


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 521/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/03/2023	<p>The appeal of Mr. Ibrar ud Din presented today by Mr. Anwar Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Hon. Member  
Copy

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

Service Appeal No. 521 /2023

With Interim Relief Application No. \_\_\_\_\_ /2023

Ibrar-ud-Din Chowkidar, Government Primary School Azamabad, Tehsil  
Mathra, District Peshawar.....Appellant

Versus

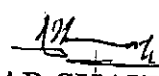
1. The Secretary, Elementary & Secondary Education,  
Government of Khyber Pakhtunkhwa Civil Secretariat, Peshawar  
and 6 others.....Respondents

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Appellant

Through

  
(ANWAR SHAH)  
Advocate High Court Peshawar

1

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

Service Appeal No. 521 /2023

With Interim Relief Application No. \_\_\_\_\_/2023

Ibrar-ud-Din Chowkidar, Government Primary School  
Azamabad, Tehsil Mathra, District Peshawar..... Appellant

Versus

1. The Secretary, Elementary & Secondary Education,  
Government of Khyber Pakhtunkhwa Civil Secretariat,  
Peshawar
2. The Director (Elementary & Secondary Education) Khyber  
Pakhtunkhwa, Peshawar
3. The Assistant Director (Admin)  
Directorate Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar
4. The District Education Officer (Male) Government of  
Khyber Pakhtunkhwa, Peshawar
5. The Sub-Divisional Education Officer (Male) Town-II  
Peshawar
6. The Assistant Sub-Divisional Education, Circle Mathra  
Road, Peshawar
7. The Head Master, Government Primary School, Azamabad,  
Peshawar..... Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE  
TRIBUNAL ACT 1974 FOR RELEASE OF APPELLANT'S SALARY  
WHICH WAS STOPPED FOR UNKNOWN REASONS AND  
WITHOUT ANY FAULT, RHYME AND REASONS, COUPLED  
WITH CONDUCTING ANY ENQUIRY ETC.**

2

## PRAYER IN SERVICE APPEAL

ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE RESPONDENTS ACT FOR STOPPAGE OF APPELLANT SALARY FOR THE MONTH OF SEPTEMBER 2022 MAY GRACIOUSLY BE DECLARED AS ILLEGAL, UNJUSTIFIED AND WITHOUT RHYME/REASON, WHICH ACT IS REFLECTED IN THE APPELLANT STATEMENT OF ACCOUNT BEARING NO.1112-000213394334 MAINTAINED IN UNITED BANK LIMITED 1112-HAYATABAD BRANCH PESHAWAR. AND MAY GRACIOUSLY BE DIRCTED TO RELEASE HIS MONTHLY SALARY FROM THE MONTH OF SEPTEMBER 2022 AND ONWARD TOO.

Respectfully Sheweth,

1. That the Appellant was appointed as Chowkidar in Government Primary Sch9ool, Azamabad, Peshawar on 21-12-2012 which is evident from the Charge Report duly signed by respondent-5.

**Copy of the Appellant Charge Report on 21-12-2012 at Annexure-I**

2. That after appointment as Chowkidar the Appellant used to perform his duty as Chowkidar in the aforesaid Government Primary School Azamabad, Peshawar under the direction and supervision of the Respondent No.6 being the most relevant/Incharge person from the date of his appointment.
3. That the Appellant used to perform his Duty upon the direction of Respondent-6 order mostly during night time while some time in Day Shift too. It is added that there was difficulties for the Appellant to mark attendance especially during the night shift due to the reason that while leaving the premises/school, the attendance Register remained in the Custody/control of the concerned relevant Office Staff usually available in Day times.

4. That the Appellant in order to avoid any mishap/objection on precautionary basis, the Appellant requested the Respondent-7 to issue him proper order in writing for Night time duty as Chowkidar and the Respondent-6 allowed in writing to work in night time. In this connection the Respondent-6 had allowed in writing on 23-4-2019 with direction to perform duty as Chowkidar during Night time. In case of failure in duty in the Night hours, the Appellant was made responsible for any kind of incident.

**Copy of the Respondent-6 permission in the shape of direction dated 23-4-2019 at Annexure-II**

5. That upon his regular duty as Chowkidar during the night time upon the proper written permission of Respondent-6 dated 23-4-2019, the Sub-Divisional Education Officer (Male) Town-II, Peshawar vide letter No.779 dated 25<sup>th</sup> August 2022 wrote by enclosing copy of Show Cause Notice addressed to the ASDEO(M) Circle Mathra Peshawar in which it was duly mentioned to inform the concerned Teacher for strict compliance. It may also be added that the concerned ASDEO Circle Mathra confirmed the receipt of the Show Cause Notice on 14-09-2022.

**Copy of the Respondent- 5 letter No.779 dated 25-08-2022 addressed to ASDEO (M) Circle Mathra Peshawar on which remarks contained thereupon of ASDEO dated 14-09-2022 enclosed herewith as Annexure-III**

6. That it is worth mentioning that in the aforesaid case, the Respondent-4 issued Show Cause notice undated addressed in the name of Appellant in which allegation of willful absence from duty since 02-07-2022 was levelled.

**Copy of the Show Cause Notice undated at Annexure-IV**

4

7. That though the Appellant furnished Reply to the aforementioned undated Show Cause Notice in which various reasons have been explained on 19-9-2022 addressed to the Respondent-4.

**Copy of the Reply to the Show Cause Notice dated 19-9-2022 at Annexure-V**

8. That without considering the contents, reasons and averments mentioned in the Reply to the Show Cause Notice dated 19-9-2022, the respondents stopped the Appellant monthly Salary due as on 1-10-2022 which is apparently evident from the Statement of Account at United Bank Hayatabad Branch Peshawar which is still not yet released, and thus the Appellant was deprived from his legitimate monthly Salary from 1-10-2022 till now.

**Copy of Appellant Bank Statement showing non-credit of month salary due on 1st Sept 2022 at Annexure-VI**

9. That the Appellant also clarified through an Application addressed to the Respondent-7 dated 22-11-2022 which is self explanatory regarding reasons of Show Cause Notice coupled with Release of his Salary.

**Copy of Application dated 22-11-2022 addressed to Respondent- 7 at Annexure-VII**

10. That malafide intention can be assessed from the another fresh notice issued by the Respondent-7 dated 23-2-2023 addressed in the name of Chowkidar in which the Appellant was also directed to be present on duty for Day as well as Night, which means that the Appellant will perform his duty for 24 hours.

5

Copy of the fresh directions addressed to Appellant/Chowkidar dated 23-2-2023 at Annexure-VIII & IX

11. That the Respondent-2 Directorate are violating own Circle/Notification issued vide No.488-538/F.No.202/GB dated 3-4-2018 regarding observing (8) Duty Hours fixed for Chowkidars like the Appellant, hence, the Respondents violated their own Notification dated 3-4-2018 which is a malafide act on their part.

Copy of Respondent-2 Notification issued vide No.488-538/F.No.202/GB dated 3-4-2018 regarding (8) Duty Hours fixed for Chowkidars at Annexure-X

12. That the Appellant approached the Respondent-2 by way of Departmental Representation on 14-11-2022 in which it was requested to release the Appellant salary with effect from September 2022 till now and onward but till completion of statutory period of 3 months, no response was communicated on aforesaid Departmental Appeal/Representation dated 14-11-2022.

Copy of Appellant's Departmental Appeal dt 14-11-2022 at Annexure-XI

13. That Appellant prefers the instant Service Appeal before this Honourable Tribunal on the following grounds, inter alia :-

6  
**FOUNDATIONS**

- A. That Respondents act for stoppage is monthly Salary w.e.f. 1st September 2022 is illegal and unjustified which is not tenable in the eye of law.
- B. That without conducting any proper Inquiry such type of harsh punishment cannot be permitted under any law.
- C. That the Respondent-7 had basically authorized the Appellant in writing to perform his Duty as Chowkidar during the Night time as Respondent-7 is the most relevant and over all Controller in the School Affairs, hence the Appellant duly acted and performed his duty. It is also added that even Appellant duty during the Night time exceeds 8 hours as per order notified by Respondent-2 directions vide letter dated 3-4-2018.
- D. That even the Respondent-7 recent instruction dated 23-2-2023 is a clear violation of the 8 Hours duty duly circulated for Chowkidars by Respondent-2 which fresh instruction dated 23-2-2023 tantamount as warning as well as against the principle of Natural Justice as demand and warning for 24 hours duty cannot be ordered which is an illegal order which should have been withdrawn and clarified once for all in order to avoid any confusion.
- E. That Respondents failed to communicate any kind of direct correspondence with the Appellant, rather all the correspondence took indirectly and in such an eventually of indirect Stoppage of Salary is severe punishment which is tantamount to an illegal, unjustified and unlawful act which cannot be permitted and allowed under any law of the land.



F. That Monthly Salary of the Appellant was stopped with effect from September 2022 without any final order communicated to him nor any proper Inquiry conducted under the prevailing laws, hence such act of stoppage monthly salary is a harsh punishment which is awarded prior to any order in writing,

G. That under the law, Appellant can never been issued direction for duty over and above the prescribed 8 hours for which the Respondent-2 circulated and notified in the entire Education Directorate. Hence any action in violation of the said Directive cannot be ordered/implemented by force. So such order for asking/performance of duty beyond 8 duty hours can be treated as an illegal, unauthorized act which is not permissible under the law/rules.

H. That the Appellant will also raise certain other Legal and Factual points at the time of arguments with prior permission of this Honourable Tribunal.

PRAYER:- It is, therefore, humbly prayed that on acceptance of the instant Service Appeal, the Appellant Salary may graciously be ordered to be released from September 2022 till now and onward without any stoppage/interruption.

Any other relief deemed appropriate by this Honourable Tribunal not specifically asked fir in the circumstances of the case which deems fit may also be granted with costs.

Appellant

Ibrar-ud-Din

Through

(ANWAR SHAH)

Advocate High Court,

Off:12, K-3, Phase-3, near Yousafzai

Market, Hayatabad Peshawar

**Affidavit**

I, Ibrar-ur-Din, Chowkidar at Government Primary School Azamabad, Tehsil Mathra, District Peshawar solemnly affirm and declare on oath that the content of the instant Service Appeal are true and correct according to my knowledge and belief and that nothing has been concealed intentionally from this Hon. Tribunal.

Deponent <sup>hwt</sup>

(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2023

With Interim Relief Application No. \_\_\_\_\_/2023

Ibrar-ud-Din Chowkidar, Government Primary School  
Azamabad, Tehsil Mathra, District Peshawar.....Appellant

Versus

1. The Secretary, Elementary & Secondary Education,  
Government of Khyber Pakhtunkhwa Civil Secretariat,  
Peshawar and 6 others.....Respondents


**Application for Temporary Injunction to the extent  
of issuance of direction to the Respondents to start  
monthly Salary to the Petitioner as Chowkidar  
from the current month of Feb 2023 (due in March  
2023) till disposal of the main Service Appeal**

Respectfully Sheweth,

1. That the Petitioner has filed Service Appeal before this Honourable Tribunal today in which no date of hearing has yet been fixed.
2. That the instant Application for interim Relief may graciously be treated and considered as an integral part of the main Service Appeal.
3. That all the three Essential Ingredients for granting Interim Relief i.e. Prima Facie Case, Balance of Convenience and Irreparable Losses are in favour of the Petitioner.

- ③
4. That the Respondents have illegally and unlawfully stopped monthly Salary of the Petitioner as Chowkidar with effect from ~~1st~~ September 2022 which continued till now and in future without any fault of the Petitioner coupled with conducted any Inquiry as per law.
  5. That the Petitioner is facing great hardship in absence of getting any monthly Salary despite performance of Duty in the Night time in the aforesaid School exceeding over and above the required 8 duty hours for Chowkidar.
  6. That monthly Salary has not released the current month of Feb 2023, then the Petitioner will face further great financial hardship, therefore the Respondents be directed to pay the monthly Salary for Feb 2023 (due in March 2023)

Prayer:- It is, therefore humbly prayed that Interim Relief Application may graciously be allowed and the Respondents may graciously be issued direction to start and pay his monthly Salary as Chowkidar for the month of Feb 2023 (due in March 2023 till disposal of the main Service Appeal.

  
Petitioner

Ibrar-ud-Din

Through

  
(ANWAR SHAH)

Advocate High Court,

Off:12, K-3, Phase-3, near Yousafzai

Market, Hayatabad Peshawar

**Affidavit**

I, Ibrar-ur-Din, Chowkidar at Government Primary School Azamabad, Tehsil Mathra, District Peshawar solemnly affirm and declare on oath that the content of the instant Service Appeal are true and correct according to my knowledge and belief and that nothing has been concealed intentionally from this Hon. Tribunal.

Deponent <sup>with</sup>

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Head Master  
Govt. primary School  
Azam Abul Pesh



Assistant Sub Division  
Education Officer  
Circle Matara Peshawar.

Handwritten signature and date: 21-12-12

Sub: Divisional Edu. Officer  
M. Primary Peshawar.

مہربانیت کے لئے جو اسرار  
آپ کو پہنچائیں گے وہ سب

کہ طاعت و سنت کی کوئی کمی نہ رہے

حوادثِ بد سے محفوظ رہیں اور

پا سہولتیں حاصل ہوں اور

کچھ نقصان بھی نہ ہو

جو کہی ہے وہ سب درج ہے

میں اور یہ سب جو درج ہے

میں ہے

*(Signature)*

b102/h/52

*(Signature)*

b102/h/52

Annexure III (13)



OFFICE OF THE SUB DIV. EDUCATION OFFICER (M) TOWN-II PESHAWAR

No. 779

sdcomalepeshawar@gmail.com

dated 25/08/2022

To

The ASDEO (M)  
Circle Mathra Peshawar

Subject: SHOW CAUSE NOTICE.

Memo: Enclosed please find herewith a show cause notices in r/o Mr. Ibrar Ud Din Chowkidi, CPS Azam Abad Peshawar.

You are hereby directed to inform the teachers concerned for strict compliance.

Encls: Token of show cause.

*A 2/2/08*  
SUB DIVISIONAL EDUCATION OFFICER  
(MALE) TOWN-II PESHAWAR  
*del*

Endst. No. \_\_\_\_\_ / Dated Peshawar the \_\_\_\_\_ / 2022

Copy of the above is forwarded to the,

- 1) DFO (M) Peshawar with reference to his letter Nos. 4577 dated: 15/03/2022 for information.
- 2) PSHT concerned.
- 3) Official concerned.
- 4) Office file.

*del*  
SUB DIVISIONAL EDUCATION OFFICER  
(MALE) TOWN-II PESHAWAR

I, ASDEO Circle Mathra  
have received the Show cause  
letter today i.e on 14-09-2022

*del*  
14/09/2022



Annexure  
14 (14)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.**

**SHOW CAUSE NOTICE.**

I, Mr. Sajjad Akhtar Iqbal DEO (M) Peshawar, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, do hereby serve you, Mr. Ibrar Ud Din Chowkidar Govt: Primary School Azamabad as follows:

- (i) The SDEO (M) Town - II Peshawar reported that you are willful absent from your duty since 02-07-2022.
- (ii) You are willful absent from your duty without any prior information.
- (iii) You did not take any interest in your duty.

I am satisfied that you have committed the following acts/omissions specified in rule 4 of the said rules:

"Mis-conduct"

As a result, thereof, I, as Competent Authority, have tentatively decided to impose upon you the major penalty under rule 4 of the said rules.

You are, thereof, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you want to be heard in person.

If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and, in that case, an ex-parte action shall be taken against you.

COMPETENT AUTHORITY  
DISTRICT EDUCATION OFFICER,  
(Male) PESHAWAR.

Un-dated ?

(15)

Registered

With the ...  
with the ...  
...

To

The SDEO (M) ...  
Peshawar

Subject SHOW CAUSE NOTICE

Memo

I am directed to refer to the subject cited above and you are directed to advise the enclosed show cause notice upon Mr. Ibrar Ullah Chaudhary of your Station and submit a copy in token having received the notice to this office for reply to be received and received please

Reply to show cause notice should be furnished within the stipulated time period

Encs as above

*Mr. Ibrar Ullah Chaudhary*

DY District Education Officer  
Male Peshawar

*11/11/81*

Annexure V  
16

To:- **The Honourable**  
**District Education Officer (Male)**  
Peshawar

Subject:- **Reply to Show Cause Notice un-dated**

Respected Sir,

Kindly refer to the Show Cause Notice issued by your honour dated nil, copy of which was enclosed by Sub-Divisional Education Officer (Male) Town-II Peshawar addressed to the ASDEO (M) Circle Mathra Peshawar which bears his signature dated 14-9-2022. Copy of the said letter from the office of ASDEO (M) Circle Mathra obtained on 16-9-2022.

**Copy of letter obtained from the office of the ASDEO Circle Mathra which bears his signature dated 14-9-2022 at as Annexure-A**

1. In this connection, I may be allowed to state that Show Cause Notice is not based on real facts on the following reasons :-

a. That it is on record that undersigned is performing his duty as Chowkidar at Government Primary School Azamabad, for which the then Head Master name Mr. Shamshad Khan had already circulated certain instruction for Chowkidar on 23-4-2019.

**Copy of the then Head Master of the said School dated 23-4-2019 at Annexure-B**

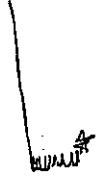
b. That from the above it is clear that the Applicant is performing his duty as Chowkidar and whose duty is more than 12 hours.

c. That there is impossible for Chowkidar to mark his attendance in the Attendance Register in the Night time.

d. That upon Government instruction, 8 Hours Duty for Chowkidars have already been circulated vide Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar vide Notification No.488-538/F.No.202/G.B. dated 3/4/2018 while the Applicant is performing his duty for more than 12 hours from 7 P.M. to 7 A.M.

Copy of the Directorate of Education, Elementary & Secondary Education KPK No.488/538/F.No.202/G.B dated 3-4-2018 at Annexure-C

- e. That it is evident the Applicant is performing his duties as Chowkidar for over 12 hours which is also violative of the instructions issued by the Directorate of Elementary & Secondary Education, KPK, Peshawar vide Circular dated 3-4-2018 upon the Court Judgement.
2. That it is further requested the Applicant may also be allowed Personal Hearing before your kind honour.
3. Keeping in view the above facts, the Applicant has never wilfully absented himself but due to performance his Duty as Chowkidar in the night time and for this reason marking in the Register is impossible for him.
4. Hence for such reasons, the Show Cause Notice may graciously be withdrawn and vacated with a request to stop further process in the matter and obliged.

  
Ibrar-ud Din  
Chowkidar

Govt. Primary School Azam Abad

Dated 19/Sept.2022

3440  
19/9/2022

1112-HAYATABAD TOWN, PESHAWAR  
 IBRAR UD DIN  
 H NO 215  
 ST NO 23 SECTOR D-4  
 PHASE-I HAYATABAD

Reg Cell No : 03329217206  
 IDAN No: PK73 UNIL 0109 0002.1339 4334 CIF#: 30770724

Statement Period:	From 01-JUN-2022 To 24-JAN-2023
Account No:	000213394334
Account Type:	CURRENT
Product Type:	BASIC BANKING ACCOUNT
Currency:	PAKISTANI RUPEE
Balance:	.00
As of:	24-JAN-2023

Date	Particulars	Inst No	Debit	Credit	Balance
01-JUN-2022	** OPENING BALANCE **				750,131.19 Cr
01-JUN-2022	CASH WITHDRAWAL - ATM (BR: 0271)		5,000.00		745,131.19 Cr
01-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		735,131.19 Cr
01-JUN-2022	I LINK WITHDRAWAL FEE		18.75		735,112.44 Cr
01-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		725,112.44 Cr
01-JUN-2022	I LINK WITHDRAWAL FEE		18.75		725,093.69 Cr
01-JUN-2022	TRANSFER			29,412.00	754,505.69 Cr
01-JUN-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		34,961.34		719,544.35 Cr
02-JUN-2022	POS SALE - MASTERCARD		2,000.00		717,544.35 Cr
02-JUN-2022	CASH WITHDRAWAL - ATM		15,000.00		702,544.35 Cr
03-JUN-2022	CASH WITHDRAWAL - I LINK		15,000.00		687,544.35 Cr
03-JUN-2022	I LINK WITHDRAWAL FEE		18.75		687,525.60 Cr
03-JUN-2022	POS SALE - MASTERCARD		1,500.00		686,025.60 Cr
05-JUN-2022	CASH WITHDRAWAL - I LINK		15,000.00		671,025.60 Cr
05-JUN-2022	I LINK WITHDRAWAL FEE		21.25		671,004.35 Cr
05-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		661,004.35 Cr
05-JUN-2022	I LINK WITHDRAWAL FEE		21.25		660,983.10 Cr
08-JUN-2022	POS SALE - MASTERCARD		3,000.00		657,983.10 Cr
08-JUN-2022	CASH WITHDRAWAL - ATM (BR: 0271)		40,000.00		617,983.10 Cr
08-JUN-2022	CASH WITHDRAWAL - ATM (BR: 0271)		25,000.00		592,983.10 Cr
11-JUN-2022	CASH WITHDRAWAL - I LINK		25,000.00		567,983.10 Cr
11-JUN-2022	I LINK WITHDRAWAL FEE		21.25		567,961.85 Cr
11-JUN-2022	CASH WITHDRAWAL - I LINK		7,000.00		560,961.85 Cr
11-JUN-2022	I LINK WITHDRAWAL FEE		21.25		560,940.60 Cr
13-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		550,940.60 Cr
13-JUN-2022	I LINK WITHDRAWAL FEE		21.25		550,919.35 Cr
14-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		530,919.35 Cr
14-JUN-2022	I LINK WITHDRAWAL FEE		21.25		530,898.10 Cr
15-JUN-2022	SMS FEE- LIABILITY PRODUCTS		120.00		530,778.10 Cr
15-JUN-2022	FEDERAL EXCISE DUTY		18.00		530,760.10 Cr
15-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		510,760.10 Cr
15-JUN-2022	I LINK WITHDRAWAL FEE		21.25		510,738.85 Cr
15-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		490,738.85 Cr
15-JUN-2022	I LINK WITHDRAWAL FEE		21.25		490,717.60 Cr
16-JUN-2022	CASH WITHDRAWAL - I LINK		2,000.00		488,717.60 Cr
16-JUN-2022	I LINK WITHDRAWAL FEE		18.75		488,698.85 Cr
16-JUN-2022	CASH WITHDRAWAL - ATM (BR: 0271)		25,000.00		463,698.85 Cr
16-JUN-2022	CASH WITHDRAWAL - I LINK		25,000.00		438,698.85 Cr
16-JUN-2022	I LINK WITHDRAWAL FEE		18.75		438,680.10 Cr
18-JUN-2022	CASH WITHDRAWAL - ATM (BR: 0271)		13,000.00		425,680.10 Cr
18-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		405,680.10 Cr
18-JUN-2022	I LINK WITHDRAWAL FEE		21.25		405,658.85 Cr
18-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		395,658.85 Cr
18-JUN-2022	I LINK WITHDRAWAL FEE		21.25		395,637.60 Cr
20-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		375,637.60 Cr
20-JUN-2022	I LINK WITHDRAWAL FEE		18.75		375,618.85 Cr
20-JUN-2022	POS SALE - MASTERCARD		2,500.00		373,118.85 Cr
21-JUN-2022	CASH WITHDRAWAL - I LINK		12,000.00		361,118.85 Cr
21-JUN-2022	I LINK WITHDRAWAL FEE		21.25		361,097.60 Cr
22-JUN-2022	I LINK BAL ENQUIRY FEE		5.00		361,092.60 Cr
22-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		341,092.60 Cr

UBL UNITED BANK LTD  
 Peshawar and Branch Peshawar

Note: The items and balance shown on this statement should be verified and the branch manager notified within 2 weeks of any discrepancies, otherwise it will be assumed as correct.

1112-HAYATABAD TOWN, PESHAWAR

IBRAR UD DIN

1112-000213394334

Date	Particulars	Inst No	Debit	Credit	Balance
22-JUN-2022	ILINK WITHDRAWAL FEE		21.25		341,071.35 Cr
22-JUN-2022	CASH WITHDRAWAL - I LINK		2,000.00		339,071.35 Cr
22-JUN-2022	ILINK WITHDRAWAL FEE		21.25		339,050.10 Cr
23-JUN-2022	CASH WITHDRAWAL - I LINK		5,000.00		334,050.10 Cr
23-JUN-2022	ILINK WITHDRAWAL FEE		18.75		334,031.35 Cr
23-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		324,031.35 Cr
23-JUN-2022	ILINK WITHDRAWAL FEE		18.75		324,012.60 Cr
24-JUN-2022	POS SALE - MASTERCARD		3,000.00		321,012.60 Cr
28-JUN-2022	POS SALE - MASTERCARD		3,000.00		318,012.60 Cr
28-JUN-2022	CASH WITHDRAWAL - I LINK		15,000.00		303,012.60 Cr
28-JUN-2022	ILINK WITHDRAWAL FEE		21.25		302,991.35 Cr
28-JUN-2022	POS SALE - MASTERCARD		2,000.00		300,991.35 Cr
29-JUN-2022	CASH WITHDRAWAL - I LINK		10,000.00		290,991.35 Cr
29-JUN-2022	ILINK WITHDRAWAL FEE		21.25		290,970.10 Cr
30-JUN-2022	ILINK BAL ENQUIRY FEE		5.00		290,965.10 Cr
30-JUN-2022	CASH WITHDRAWAL - I LINK		20,000.00		270,965.10 Cr
30-JUN-2022	ILINK WITHDRAWAL FEE		21.25		270,943.85 Cr
30-JUN-2022	POS SALE - MASTERCARD		2,000.00		268,943.85 Cr
01-JUL-2022	CASH WITHDRAWAL - ATM (BR: 0271)		25,000.00		243,943.85 Cr
02-JUL-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		34,961.34		208,982.51 Cr
04-JUL-2022	SALARY			29,412.00	238,394.51 Cr
04-JUL-2022	POS SALE - MASTERCARD		3,000.00		235,394.51 Cr
06-JUL-2022	POS SALE - MASTERCARD		5,000.00		230,394.51 Cr
08-JUL-2022	CASH WITHDRAWAL - I LINK		20,000.00		210,394.51 Cr
08-JUL-2022	ILINK WITHDRAWAL FEE		23.44		210,371.07 Cr
08-JUL-2022	ILINK BAL ENQUIRY FEE		5.63		210,365.44 Cr
08-JUL-2022	CASH WITHDRAWAL - I LINK		10,000.00		200,365.44 Cr
08-JUL-2022	ILINK WITHDRAWAL FEE		25.94		200,339.50 Cr
13-JUL-2022	POS SALE - MASTERCARD		2,000.00		198,339.50 Cr
16-JUL-2022	CASH WITHDRAWAL - I LINK		6,000.00		192,339.50 Cr
16-JUL-2022	ILINK WITHDRAWAL FEE		23.44		192,316.06 Cr
19-JUL-2022	SMS FEE- LIABILITY PRODUCTS		120.00		192,196.06 Cr
19-JUL-2022	FEDERAL EXCISE DUTY		18.00		192,178.06 Cr
19-JUL-2022	CASH WITHDRAWAL - ATM (BR: 0271)		20,000.00		172,178.06 Cr
20-JUL-2022	CASH WITHDRAWAL - ATM (BR: 0271)		50,000.00		122,178.06 Cr
21-JUL-2022	POS SALE - MASTERCARD		2,000.00		120,178.06 Cr
22-JUL-2022	CASH WITHDRAWAL - ATM (BR: 0271)		10,000.00		110,178.06 Cr
26-JUL-2022	CASH WITHDRAWAL - ATM (BR: 0271)		10,000.00		100,178.06 Cr
26-JUL-2022	CASH WITHDRAWAL - I LINK		5,000.00		95,178.06 Cr
26-JUL-2022	ILINK WITHDRAWAL FEE		25.94		95,152.12 Cr
27-JUL-2022	POS SALE - MASTERCARD		3,000.00		92,152.12 Cr
27-JUL-2022	CASH WITHDRAWAL - I LINK		16,500.00		75,652.12 Cr
27-JUL-2022	ILINK WITHDRAWAL FEE		23.44		75,628.68 Cr
28-JUL-2022	POS SALE - MASTERCARD		2,000.00		73,628.68 Cr
30-JUL-2022	POS SALE - MASTERCARD		3,000.00		70,628.68 Cr
01-AUG-2022	SALARIES			31,558.00	102,186.68 Cr
01-AUG-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		34,961.34		67,225.34 Cr
04-AUG-2022	POS SALE - MASTERCARD AT TOTAL PARCO ISLAMABAD PAK		3,000.00		64,225.34 Cr
05-AUG-2022	POS SALE - MASTERCARD		2,000.00		62,225.34 Cr
07-AUG-2022	POS SALE - MASTERCARD		2,500.00		59,725.34 Cr
09-AUG-2022	POS SALE - MASTERCARD		1,500.00		58,225.34 Cr
09-AUG-2022	CASH WITHDRAWAL - I LINK		1,000.00		57,225.34 Cr
09-AUG-2022	ILINK WITHDRAWAL FEE		25.94		57,199.40 Cr
10-AUG-2022	SMS FEE- LIABILITY PRODUCTS		120.00		57,079.40 Cr
10-AUG-2022	FEDERAL EXCISE DUTY		18.00		57,061.40 Cr
10-AUG-2022	POS SALE - MASTERCARD		1,500.00		55,561.40 Cr
11-AUG-2022	CASH WITHDRAWAL - ATM (BR: 0271)		20,000.00		35,561.40 Cr
14-AUG-2022	POS SALE - MASTERCARD		2,000.00		33,561.40 Cr

Note: The items and balance shown on this statement should be verified and the branch manager notified within 2 weeks of any discrepancies, otherwise it will be assumed as correct.



IBRAR UD DIN

1112-000213394334

Date	Particulars	Inst.No.	Debit	Credit	Balance
18-AUG-2022	POS SALE - MASTERCARD		1,000.00		32,561.40 Cr
20-AUG-2022	POS SALE - MASTERCARD		2,500.00		30,061.40 Cr
22-AUG-2022	CASH WITHDRAWAL - I LINK		4,000.00		26,061.40 Cr
22-AUG-2022	I LINK WITHDRAWAL FEE		23.44		26,037.96 Cr
23-AUG-2022	POS SALE - MASTERCARD		4,000.00		22,037.96 Cr
25-AUG-2022	POS SALE - MASTERCARD		2,500.00		19,537.96 Cr
31-AUG-2022	POS SALE - MASTERCARD		4,000.00		15,537.96 Cr
01-SEP-2022	CASH WITHDRAWAL - ATM (BR: 0271)		15,500.00		37.96 Cr
01-SEP-2022	SALARY			31,558.00	31,595.96 Cr
01-SEP-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		31,595.96		.00
16-SEP-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			5,500.00	5,500.00 Cr
16-SEP-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		4,947.38		552.62 Cr
16-SEP-2022	SMS FEE- LIABILITY PRODUCTS		120.00		432.62 Cr
16-SEP-2022	FEDERAL EXCISE DUTY		18.00		414.62 Cr
01-OCT-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		414.62		.00
02-NOV-2022	CASH DEPOSITED - SELF	3097696478		40,000.00	40,000.00 Cr
02-NOV-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		40,000.00		.00
03-NOV-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			5,000.00	5,000.00 Cr
03-NOV-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		5,000.00		.00
18-NOV-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			520.00	520.00 Cr
18-NOV-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		520.00		.00
20-NOV-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			1,850.00	1,850.00 Cr
20-NOV-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			550.00	2,400.00 Cr
20-NOV-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			1,000.00	3,400.00 Cr
20-NOV-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		3,400.00		.00
08-DEC-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			30,000.00	30,000.00 Cr
08-DEC-2022	ATM-IBFT FUNDS TRANSFER, FR: MIAN SOHAIL AHMED KAKA KHAIL BANK:			1,500.00	31,500.00 Cr
08-DEC-2022	ATM-IBFT FUNDS TRANSFER, FR: MIAN SOHAIL AHMED KAKA KHAIL BANK:			5,000.00	36,500.00 Cr
08-DEC-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		36,500.00		.00
15-DEC-2022	CASH DEPOSITED - SELF	3171077307		20,000.00	20,000.00 Cr
15-DEC-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		20,000.00		.00
16-DEC-2022	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			3,800.00	3,800.00 Cr
16-DEC-2022	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		3,795.40		4.60 Cr
16-DEC-2022	SMS FEE- LIABILITY PRODUCTS		4.60		.00
10-JAN-2023	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			4,500.00	4,500.00 Cr
10-JAN-2023	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			150.00	4,650.00 Cr
10-JAN-2023	BILL PAYMENT TO UBL DRIVE ACCOUNT # 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		4,650.00		.00
12-JAN-2023	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK:			10,500.00	10,500.00 Cr
12-JAN-2023	BILL PAYMENT TO UBL DRIVE ACCOUNT #		10,500.00		.00

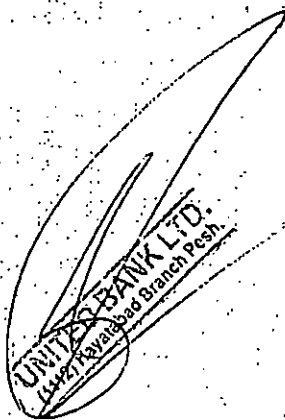
Page # 3 / 4

Note: The items and balance shown on this statement should be verified and the branch manager notified within 2 weeks of any discrepancies, otherwise it will be assumed as correct.

**IBRAR UD DIN**

1112-000213394334

Date	Particulars	Inst No	Debit	Credit	Balance
18-JAN-2023	0002****4334 OF IBRAR UD DIN. (Ref # 0000228592) ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK			20,000.00	20,000.00 Cr
18-JAN-2023	ATM-IBFT FUNDS TRANSFER, FR: IBRAR UDDIN BANK			1,000.00	21,000.00 Cr
18-JAN-2023	BILL PAYMENT TO UBL DRIVE ACCOUNT #: 0002****4334 OF IBRAR UD DIN. (Ref # 0000228592)		21,000.00		.00
24-JAN-2023	** CLOSING BALANCE **				.00
<b>Total Withdrawals &amp; Total Deposits</b>			1,022,941.19	272,810.00	
<b>Total number of Transactions</b>			150		



Note: The items and balance shown on this statement should be verified and the branch manager notified within 2 weeks of any discrepancies, otherwise it will be assumed as correct.



**بخدمت جناب پرنسپل صاحب گورنمنٹ پرائمری سکول اعظم آباد پشاور**

جناب عالی!

مودبانہ گزارش کی جاتی ہے کہ میں گورنمنٹ پرائمری سکول اعظم آباد پشاور مورخہ 21-12-2012

چوکیدار کے فرائض سرانجام دے رہا ہوں۔ جناب عالی میں پہلے دن کے وقت ڈیوٹی کر رہا تھا اور پھر 2018 میں عدالتی حکم کے مطابق کے تمام چوکیدار 8 گھنٹے ڈیوٹی سرانجام دیئے۔ یہ کہ مورخہ 23-04-2019 میں سابقہ ہیڈ ماسٹر صاحب نے مجھے ہدایت دی کے آپ رات کے وقت اپنی ڈیوٹی سرانجام دیوئے۔ اور عدالت حکم کے مطابق میں 8 گھنٹے کے بجائے 12 گھنٹے کی ڈیوٹی سرانجام دے رہا ہوں۔ یہ کہ 23-04-2019 لے کر 30-06-2022 میں صبح جاتے وقت رجسٹری میں اپنی حاضری لگا دیتا تھا یہ کہ مورخہ 02-07-2022 سے میں نے اپنی حاضری نہیں لگائی کیونکہ رجسٹر آپ جناب کے دفتر میں بند ہوتا تھا اور تمام چابیاں آپ جناب کے پاس ہے۔ جناب عالی مجھے ایک عدو SHOW CAUSE نوٹس ملا ہے جس میں لکھا گیا ہے کہ آپ مورخہ 02-07-2022 سے غیر حاضر لکھ گیا ہے میری حاضری تو رجسٹر دفتر میں بند ہونے کی وجہ سے نہیں لگی۔ نوٹ:- جناب عالی میں سال 2019ء سے رات کی ڈیوٹی سرانجام دے رہا ہوں اگر اس میں آپ جناب کو کوئی اعتراض ہے تو آپ جناب کے حکم سے میں دن کو بھی 8 گھنٹے ڈیوٹی کرنے کے لیے تیار ہوں۔ یہاں یہ امر قابل ذکر ہے کہ اگر میری ڈیوٹی دن کے وقت مقرر کی تو رات کے وقت میری کسی قسم کی کوئی ذمہ داری نہیں ہوگی۔ اور اگر آپ صاحب چاہتے ہیں کہ آپ رات کو ڈیوٹی کریں تو میں دن کے وقت کی میری کوئی ذمہ داری نہیں ہوگی۔ یہاں یہ امر قابل ذکر ہے کہ آپ صاحب جو بھی حکم لکھ کر دیں۔

جناب والا میری تنخواہ بند ہو چکی ہے آپ صاحب سے ہمدردانہ اپیل ہے کہ آپ جناب اپنے اعلیٰ آفسران سے میری تنخواہ بحال کرنے کی استدعا کریں۔

ابراہیم الدین چوکیدار  
گورنمنٹ پرائمری سکول اعظم آباد پشاور

تاریخ:- 22/NOV/22

صحیح (A) ہیڈ ماسٹر کی  
22/NOV/2022  
وقت 11:07 AM

ہیڈ ماسٹر  
گورنمنٹ پرائمری سکول اعظم آباد پشاور

تاریخ:-

مدرسہ اسلامیہ کراچی

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

مدرسہ اسلامیہ کراچی کے لیے طلبہ کی فہرست

آئی ایم

شیر

HEADMASTER  
G.P.S. 23  
Azam Abad Pesh.

آئی ایم

آئی ایم

4/2/23

یہ ادارت پرانے جو کلب پر  
ایک عمارت کی حالت ہے کہ اب اسکول گاہ پر دن

کے وقت موجود رہتا ہے۔ گھنٹہ گھر کی نچر کی سہولتوں کی حالت

کو کھینک نہیں ہے۔ رات کو کھینک ڈھلوانی سے غافل نہ رہے

اس دوران خیر خواہانہ اسکول سے کوئی چیز علم سولہ

پا سولہ عمارت کو کوئی نقصان نہ پہنچا۔ اس کے

ذمہ داری اس پر ہے۔ ہم نے ایسے آرڈر دینے کو

کھینک کھینکی دی تاکہ آپ باخبر رہیں۔ شکریہ

M. M. M.

23/12/13

HEAD MASTER

G.P.S.

Azam Abad Pesh.

مستند جو کلب پر



Amereave X

25

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION,  
KHYBER PAKHTUN KHWA, PESHAWAR.**

No. 488-538 / F.No.202/G.B  
Dated: Peshawar the 3/6 /2018.

To

All the District Education Officers,  
(M+F) in Khyber Pakhtun Khwa.


Subject: **DUTY HOURS FOR CHOWKIDARS.**

Memo:

I am directed to refer to the subject captioned above and to say that on the demands of the Class-IV employees Association Eight (08) hours duty may be taken from the Chowkidars of the Provincial Govt. as per court judgment.

I am therefore further directed to ask you to issue necessary instructions to all the Heads of the Institutions/schools under your jurisdiction that this court decision may be implemented in the letter and spirit (Copy attached).

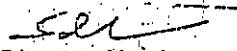
Encls: As Above.

  
Dy: Director (ES) /  
Directorate of Elementary & Secondary  
Education Khyber Pakhtun Khwa, Peshawar.

Encls. No. \_\_\_\_\_

Copy to the:-

1. Mr. Akbar Khan Mohmand, Provincial President, All Pakistan Class-IV Employees Association All Department Khyber Pakhtun Khwa w/r to his letter No.786-75 Dated 12/03/2018; with the remarks that all the Chowkidars working in Schools or Offices are already obtaining uniform allowance and washing allowance.
2. P.A. to Director of Elementary & Secondary Education KPK, Local Directorate.

  
Dy: Director (ES) /  
Directorate of Elementary & Secondary  
Education Khyber Pakhtun Khwa, Peshawar.

*Slit 18*  
*with enclosure for all concerned*  
D:/Establishment M/General Branch/346-M+F in KPK.docx

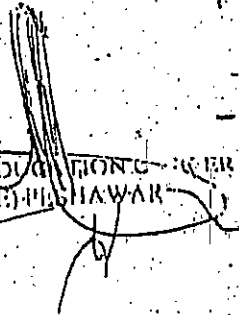
21

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR

Encl: No. 130-490/FILE NO-15 <sup>c/dec</sup> 17/11/18 6/14/2018  
*S. K. M. M. M.*

Copy of the above is forwarded to the following:-

1. All the Principals/ Headmasters GHSS/GI /GMS District Peshawar.
2. Sub Divisional Education Officer (Male) Tr. vn-I, II, III & IV Peshawar.
3. All ASDECs (Male) District Peshawar.
4. All Head Teachers GPS District Peshawar.
5. Mr. Akbar Khan Mohmand President.
6. Mr. Qasim Jan General Secretary District Peshawar.

  
 DISTRICT EDUCATION OFFICER  
 (MALE) PESHAWAR

21

(27)

The Director Education  
Secondary and Elementary  
Peshawar

Subject:- Release of monthly Salary

Respected Sir,

1. That the Petitioner is working as Chowkidar at Government Primary School Azamabad since the inception of appointment in Night time.
2. That upon an undated Show Cause Notice duly signed by the District Education Office (Male) Peshawar which is even not addressed to the Petitioner.

Copy of the Show Cause Notice by the District Education Officer (Male) Peshawar at Annexure-I

3. That subsequent Dy. District Education Officer (Male) forwarded vide letter No.4777/PF/No.148 dated 15-8-2022 to SDE(O) (M) Town-II, Peshawar.

Copy of letter dated 15-8-2022 at Annexure-II

4. That thereafter the said SDOE (Male) Town-II Peshawar forwarded to ASDEO (M) Circle Mathra Peshawar on 25-8-2022.

Copy of the SDEO (Male) Town-II Peshawar at Annexure-III

5. That afterward, the ASDEO Circle Mathra have confirmed the receipt of the Show Cause as on 14-9-2022, unofficial copy was obtained on 16-9-2022.

Copy of receipt of the Show Cause Notice to the ASDEO Circle Mathra dated 14-09-2022 at Annexure-IV

6. That on the basis of receipt of an unofficial copy, the Petitioner furnished reply to the Show Cause Notice to the District Education Officer (Male) Peshawar on 19-09-2022.

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Copy of the Reply to Show Cause Notice dated 19-9-2022 at Annexure-V

7. That upon explaining the above factual position, my Salary for the month of September 2022 has been stopped without any rhyme and reason for which the Petitioner approached the concerned Officer for release of his Salary but not yet released so far.

Prayer:- It is, therefore, humbly prayed your honour to please issue direction to the concerned Officer for release of my salary forth with.

Ibrar-ud-Din

Chowkidar

Govt. Primary School Azamabad

Date:- 14/11/2022

CNIC # 21202-5583077-7

mob # 0332-9217206

= # 0301-3107142

Diary  
No-444

Time:- 12:34 PM



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR**

No. JA-20/C-IV/Peshawar/Vol-23  
Dated: Peshawar the 17 / 11 / 2022  
Phone: 091-9225344 Email: ddadmin.esc@gmail.com

The District Education Officer  
(Male) Peshawar

Subject: **RELEASE OF MONTHLY SALARY**  
Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application along with other relevant documents in r/o Mr. Ibrar Ud Din Chowkidar GPS Azam Abad Peshawar.

You are therefore directed to submit detail report/comments at an early date.

*sdl*  
Assistant Director (Admn)  
Directorate: E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst. No. 032-33




- Copy forwarded to the:-
1. Mr. Ibrar Ud Din Chowkidar GPS Azam Abad Peshawar (0332-9217206)
  2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
  3. Master File.

*[Signature]*  
Assistant Director (Admn)  
Directorate: E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar  
*16/11/22*

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*[Signature]*  
Assistant Director (Admn)  
Directorate: E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar  
*17/11/22*



قیمت 50 روپے	62284	 	
ایڈریس: <u>الہ آباد</u>			
بار کونسل / ایسوسی ایشن نمبر: <u>BC-10-7760</u>			
رابطہ نمبر: <u>0321-5850011</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ	

بعدالت جناب: جنرل منسٹر KPK سروس ٹریڈنگ پشاور

مخاطب: <u>الہ آباد</u>	دعویٰ: <u>سروس ٹریڈنگ</u>
<u>الہ آباد</u>	علت نمبر:
<u>بنام</u>	موضوع:
<u>سروس ٹریڈنگ (P.L.C)</u>	جرم:
<u>KPK / الہ آباد / دہلی</u>	تھانہ:

**باعت تحریروا نکه**

مقدمہ ہندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام سروس ٹریڈنگ کیلئے الہ آباد سروس ٹریڈنگ کو وکیل 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 ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم:

\_\_\_\_\_ بد  
 \_\_\_\_\_ بد  
 \_\_\_\_\_ مقام کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Anwar Ghaly  
 Advocate  
 HC

الہ آباد  
 10/05/2019