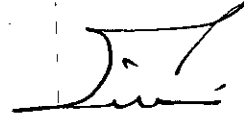


22.09.2021

Mr. Abdur Rauf Chohan, Advocate, for the appellant present and sought time for preliminary hearing. Adjourned. To come up for preliminary hearing before the S.B on 16.11.2021 at Camp Court Abbottabad.

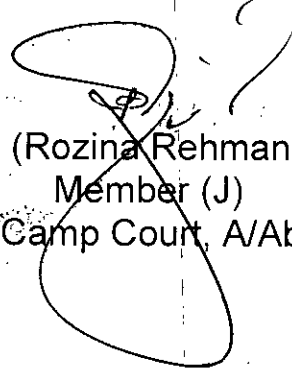

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

16.11.2021

Appellant present through counsel.

At the very outset request was made by the learned counsel for appellant seeking sine die adjournment of the present service appeal till the disposal of C.P.L.A pending before the Apex Court in respect of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

As such, the instant service appeal stands adjourned sine die. The appellant would be at liberty to seek restoration after decision by the Apex Court, if so desired.


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader


Due to summer vacation case to come up for the same on 1/19
10 / 20 at camp court abbottabad.


Reader

19.10.2020

Nemo for appellant.

Lawyers are on general strike, therefore, case is adjourned to 20.01.2021 for preliminary hearing, before S.B at Camp Court, Abbottabad. Notice be issued to appellant and her counsel for the date fixed.


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

20-1-21. Due to covid-19, The case is
adjourned to 22-8-2021 as before.


Reader.

Naheed Akhtar

16.11.2021

Appellant present through counsel.

At the very outset request was made ^{by lead counsel for applt seeking} for sine die adjournment of the present service appeal till the disposal of C.P.L.A pending ^{before} the Apex Court in respect of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012.

As such, the instant service appeal stands adjourn^{ed}/sine die. The appellant would be at liberty to seek restoration after decision ^{by} of the Apex Court, if so desired.

(Rozina Rehman)
Member (J)
Camp Court, A/Abad

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.38/2019

Date of Institution ... 04.01.2019
Date of Decision ... 08.11.2021

Bacha Khan (Certified Teacher) (BPS-15) Government High
School Sur Kamar, District Charsadda.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary,
Civil Secretariat Peshawar and four others.

... (Respondents)

Muhammad Iqbal,
Advocate

... For appellant.

Muhammad Adeel Butt,
Additional Advocate General

... For respondents.

Ahmad Sultan Tareen
Rozina Rehman

... Chairman
... Member (J)

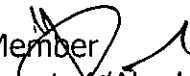
JUDGMENT

Rozina Rehman, Member(J): Brief facts of the case are that appellant was appointed as Certified Teacher at GMS Qalagai, Mohmand Agency. He was transferred to District Peshawar and then to G.H.S Zahid Abad District Charsadda on 07.02.2012. He was not considered for promotion despite repeated requests, hence; the present service appeal.

2. We have heard Muhammad Iqbal Advocate learned counsel for appellant and Muhammad Adeel Butt, learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

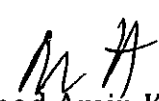
25.10.2019

Appellant absent. Counsel for the appellant absent. Notice
been issued to appellant for the date fixed to come up for
preliminary hearing on 20.12.2019 before S.B at camp court,
Abbottabad. Hearing on 20.12.2019 before S.B at camp court,
Abbottabad. Hearing on 20.12.2019 before S.B at camp court,
Abbottabad.


Member
Camp court, A/Abad
Member
Camp court, A/Abad
Camp court, A/Abad

20.12.2019

Counsel for the appellant present and requested for
adjournment. Adjourned to 20.02.2020 for preliminary
hearing before S.B at Camp Court Abbottabad.


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. _____ 909/2019 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/07/2019	<p>The appeal of Mst. Naheed Akhtar received today by post through Ch. Abdur Rauf Chohan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 10/7/19</p>
2-	18-7-19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>23-08-2019</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
	23.08.2019	<p>Dil Nawaz husband of the appellant on behalf of appellant present and seeks adjournment on the ground that learned counsel for the appellant is not available being indisposed. Adjourn. To come up for preliminary hearing on 25.10.2019 before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"><i>[Signature]</i> Member Camp Court, A/Abad</p>

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

Service Appeal No. 909 /2019

Mst. Naheed Akhtar daughter of Akhtar Hussain Malik, resident of CB-25, Rehmatabad, Cantt. Tehsil & District, Abbottabad.

....APPELLANT

VERSUS

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

....RESPONDENTS

SERVICE APPEAL


INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 6	
2.	Copy of appointment order	7-8-9	"A"
3.	Copy of reappointment order	10-11	"B"
4.	Copy of departmental appeal	12	"C"
5.	Wakalatnama	13	

Naheed Akhtar
...APPELLANT

Through

Dated: 08/07 /2019


(Ch. Abdur Rauf Chohan)
Advocate High Court, Abbottabad

1

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 909 /2019

Mst. Naheed Akhtar daughter of Akhtar Hussain Malik, resident of CB-25, Rehmatabad, Cantt. Tehsil & District, Abbottabad.

....APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 944

Dated 10/7/2019

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 (Female), District Abbottabad.

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974, FOR DECLARATION TO THE EFFECT THAT THE APPELLANT WAS REINSTATED IN SERVICE ON 09/08/2017 AND IS ENTITLED TO RECEIVED BACK BENEFITS I.E ALLOWANCES, INCREMENTS AND SENIORITY FROM TAKING OVER CHARGE OF HIS POST ON 20/08/1995 AND BRIDGE UP THE GAP I.E (CONTINUATION OF SERVICE) AND ALL THE INFRINGED BENEFITS BUT THE RESPONDENTS DEPARTMENT HAS FAILED TO

Filed to-day

Registrar
10/7/19

GIVE BENEFITS FROM THE DATE OF HIS APPOINTMENT, THE SAID ACT OF RESPONDENTS IS ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY, PERVERSE, DISCRIMINATORY AND AGAINST THE PRINCIPLE OF NATURAL JUSTICE.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPEAL, THE RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO PAY THE BENEFITS I.E ALLOWANCES, INCREMENTS AND SENIORITY TO THE APPELLANT FROM THE DATE OF HIS TAKING OVER CHARGE ON 20/08/1995, AND BRIDGE UP THE GAP (CONTINUATION OF SERVICE) AND ANY OTHER RELIEF DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth: -

1. That the appellant was appointed as CT teacher in the respondents' department on 20/08/1995 on regular basis. Copy of appointment order is attached as Annexure "A".
2. That the appellant was terminated from service on 13/02/1997. ~~_____~~

~~_____~~

3. That under the Sacked Employee Act, petitioner was reinstated on 09/08/2017 in service but the respondents department did not bridge up the gap (continuation) of service of former service towards present service and petitioner not given allowances, benefits and seniority from taking over charged i.e 20/08/1995. Copy of reappointment order is annexed as Annexure "B".
4. That feeling aggrieved, the appellant preferred departmental appeal before respondent No.2 on 27/03/2019. The said departmental appeal is still unattended. Copy of departmental appeal is attached as Annexure "C".
5. That feeling aggrieved, the appellant has now come to this Honourable Tribunal, assailing the impugned act of respondents being unwarranted at law and facts, inter-alia, on the following grounds:-

GROUND:-

- a. That the impugned act of refusal of payment of benefits to the appellant is illegal, unlawful, without lawful authority, without jurisdiction, perverse, discriminatory and against the

principle of natural justice, hence liable to be set aside.

- b. That, the impugned act of respondents is a worst example of discrimination and misuse of powers/ authority.
- c. That the respondents are bound to act according to law. It is universally accepted principle of law that when law prescribe something to be done in a particular that must be done in same manner and not otherwise. A proper procedure has been prescribed in the law on the subject which has been violated by respondents.
- d. That the appellant is reinstated in service on 09/08/2017, therefore, the appellant is also entitled to be paid the back benefits. The respondents are reluctant to pay the same which is liable to be struck down.
- e. That it is inalienable right of every citizen to be treated in accordance with law and especially when placed in similar position with the other persons, thus, the impugned act of respondents being nullity in the eye of law is liable to be struck down.

- f. That due to the illegal act of respondents, a huge loss has been caused to the appellant with respect to his allowances, increments and seniority.
- g. That no other efficacious, speedy and adequate remedy is available to appellant except the instant appeal.
- h. That the other points shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant appeal, the respondents may graciously be directed to pay the benefits i.e allowances, increments and seniority to the appellant from the date of his taking over charge on 20/08/1995, and bridge up the gap (continuation of service) and any other relief deemed fit and proper in the circumstances of the case.

Nahud Akhbar

...APPELLANT

Through

Dated: 08/2019 /2019

(Ch. Abdur Rauf Chohan)

(Ch. Abdur Rauf Chohan)
Advocate High Court, Abbottabad

VERIFICATION:-

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

Nahud Akhbar

...APPELLANT

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

Service Appeal No. _____/2019

Mst. Naheed Akhtar daughter of Akhtar Hussain Malik, resident of CB-25,
Rehmatabad, Cantt. Tehsil & District, Abbottabad.

....APPELLANT

VERSUS

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

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mst. Naheed Akhtar daughter of Akhtar Hussain Malik, resident of CB-25,
Rehmatabad, Cantt. Tehsil & District, Abbottabad, do hereby solemnly affirm and
declare that the contents of forgoing appeal are true and correct to the best of my
knowledge and belief and nothing has been concealed therein from this
Honourable Court.

Naheed Akhtar

DEPONENT

Attested
Ch: Abdur Rauf Chohan
Advocate High Court
Office 280 Lawyer's Plaza I.
0347-3146975

Amer "A" 7

OFFICE OF THE DISTRICT DIRECTOR OF EDUCATION(S) HAZARA DIVISION, ABBOTTABAD.

OFFICE ORDER NO: 87 / AE-VIII / CE (F)
D. JED ABBOTTABAD THE 20/8/99.

APPOINTMENT:-

The following appointment of 11/T candidates are hereby ordered on CT post as noted against each in RPS-5 (No. 1605-97-3060) and RPS-14 (Rs. 2065-161-4404) in case of trd./B.A.E. 5c with end Fivn:) + usual allowances admissible under the rules on the following terms and conditions:-

S.No.	Name of candidate with qualification & address.	School where appointed.	Remarks.
1.	Mst: Naheed Akhtar, D/O Akhtar Hussain Shakir Malik, BA, r/o H.No. 184, near Ummer Masjid, Link Rd: Narian, Abbottabad.	GGMS, Mohri bed Bhen.	agaveant CT post

CONDITIONS:-

- The appointments are purely on temporary basis and liable to termination at any time without notice or assigning reasons.
- They should produce their age and health certificate from the concerned Medical Superintendent.
- The Head of Institutions/Office are required to check all the original Educational/Qualification/Professional Certificates before handing over them.
- The newly appointed Head of Institution/Office are required to get verify their academic certificate from Board/University concerned.
- Appointment of trained candidates who passed their Professional Exam: from other than NWFP, is provisional & subject to the verification of certificate.
- In case they wish to resign from service/post they will have to give one month's prior notice or forfeit one month's pay in lieu of short notice.
- The appointment shall stand automatically cancelled if they failed to join the post within 15 days of the issue of this order.
- Special relaxation of upper age limit for 2 yrs: has already been allowed with Govt: of NWFP, S&GAD letter No: SOS-JII (S&GAD) 8(4) 14, dated 13.7.1991.
- They should not be handed over charge if their age exceed years or below 18 years.
- No TA/DA is allowed on 1st appointment.
- Charge reports should be sent to all concerned.

Enst: No: 19819-25

Copy of the above is forwarded to the:-

1. P/S to Minister for Education (S/O) NWFP, Peshawar.
2. P/S to Minister for S/Welfare & Hospital.
3. Director Secy: Education, NWFP, Peshawar.
4. District Education Officer (Male/Female) Abad, Pingshra, Haripur & Kohistan.
5. Principal, Headmaster, Headmistress, CHSS/GSS/GPS Chakri, Mahli, ...
6. District Accounts Officer, (B) A.D.F.O. (E) Local Office, (9) T/A to DDE
7. Candidate concerned.
8. Office order file.

(HAJI SARMUJ HILAL)
DISTRICT DIRECTOR OF EDUCATION(S)
HAZARA DIVISION, ABBOTTABAD.
Dated 20-8/99.

Attested

Ch: Abdur Rauf Chohan
Advocate High Court
Office 201 Lawyer's Plaza I
0347-3146975

Ch: Abdur Rauf Chohan
Advocate High Court
Office 201 Lawyer's Plaza I
0347-3146975

For/Dist: Director of Edu (S)
Hazara Division, Abbottabad.

OFFICE OF THE DIVL: DIRECTOR OF EDU: (SCHOOLS) HAZARA DIV: A. ABAAD.

GRADED PAY.

Mst. Naheed Akhtar, C.T., Govt: Girls Middle School Mohri Bed Ehen (A/Abad) is hereby allowed to draw graded pay in EPS-14 @ Rs. 2065-144-4410 w.e. from 21.8.1995.

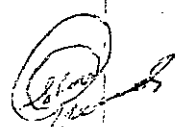
Necessary entry to this effect should be made in her Service Book.

(FAZAL-UR-REHMAN KHAN)
DIVL: DIRECTOR OF EDU: (SCHOOLS)
HAZARA DIVISION, ABBOTTABAD.

Endst: No. 15145-47 / AE-VIII/C. Pay-II dated A/Abad the 14-12 /95.

Copy to the :-

1. District Education Officer (Female) Secondary A/Abad w/r to her No. 31326/AE-II/P. File dated 14.11.95.
2. Headmistress, GGUS Mohri Bed Ehen A/Abad.
3. Teacher concerned.


For/Divl: Director of Edu: (Schools)
Hazara Division, Abbottabad.

started.
Ch: Abdur Rauf Chohan
Advocate High Court
Office 28 Lawyer's Plaza I
0347-3146975

order file.

(1) Local Office, (2) I/A to DDE

For/Divl: Director of Edu: (S)
Hazara Division, Abbottabad.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



0992-342533, 0992-342314



deofemale_abbottabad@yahoo.com

CORRIGENDUM.

Please read GGHSS Hajia Gali instead of GGMS Makol Bala occurring at S.No.1 Mst:Naheed Akhtar vide this office order No.5124-38/Apptt: of sacked employ dated 07-08-2017

District Education Officer
(Female) Abbottabad

Endst:No. S306-11 /Corrigendum Sack employ

Dated 9/8 /2017.

Copy to the:

- 1. Principal GGHSS Hajia Gali
- 2. District Accounts Officer Abbottabad
- 3. B & AO local office
- 4. Candidate concerned
- 5. O order file.

District Education Officer
(Female) Abbottabad

Corrigendum sacked employ

Ch: Abdur ~~Rah~~ Chohan
Advocate High Court
Office 28 Lawyer's Plaza I
0347-3146975

Annex B 10

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. S/2438/ Apptt of Sacked Employee

Dated A. Abad the: 7/8/08/2017

0992-342533, 0992-342314

deofemale.abbottabad@gmail.com

APPOINTMENT OF SACKED EMPLOYEES AGAINST CT POST

In pursuance to the Judgment of Honorable Peshawar High Court Abbottabad Bench in W.P No.516-A / 2013 announced on 24.5.2016 & recommendation of the Departmental Selection Committee, appointment of the following sacked employees is hereby ordered against the vacant posts of CT, in BPS-15 @ (Rs. 16,120-13,300-56020) plus usual allowances as admissible under the rules under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:

S#	SR. No	Name of Candidate	Father's Name	DOB	Reason of Termination	D/O Appointment	Qualification	Previous School	Present place of posting	Remarks
1	2	Naheed Akhter	Akhter Hussain	04/02/1966	Illegal	20/08/1995	B.A	GGMS Mohri Bed Bhen	GGMS Makool Bala	A.V. Post
2	4	Waheeda Rehman	Khalil ur Rehman	01/10/1972	Illegal	10/03/1996	B.A/CT /B.Ed	GGMS Kari Raiky	GGHS Upper Kehal	A.V. Post
3	5	Shazia Rahim	Muhammad Rahim	12/10/1972	Illegal	NIL	F.A/CT	GGMS Dasoo	GGHS Mailach	A.V. Post
4	6	Nayyer Zaman	Raja Badi Uz Zaman	01/01/1973	Illegal	25/02/1996	F.A, B.Ed	GGMS Dasoo	GGHS Nagri Tutial	A.V. Post
5	7	Niaz Iqbal	Muhammad Iqbal	16/03/1973	Illegal	10/12/1995	F.A/CT	GGHS Hajia Cali	GGMS Kasala	A.V. Post
6	9	Fozia Ajab	Ajab Khan	10/05/1975	Illegal	24/03/1996	B.A	GGHS Kunj	GGMS Pattan Kal	A.V. Post
7	10	Sajida Saklar	Mir Muhammad	15/01/1976	Illegal	19/12/1995	B.A	GGMS Nara Doga	GGMS Riyala Monin Abad	A.V. Post
8	11	Robina Shaheen	Muhammad Iqbal	12/11/1976	Illegal	24/03/1996	B.ACT	GGMS Mallkpora	GGMS Tajwal	A.V. Post

- TERMS AND CONDITIONS**
- No TA/DA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Their Appointment is subject to the condition that their certificates/documents are verified from the concerned authorities by the DEO Office, anyone found producing bogus Certificates/documents proceeded against through law enforcing agencies.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate regarding verification of their documents is issued by this office.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.

[Handwritten signature]

SUNAIL
BOOKS & PHOTOSTATE
Link Road Band Kho Abbottabad
Cell: 9344-9443494, 0334-8997928

Attested

Ch: Abdur Rauf Chohan
Advocate High Court
Office 28 Lawyer's Plaza
0347-3146975

their services shall be terminated at any time, in case their performance is found unsatisfactory. In case of misconduct, they shall be preceded under the rules framed from time to time. Before handing over charge, once again their document may be checked by the DDO concerned, if they have not passed the above qualification, they may not be handed over charge of the post.

- The prescribed qualification for appointment of CT is B.A with CT/Diploma in Education /ADE as professional qualification. They shall be provided opportunity to appear in the HSSC/PTC/Diploma in Education /ADE Exam from the recognized Board/University within three years. In case they failed to acquire the requisite qualification/training certificate within the stipulated period, their service shall stand terminated automatically. The stipulated period shall be reckoned from the date of taking over charge.
- Their appointment is subject to the medical fitness & verification of their character antecedents to the stratification of the undersigned in the light of section-3 of the Khyber Pakhtunkhwa SACKED Employees (Appointment) Act, 2012.
- The period of dismissal, removal and termination from service of the SACKED employees till the date of their appointment shall be deemed to have been automatically relaxed and there shall be no further relaxation under any rules for the time being in force in the light of section-4 of the Khyber Pakhtunkhwa SACKED Employees (Appointment) Act, 2012.
- SACKED employees shall not be entitled to claim seniority, promotion or other back benefits and their appointment shall be considered as fresh appointment in the light of section-5 of the Khyber Pakhtunkhwa SACKED Employees (Appointment) Act, 2012.
- They should join their post within 30 days of issuance of this appointment order, in case of failure to join the post within stipulated period, appointment will stand expired automatically and no subsequent appeal shall be entertained. & the next senior sacked employee shall be considered for appointment in the light of section-7 (3) of the Khyber Pakhtunkhwa SACKED Employees (Appointment) Act, 2012.
- Copy of professional standards, core competencies and job description issued vide Govt. of Khyber Pakhtunkhwa E&SED Notification No. SO(PE)4-3/CT/2014 dated 17-09-2014 is attached with the appointment order.

[Signature]
District Education Officer
(Female) Abbottabad

Even Endst No & Date

Copy for information to the:

1. Additional Registrar Peshawar High Court Abbottabad Bench w/r to Judgment passed in W.P No.516-A / 2013 announced on 24.5.2016
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Comptroller of Accounts Abbottabad.
4. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department Peshawar.
5. AP EMIS local office.
6. Candidates Concerned.
7. Master File.

[Signature]
District Education Officer
(Female) Abbottabad



[Signature]
Ch: Abdur Raaf Chohan
Advocate High Court
Office 28 Lawyer's Plaza I
0347-3146975

Anz C
12

To,

The Director Education,
E & SE KPK Peshawar.

Subject: Departmental Representation

Honourable Sir,

The applicant / appellant submitted as under.

1. The applicant / appellant was appointed as C.T in the department on 20/08/1995 on regular basis. copy of Appointment order annexed as annexure "A".
2. That the service of applicant / appellant was terminated on 13/02/1997. copy of termination letter is annexed as annexure "B"
3. That the applicant / appellant was reinstated in service on 09-08-2017 by the Honourable Peshawar High Court/department.
4. That department did not bridge ups the gap (continuation) of services of former service towards, allowances, increments and seniority from taking over charge dated 20/08/1995.
5. That applicant / appellant demands including / Accounting his previous service in present service, allowance , increments and seniority from taking over charge dated 20/08/1995 and payment all the previous dues / back benefits since his appointment.

Dated: ~~27-03-2019~~

Yours Sincerely

Naheed Akhter

Mst. Naheed Akhter

CT. BPS15

CB.25 Rehmatabad

Cantt, Abbottabad

Abdur Rauf Chohan
Ch: Abdur Rauf Chohan
Advocate High Court
Office 28, Lawyer's Plaza I
0347-3146975

کورٹ فیس

وکالت نامہ

بعدالت سروس ٹرانسومیل رجا اور

عنوان: صہاء نائید اختر بیام گوانڈہٹ KPM ۵

منجانب: Petitioner

نوعیت مقدمہ: Appeal

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسے پیروی وجواب دہی کل کاروائی متعلقہ آں مقام
ایبے آباد کے لے راجداری سبھاروف وولمن اینڈ وکسٹ معراج کورٹ ایبے آباد

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 کرانے 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 ہر جانہ 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 بھینچہ مفلسی کے دائرہ کرنے اور اس کے
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 08/07/2019

بمقام: ایبے آباد

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Nabeed Akhtar