


FORM OF ORDER SHEET

Court of _____

Case No.- _____ **163/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/1/2023	<p>The appeal of Mr. Muhammad Zubair resubmitted today by Mr. Asad Ullah 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>

The appeal of Mr. Muhammad Zubair, Electrician, Administration Department Civil Secretariat Peshawar received today i.e. on 23.12.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Copy of notification dated 06/12/2022 mentioned in para-7 of the memo of appeal is not attached with the appeal which may be placed on it.
- 5- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3699 /S.T.

Dr. 26/12 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Asad Ullah Adv. Pesh.

Respected Sir,

- ① Check list is attached with the appeal.
- ② Appeal has been flagged with annexures.
- ③ Annexures of the appeal are attested.
- ④ Copy of Notification dated 06/12/2022 was clarified mistake mentioned in para 7 of the memo of appeal is attached with appeal which may be placed.
- ⑤ Five more copies of the appeal along with annexures are attached.

⇒ I have received the file on 04-01-2023 and today is the last date of objection re submission. Through Counsel

19/01/2023



BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No. 163/2023

Muhammad Zubair. **APPELLANT**

VERSUS


Govt. of KP through its Chief Secretary etc. **RESPONDENTS**

I N D E X


S.No.	Description of Documents	Annex	Pages
1.	Service Appeal with Affidavit		1-5
2.	Memo of Address of Parties		6
3.	Copy of Order dated 03.04.2008	A	7
4.	Copy of the Departmental Appeal alongwith Notification dated 17.04.2004	B & C	8-11
5.	Copy of the Notification dated 06.12.2012	D	12-15
6.	Wakalatnama		16


Appellant

Through


Asad Ullah

&


Armaghan Gandapur
Advocates Peshawar
Cell: 0336-1559559

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No. /2022

Khyber Pakhtunkhwa
Service Tribunal

Entry No. 2478

Dated 23/12/2022

Mr. Muhammad Zubair, Electrician, Administration department, Civil Secretariat Peshawar, Khyber Pakhtunkhwa

Appellant

Versus

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. The Secretary Administration Civil Secretariat, Peshawar Khyber Pakhtunkhwa.
3. Secretary Establishment Civil Secretariat, Peshawar Khyber Pakhtunkhwa.

Respondent(s)

**APPEAL UNDER SECTION 4 OF THE KP
SERVICE TRIBUNAL ACT, 1974**

Respectfully Sheweth,

1. That the Constitution of Islamic Republic of Pakistan aims at protecting civil servants in order to ensure smooth running of affairs of the Government and Institutions so as to benefit the public citizenry.
2. That the Constitution of Islamic Republic of Pakistan equally be-shields civil servants from being treated otherwise than in accordance with law.

23/12/2022
Registrar

2

In Sheikh Riaz-ul-Haq's Case¹, it was held that,
"Admittedly, civil servants being citizens of Pakistan have fundamental rights including the right to access to justice as envisaged under Article 9 of the Constitution".

ON FACTS

3. That the appellant was appointed as electrician (BPS-03), in the establishment and administration department on 03-04-2008, **(Copy of the order dated 03-04-2008 is annexed as Annexure "A"**
4. That the appellant performed his duty to the best of ability, determination and to the entire satisfaction of the competent authority right from day first and holding no stigma on his part till date.
5. That in the mean while the appellant preferred departmental appeal on 24.08.2022 seeking insertion of his name in the seniority list entitling him to be considered for promotion by taking into account notification dated 17-04-2004 but of no avail. **(copy of the departmental appeal along with notification dated 17-04-2004 as annexed as annexure "B" and "C")**

In Suo Moto Case No. 19 of 2016², it was held that,
"Good governance was not a favour to be bestowed on the people; it was their right".

6. Even otherwise the appellant is entitled to have a service structure like that of other employees serving in the civil secretariat.
7. That having left with no other option but to approach the Hon'ble tribunal aimed at placing the name of the appellant in the seniority list like that of employees taking benefit of

¹ PLD 2013 SC 501

² 2017 SCMR 683

notification dated 06-12-2012 and 17-04-2004 and in either case formation of service structure ;as such the instant appeal inter alia on the following grounds.

GROUND

- A.** That non-insertion of Mr. Muhammad Zubair in seniority list as that of other employee serving in civil secretariat as against law.
- B.** That even otherwise the appellant is entitled to have his service structure enabling him to raise high in so far ladder of promotion.
- C.** That the purported omission on the part of respondents to the determinant of appellant itself speaks volumes engraving danger to the notion of good governance, hence requires interference of the Hon'ble Court.

In Qaiser Iqbal's Case³, it was held that, "Rule of Law meant supremacy of law as opposed to arbitrary authority of the Government; said supremacy guaranteed three concepts; first, the absence of arbitrary power; second, equality before law and third the rights of a citizen".

- D.** That it is cardinal principle of law and justice that what cannot be done directly cannot be done indirectly.⁴
- E.** That public functionary has to reinforce good governance, observe rules strictly and adhere to rule of law in public service⁵.

³ 2018 PLD Lahore 34

⁴ PLD 1993 SC 473 at Page 687

⁵ 2015 SCMR 456; PLD 2013 SC 195

F. That "Expressio Unis Est Exclusio Alterius", commanding that when law requires a thing to be done in particular manner then, it should be done in that manner as anything done in conflict of the command of law shall be unlawful being prohibited.

G. That "Ignorantia juris non excusat", commanding that ignorance of the law excuses not.

H. That further necessary grounds will be raised during the course of arguments.


PRAYER

It is therefore humbly prayed that on acceptance of this Service Appeal: -

- 1. The respondents shall be directed to place the name of appellant in seniority list with that of employees taking benefit of notification dated 06-12-2012 and 17-04-2004 enabling him to be considered for promotion.
- 2. The respondents shall be directed to formulate service structure of the appellant cadre aimed at extension of equal treatment and in accordance with law.
- 3. Any such order be passed which this Hon'ble Tribunal deems fit and appropriate as the circumstances may require for determination of the subject at hand.


Appellant

Through


Asad Ullah
Advocate
Contact # 0336-1559559

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

5

Service Appeal No. /2022

Muhammad Zubair.....Appellant

Versus

Govt of KP through its chief secretary & Others...Respondent(s)

AFFIDAVIT

I, **Mr. Muhammad Zubair, Electrician, Administration department, Civil Secretariat Peshawar, Khyber Pakhtunkhwa**, 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, belief and nothing has been concealed therefrom the Hon'ble Tribunal.



23/12/22

M. Zubair
DEPONENT

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

6

Service Appeal No. /2022

Muhammad Zubair.....**Appellant**

Versus

Govt of KP through its chief secretary & Others...**Respondent(s)**

MEMO OF ADDRESS OF PARTIES

APPELLANT


Mr. Muhammad Zubair, Electrician, Administration department, Civil Secretariat Peshawar, Khyber Pakhtunkhwa

RESPONDENT(S)

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. The Secretary Administration Civil Secretariat, Peshawar Khyber Pakhtunkhwa:
3. Secretary Establishment Civil Secretariat, Peshawar Khyber Pakhtunkhwa.


Appellant

Through


Asad Ullah
Advocate
Contact # 0336-1559559

Ameeul A
7

ADMINISTRATION DEPARTMENT

Dated Peshawar the 03.04.2008

ORDER

NO.E&A/DI4(1)/2007. Under rule 10 and rule-2 of the N-WFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 read with amendment made vide notification No.SOR.VI(E&AD)1-13/2000 dated 10.08.2005, Mr. Muhammad Zubair S/O Rast Baz Khan, resident of District Bannu is hereby appointed as Electrician (BS-03) (2615-100-5615) against an existing vacancy in Establishment and Administration Department with immediate effect on the following terms and conditions:-

- i. He shall get pay at the minimum of BS-02 including usual to annual increment in his existing terms.
 - ii. He shall be governed by the N-WFP Civil Servants Act 1973 and all the laws applicable to the Civil Servants and Rules made there under.
 - iii. He shall, for all intents and purposes, be Civil Servant except for purpose of pension or gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount as would be contributed by him towards Contributory Provident Fund (C.P.F) alongwith the contributions made by Government to his account in the said fund, in the prescribed manner.
 - iv. In case, he wishes to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
 - v. He shall produce a Medical Certificate of fitness from Medical Superintendent, Services Hospital, Peshawar, before joining in the Civil Servants as required under the rules.
 - vi. He has to join duties at his own expenses.
2. If he accepts the post on these conditions, he should report for duties to the undersigned within 14 days of the receipt of this order.

DEPUTY SECRETARY (ADMIN),
ADMINISTRATION DEPARTMENT.

ENDST: NO. & DATE EVEN.

Copy forwarded to:-

1. Accountant General, NWFP, Peshawar.
2. P.A to Dy.Secy (Admin), Admin Deptt.
3. Bill Assistant, Administration Department.
4. Mr. Muhammad Zubair S/O Rastbaz Khan, resident of District Bannu
5. Personal file.
6. Office Order file.

TESTED

(SHAH JEHAN)
SECTION OFFICER (ADMIN)

Ate
B

ADMINISTRATION DEPARTMENT

Annexure B

DATED PESHAWAR THE 17.04.2004

8

NOTIFICATION.

NO.E&A(A.D)4(17)/2003. In pursuance of the provisions contained in sub-rule(2) of rule 3 of the N-WFP civil Servant (Appointment, Promotion and Transfers) Rules, 1989, the competent authority on the recommendations of Standing Services Rules Committee, hereby directs that in the service rules pertaining to the post of Daftari notified vide Administration Department Notification of even number dated 11.07 2003, the following amendments shall be made namely:-

AMENDMENTS

In the appendix for the entries under column No.5 against serial No.2, the following shall be substituted namely:-

S.NO.	METHOD OF RECRUITMENT
2	By promotion on the basis of seniority-cum-fitness from amongst the holders of posts of matriculate Qasids, Naib Qasids, Farashs, Chowkidars, Malis, Sweepers, Bahishtis and equivalent posts.

NOTE: For the purpose of promotion, Administration Department shall maintain the joint seniority list of class-IV matriculate employees with regard to the date of regular appointment and the eligibility i.e acquiring SSC, shall be examined and taken into account at the time of promotion under consideration by the Departmental Promotion Committee.

SECRETARY TO GOVT: OF N-WFP
ADMINISTRATION DEPARTMENT.

ENDST: NO. & DATE EVEN.

- 1) All Administrative Secretaries to Govt: of N-WFP.
- 2) All Additional Secretaries in E&A Department.
- 3) All Deputy Secretaries in E&A Department.
- 4) The Section Officer(Admn), Chief Minister's Secretariat, N-WFP, Peshawar.
- 5) The Section Officer(Secret). E&A Department.
- 6) The Librarian, E&A Department.

100
17/4/04

TESTED

Shah Jehan
(SHAH JEHAN)
SECTION OFFICER(AMDN)

Atc
J

خدمت جناب سیکریٹری اسٹیبلشمنٹ

یشن ڈیپارٹمنٹ خیبر پختونخوا

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عنوان:

PS DS (Administration Deptt.)

Dairy No. 24/8 Date: 24/8/12

جناب عالی!

نہایت سوزناک گزارش کیجاتی ہے کہ من سائل محکمہ ایڈمنسٹریشن میں بطور ایگزیکٹو سکیل 04 میں اپنی ڈیوٹی سرانجام دے رہا ہوں۔ من سائل تاریخ 03-04-2008 سے تاحال ترقی سے محروم ہوں ایک ہی آسامی پر کام کرنے پر مجبور ہوں۔ سیکشن آفیسر ایڈمن اور ڈپٹی سیکریٹری ایڈمن کو بار بار درخواست کر چکا ہوں مگر تاحال میرا نام سنیاریٹی لسٹ میں شامل نہ کرنا سمجھ سے بالاتر ہونی۔

جناب عالی!

محکمہ P & D خیبر پختونخوا کے جاری کردہ قانون برائے ترقی بطور جوئینر کلرک ایگزیکٹو کو 07 فیصد کوٹہ مختص کیا گیا ہے نقل لف ہڈا برائے ملاحظہ جبکہ محکمہ اسٹیبلشمنٹ ایڈمنسٹریشن کے جاری کردہ قانون کے مطابق دفتری، قاصد، نائب قاصد، بشمول دیگر سہاؤ کی سکیل کے سرکاری ملازمین جنہیں کم از کم 02 سال نوکری ہوتی کے مستحق ہیں۔

تاریخ 06-12-2012 نوٹیفیکیشن نمبر SOE-IV (E&AD)/1-35/2012 نمبر 4 (a) (نقل لف ہڈا)

4 (a). "Thirty-Three percent by promotion on basis of Senior aty -cum-fitness. From amongst Daftaris, Gestetner Operator, Qasid and Naib Qasid including Ho lders of other equelept post in Secretariat with 2 years Service as such, who have passed SSC Examination"

جناب عالی!

درجہ بالا محقق و معروضات کو مد نظر رکھتے ہوئے آپ جناب کی خدمت میں گزارش ہے کہ من سائل کو ترقی کیلئے سنیاریٹی لسٹ میں شامل کیا جائے جیسا کہ من سائل بنیادی سکیل 04 میں ڈیوٹی سرانجام دے رہا ہوں جبکہ قاصد اور دفتری بھی سکیل 04 کے ملازمین ہوتے ہیں اس لحاظ سے من سائل بنیادی سکیل 04 ہونے کی وجہ سے مستحق ہوں۔ لہذا استدعا کی جاتی ہے کہ متعلقہ حکام کو من سائل کا نام متعلقہ سنیاریٹی لسٹ میں نام شامل کرنے کے احکامات صادر فرما کر مشکور فرمائیں تاکہ من سائل کی ترقی ممکن ہو اس احسان کیلئے تاحیات دعا گو رہوں گا۔

جائے
بنیادی
صادر فرما

مورخ:

نقل برائے اطلاع
نزد سیکریٹری
ڈپٹی سیکریٹری
وزیر ایشیا
تخت خیبر پختونخوا

مورخ:

نقل برائے اطلاع

معزز چیف سیکریٹری صاحب
حکومت خیبر پختونخوا ایشیا

AK

24/8/12

آپ کا وفادار محمد زبیر ایگزیکٹو محکمہ ایڈمنسٹریشن (SOIA)
سول سیکریٹری تخت خیبر پختونخوا ایشیا

impeltcaj

ADMITTED

PS to SECY:(ADMIN)

case has been filed.

AS Incl

26-8-12

Ashraf Khan
Superintendent
Admin. Department.

پارٹمنٹ، پشاور

بخدمت جناب سیکرٹری ایڈمنسٹریشن صاحب،

10

کلیے شمولیت کی استدعا

کلاس فور میٹرکولیٹ ملازمین کی سناریائی لسٹ میں بطور

عنوان:

Ps to Secy Admin

Dairy No: 1155 Date: 19/04/22

S.O (Admn) Administration Deptt:

Dairy No: 1002

PA.DS (Admin)

Date: 20-4-22

Dairy No: 1166 Date: 20/04/22

جناب عالی!

گزارش کی جاتی ہے کہ سن سائل بتاریخ 03-04-2008 محکمہ انتظامیہ بطور الیکٹریشن بنیادی سکیل 2 میں بھرتی ہوا جبکہ تاحال اسی اسامی پر کام کر رہا ہوں۔ حکومت وقت نے 2 مرتبہ سکیل اپ گریڈ کیا۔ جس کی وجہ سے اب سکیل 4 میں اپنی ڈیوٹی بطریقہ احسن سرانجام دے رہا ہوں۔ سرکاری نوکری میں تمام ملازمین ترقی کے خواہشمند ہوتے ہیں۔ اسی طرح مجھے بھی ترقی کی خواہش ہے جس کی بار بار درخواستیں دے چکا ہوں مگر تاحال میرا نام میٹرکولیٹ لسٹ میں شامل نہیں کیا گیا جبکہ میری تعلیم BA ہے جو قانون کی صریحاً خلاف ورزی ہے۔ کلاس فور ملازمین کو ترقی کے لئے مشترکہ سناریائی لسٹ مرتب کی جاتی ہے جس میں سکیل 1 تا 2 گریڈ ملازمین کو بطور دفتری سکیل 4 میں ترقی پاتے ہیں۔ جبکہ محکمہ پی ایچ ڈی کے رولز میں باقاعدہ Electrician بھی نائب قاصد کی طرح درج ہے جس کے رولز کی کاپی لف ہے، مردہ قانون برائے ترقی دفتری میں واضح طور پر تحریر ہے کہ

Annex-I

"By Promotion on the basis of seniority-cum-fitness from amongst the holders of posts of matriculate Qasid, Naib Qasids, Farashs, Chokidars, Malis, Sweepers, Bahishtis and equivalent posts"

جیسا کہ آپ کے علم میں ہے کہ دفتری سکیل 4 کا ملازم ہوتا ہے جس کے equivalent الیکٹریشن بھی سکیل 4 کا ملازم ہے۔ اس قانون کی زد سے میرا حق بننا ہے کہ میرے نام کا اندراج بھی مذکورہ فہرست میں کرتے ہوئے دفتری سکیل 4 کی اسامی پر ترقی دی جائے۔ مزید یہ کہ جو نیکر کلرک سکیل 11 کے سرورس رولز میں بھی واضح طور پر تحریر ہے کہ

Annex-II

"Thirty-three percent by Promotion, on the basis of seniority-cum-fitness from amongst Daftris, Gestetner Operators, Qasids and Naib Qasid including holders of other equivalent posts in the Secretariat with two years service as such, who have passed SSC Examination."

جہاں تک سکیل 4 سے سکیل 4 مساوی سکیل کے ترقی کا معاملہ ہے اس ضمن میں عرض کی جاتی ہے کہ سپرنٹنڈنٹ سکیل 17 سے PMS سکیل 17 کی مساوی اسامی پر اور اسی طرح PA اور پرائیویٹ سیکرٹری بھی مساوی سکیل پر ترقی پاتے ہیں۔

جناب عالی!

تمام حقان صاف اور درست انداز میں آپ جناب کی خدمت میں پیش کئے گئے ہیں۔ کہیں بھی کوئی غلط بیانی نہیں کی گئی اور نہ ہی کچھ پوشیدہ رکھا گیا۔ جس کی زد سے ترقی پانا میرا بھی حق بننا ہے۔

لہذا درج بالا حقان اور معروضات کو مد نظر رکھتے ہوئے آپ جناب کی خدمت میں اپیل کی جاتی ہے کہ سن سائل محمد زبیر الیکٹریشن سکیل 4 کو میٹرکولیٹ کلاس 4 ملازمین کی فہرست میں شامل کرنے کے احکامات صادر فرمائیں تاکہ ترقی پا کر مزید خدمت اور لگن سے اپنی ڈیوٹی جاری رکھ سکوں۔ اس احسان کے لئے تاحیات آپ کی اور آپ کے بچوں کی عمر درازی کے لئے دعا گو ہوں گا۔

NOTES

M. Zahir
محمد زبیر الیکٹریشن، محکمہ انتظامیہ

PS
S.O (Admn)

العارض

Supt (Admn)
4/04/22

19/04/22
SECY: (ADMIN)
Afe AS-1
R
DSL (A)



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT
(ESTABLISHMENT WING)

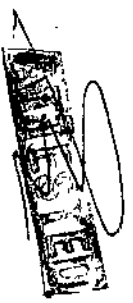
NOTIFICATION

Peshawar, dated the 6th December 2012.

No SOE.IV(E&AD)/1-35/2012:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous rules, issued in this behalf, the Establishment and Administration Department in consultation with the Finance Department hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification, which shall be applicable to posts in the Khyber Pakhtunkhwa Civil Secretariat, specified in column 2 of the said Appendix.

APPENDIX

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2	3.	4.	5.
1.	Superintendent.	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Assistant with atleast five years service as such.



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S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
2.	Assistant.	Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Clerks with at least five years service as Junior and Senior Clerk. (b) twenty-five per cent by initial recruitment.
3.	Senior Clerk.			By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerk with at least two years service as such.
4.	Junior Clerk.	(i) Matriculation with second division or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing	18 to 30 years	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst Dafnaris, Gestener Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed S.S.C Examination; and (b) sixty-seven per cent by initial recruitment.

Note: For the purpose of promotion, there shall be maintained a common seniority list of Dafnaries, Gestener Operators, Qasids, Naib Qasids etc., with reference to the dates of their acquiring the Secondary School Certificate.

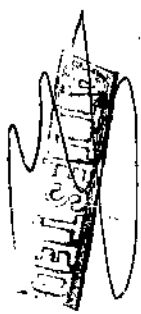


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S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5. Provided that: (a) if two or more officials have acquired the Secondary School Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post; (b) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.

CHIEF SECRETARY
GOVERNMENT OF THE NIVBER PAKHTUNKHAWA.




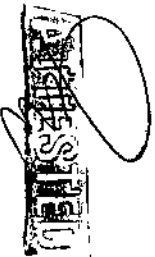
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Endst: No. SOE-IV(E&AD)/1-35/2012, dated 6th December, 2012

Copy forwarded for information and necessary action to:-

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Addl. Chief Secretary (FATA), Khyber Pakhtunkhwa.
3. The Chairman, Khyber Pakhtunkhwa Public Service Commission.
4. The Senior Member of Board of Revenue.
5. Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
6. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. The Chairman to Khyber Pakhtunkhwa Service Tribunal Peshawar.
9. The Private Secretary to Chief Secretary Khyber Pakhtunkhwa.
10. The Private Secretary to Secretary Establishment Department,
11. The P.A to Special Secretary (Estt. Reg), Establishment Department.
12. The P.A to Addl. Secretary (Estt. Reg), Establishment Department.
13. The PA to Addl. Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette.

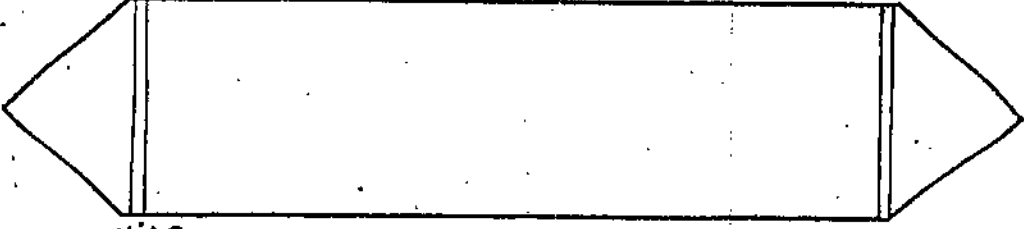

(NASIR AMAN)
SECTION OFFICER (E.I.V)



Adv Asad
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(16)

بعدالت



جنیف مسکری ۶۹

2 مخناب
بنام

عہد زسیر

23-12-2022

موزخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام ساعر کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلقہ دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا 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 درجہ جانا التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد ماکہ سندر ہے۔

المرقوم 23/12/2022

واہ العی کے لئے منظور ہے۔

بمقام