Form A FORM OF ORDER SHEET

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

. . .

1262 /2021 Case No.-

S.No.	Date of order	Order or other proceedings with signature of judge
	proceedings	
1	2	3
· 1-	19/01/2021	The appeal presented today by Mr. Adnan Aman Advocate may
		be entered in the Institution Register and put to the Learned Member for
•		proper order please.
		REGISTRAR
. 7		This case is entrusted to S. Bench for preliminary hearing to be put
<b>.</b> .	08-02-71	up there on01 - 03 - 21
	<b>v</b>	MEMBER(I)

01.03.2021 The learned Member Judicial Mr. Muhammad Jamal Khan is on leave, therefore, the case is adjourned. To come up for the same before S.B on 26.07.2021.

, . <sup>. .</sup> . . .

Reader

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

## APPEAL NO. \_\_\_\_/2021

ABID ULLAH VS EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	•••••	1-3
2.	Notification	Α	4
3.	Pay slips	B&C	5-6
4.	Departmental appeal	D	7
5.	Service Tribunal judgment	E	8-9
6.	Vakalat nama		10

APPELLANT

.

THROUGH:

ADNAN AMAN ADVOCATE HIGH COURT (S) CELL NO 0321-9853530

Note: Sir, ,

8

Spare copies will be submitted After submission of the case. BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR Khyber Palehtukhwa Service Tribunał

# APPEAL NO 12 62+2021

Diary No. [35]

Mr. ABID ULLAH, CT (BPS-15) GHSS, MAYAR, LOWER DIR Personnel Number: 00259986

APPELLANT

んわれ

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.

5- The Director of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar. 

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS WHO VIDE THE SAME ARE ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE OF THE **APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST** IN ACTION OF THE DEPARTMENTAL APPEALLATE AUTHORITY WHO VIDE THE SAME DID NOT PASS ANY APPROPRIATE ORDER OVER THE DEPARTMENTAL APPEAL OF THE APPEALLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

**PRAYER:** 

That on acceptance of this appeal the respondents may kindly be ordered/directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the \*Yayment of all outstanding amount of Conveyance allowance which have been deducted previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

## **R/SHEWETH:**

**ON FACTS:** 

- 1- That the appellant is serving in the Elementary & Secondary Education Department as CERTIFICATED TEACHER (CT) BPS-15 quite efficiently and up to the entire satisfaction of their superiors.
- 2- That the Conveyance Allowance is admissible to all the Civil Servants and to this effect a Notification No. FD (PRC)1-1/2011 dated 14.07.2011 was issued. That later on vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS 1 to 15 were enhance/revised while employees from
  - BPS-16 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Copy of the Notification dated 20.12.2012 are attached as annexure.....

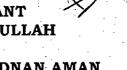
- 5- That other colleges of appellant of different cadre approached this august tribunal in different service appeals which was allowed by this august tribunal vide its judgment no 1452/2019 titled maqsad Hayat versus Education Department Dated 11-11-2019......E.
- 6- That the appellant also prayed to be treated alike through the principles of consistency for allowing such relief which was granted in appeal No 1452/2019 titled Maqsad Hayat versus Education Department in Judgment Dated 11.11.2019.
- 7- That where after the appellant waited for the statutory period of ninety
  days but no reply has been received from the respondents. That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

#### GROUNDS:

- A- That the action and inaction of the respondents regarding deduction of conveyance allowance for vacations period/months is illegal, against the law, facts, norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and Rules on the subject noted above and as such the respondents have violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned action of the respondents is without any legal & lawful authority, discriminatory and in clear violation of fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.
- D- That there is clear difference between leave and vacation as leave is applied by the Civil Servant in light Government Servant Revised Leave Rules, 1981 while the vacations are always announced by the Government, therefore under the law and Rules the appellant fully entitled for the grant of conveyance allowance during vacations period.

- E- That the Government Servants Revised Leave Rules, 1981 clearly explain that the civil servants who avail the vacations are allowed only one leave in a month whereas, the other civil servants may avail 04 days leave in a calendar months and the same are credited to his account and in this way he may avail 48 days earned leave with full pay, whereas the Government servants to avail vacation such as appellant is allowed one day leave in a month and twelve (12) days in a year and earned leave for twelve days in a year are credited to his account and there is no question. of deduction of conveyance allowance for vacation period, the respondents while making the deduction of conveyance allowance lost sight of this legal aspect and illegally and without any authority started the recovery and deduction of conveyance allowance from appellant.
- F- That as the act of the respondents is illegal, unconstitutional, without any lawful authority and not only discriminatory but is also the result of malafide on the part of respondents.
- G- That appellant has the vested right of equal treatment before law and the act of the respondents to deprive the appellant from the conveyance/allowance is unconstitutional and clear violation of fundamental rights.
- H-That according to Government Servants Revised Leave Rules, 1981 vacations are holidays and not leave of any kind, therefore, the deduction of conveyance allowance in vacations is against the law and rules.
- I- That according to Article 38 (e) of the Constitution of Islamic Republic of Pakistan, 1973 the state is bound to reduce disparity in the income and earning of individuals including persons in the services of the federation, therefore in light of the said Article the appellant fully entitle for the grant of conveyance allowance during vacations.
- J- That the appellant seeks permission of this Honorable Tribunal to raise any other grounds available at the time of arguments.
  - It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for under the golden principals of consistency.

APPELLANT ABID ULLAH **THROUGH:** ADNAN AMAN ADVOCATE HIGH COURT(S)





From

To:

# GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGULATION WING)

#### NO. FD/SO(SR-IN/8-52/2012 Dated Peshawar the: 20-12-2012

The Secretary to Govt. of Khyber	Həzi	លេកុម	<b>∵</b> 4•a
Finance Department,	•	• `	
Pennavear.			

All Administrative Secretaries to Gov. of Khyter Pakhturithwo. The Senior Member, Board of Revenue, Knyber Pakhuaistwo. The Secretary to Governer Knyber Pakhtanawa The Secretary to Chiai Micseer, Khyber Pakhunkhwa. The Secretary, Franhold Arothey, Khyber Pakhlenkhiwa All Heads of Altached Departments in Knyher Pakhurkhiva Ar District Coordination Officerous Khyser Paklitunkinga AF Political Agents / District & Semions Judges in Kluyder Politicalwa The Registrer, Reshawar High Cost, Poshawar The Charman Public Service Contresion, Khyber Pokhlunkines. The Chairman, Services Tribunal Koyper Pathipethwa.

Scittleret

5

i.

5.

÷.

## REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA, PROVINCIAL GOVERNMENT BPS 1-19

Dear Sit.

The Government of Khyber Pakhturahwa has been pleased to enhance / revise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants, Covil of Knyber Pethanishwa (Violking in BPS-1 to BPS-13) w.e.t from 1° September, 2012 at the following rates. However, the conveyance allowance for employees in BFS-15 to EPS-19 . Department witchinged.

S.NO BPS	EXISTING RATE (PM)	REVISED RATE (PM)
1. 1-1	<u>Rs 1 500/-</u>	Rs.1,700/-
2, 5-10	Rs 1,500/-	<u>Rs.1,840/-</u>
3 11-15	1 <u>Ps.2,000</u> /-	Rs.2,720/-
<u> </u>	Rs.5,000/+	R\$.5,000/-

Conveyance Allowance at the above rates per month shall be admissible to those BPS-17, 18 and 19 effects who have not been sanctioned efficial vehicles.

Yours Faithfully,

(Sahibzada Saood Ahmad) Secretary Finance

Dated Persuawar the 20" December, 2011 Endst: NO. FDESO(SR-IT):8-52/2012

A Copy is forwarded for information to the:-

- Accountant General Parater Pakiture Restricted
- Secretaries to Covernment of Punjab, South & Salperseisen Fansinge De AU Autoromous / Seria Autonorpous Bodes in Khyper Pakturaktiwa

(INTIAZ AYUB) : Indikanal Sarahary (Rad

#### BETTER COPY PAGE-5

#### GOVERNMENT OF KHYBER PAKHTUNKHW FINANCE DEPARTMENT (REGUALTION WING)

#### NO.FD/SO(SR-II)/52/2012 Dated Peshawar the: 20.12.2012

#### From

To:

#### The Secretary to Govt: of Khyber Pakhtunkhwa. Finance Department, Peshawar.

- All administrative Secretaries to Govt: of Khyber Pakhtunkhwa.
- 2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa.
- 4. The Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
- 6. All Heads of attached Departments in Khyber Pakhtunkhwa.
- 7. All District Coordination Officers of Khyber Pakhtunkhwa: S. All Political Agents/District & Session Judge in Khyber Pakhtunkhwa.
- 9. The Registrar Peshawar High Court, Peshawar.
- 10. The Chairman Public Service Commission, Khyber Pakhtunkhwa.
- 11. The Chairman, Service Tribunal, Khyber Pakhtunkhwa.

#### Subject: <u>REVISION IN THE RATE OF CONVEYANCE ALLOWANCE</u> FOR . म.म. म. PROVINCIAL CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA GOVERNMENT BPS-1-19

#### Dear Sir,

The Government of Khyber Pakhtunkhwa has been pleased to enhance/revise inc rate of Conveyance Allowance admissible to all the Provincial Civil Servants Govt: of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from 1st September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain unchanged.

	••	•			
	S.No.	BPS	Existing Rate (PM)	Revised Rate (PM)	
	1. •	1-4	Rs. 1,500/-	Rs. 1,700/-	
•	'2	5-10 .	Rs. 1,500/-	Rs. 1;840/-	1. ·
·	3.	.11-15	Rs. 2,000/-	Rs. 2,720/-	] :
-	4.	. 16-19	Rs. 5,000/-	Rs. 5,000/-	

Conveyance Allowance at the above rates per month shall be admissible to those BPS-17 18 and 19 officers who have not been sanctioned official vehicle.

Your Faithfully

(Sahibzada Saeed Ahmad) Secretary Finance

10

Endst No. FD/SO(SR-II)8-52/2012 Dated Peshawar the 20th December;

	Dist. Gov <u>t</u> District Accounts Ionthly Salary Sta		Timargar	Ś	-B	
Personal Information of Mr	ABID ULLAH d/	w/s of HABIB	UR REHMAN			776
Personnel Number: 00259986				NTN:		
Date of Birth: 10.10.1981	Entry into Gov	vt. Service: 01.	.04.2004	Length of S	Service: 16	Years 08 Months 001 Days
Employment Category: Voca	tional Temporary	7				
Designation: CERTIFICATE			80001427-DIST	RICT GOVE	ERNMENT	КНҮВЕ
DDO Code: DA6032-GHSS N	AYAR					
Payroll Section: 001	GPF Section: 0	01	Cash Center: 09			•
GPF A/C No: 259986	Interest Applie	d: Yes	GPF B	alance:	4	13,233.00
Vendor Number: -					•	10,255.00
Pay and Allowances:	Pay scale: BP	S For - 2017	Pay Scale Type	e: Civil B	PS: 15	Pay Stage: 11
Wage type		Amount		Wage ty	pe	Amount

L	Wage type	Amount	Wage type	Amount
0001	Basic Pay	30,750.00	1000 House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1923	UAA-OTHER 20%(1-15)	1,000.00	2148 15% Adhoc Relief All-2013	575.00
2199	Adhoc Relief Allow @10%	388.00	2211 Adhoc Refief All 2016 10%	2,154.00
2224	Adhoc Relief All 2017 10%	3,075.00	2247 Adhoc Relief All 2018 10%	3,075.00
2264	Adhoc Relief All 2019 10%	3,075.00		0.00

.

#### Deductions - General

	Wage type	Amount		Wage type	Amount
3015	GPF Subscription	-2.890.00	3501	Benevotent Fund	-600.00
3609	Income Tax			Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00			0.00

## Deductions - Loans and Advances

Loan	Desci	ription	Principal amount	Deduction	Balance
Deductions Payable:	- Income Tax 478.15 Recove	red till NOV-2020:	200.00 Exempted	d: 0.31- Recov	erable: 278.46
Gross Pay (I	<b>Rs.):</b> 50,797.00	Deductions: (Rs.):	-4,255.00	Net Pay: (Rs.):	46,542.00
Account Nu	e: ABID ULLAH imber: C/A 5503-8 is: NATIONAL BANK (	DF PAKISTAN, 230841 M	NBP TIMARGARA DIF	R NBP TIMARGARA I	DIR, KOHAT
Leaves:	Opening Balance:	Availed:	Earned:	Balance:	
Permanent A	Address: VILL.JONI KA	LAY MAYAR			
City: DIR Lo Temp. Addr		Domicile: NW - Kh	iyber Pakhtunkhwa	Housing Stat	tus: No Official
City:		Email: abidullahsps	t866@gmail.com	. ,	·
· · ·	· ·			ATTESTE	D

·	Dist. Govt. District Account Monthly Salary	NWFP-Prov s Office Dir at Statement (Ju	Timargar	6-	C	
Personal Information of Mr A	BID ULLAH d/	w/s of HABIB	UR REHMAN			
Personnel Number: 00259986	CNIC: 10881			NTN		
Date of Birth: 10.10.1981	Entry into Go	vt. Service: 01	.04.2004		ervice: 13 Years 04	Months 001 Days
<b>Employment Category: Vocati</b>	onal Temporar	v		ι.		•
Designation: SENIOR PRIMAR			. 80001409-015	STRICT GOVE	RNMENT KHYBE	
DDO Code: DA6140-GOVT. P			ARBAGH		MINIMENT KHABE	
Payroll Section: 001	GPF Section: (		Cash Center: (	20		
GPF A/C No: 259986	Interest Applie	d: Yes		Balance:	176,037.00	)
Vendor Number: -					-,	
Pay and Allowances:	Pay scale: BF	PS For - 2017	Pay Scale Ty	pe: Civil BP:	S: 14 Pay S	Stage: 8
Wage type		Amount		Wage typ		
0001 Basic Pay		24 540 00	1000 House		<u>v</u>	Amount

0001 Basic Pay	Anount	wage type	Amount
	24,540.00	1000 House Rent Allowance	1,476.00
1300 Medical Allowance	1 .	1923 UAA-OTHER 20%(1-15)	
2148 15% Adhoc Relief All-2013			1,000.00
2211 Adhoc Relief All 2016 10%	,	2199 Adhoc Reliet Allow @10%	373.00
	2,056.00	2224 Adhoc Relief All 2017 10%	2,454.00

#### **Deductions - General**

r

Amount	Waga tura	
		Amount
		-600.00
-8.00	3914 Education (ROP)	-1.099.00
-125.00	4004 R. Benefits & Death Comp	-600.00
	-8.00	-2,194.00         3501         Benevolent Fund           -8.00         3914         Education (ROP)

# **Deductions - Loans and Advances**

	Descri	ption '	Principal amount	Deduction	Balance
Payable:		d till July-2017:	8.00 Exempted: :	58.45 Recoverat	ble: 81.29
Gross Pay (	Rs.): 33,949.00	Deductions: (Rs.):	-4,626.00 N	let Pay: (Rs.): 29,323.	00
Account Nu	e: ABID ULLAH mber: C/A 5503-8 s: NATIONAL BANK O Opening Balance:	F PAKISTAN, 230841 N Availed:	IBP TIMARGARA DIR N Earned:	BP TIMARGARA DIR Balance:	, КОНАТ
_					
^ Permanent A	Address: VILL.JONI KAL	AY MAYAR		· · · · · · · · · · · · · · · · · · ·	
Permanent A City: DIR La Temp. Addr		AY MAYAR Domicile: NW - Kh	yber Pakhtunkhwa	Housing Status:	No Official



The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

#### Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ACTION OF THE CONCERNED AUTHORITY BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING WINTER & SUMMER VACATIONS

Respected Sir,

1 To

With due respect it is stated that I am the employee of your good self Department and is serving as CT (BPS-15) quite efficiency and up to the entire satisfaction of the superiors. It is stated for kind information that Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. Later ion vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS 1 to 15 were enhance/revised while employees from BPS-15 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Respected Sir, I was receiving the conveyance allowance as admissible under the law and rules but the concerned authority without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. One of the employee of Education Department in Islamabad filed service appeal No.1888 (R) CS/2016 before the Federal Service Tribunal, Islamabad regarding conveyance allowance which was accepted by the Honorable Service Tribunal vide its judgment dated 03.12.2018. That the august K.P.K service tribunal also allowed the restoration of the convence allowance in its judgment dated 11.11.2019 in appeal No 1452/2019 titled Magsad Hayat versus Education Derpartment.Copy attached.That I also the similar employee of Education Department and under the principle of consistency I am also entitled for the same treatment meted out in the above mentioned service appeal but the concerned authority is not willing to issue/grant the same conveyance allowance which is granting to other employees. Copy attached. I am feeling aggrieved from the action of the concerned authority regarding deduction of conveyance allowance in vacations period/months preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the concerned authority may very kindly be directed the conveyance allowance may not be deducted from my monthly salary during the winter & summer vacations.

**Your Obediently** 

ABID ULLA

Dated: 24.09.2020

ATTESTED to be true Сору Advecat

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

A HIGH HIGH IN

ឬក្រោះ

EXAD KHUM

APPEAL NO. 1452 /2019

Mr. Maqsad Hayat, SCT (BPS-16), APPE GHS Masho Gagar, Peshawar.....

## VERSUS

1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.

2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar. 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.

4- The Accountant General, Khyber Pakhtunkhwa, Peshawar. 5- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

RESPONDENTS

APPEAL UDNER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED RESPONDENTS BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE WINTER & SUMMER THE APPELLANT DURING VACATIONS AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

## PRAYER:

24/10/19

Ę,

That on acceptance of this appeal the respondents may kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winte Vacations) and make the payment of all outstanding amoun of Conveyance allowance which have been deducte Flecte-day previously with all back benefits. Any other remedy whic this august Tribunal deems fit that may also be awarded i Registrar favor of the appellant.

# R/SHEWETH: ON FACTS:

1- That the appellant is serving in the elementary and seconda education department as Certified Teacher (BPS-15) quite efficier and up to the entire satisfaction of the superiors.

2- That the Conveyance Allowance is admissible to all the civil serva and to this effect a Notification No. FD (PRC) 1-1/2011 da 14.07.2011 was issued. That later ion vide revised Notification da 20.12.2012 whereby the conveyance allowance for employ

To Be The COPY

Appleal No. 1452/2019 Markad Hayat VS Gior

11.11.2019

Counsel for the appellant present.

Learned counsel referred to the judgment passed by learned Federal Service Tribunal in Appeal No. 1888(R)CS/2016 which was handed down on 03.12.2018. Through the said judgment the issue of payment of Conveyance Allowance to a civil servant during summer and winter vacations was held to be within his entitlement and the deduction already made from him was to be reimbursed. Similar reference was made to the judgment by Honourable Peshawar High Court passed on 01.10.2019 in the case of appellant.

Learned counsel, when confronted with the proposition that the issue, in essence, was dilated upon by the Federal Service Tribunal and, more particularly, by the Honourable Peshawar High Court in the case of appellant, stated that in case the respondents are required to execute the judgment of Peshawar High Court, the appellant will have no cavil about disposal of instant appeal.

The record suggests that while handing down judgment in the Writ Petition preferred by the appellant, the Honourable High Court not only expounded the definition of "Pay" as well as "Salary" but also entitlement of a civil servant for the Conveyance Allowance during the period of vacations. It is important to note that the respondents were represented before the High Court during the proceedings.

In view of the above noted facts and circumstances and in order to protect the appellant from a fresh round of litigation which may protract over a formidable period, the appeal in hand is disposed of with observation that the judgment of Honourable Peshawar High Court passed in Writ Petitions including W.P. No. 3162-P/2019 shall be honoured and implemented by the respondents within shortest possible time. The appellant shall, however, be at liberty to seek remedy in accordance with law in case his grievance is not redressed by the respondents within a reasonable time.

File be consigned to the record. 5 

E V Kh Chairman

C ....

ANNOUNCED

Certifien

Pesilawar.

#### VAKALATNAMA

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TIBUNAL, PESHAWAR

OF 2021

#### ABID ULLAH

(APPELLANT)

\_\_(PLAINTIFF)

(PETITIONER)

VERSUS

#### Education Department

(RESPONDENT) \_(DEFENDANT)

#### I/We ABID ULLAH

do hereby appoint and constitute **ADNAN AMAN**, **Advocate**, **High Court**, **Peshawar** 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.\_\_\_/\_\_/2021

CLIENT

ACCEPTED ADNAN AMAN ADVOCATE