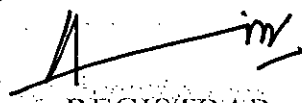


FORM OF ORDER SHEET

Court of _____

Case No. - 526 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/03/2023	<p>The present appeal resubmitted today by Mr. Noor Muhammad Khattak 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>

The appeal of Mr. Raj Wali Khan Accountant P&D Department KP Peshawar received today i.e. on 17.02.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Check list is not attached with the appeal.
- 3- Affidavit be got attested by the Oath Commissioner.
- 4- Appeal has not been flagged/marked with annexures marks.
- 5- Certificate be given to the effect that the appellant has not filed any service appeal earlier on the subject matter in this Tribunal.
- 6- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 7- Copy of rejection order of departmental appeal in respect of appellant is not attached with the appeal which may be placed on it.
- 8- Copy of impugned order is not attached with the appeal which may be placed on it.
- 9- Copy of Act mentioned in para-3 of the memo of appeal (Annexure-C) is not attached with the appeal.
- 10- Documents attached with the appeal are illegible which may be replaced by legible/better one.
- 11- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.
- 12- The documents that are to be provided must be illegible/readable.

No. 642 /S.T.

Dt. 20/2 /2023

REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.
High Court Peshawar.

R/Six

- obj No: 1, Attached.
- // no: 2, Attached.
- // no: 3, Attested.
- // no: 4, Flagged.
- // 5, Attached.
- // 6, Attached.

4- 7) The appeal of the appellant alongwith others were rejected vide consolidated order dt: 17/1/23 available on file on Annex 9, Page, 23, the same is appellate order for appellant.

P.T.O

Ob; No. 8 Attached

// 9 Attached.

4 10, Better Copies Attached.

4 11, Attached.

// 12, B. Copies Attached.

It is therefore requested
that the case may kindly be
placed before the Hon'ble bench.

7/3/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 526 /2023

RAJWALI KHAN VS PLANNING & DEVELOPMENT DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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2.	advertisement and Appointment Order	A	4-9
3.	Charge Report	B	10
4.	Notification and Act	C	11-19
5.	Copies of pay slip and departmental appeal	D&E	20-21
6.	Appellate Order Dated 17.01.2023	F	22
7.	Notification/Circular dated 18.03.2021	G	23-24
8.	Vakalatnama	25

THROUGH: APPELLANT


NOOR MOHAMMAD KHATTAK,
ADVOCATE SUPREME COURT

-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 526 /2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 366

Dated 17/2/23

Mr. Raj Wali Khan, Accountant (BPS-16),
Planning and Development Department, Khyber Pakhtunkhwa, Peshawar.

.....**APPELLANT**

VERSUS

- 1- The Secretary, Planning & Development Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General, Planning & Development, Khyber Pakhtunkhwa, Peshawar.

.....**RESPONDENTS**

APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 17.01.2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT FOR FIXATION OF PAY W.E.F. 19.03.1991 I.E. FROM THE DATE OF INITIAL APPOINTMENT HAS BEEN REJECTED WITHOUT ANY GOOD REASON.

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 17.01.2023 may very kindly be set aside and the appellant may kindly be allowed/granted pay fixation w.e.f. 19.03.1991 i.e. from the date of initial appointment with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That initially the appellant was appointed Junior Clerk in the Mohmand Area Development Project in erstwhile FATA vide order dated 19.03.1991, in pursuance to that the appellant submitted his arrival report. That during service the appellant was selected against the post of typist vide order dated 16.03.1993. That again in the year 2007 different posts including the post of Accountant were advertised and after following the codal formalities the appellant was appointed in the respondent Department as Accountant (BPS-16) vide order dated 03.12.2007. Copies initial appointment orders, advertisement and appointment order are attached as annexure.....**A.**

- 2- That In response to the order mentioned above the appellant submitted his arrival report and took over the charge of her post. Copy of the charge report is attached as annexure**B.**
- 3- That while performing his duty the service of the appellant was regularized vide notification dated 30.06.2022 in pursuance of K.P (Regularization of Services of employees of Erstwhile FATA) Act, 2021. Copies of the notification and Act are attached as annexure**C.**
- 4- That in pursuance to the notification mentioned above the services of the appellant was regularized and his pay was fixed from the date of notification, feeling aggrieved the appellant along with other preferred departmental appeal/ representation before the respondents. Copies of pay slip and departmental appeal are attached as annexure**D&E.**
- 5- That the representation of the appellant was disposed of/dismissed vide order dated 17.01.2023. Copy of the appellate order dated 17.01.2023 is attached as Annexure **F.**
- 6- That feeling aggrieved from the appellate order and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

GROUND:

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 19.03.1991 is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 11.06.2010 i.e. from the date of appointment and as such the inaction of the respondents is violative of law and rules.
- D- That in such a situations/ similar cases pay protection was granted to the regularize civil servants by the finance department vide notification/ circular dated 18.03.2021. Copy of notification/ circular dated 18.03.2021 is attached as Annexure **G.**
- E- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.

F- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitled for the grant of pay fixation w.e.f. the date of initial appointment.

G- That as per rule 2.3. of the West Pakistan Pension Rules, 1963 and FR 22 the appellant is fully entitled for the grant of pay fixation w.e.f. initial appointment with all back benefits.

H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 15.02.2023



APPELLANT

THROUGH:



NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT



KAMRAN KHAN



UMAR FAROOQ



WALED ADNAN



MUHAMMAD AYUB
ADVOCATES HIGH COURT

AFFIDAVIT

Mr. Raj Wali Khan, Accountant (BPS-16), Planning and Development Department, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



DEPONENT

- 4 - "A"
No. 169 /MADP

①
24

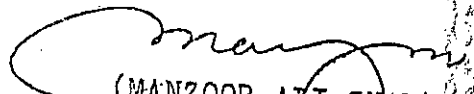
Dated Ghallanai the 19th March, 1991.

To:- Mr. RAJ WALI Khan S/o Haji M. Hussain
W.P.O. Matta Mughel Khel
Mohallah Palangzai, P.H+Bisla, Charsadda.

SUBJECT:- APPOINTMENT.

Reference your interview with the selection Board for the post of Junior Clerk in the office of Mohmands Area Development Project, the Commissioner Peshawar Division/Chairman selection Board has been pleased to approve your appointment on contract basis for a period of one year and subsequently extendable with mutual agreement of the parties.

You are advised to report to this office at the latest by 25th March 1991 to assume the charge of your duties.


(MANZOOR ALI SHAH)
PROJECT MANAGER MOHMANDS,
AREA DEVELOPMENT PROJECT
AT GHALLANAI.

: - + * * * * * : -

PR FR
P-2

delivered by Hand -
Chang

-5- 29 (2)

Sir,

In compliance with your office order No. 169 /MADP

dated 2/13 /1991.

I beg to submit my arrival report for duty for the post of Junior Clerk with effect from 2/13 /1991. (P.N)

Dated 2/13 /1991.

Yours obediently.

(Raj)
S/o Haji M Hussain.
Vill: Matt Kugled Khel.

Scanned

W-effect from 25/3/91

Project Manager
Mohmands Area Dev. Project
GHALANAI

Project Manager

M. A. D. P. at Ghallanai.

PR FR
P-1

No. MADP/2750

GHALLANAI

DATED: 16/03/1993.

To: Mr. Raj Wali s/o Haji Mohammad Hussain.

Vill & P.O. Mata Mughal Khel Tehsil,


District Chaman.

SUBJECT: APPOINTMENT.

Reference your interview for the post of Stenotypist (BFS-12) in the office of the Commissioner Peshawar Division, Peshawar dated March 15th, 1993.

The Selection Board has approved your appointment as Typist (BFS-9) in Mohmand Area Development Project at Ghallanai, on contract basis for a period of one year and subsequently extendable with mutual agreement of the parties.

You are advised to report to this office on 20th March 1993 to assume charge of your duties.


PROJECT MANAGER
MADP GHALLANAI.

SCHEDULE OF SERVICES

PART-B

TYPIST

The Subscriber will perform the duties of Typist in the Project Management Unit of Mohmands Area Development Project. His duties include of typing letters (Official/Semi Official)

COMPENSATION SCHEDULE MONTHLY

TYPIST B.P.S. 9

Basic pay	Rs. 1185.00
House rent Allowance.	Rs. 355.50
Unattractive Allowance.	Rs. 75.00
Medical Allowance.	Rs. 60.00
Adhoc Allowance.	Rs. 100.00

PAY TOTAL PER MONTH: + Rs. 1775.5

All other allowances such as TA/DA and medical e.t.c. permitted under Government Rules shall be payable to the subscriber.

POSITIONS VACANT

Applications are invited from suitable candidates domiciled NWFP / FATA for the following vacant positions in Khyber & Mahmand Area Development Project on contractual basis. Positions are likely to continue for one year on satisfactory performance up to the life of project.

Complete application along with CV, copies of educational certificates, degrees, diplomas and NIC should reach the office of undersigned within fifteen (15) days of this advertisement. Name of the position should be clearly mentioned on the envelope. Incomplete applications and those received after the due date will not be entertained. Only short listed candidates will be interviewed, on dates to be communicated later on. No TA / DA will be admissible.

S. #	Post	Domicile	Age Limit	Qualification
1.	Program Officer Civil Secretariat FATA (BPS- 17) for Khyber Area Development Project	NWFP/ FATA	20-40	Master Degree in Social Sciences from a recognized University with at least 5 years experience. Project experience will be given preference.
2.	Monitoring Officer (BPS- 17) at PIU Mohmand Area Development Project	NWFP/ FATA	20-40	MA/MSc in Economics from a recognized University with at least 5 years experience. Project experience will be given preference.
3.	Project Accountant at PMU Jamrud (BPS- 16) for Khyber Area Development Project	NWFP/ FATA	21-40	BA/B.Com from a recognized University with at least 5 years experience as an Accountant. Project experience will be given preference.
4.	Computer Operator (BPS- 14) at Civil Secretariat FATA for Mohmand Area Development Project	NWFP/ FATA	21-35	DA/DC from a recognized University & one year diploma in Information Technology with 3 years experience.
5.	Steno Typist (BPS- 12) at Civil Secretariat FATA for Mohmand Area Development Project	NWFP/ FATA	21-35	FA / FSc and 100% WPIA speed in short hand and typing respectively. Experience and Computer literacy will be given preference.

Project Manager
Khyber Area Development Project at Jamrud
 Khyber Agency, Jamrud. Phone & Fax: 0918827186

ناراضی (مذاہقہ) اور داخل کی جاتی ہے۔ ہر ماہ کو لے کر اس کی ایک کاپی بھیج کر اس کی ...
 لے کر اس کی ایک کاپی بھیج کر اس کی ...
 لے کر اس کی ایک کاپی بھیج کر اس کی ...
 لے کر اس کی ایک کاپی بھیج کر اس کی ...



یہ لے کر اس کی ایک کاپی بھیج کر اس کی ...
 یہ لے کر اس کی ایک کاپی بھیج کر اس کی ...
 یہ لے کر اس کی ایک کاپی بھیج کر اس کی ...
 یہ لے کر اس کی ایک کاپی بھیج کر اس کی ...



ایمان اور ان کی صورت میں ہونے پر خوش
 چاہا (آن غفر) جہا
 جہا ہر ایک کو ایک ایک
 جہا ہر ایک کو ایک ایک
 جہا ہر ایک کو ایک ایک
 جہا ہر ایک کو ایک ایک

AYUB TEACHING HOSPITAL

ایوب ٹیچنگ ہسپتال
 26/8/07



Directorate
Civil Secretariat
Warsak Road
Phone: 091-5507/07, 215000

cts
IA
r

No. DoP/ CSF/89-91
Dated: 03-12-2007

-9-



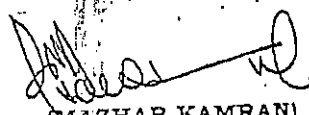
Mr. Rajwali Khan,
S/O. Muhammad Hussain,
Village Matta Khel, District & Tehsil,
Charsadda

Subject: OFFER OF APPOINTMENT AGAINST THE VACANT POST OF
ACCOUNTANT AT PMU KADP, KHYBER AGENCY

The Competent Authority has been pleased to appoint you on contract basis against the vacant post of Accountant (BPS 16) at PUM Khyber Area Development Project, w.e.f the date of taking over charge.

Your appointment shall be subject to the following terms and conditions.

- i. You shall give your consent physically in this office within 07 days from the date of issuing of the appointment order/ offer. In case of failure your appointment shall automatically be stand cancelled and the post shall be offered to the next candidate on merit.
- ii. You will have to produce a medical fitness certificate from the Medical Superintendent.
- iii. Your appointment is purely on contract basis and you will have to sign a contract appointment deed with the project authorities.


(MAZHAR KAMRAN)
Programme Officer
Civil Secretariat FATA

Copy to:

1. Additional Secretary / Director Projects, Civil Secretariat FATA
2. Project Manager, Khyber Area Development Project

11/13/11

-10-

17701-8044893-1
29/07/2010

To,

Project Manager
Khyber Area Development Project
Jamrud, Khyber Agency

Subject: Arrival Report

R/Sir,

Reference Directorate of Projects (DoP) Civil Secretariat FATA letter
No: DoP/CSF/119-91 dated: 03.12.2007.

In view of the above reference letter, I hereby report for joining the duty as
Accountant Khyber Area Development Project with effect from 03.12.2007 today (FN).

Yours Obedient

[Signature]
13-12-07
Raj Wali Khan
S/o
Muhammad Hussain Khan

Cc:

PA/Project Director Khyber Area Development Project for information, please.

Programme Officer Civil Secretariat FATA for information, please.

17
3/12/2007

Contract agreement will be prepared accordingly.

Mo
3/12/07



Dated Peshawar, June 30, 2022

NOTIFICATION:

NO. SO/EIP&D/3-1/Reg./Projects/M. As/2022. In compliance of Section-3 of the Khyber Pakhtunkhwa (Regularization of Services of Employees of Erst-while Federally Administered Tribal Areas) Act, 2021, the Provincial Government is pleased to notify regularization of services of the following (16) employees of the project titled "Khyber Area Development Project" with effect from 13.01.2022, subject to following conditions as provided in Section-4 of the Act ibid:

- the service promotion quota of all service cadres shall not be affected;
- the employees shall possess the same qualification and experience as required for a regular post;
- the employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- the services of such employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

S#	Name of Officials	BPS	Designation
1	Mr. Raj Wali Khan	16	Accountant
2	Mr. Bilal Khan	16	Office Assistant
3	Mr. Ahmad Ullah	16	Office Assistant
4	Mr. Tahir Waseem	16	Computer Operator
5	Mr. Ahmad Faraz	11	Junior Clerk
6	Muhammad Haris	11	Junior Clerk
7	Mr. Wakeel Khan	06	Driver
8	Mr. Sher Zali Khan	06	Driver
9	Haji Rehman	06	Driver
10	Mr. Mir Azam Khan	03	Naib Qasid
11	Mr. Nooran Gul	03	Naib Qasid
12	Mr. Naeem Khan	03	Naib Qasid
13	Mr. Sadaqat Ullah	03	Naib Qasid
14	Hafiz Ameer Hamza	03	Naib Qasid
15	Mr. Abdur Rahman	03	Chowkidar
16	Muhammad Riaz	03	Chowkidar

PLANNING & DEVELOPMENT DEPARTMENT

Dated Peshawar, June 30, 2022

NOTIFICATION

No.SOEP&D/3-1/Reg:/Projects/M.As/2022: In compliance of Section -3 of the Khyber Pakhtunkhwa (Regularization of Service of Employees of Erstwhile Federally Administered Tribal Areas) Act, 2021, the Provincial Government's Pleas to notify regularization of Service of the following (16) employees of the Project titled "Khyber Area Development Project" with effect from 13.01.2022, subject to following candidates as provided in Section -4 of the Act ibid.

- (a) the service promotion quota of all service cadres shall not be affected.
- (b) the employees shall possess the same qualification and experience as required for a regular post.
- (c) The employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- (d) The services of such employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

S#	Name of Officials	BPS	Designation
1.	Mr. Raj Wali Khan	16	Accountant
2.	Mr. Bilal Khan	16	Office Assistant
3.	Mr. Ahmad Khan	16	Office Assistant
4.	Mr. Tahir Waseem	16	Computer Operator
5.	Mr. Ahmad Faraz	11	Junior Clerk
6.	Muhammad Haris	11	Junior Clerk
7.	Mr. Wakeelhan	06	Driver
8.	Mr. Sher Zali Khan	06	Driver
9.	Haji Rehman	06	Driver
10.	Mr. Mir Azam Khan	03	Nabi Qasid
11.	Mr. Nooran Gul	03	Nabi Qasid
12.	Mr. Nooran Khan	03	Nabi Qasid
13.	Mr. Sadaqat Ullah	03	Nabi Qasid
14.	Hafiz Ahmeer Hamza	03	Nabi Qasid
15.	Mr. Abdur Rehman	03	Chowkidar
16.	Muhammad Riaz	03	Chowkidar

-12-


As per Section-3 (2) of the Act 1949, all the above employees shall, in lieu of pension and gratuity, be entitled to receive such amount contributed by them towards the Contributory Provident Fund, alongwith the contributions made by Government to their accounts in the said Fund, in the prescribed manner.

ADDITIONAL CHIEF SECRETARY
P&D DEPARTMENT

Encls: No. & date even.

Copy forwarded to the:

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa.
3. PSO Chief Secretary, Khyber Pakhtunkhwa.
4. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
5. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
6. Project Director, Khyber Area Development Project.
7. Assistant Chief (B&A), P&D Department.
8. Manager, Government Printing Press for publication in the official gazette at an early date.
9. PS to Additional Chief Secretary, P&D Department.
10. PS to Secretary, P&D Department.
11. PA to Additional Secretary-II, P&D Department.
12. PA to Deputy Secretary-II, P&D Department.
13. Officials concerned.


(SONIA KHAN) 3-7-71
Section Officer (Estt.)

As per section-3 (2) of the Act Ibid, all the above employees shall, in lieu of pension and gratuity, be entitled to receive such amount contributed by them towards the Contributory Provident Fund, alongwith the contributions made by Government to their accounts in the said Fund, in the prescribed manner.

Sd/-
Additional Chief Secretary
P&D Department

Endst. No & date even.

Copy forwarded to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar
2. Accountant General, Khyber Pakhtunkhwa
3. PSO Chief Secretary, Khyber Pakhtunkhwa
4. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department
5. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department
6. Project Director, Khyber Area Department, Project
7. Assistant Chief (B&A), P&D Department
8. Manager, Government Printing Press for publication in the official gazette at an early date.
9. PS to Additional Chief Secretary-II, P&D Department.
10. PA to Deputy Secretary-II, P&D Department.
11. Officials concerned.

Sd/-
Sona Khan
Section Officer (Estt:)



KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, THURSDAY, 13th JANUARY, 2022.

PROVINCIAL ASSEMBLY SECRETARIAT
KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 13th January, 2022.

No. PA/Khyber Pakhtunkhwa/Bills-182/2022/745.— The Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Bill, 2021 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 31st December, 2021 and assented to by the Governor of the Khyber Pakhtunkhwa on 07th January, 2022 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

**THE KHYBER PAKHTUNKHWA (REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE FEDERALLY ADMINISTERED TRIBAL AREAS) ACT, 2021.
(KHYBER PAKHTUNKHWA ACT NO. I OF 2022)**

(First published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of the Khyber Pakhtunkhwa, (Extraordinary), dated the 13th January, 2022).

**AN
ACT**

to provide for the appointment and regularization of services of certain employees appointed on contract basis against project posts in the erstwhile Federally Administered Tribal Areas.

WHEREAS it is expedient to provide for the appointment and regularization of services of certain employees appointed on contract basis against project posts in the erstwhile Federally Administered Tribal Areas:

It is hereby enacted by the Provincial Assembly of Khyber Pakhtunkhwa as follows:

1. Short title, application and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa (Regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Act, 2021.

(2) It shall apply to all the employees as defined in clause (d) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once.

2. **Definitions.**--- (1) In this Act, unless the context otherwise requires:-

- (a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;
- (b) "Departmental Selection Committee" means a Departmental Selection Committee, constituted for the purpose of making selection for appointment to project post under a Department or office in the erstwhile Federally Administered Tribal Areas;
- (c) "Government" means the Government of Khyber Pakhtunkhwa;
- (d) "employees" means a person, who was appointed on contract basis, as per project policy, to a project post, in the erstwhile Federally Administered Tribal Areas, and such post was duly reflected in PC-I of that project, and who possess the prescribed qualification, training and experience for the said post at the time of such appointment;
- (e) "Department" means a Government Department, as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985;
- (f) "law or rules" means the law or rules, for the time being in force, governing the selection and appointment of civil servants;
- (g) "project" means a perpetual nature project in the erstwhile Federally Administered Tribal Areas, the continuation of which and conversion to regular budget is essential for service delivery, duly identified by the Departments and reflected in the Schedule;
- (h) "project post" means a post in the project; and
- (i) "Schedule" means a Schedule appended to this Act.

(2) The expression "contract appointment" shall have the same meaning as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. **Appointment and regularization of services of employees.**--- (1) Notwithstanding anything contained in any law or rules, the employees, appointed on contract basis, against project posts, in the erstwhile Federally Administered Tribal Areas, and holding such project posts till the commencement of this Act, shall be deemed to have been validly appointed, on regular basis, from the commencement of this Act, subject to verification of their qualifications and other credentials by the concerned Department.

(2) All such employees, after the commencement of this Act, shall, in lieu of pension and gratuity, be entitled to receive such amount contributed by them towards the Contributory Provident Fund, along with the contributions made by Government to their account in the said Fund, in the prescribed manner.

(3) A Committee, headed by the Secretary of the Department concerned, with the following membership, shall scrutinize all the credentials of the employees, before issuance of the regularization orders:

-15-

- (a) head of the Attached Department concerned;
- (b) representative of the Establishment and Administration Department of Government;
- (c) representative of the Finance Department of Government;
- (d) representative of the Planning and Development Department of Government; and
- (e) Deputy Secretary of the Department concerned.

4. **General conditions for regularization.**--- For the purpose of regularization of the employees under this Act, the following general conditions shall be observed:

- (a) the service promotion quota of all service cadres shall not be affected;
- (b) the employees shall possess the same qualification and experience as required for a regular post;
- (c) the employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- (d) the services of such employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

5. **Determination of seniority.**---(1) All employees, whose services are regularized under this Act, shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission or Departmental Selection Committee, as the case may be, made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined as per provisions of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) and rules made thereunder.

6. **Removal of difficulties.**---If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister of Khyber Pakhtunkhwa may make such order, not inconsistent with the provisions of this Act, as may appear to it to be necessary for the purpose of removing such difficulty.

7. **Overriding effect.**---Notwithstanding anything to the contrary contained in any other law or rules, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency to this Act shall cease to have effect.

Schedule
[see section 2 (1) (h) (i)]

-16-

1.	Strengthening and Capacity Building of AGRJ Extension in FATA.
2.	Promotion of Olive Cultivation - Grafting for Oil Production in Bajaur Agency.
3.	Establishment of Semen Production Unit at Jamrud and Breed/ Veterinary Service Improvement Program.
4.	Capacity Building Directorate of Livestock FATA.
5.	Mobile Veterinary Clinic in FATA (MVC).
6.	Establishment of Model Dairy Farm in FATA.
7.	Strengthening of Artificial Insemination/Veterinary Aid Services and Disease Reporting System I.&DD in FATA.
8.	Creation of Disease Free Zone Through Mass Vaccination and Treatment and Feasible Districts on Pilot Basis.
9.	Opening of 5 CVDS 5 CVC'S 6 AIC'S and Up-gradation of 2 CVDS to the level of CVHS Status in Bajaur Agency.
10.	Provision of Medicine and A.I Services in Existing Vet. Institution in Bajaur Agency.
11.	Establishment Vety. Diagnostic Lab in CVII Khar and Construction of Garage For 2 Vehicle in A.I.O Office Bajaur Agency.
12.	Provision of A.I. Facilities/Medicine in Existing Veterinary Institution Construction of Building of Functional Veterinary Centers (In Rented Building). Special Campaign for The Control of Ecto and Endo Parasite in Mohmand Agency.
13.	Opening of 3 CVDS, 23 VCS, 16 AICs and Up-gradation of CVD Lakaro to CVII Status Mohmand Agency.
14.	Provision of Mobile Vety Clinic in Mohmand Agency.
15.	Opening/Establishment of 2 CVDs in Rented Building Ambar Area and Provision of A.I. Services in Existing Institutes of Mohmand Agency.
16.	Opening of 18 Vety Centers and 26 AICs in Khyber Agency.
17.	Opening of 3 CVDs in Rented Building, Bara Khyber Agency.
18.	Establishment of 02 Veterinary Diagnostic Lab in Civil Veterinary Hospitals in Jamrud and Landikotal.
19.	Opening of 3 CVCs, 11 CVDs and 9 AICs and Up-gradation of 3 CVDs to CVII Status in Orakzai Agency.
20.	Small Ruminants (Sheep and Goat) Development Program in Tribal Districts
21.	Provision of Artificial Insemination Services in Existing Veterinary Institution in Orakzai Agency.
22.	Construction of Building for Existing Vety Institution and Provision of Artificial Insemination in Existing Veterinary Facilitation in District Orakzai.
23.	Construction of Building for 3 Rented Veterinary Institutions and Opening of One CVD in Mamozai Area, Orakzai Agency.

24.	Opening of 5 CVCs, 8 CVIDs, 22 AICs and Diagnostic Laboratory in Kurram Agency.
25.	Provision of AI Facilities in Existing 11 Veterinary Institutions in NWA.
26.	Provision of Veterinary Health Facilities in District North Waziristan.
27.	Opening of 41 Veterinary Centres, 22 AICs and Up-gradation of one CVD to CVII Status in SWA.
28.	Opening of 07-Veterinary Dispensaries and 10-A.I. Centers in FR Peshawar.
29.	Provision of Mobile Veterinary Clinic in Sub Division Peshawar.
30.	Opening of 02- CVIDs and 04-AICs in FR Kohat.
31.	Establishment of Mobile Veterinary Clinic in Sub Division Kohat.
32.	Opening of 2 CVIDS, 2 CVCS, 6 AICS and Up-gradation of 1 CVD to CVII Status in FR DI KHAN.
33.	Provision of Mobile Veterinary Clinic in Sub Division D.I. Khan.
34.	Opening of 1 CVII, 02 CVIDS, 04 CVCS and 11 AICS in FR Tank.
35.	Up-gradation of CVC to the Level of CVD, and 2 No. of CVD to the Level of CVII in Sub Division Tank.
36.	Opening of 5 Vety: Dispensaries, 05 Civil Vety: Centers, 10-AICs and Up-gradation of 01 CVC to CVD in FR Bannu.
37.	Opening of 08 Veterinary Centres and 08 AICS in FR LAKKI.
38.	Provision of Mobile Veterinary Clinic in Sub Division Lakki.
39.	Uplifting the Socio-Economic Condition and Gender Mainstreaming of Livestock Farmers Through PPP in FATA.
40.	Strengthening of Fisheries Department in FATA
41.	Control of Zoonotic / Contagious Disease Through Existing Vety Health Facilities and Establishment of Two Mobile Testing Labs on Pilots Basis in Tribal Districts.
42.	Provision of Mobile Vety: Clinic in Bajaur Agency.
43.	Provision of Artificial Insemination Services in Existing Function Vety: Institutes and Solarization of Major Vaccine Bank in AD Office in FR D.I. Khan.
44.	Program Management Unit for Roads and Infrastructure.
45.	Strengthening of Finance Department Civil Secretariat FATA.
46.	Aids Control Program in FATA.
47.	Health Sector Reforms Unit FATA.
48.	District Health Information System.
49.	Physical Rehabilitation Centres in FATA.
50.	Hepatitis Control Program in FATA (Phase-III).
51.	Integrated Vector Management Program in FATA.
52.	Eye Care Program in FATA (Phase-III).
53.	Thalassemia Control Program in FATA.
54.	Mobile Hospital Program in FATA (Phase-III).
55.	Establishment of Mental Health Clinics in AIHQ Hospitals in FATA.
56.	Health Nutrition Program in FATA.

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57.	TB Control Program in FATA.
58.	Maternal, Newborn, Child Health (MNCH) Program Merged District.
59.	Expanded Programme on Immunization (EPI) in FATA.
60.	Strengthening of EPI Program in FATA.
61.	Facilitation of FR Setup Health Sector in FRs (Tank Jandola).
62.	Facilitation of FR Health Setup in FRs (DI Khan Darazinda).
63.	Facilitation of Health Setup in FRs (Bannu Wazir).
64.	Facilitation of Health Setup in FRs (Lakki Bittani).
65.	Facilitation of Health Setup in FRs (Kohat Dara Adam Khel).
66.	Facilitation of Health Setup in FRs (Peshawar Hassan Khel).
67.	Opening of 07 CIDs in FR Tank.
68.	Opening of 08 CHCs / CIDs in FR D.I Khan District.
69.	Opening of 06 CHCs/CDs in FR Bannu District.
70.	Opening of 08 CHCs / CDs in FR Lakki.
71.	Opening of 02 CIDs in FR Kohat District.
72.	Opening of 11 CHCs / CDs in FR Peshawar.
73.	Opening of 41 CHCs / CDs in Mohmand District.
74.	Opening of 22 CHCs / CDs Khyber District.
75.	Opening of 07 CHCs / CDs in Kurram District.
76.	Opening of 15 CHCs/ CDs in Orakzai District.
77.	Opening of 24 CHCs/CDs in North Waziristan District.
78.	Opening of 18 CHCs / CDs in South Waziristan District.
79.	Removal of Staff Deficiencies in Newly opened Areas in Health Facilities FATA.
80.	Establishment of Government College of Management Sciences, SWA.
81.	Strengthening of Crises Management Cell Through FATA Analysis and Strategy Team.
82.	Establishment of Levy Training Center at Shahkass, Jamrud, Khyber Agency.
83.	Establishment of Center of Excellence/Govt. College of Technology, Khan, Bajaur Agency.
84.	Establishment of Vocational Training Centres / Institutes in Bajaur Agency and FR Kohat.
85.	Opening Govt. Polytechnic Institute Parachinar Kurram Agency in rented building.
86.	Establishment of Govt. Technical Institute Wana SWA.
87.	Establishment of Govt. Technical Institute SWA at Chaghmalai.
88.	Introduction of Additional Technologies in Polytechnic Institutes of FATA.
89.	Overcoming of Staff/Equipment Deficiencies in Technical Institutes in FATA.
90.	Operationalization and Provision of Equipment/Machinery to Labs of Existing Technical Institutes in Mohmand Agency GTI Mohmand Agency.
91.	Reformation of Technical Education in all Institutes in FATA.
92.	Introduction of 02 Technologies (Civil & Electrical) at Govt. Tech. Institute Sadda kurram Agency.

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-19-

93.	Introduction of New Technologies in Existing Technical Institutes of Tribal Districts.
94.	FATA Investment Facilitation Agency (FIFA).
95.	Small and Medium Enterprises Facilitation Unit.
96.	Establishment of PMU for Operationalization of Five FM Radio Stations in Merged Areas.
97.	Creation of Project Support Unit For Pre Construction and Implementation of Small Dams/Power Section.
98.	Strengthening of Local Govt. Directorate FATA.
99.	Directorate of Projects FATA Secretariat.
100.	Directorate of Monitoring and Evaluation in FATA Secretariat.
101.	Establishment of E&I Formation for the Directorate of Monitoring and Evaluation in FATA Secretariat.
102.	Satellite Monitoring of Development Schemes in FATA.
103.	Project Management Unit, Fata Infrastructure Programme.
104.	Khyber Area Development Project.
105.	Mohmand Area Development Project.
106.	Bajaur Area Development Project.
107.	Fata Water Resources Development Project.
108.	Survey Feasibilities Under Various Sector Phase-II.
109.	Urban Policy and Planning Unit FATA.
110.	Project Management Unit for World Food Programme in FATA.
111.	Strengthening of P&D Department.
112.	Establishment of HR/Archival Library in P&DD.
113.	Strengthening of AI&C Department, FATA Secretariat.
114.	Instructional and Physical Training Programme in FATA.
115.	Institutionalization of Boy Scouts Activities in Tribal Districts in FATA.
116.	Strengthening of FATA Olympics Association.
117.	Strengthening of Zakat and Ushr Department, FATA Secretariat.
118.	Strengthening of Minerals Department, PMU for Mineral Sector Projects.
119.	Exploration and Evaluation of Dimension and Decorative Stones in FATA.
120.	Exploration and Evaluation of Occurrences in FATA.
121.	Establishment / Operation of Mines Rescue, Safety and Labour Welfare Centre in FATA.

BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(KIFAYAT ULLAH KHAN AFRIDI)
Secretary

Provincial Assembly of Khyber Pakhtunkhwa

Printed and published by the Manager,
Stap. & Ptg. Deptt., Khyber Pakhtunkhwa, Peshawar

SD/-20-

AG KP Peshawar	
S# 2	P Sec:009 Month:January 2023
PR8243 -Khyber Areas Development P	
Pers # 01011769	Buckle: Khyber Areas Development
Name: Rajwali Khan	NTN:
ACCOUNTANT	GPF #:
CNIC No.1710180448931	Old #:
GPF Interest Free	
16 Active Temporary	PR8243 -
PAYS AND ALLOWANCES:	
0001-Basic Pay	30,330.00
1004-House Rent Allow 45% KP21	9,024.00
1210-Convey Allowance 2005	5,000.00
1974-Medical Allowance 2011	1,500.00
2315-Special Allowance 2021	3,500.00
2341-Dispr. Red All 15% 2022KP	2,836.00
2347-Adhoc Rel Al 15% 22(PS17)	2,836.00
Gross Pay and Allowances 55,026.00	
DEDUCTIONS:	
IT Payable 800.25 Deducted 426.00	TAX: (3609) 161.00
GPF Balance 23,380.00	Subrc: 3,340.00
3501-Benevolent Fund	1,500.00
4004-R. Benefits & Death Comp:	650.00
Total Deductions 5,651.00	
49,375.00	
D.O.B LFP Quota:	
01.01.1970	HABIB BANK LIMITED POLICE ROAD, PESHAWA
01 Years 00 Months 020 Days	7927741603

Rajwali Khan
A O

"E" 21

To,

The Director General
Sustainable Development Unit (SDU)
Planning & Development Department,
Govt. of Khyber Pakhtunkhwa
SDU Building Peshawar

Subject: REQUEST FOR PAY PROTECTION / FIXATION UPON
REGULARIZATION OF CONTRACT / PROJECT EMPLOYEES OF
KHYBER AREA DEVELOPMENT PROJECT, P&D DEPARTMENT

Respect Sir,

It is kindly stated that the staff of Khyber Area Development Project has been regularized under the Khyber Pakhtunkhwa (regularization of Services of Employees of Erstwhile Federally Administered Tribal Areas) Act, 2021 w.e.f. 13th January 2022, however, the salaries of the staff has been fixed at initial stage of the appointment.

After regularization the staff is drawing their salaries on initial stage on their respective grades, thus lost their service period without recognition of services rendered in their respective projects. Coupled with the double digit decrease in their salaries thus huge difference in pay has adversely affected the employees and its implications are far reaching on families and performance of the employee adversely effected.

Furthermore, the regularized employees have been notified by the Finance Department Notification No. SOSR-1)12-2/2020(34323) dated 18/03/2021 (Copy enclosed).

In view of the above, it is requested that the pay of the employees of Khyber Area Development Project may be protected from their initial date of appointment. The staff will be highly obliged for your kind attention in the subject matter, please.

Yours Obediently Khyber Area Development Staff

S.No.	Full Name	Designation	BPS	Date of appointment	Signature
1	Raj Wali Khan	Accounts Officer	16	25.03.1991	
2	Bilal Khan Afridi	Office Assistant	16	16.10.2003	
3	Ahmadullah	Office Assistant	16	01.07.2002	
4	Tahir Waseem	Computer Operator	16	14.05.2007	
5	Ahmad Faraz	Junior Clerk	11	04.06.2010	
6	Waqeeel Khan	Driver	6	17.02.2003	
7	Mir Azam Khan	Naib Qasid	3	12.09.1984	
8	Nooran Gul	Naib Qasid	3	02.09.2002	
9	Naqem khan	Naib Qasid	3	02.09.2002	



11 F 4 - 22

GOVERNMENT OF KHYBER PAKHTUNKHWA
PLANNING & DEVELOPMENT DEPARTMENT

NO.SO (B&A)/P&DD/1-4/SDU/2021-22/100

Dated Peshawar the 17th January, 2023

To: The Director General, SDU
P&D Department.

Subject: PAY PROTECTION OF PAY OF PROJECT/CONTRACT EMPLOYEES
REGULARIZED UNDER THE "KHYBER PAKHTUNKHWA
(REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE
FATA) ACT 2021"

Dear Sir

I am directed to refer to a joint appeal submitted by all Employees of Directorate of Projects (DOP) & PMU-World Food Program (WFP) for grant of pay protection dated 07.11.2022 and to enclose herewith a copy of Finance Department letter No.FD(SOSR-1)12-4/2022/ERSTWHILE FATA dated 09.01.2023 along with enclosures, wherein Finance Department has tendered that "all project employees who were appointed on fixed pay basis and in receipt of 5% increment are not entitled to the pay protection", please.

Yours Faithfully

Encl: As above.

(JAWAD KHAN)
ASSISTANT CHIEF (B&A)

Copy forwarded for information to:

1. The Additional Secretary-II, P&D Department.
2. The Deputy Secretary (Admn), P&D Department.
3. P.S. to Secretary, P&D Department.

ASSISTANT CHIEF (B&A)

Legible Copy

**GOVERNMENT OF KHYBER PAKHTUNKHWA
PLANNING & DEVELOPMENT DEPARTMENT**

No.SO (B&A) /P&DD/1-4/SDU/2021-22/100
Dated Peshawar the 17th January, 2023

To,

The Director General, SDU
P&D Department

Subject:

**PAY PROTECTION OF PAY OF PROJECT/CONTRACT EMPLOYEES
REGULARIZED UNDER THE "KHYBER PAKHTUNKHWA
(REGULARIZATION OF SERVICES OF EMPLOYEES OF ERSTWHILE
FATA) ACT 2021"**

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Yours faithfully

Sd/-
Jawad Khan
Assistant Chief (B&A)

Copy forwarded for information to

1. The Additional Secretary-II P&D Department.
2. The Deputy Secretary (Admn) P&D Department
3. P.S to Secretary P& Department.

Sd/-
Assistant Chief (B&A)



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT "G"

-23-

Financial Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKPPD](https://www.facebook.com/GoKPPD)

[twitter.com/GoKPPD](https://www.twitter.com/GoKPPD)

NO. FD (SOSR-1) 12-2/2020(34323)

Dated Peshawar the: 18th March, 2021

To:

1. The Addl. Chief Secretary, P&D Department, Khyber Pakhtunkhwa.
2. The Addl. Chief Secretary, Merged Areas Sectt: Khyber Pakhtunkhwa.
3. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
4. All Administrative Secretaries to Govt: of Khyber Pakhtunkhwa.
5. The Principle Secretary to Governor, Khyber Pakhtunkhwa.
6. The Principle Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. The Registrar, Peshawar High Court, Peshawar.
10. All District & Sessions Judges in Khyber Pakhtunkhwa.
11. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
12. The Chairman, Services Tribunal, Khyber Pakhtunkhwa.
13. All Deputy Commissioners, in Khyber Pakhtunkhwa.

Subject:

**PROTECTION OF PAY OF CONTRACT EMPLOYEES ON
REGULARIZATION / APPOINTMENT ON REGULAR
BASIS.**


Dear Sir,

In pursuance to the Finance Division's Office Memorandum No.4(2)R-2/2014-237 dated 7th April, 2015, the Competent Authority (Provincial Cabinet) is pleased to allow the pay protection to gazetted contract employees on their regularization / appointment on regular basis subject to the following conditions:-

- i) That the contract appointment has been made in BPS on standard terms and conditions, circulated by this Provincial Government as amended from time to time.
- ii) That the contract employee has applied through proper channel and has been properly relieved by the appointing authority. This condition shall not apply in case of regularization on the same post.
- iii) That regularization / regular appointment has been made with the approval of competent authority.
- iv) That there is no break / interruption between contract service and regular service.

- vii) That the pay protection / fixation of pay will be admissible with immediate effect with regard to old / new cases which are fulfilling the pay protection criteria mentioned above.


2. In addition to the above, the Accountant General Khyber Pakhtunkhwa may make fixation of pay in terms of above guidelines and only those cases may please be referred to Finance Department where some clarification or advice is required.

Yours faithfully,

 (Muhammad Salim Shah)
 Deputy Secretary (Reg-I & II)

Endst: No & Date even.

A Copy for information & necessary action is forwarded to the:-

1. Secretaries to Government of Punjab, Sindh, Balochistan, Finance Departments;
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.
4. The Director, Treasuries & Accounts, Khyber Pakhtunkhwa.
5. All the District Comptroller of Accounts in Khyber Pakhtunkhwa.
6. The Director, Local Fund Audit, Khyber Pakhtunkhwa, Peshawar.
7. The Director, FMIU, Finance Deptt: with the request to upload the same on FD's Website.
8. The Manager, Govt. Printing Press, Printing & Press Department, Peshawar.
9. All the District Accounts Officers in Khyber Pakhtunkhwa.
10. The Section Officer (Cabinet) Estt: Deptt:, Khyber Pakhtunkhwa with reference to his letter No.SOC(E&A)9-51/2021 dated 08-03-2021.
11. The Section Officer (Estab), C&W Deptt: with reference to his letter No.SOE/C&WD/1-61/2010 dated 26-10-2020 in respect of Eng. Syed Nasir Jehan, Asstt: Engineer / SDO (BS-17) of C&W Deptt: KP.
12. The Private Secretary to Chief Secretary, Khyber Pakhtunkhwa.
13. The Private Secretary to Minister for Finance, Khyber Pakhtunkhwa.
14. The Private Secretary to Secretary, Finance Deptt: Khyber Pakhtunkhwa.
15. PA to Special Secretary, Finance Department, Khyber Pakhtunkhwa.
16. PAs to Additional Secretaries / Deputy Secretaries in Finance Department, Peshawar.


 (REHMAT KHAN)
 SECTION OFFICER (SR-1)

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2023

Rajwali v. Govt

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

P & D Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Appellant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 15 / 2 / 2023

Client
CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT
(BC-10-0853)
(15401-0705985-5)

Kamran Khan
KAMRAN KHAN

Umar Farooq Mohmand
UMAR FAROOQ MOHMAND
Waleed Adnan
WALEED ADNAN

& Muhammad Ayub
MUHAMMAD AYUB
ADVOCATES

OFFICE:
Flat No: (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)