR GHAR



Annex-D

P-3

NOTIFICATION

WHEREAS Mr. Mukhtiar Ahmad Khan GPS Zangia District Tor Ghar proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of his willful and unauthorized absence from duty.

2. AND WHEREAS the accused Teacher was issued show cause through print media Daily Aaj Peshawar Dated: 11/05/2014, he submitted his reply along with connected paper.

3. AND WHEREAS the competent authority refer the official to medical board for retirement on medical ground vide this office letter no. 4632-36 dated 15/01/2015, after standing medical board the Medical Superintendent of King Abdullah Teaching Hospital Mansehra stated that the official now is all right and fit for job vide letter No. 2751/SMB dated 01/06/2015 but again the official failed to report for further duty.

4. AND WHEREAS the Competent Authority (District Education Officer 'M') after having considered the charges and evidence on record, response to the Show Cause Notice, is of the view that the charges against the accused official have been proved and ex-parte action has been taken.

5. NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer 'M') is pleased to impose major penalty of "REMOVAL FROM SERVICE" w.e.f 01/07/2011 upon Mr. Mukhtiar Ahmad Khan PST GPS Zangia District Tor Ghar.

-SD-

District Education Officer (M)
E&SE Tor Ghar

Attested

Endst: No 8706-08 /Dated: 22/09/2015:

Copy forwarded for information and necessary action to the -

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. Sub Divisional Education Officer (M) Tor Ghar.
3. Official Concerned.

District Education Officer (M)
E&SE Tor Ghar

Attested

 Advocate High Court
 Office No 33 Adjacent to
 District Tor Abbottabad

Received on 17/11/2016

17/11/2016

NO

?

Annex - B

P-4

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2018

Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer Elementary & Secondary Education (Male), District Torghar.

...RESPONDENTS

SERVICE APPEAL UNDER ARTICLE 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WHILE TRAVELING TO GPS
ZANGIA MET A SEVER ACCIDENT ON
29/10/2013 AND REMAINED UNDER
TREATMENT W.E.F 29/10/2013 TO 31/05/2014
ON EARNED LEAVE ON MEDICAL GROUND

Alleged

Mukhtar Ahmed Khan
Mukhtar Ahmed Khan
SPST Zangia Basi Khail
Badhen Post Office Lassan Nawab
Tehsil & District Mansehra

DULY SANCTIONED BY THE COMPETENT AUTHORITY BUT DURING THIS PERIOD THE APPELLANT COULD NOT RECOVER HIS HEALTH AND REMAINED UNDER TREATMENT W.E.F 02/06/2014 TO 15/01/2015 AND THE COMPETENT AUTHORITY REFERRED THE CASE OF THE APPELLANT FOR MEDICAL BOARD ON 15/01/2015 AND THE MEDICAL BOARD DECLARED THAT THE APPELLANT WAS PARTIALLY FIT FOR DUTY. THEREAFTER, THE PETITIONER FILED APPLICATIONS AGAIN AND AGAIN FOR HIS ADJUSTMENT IN THE DEPARTMENT BUT INSTEAD OF ADJUSTMENT, RESPONDENTS DEPARTMENT REMOVED THE APPELLANT FROM SERVICE ON 22/09/2015. WITHOUT SHOW CAUSE NOTICE, INQUIRY AND WITHOUT FOLLOWING, THE PRESCRIBED PROCEDURE HENCE, THE IMPUGNED REMOVAL FROM SERVICE ORDER IS LIABLE TO BE SET-ASIDE.

Allesed

Stamp: *Office of the Director, Health Services, Government of India*

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL OF THE APPELLANT, IMPUGNED REMOVAL FROM SERVICE ORDER DATED 22/09/2015 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS MAY BE DIRECTED TO RE-INSTATE THE APPELLANT WITH ALL SERVICE BACK BENEFITS.

Respectfully Sheweth:-

That the facts forming the backgrounds of the instant service appeal are arrayed as under:-

1. That, the appellant was serving as SPST in Govt. Primary School Zangia District Torghar and served the department with complete devotion and left no stone unturned in the smooth functioning of the school and rendered near about 11 years of service.

2. That, the appellant while plying towards the school met a severe accident on 29/10/2014.

Therefore, he remained under treatment w.e.f 29/10/2013 to 31/05/2014 and the earned leave on medical grounds have been granted as per revised leave rule 1981 w.e.f 29/10/2014 to 31/05/2015 vide order Endst: No.2609-15 dated 20/05/2014. Copies of medical treatment/ paper and sanction of earned leave on medical grounds letter dated 20/05/2014 showing earned leave on medical ground are attached as Annexure "A".

3. That the appellant could not recover health and could not assume his charge. Therefore, he remained under treatment/ bed rest w.e.f 02/06/2014 to 15/01/2015 on the medical certificate duly issued by the registered medical practitioner. Copy of medical certificate is annexed as Annexure "B".

Attested
 [Signature]
 4.

That during the ailment of appellant, respondents department referred the case of the appellant to the standing medial board for assessment of his physical health/disability on 01/06/2015. Copy of

letter dated 01/06/2015 is annexed as Annexure "C".

5. That after getting medical board proceedings, the appellant approached the competent authority on 02/06/2015 for his adjustment but instead of adjusting the appellant, respondent No.3 without following the prescribed procedure, without regular inquiry, in a cursory manner without issuing any show cause notice, removed the appellant from service w.e.f. 01/07/2011 vide impugned order No.8706 dated 22/09/2015 which is retrospective, and void and is not maintainable at law. Therefore, the appellant received the said order dated 22/09/2015 on 17/11/2016 and filed departmental appeal on 05/12/2016. Copy of impugned order dated 22/09/2015 and appeal dated 05/12/2016 are attached as Annexure "D" and rejection letter dated 02/11/2018 is attached as Annexure "E".

Attested
 Advocate Supreme Court of India
 Office # 33, Jangra Plaza, Jangra
[Signature]

Hence, service appeal is filed on the following grounds:-

GROUNDS:-

- a) That as per revised leave rule 1981 once medical certificate for bed rest or for further investigation is issued by the registered medical practitioner, the competent authority is bound to grant medical leave to the indisposed/ailing employee as a matter of right, but in case if the competent authority consider the medical certificate to be fake/bogus, then, the competent authority has the option to send the medical certificate/ medical to the next higher medial authority for its verification. Therefore, no such procedure has been adopted by the competent authority for the period w.e.f 02/06/2014 to 15/01/2015.
- b) That the competent authority granted earned leave to the appellant on medical ground w.e.f. 29/10/2014 to 31/05/2014 vide order No.2609-15 dated 20/05/2014 but the appellant has been removed from service w.e.f

Attested

Attested by the Competent Authority
 Attested by the Competent Authority
 Office # 33, Jinnah Plaza, Islamabad
 Pakistan

~~01/07/2011~~ which is not understandable and against the facts and law.

c) That, as per judgment of superior courts and Service Tribunal removal from service is always prospective and not retrospective. The order of removal from service of the appellant w.e.f 01/07/2011 issued on 22/09/2015 is void and no limitation runs against the void order.

d) That, removal from service order is a result of without proper inquiry, without show cause notice, without affording opportunity of personal hearing which are sine qua non for taking punitive action and imposing major penalty on the appellant. Therefore, impugned removal from service order is null and void on the rights of the appellant.

Alleged

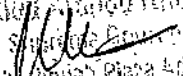
[Signature]
Director, System, Govt of Punjab
Director, Punjab Public Accounts

e) That, respondents have failed to follow the codal formalities and

imposed major penalty upon the appellant without lawful justification. Therefore, impugned removal from service order dated 22/09/2015 is liable to be set-aside.

- f) That, respondent's department has led the petitioner to the place which is utterly unknown to the principle of jurisprudence, natural justice and the principle of good governance.
- g) That the matter relates to the terms and condition of service. Therefore, this tribunal has jurisdiction to entertain the appeal under article 212 of the Constitution.
- h) That appeal is well within the period of limitation because the impugned order is void and no limitation runs against the void order. Besides, the service appeal remained under consideration the competent authority for his. Ultimately, departmental appeal has been rejected on

Attested


 Advocate Supreme Court District
 Office # 3, Dhanu Plaza, Adlan, ...
 ...

02/11/2018. Therefore, the instant appeal is filed within the period of 30 days from the date of rejection order.

- i) That, other points shall be urged at the time of arguments.

It is therefore, humbly prayed that on acceptance of the instant service appeal of the appellant, impugned removal from service order dated 22/09/2015 may graciously be set-aside and respondent may be directed to re-instate the appellant with all service back benefits.

[Signature]

...APPELLANT

Through

Dated: 20/11 /2018

[Signature]
 (Muhammad Arshad Khan Tanoli)
 Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

[Signature]

...APPELLANT

[Signature]

Muhammad Arshad Khan Tanoli
 Advocate Supreme Court of Pakistan
 High Court, Abbottabad

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

Service Appeal No. _____/2018

Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mukhtar Ahmed Khan SPST Zangia Basi Khail presently Village Bandi
Badhen Post Office Lassan Nawab, Tehsil & District Mansehra, do hereby
solemnly affirm and declare that the contents of foregoing appeal are true
and correct to the best of my knowledge and belief and nothing has been
concealed therein from this Honourable Court.

Mukhtar Ahmed Khan

Mukhtar Ahmed Khan
Office of the Secretary, Government of Khyber Pakhtunkhwa,
Peshawar

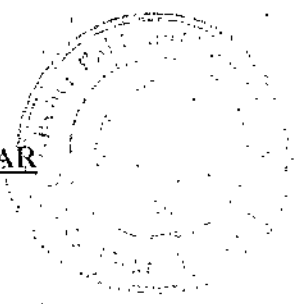


28/11/2018

Mukhtar Ahmed Khan

DEPONENT

P-14



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CAMP COURT ABBOTTABAD

Service Appeal No. 1464/2018

BEFORE: MRS. ROZINA REHMAN ... MEMBER (J)
MISS. FAREEHA PAUL ... MEMBER(E)

Mukhtar Ahmad, SPST Zangia Basi Khail presently Village Bandi
Balhen Post Office Lassan Nawab, Tehsil & District Mansehra.

... (Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), District Torghar.

.... (Respondents)

Mr. Muhammad Arshad Khan Tanoli
Advocate

For appellant

Mr. Muhammad Jan
District Attorney

For respondents

Date of Institution.....06.12.2018
Date of Hearing.....20.09.2022
Date of Decision.....20.09.2022

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the impugned order dated 22.09.2015 whereby the appellant was removed from service on account of his willful absence from duty.

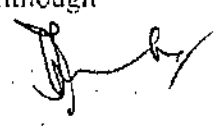
2 Brief facts of the case, as per memorandum of appeal, are that the appellant was serving as Senior Primary School Teacher in Government

P-15

Primary School Zangia, Forghar and rendered about 11 years service. While plying towards the school he met severe accident on 29.10.2013 and remained under treatment w.e.f 29.10.2013 to 31.05.2014. He was granted leave on medical ground w.e.f 29.10.2014 to 31.05.2015 (215 days) vide order dated 20.05.2014. The appellant did not recover and could not resume his charge and remained under treatment /bed rest w.e.f 02.06.2014 to 15.01.2015. During the ailment of appellant, respondent department referred his case to Standing Medical Board for assessment of physical health/disability vide letter dated 15.01.2015. Medical board declared him alright and fit for job. After getting the proceedings of Medical Board, the appellant approached the competent authority on 01.06.2015 for his adjustment, but instead of adjusting him respondent No. 3 (DFO (Male), Forghar), without following the proper procedure and conducting regular inquiry, removed the appellant from service w.e.f 01.07.2011 vide order dated 22.09.2015. The appellant received the said order on 17.11.2016 and filed departmental appeal on 05.12.2016 which was not responded; hence this service appeal.

3. Respondents were put on notice but reply/comments were not submitted despite repeated directions, hence the right of submission of written reply/comments was struck off on 19.06.2022. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents minutely and thoroughly.

4. Learned counsel for the appellant contended that competent authority under revised leave rules 1981 was bound to grant medical leave to ailing employees as a matter of right. He further contended that if the competent authority considered the medical certificate to be fake/bogus, he had the option to send it to the next higher medical authority for verification, but no such procedure was adopted for the period 02.06.2014 to 15.01.2015. Although



earned leave to the appellant on medical grounds w.e.f 29.10.2014 to 31.05.2015 was granted vide order dated 20.05.2014 but the appellant was removed from service w.e.f 01.07.2011 which was not understandable. He further contended that the appellant was removed without proper inquiry, show cause notice and affording any opportunity of personal hearing which was against the law/rules.

5. Learned District Attorney on the other hand contended that the appellant was removed from service based on the grounds that he was absent from duty without any sanctioned leave. He invited the attention of Tribunal that only one sanction order of leave was available on record. Medical Board considered him fit for job but even then he did not resume his duty and was hence removed from service.

6. The record available before us indicates that competent authority sanctioned earned leave on medical grounds of the appellant w.e.f 29.10.2014 to 31.05.2015 (215 days) on full pay vide order dated 20.05.2014. All the dates mentioned in that Notification were found confusing and incorrect. When asked the learned District Attorney confirmed that they seemed incorrect but the learned counsel for appellant corrected the dates of medical leave as 29.10.2014 to 31.05.2015, but the date on Notification still remained unclear. Date of sanction 20.05.2014 on the notification was read as 20.05.2015, on the request of learned District Attorney. It further remained unclear that the appellant met an accident on 29.10.2013 and remained under treatment from that date to 31.05.2014 but no sanction of medical leave was available on record, rather the leave on medical grounds was sanctioned from 29.10.2014 to 31.05.2015. When confronted the learned District Attorney as well as the departmental representative could not provide the court with the dates of leave availed by the appellant as a result of accident and leave actually sanctioned by

WITNESSED

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[Handwritten signature]

the department. However, an application of the appellant dated 05.12.2016 addressed to Director Elementary & Secondary Education Khyber Pakhtunkhwa, available with the main appeal at page no.19, provided a brief background of his absence on medical grounds according to which he while posted at GPS Zangia, Torghar, met an accident on 29.10.2013 for which he remained on medical leave w.e.f 29.10.2013 to 31.05.2014. As his health could not allow him to resume his duty, he remained on medical leave w.e.f 02.06.2014 to 15.01.2015. The same application further reveals that the department referred him to medical board on 15.01.2015, which on 01.06.2015 declared him fit for service after which he appealed for his adjustment, but instead of his adjustment, the department, on 17.11.2016, removed him from service.

7. Another letter dated 06.09.2018 written by DEO (Male) Torghar and addressed to Assistant Director Establishment, E&SE, Peshawar on the appeal for adjustment as SPST by the appellant available at page no. 26 of the service appeal indicates that the appellant had been absent from duty since 01.07.2011, for which an advertisement in daily Aaj dated 11.05.2014 was also given. Afterwards he was referred to the Medical Board which declared him fit for duty on 01.06.2015, but on 22.09.2015 he was removed from service. In the same letter the DEO (M) has recommended that he may be retired on medical grounds to avoid further litigation.

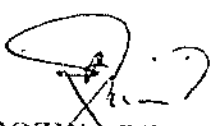
8. It has been noted that the department itself sanctioned his medical leave of 215 days w.e.f 29.10.2014 to 31.05.2015, then how can they remove him from service from 01.07.2011? Record is silent on any action taken if he was absent from 01.07.2011 except an absence notice served on 11.05.2014, after a lapse of approximately three years, as is evident from the letter of DEO (Male) Torghar dated 06.09.2018. If we assume that he was absent for his entire

ATTENTION

period, then why his medical leave was sanctioned on 20.05.2015 for 215 days? During the course of his medical leave, he was referred to the Standing Medical Board on 15.01.2015 which declared him fit for duty on 01.06.2015 and he reported for duty. It is felt that the concerned department has dealt with this case in a haphazard manner. They themselves failed to prove the correct dates of absence and the sanctioned medical leave. Moreover, perusal of record further indicates that ex-parte action was taken against the appellant and he was not given any opportunity of personal hearing.

9. In view of the details mentioned above, the appeal in hand is allowed as prayed for and order dated 22.09.2015 is set aside. The appellant is reinstated in service w.e.f 01.07.2011, and the period of absence is to be treated as leave of the kind due. Parties are left to bear their own costs. Consign.

10. *Pronounced in open court in Abbotabad and given under our hands and seal of the Tribunal on this 26th day of September, 2022.*


 (ROZINA REHMAN)
 Member (J)


 (FAREEHA PAUL)
 Member (E)

Certified to be true copy

 Khuzdar
 Sindh
 Pakistan

Date of Filing of Appeal 26/9/22
 Number of Pages 2006
 Number of Exhibits 22/
 Number of Witnesses 22/
 Date of Decision 04/11/22
 Date of Execution of Order 04/11/22

خدمت جناب ڈسٹرکٹ ایجوکیشن افسر صاحب اربیلہ ٹری اینڈ ٹرینڈنگ ایجوکیشن ڈویژن لاہور

عنوان: بحالی سروں از فورم 07/2011

P-19

Annex - c

جناب عالی! جوڈمانڈ گزارش ہدیہ سائل فورم 10/2013 تا 05/2014 تک ایلیٹڈٹ/عادتی و...
 پہلے پر تھا۔ جس کے لیے سائل نے حکم تعلیم کو پہلے ہی منظر پر لے دیا اور اسے ارسال کی گئی
 تھی۔ حکم تعلیم نے منظر پر سے فورم 10/2014 تا 05/15 تک اس کے منظر پر لے کر لی۔ لیکن
 سائل کو فورم 07/2011 کو بغیر کسی وجوہ سے سروں سے برخاست کر دیا گیا تھا۔ سائل
 نے فورم 12/2018 کو سروں میں اپیل کی جس کا فیصلہ سروسز ٹریبونل آف پاکستان نے
 فورم 20/09/2022 کو سنایا اور پھر اراف ٹرائے کے مطابق سائل کو فورم 07/2011 سے
 سروں بحال کر دیا گیا۔ اور غیر جانبداری کا عملہ جو بنتا ہے۔ جو کہ فورم 06/2015 سے
 تا 22/09/2022 تک کسی قسم کی پہلے ہی منظر پر رکھا جائے۔ اور باقی جو عملہ ہے
 اسے لایا جائے اور لے جائیں۔ اسے علاوہ سائل سروں سے برخاستگی سروسز
 SPST زنگیا بسلی میں SPST کی پوسٹ پر تصنیف تھا۔ درخواست ہدیہ سائل
 کو دوبارہ SPST کی حالی پوسٹ پر تصنیف کا آرڈر جاری کیا جائے۔
 سائل جناب کی طرف درازگی کے لیے بہت شکرگزار ہے گا۔

الصاف

فختیار احمد خان SPST
 زنگیا بسلی ضلع لاہور
 CNC No: 13503-0574251-3
 Ph: No 0345-9463541
 11-11-2022

Office # 39, Jinnah Plaza, Lahore

اعلیٰ قومی

وکالت نامہ

کورٹ فیس

Before The Service Tribunal Kp Pesho بعدالت

Makhtayab عنوان: De omarle Evogor نام

Appellant منجانب:

Implementor-petition نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Atoshad Khan Evogor AV S. C

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرنے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش بصفہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم:

بمقام
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