


FORM OF ORDER SHEET

Court of _____

Case No.- _____

892 /2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/04/2023	<p>The appeal of Mr. Bacha Khitab resubmitted today by Mr. Muhammad Adam Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on-</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Bacha Khitab son of Sardar Khitab Ex-Chowkidar GGP's Miangama Cham Gujar Garhi Mardan received today i.e. on 04.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 7 days.

- 1- Copy of regularization order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Memorandum of appeal is not signed by the counsel.
- 4- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 5- The documents that are to be provided must be illegible/readable.

No. 1084/S.T.

Dt. 5-4/2023


REGISTRAR *CB*
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Muhammad Adam Khan Adv.

High Court Mardan.

07/04/2023 Received back today.

*26/04/2023 Objection Removed and Re-submitted on
26/4/2023 on a/c of vacations* Adnan

Before The Service Tribunal Peshawar.

Appeal No. 892 / 2023.

Bacha Khitab **V/S** The Secy; Education Deptt; etc;


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Total:- 19

Dated:-07-04-2023.

Appellant


(Bacha Khitab)

Through:-

Muhammad Adam Khan
Advocate High Court
at District Courts Mardan.

Before The Service Tribunal Peshawar

Appeal No. 892 / 2023.

Bacha Khitab S/O Sardar Khitab (Ex-Chowkider The Govt Primary School, (Miangano Cham) Gujar Garhi Mardan. (Resident of Mohalah Miangano Cham Gujar Garhi Mardan.

Appellant.

Versus

1. The Secretary, The Elementary and Secondary Education Department KPK Peshawar.
2. The Director, The Elementary and Secondary Education Department KPK Peshawar.
3. The District Education Officer (Male) , The Elementary & Secondary Education Department Mardan.
4. The Sub-divisional Education Officer (Male) , The Elementary & Secondary Education Department Mardan.

Respondents.

Appeal Under Section-4 of the Service Tribunal Act, 1974, against the order of The D.E.O (M)/Respondent No.3 contained in Endst; No. 9724-26/PF dated 05.10.2013, whereby the Appellant is awarded the punishment of Removal from Service and Appeal there-against is rejected returned vide Endst; No. 1399 dated 15.02.2023 directing the Appellant to approach the proper forum.

Prayer:-

On acceptance of this Appeal, setting aside the impugned order, the Appellant may be re-instated into service with back service benefits.

FACTS:-

1. That the Appellant was appointed as Chowkider on 18-10-1994, on contract basis whose service was later-on regularized with effect from the date of appointment i.e; 18-10-1994 on the basis of Notification dated 30-07-2008. **(Copies Annexure-"A & A/I")**.
2. That the Appellant was falsely charged in a Criminal Case Under Section-302/324/34 PPC vide Fir No.273 dated 30-04-2013 of P.s Sadder Mardan on account of family enmity. **(Copy of F.I.R is Annexure-"B")**.
3. That after trial of the criminal case, the Appellant was acquitted by The Addl; Session Judge-VI Mardan vide Judgment dated 10-01-2023. **(Copy Annexure-"C")**.
4. That the Appellant contacted the Office of The DEO/Respondent No.3 on 17-01-2023 in order to report for duty, where he learnt that Appellant was removed from Service vide Endorsement No.9724-26/PF dated 05-10-2013. **(Copy Annexure-"D")**.

5. That the Appellant preferred representation to The DEO/Respondent No.3 on 17-01-2023.

(Copy Annexure-"E").

6. That the office of The DEO/Respondent No.3 was reluctant to process the said representation. Hence, Appellant submitted application dated 15-02-2023 for process of the Representation. (Copy Annexure-"F").

7. That the DEO//Respondent No.3 rejected the Appeal vide Endorsement No.1399 dated 15-02-2023, with direction to approach the proper forum. The Appellant learnt about the same on 10.03.2023 and preferred the Appeal to The Director/ Respondent No.3, there & then.

(Copy Annexure-"G").

8. That the Respondent No.3 was supposed to forward the said Representation to the Director/Respondent No.2 or to mention the word returned instead writing the word as rejected. (Copies Annexure-"H & I").

9. That the Appellant seeks the leave of this Honourable Tribunal to claim other grounds also.

10. That the Appellant is jobless after the impugned order.

It is prayed that on acceptance of this Appeal, setting-aside the impugned order, the Appellant may be ordered to be re-instated into service with all back & service benefits.

The costs of this Appeal may also be awarded in favour of Appellant against the Respondents.

Dated:-07-04-2023.

Appellant

Bacha Khitab
(Bacha Khitab)

Through:-

Muhammad Adam Khan
Advocate, Mardan.

AFFIDAVIT:-

I, Bacha khitab/the Appellant, do hereby stated on solemn affirmation that the contents of the above Appeal are true and correct to the best of my knowledge and belief and nothing is concealed from this Honourable Tribunal.

Deponent: *Bacha Khitab*
(Bacha Khitab)

Certificate:-

This is certified that as per the Appellant, he has not instituted any other Appeal/ suit/Petition, on the same cause of action, in this Honourable Tribunal/ other service Tribunal/Court, previously.

Muhammad Adam Khan
Advocate, Mardan.

M.A.K.
M.L.U. Mardan Advocate
Oath Commissioner
No. *1001/2023*
Dist. *Mardan*

5

ANNEXURE "A"

OFFICER OF THE SUB-DIVISIONAL EDUCATION OFFICER (MALE) TAKHT BHAI

APPOINTMENT:

ATTESTED
Adam Khan
ADAM KHAN

Mr. Bacha Khitab, S/O: Sardar Khitab: Resident of Gujer Ghari:
is hereby appointed against Chowkidar: Post: at Government Primary School:
Milangano Cham: on contract basis Rs; 1200/- Fixed: with effect from the date
of taking over charge: in the interest of public service.

- NOTE:-
- 1:- Charge report should be submitted to this office in duplicate.
 - 2:- Health and Age Certificate obtained from the M:S: (DHQ) Hospital:
Mardan: should be produced to the undersigned.
 - 3:- He should not be taken charge if his age is less than 18: Years: or
or above 45: years:

Sd
(Mr, HAQ DAD KHAN)

SUB-DIVISIONAL EDUCATION OFFICER:
(MALE) TAKHT BHAI: MARDAN.

Endst: No: 1160-77 DATED: TAKHT BHAI: THE 10/10 /1994.

- Copy forwarded for information:-
- 1:- District Education Officer (Male) Primary: Mardan.
 - 2:- Head Teacher: G:P:S: Milangano Cham (Gujer Ghari).
 - 3:- Candidate Concerned.
 - 4:- A:S:D:E:O: Taluqa.
 - 5:- Accountant Local Office.

H. Khan
SUB-DIVISIONAL EDUCATION OFFICER,
(MALE) TAKHT BHAI: MARDAN.

1160

A

BETTER COPY of Annexure
"A" / PAGE: - 5.

OFFICE OF THE SUB: DIVISIONAL EDUCATION OFFICER (MALE) TAKHT BHAI.

APPOINTMENT:

Mr, Bacha Khitab, S/o: Sardar Khitab: resident of Gujar Ghari: is hereby appointed against Chowkider: Post: at Government Primary School; Miangano Cham: on Contract Basis Rs: 1200/- Fixed: with effect from the date of taking over charge: in the interest of Public Service.

- NOTE:- 1:- Charge report should be submitted to this office in duplicate.
2:- Health and Age Certificate obtained from the M: S: (DHO) Hospital; Mardan: should be produced to the undersigned.
3:- He should not be taken charge if his age is less than 18: Years: of or above 45: years:

* * * * *

S-d
(MR, HAD DAD KHAN)
SUB: DIVISIONAL EDUCATION OFFICER:
(MALE) TAKHT BHAI: MARDAN.

Endst: No: 1268-72 DATED: TAKHT BHAI: THE 18/10 /1994.

Copy forwarded for information: -

- 1:- District Education Officer (Male) Primary; Mardan.
- 2:- Head Teacher: G: P: S: Miangano Cham (Gujar Ghari).
- 3:- Candidate Concerned.
- 4:- A: S: D: E: O: Illega.
- 5:- Accountant Local Office.

Sd/-
SUB: DIVISIONAL EDUCATION OFFICER,
(MALE) TAKHT BHAI: MARDAN.

P/5(a)

Annexure - A/I

Employees (Regularization of Services) Act, 2009

401

commencement of the said Act, but appointment on contract basis, shall, with effect from the commencement of the said Act, be deemed to have been appointed on a regular basis. All such persons and the persons appointed on regular basis to a service or post in the prescribed manner after the commencement of the said Act shall, for all intents and purposes be civil servant, except for the purpose of pension or gratuity. Such a Civil servant shall, in lieu of pension and gratuity, be entitled to receive such amount contributed by him towards the Contributory Provident Fund, along with the contributions made by Government to his account in the said fund, in the prescribed manner:

Provided that in the event of death of such a civil servant, whether before or after retirement his family shall be entitled to receive the said amount, if it has already not been received by such deceased civil servant.

(3) No pension to a civil servant, who is otherwise entitled to it, shall be admissible to him, if he is dismissed or removed from service for reasons of discipline, but Government may sanction compassionate allowance to such a civil servant, not exceeding two-third of the pension or gratuity which would have been admissible to him had he been invalidated from service on the date of such dismissal or removal.

Provided that a civil servant referred to in sub-section (2), in case of such dismissal or removal, may, in addition to his own contributions to the Contributory Provident Fund, be allowed, on account of such compassionate allowance, a sum not exceeding two-third of Government contributions in his account.

(4) If the determination of the amount of pension or gratuity admissible to a civil servant is delayed beyond one month of the date of his retirement or death, he or his family, as the case may be, shall be paid provisionally such anticipatory pension or gratuity as may be determined by the prescribed authority, according to the length of service of the civil servant which qualified for pension or gratuity; and any over payment on such provisional payment shall be adjusted against the amount of pension or gratuity finally determined as payable to such civil servant or his family.

**Khyber Pakhtunkhwa
Employees (Regularization of Services) Act, 2009**

Khyber Pakhtunkhwa Act No. XVI of 2009

AN ACT to provide for the regularization of the services of certain employees appointed on adhoc or contract basis.

[Gazette of Khyber Pakhtunkhwa, Extraordinary, Page No. 289 – 291, 24TH October, 2009

No.PA/Khyber Pakhtunkhwa/Bills/2009/38472 dated 24-11-2009.---The Khyber Pakhtunkhwa Employees (Regularization of Services) Bill, 2009 having been passed by the Provincial Assembly of Khyber Pakhtunkhwa on 15th October, 2009 and assented to by the Governor of the Khyber Pakhtunkhwa on 20th

October, 2009 is hereby published as an Act of the Provincial Legislature of the Khyber Pakhtunkhwa.

Preamble. ---WHEREAS it is expedient to provide for the regularization of the services of certain employees appointed on adhoc or contract basis, in the public interest, for the purposes hereinafter appearing;

It is hereby enacted as follows:-

1. Short title and commencement. --- (1) This Act may be called the North- West Frontier Province Employees (Regularization of Services) Act, 2009.

(2) It shall come into force at once and shall be deemed to have been taken effect at the promulgation of the Ordinance.

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

(a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;

(aa) "contract appointment" means appointment of a duly qualified person made otherwise than in accordance with the prescribed method of recruitment;

(b) "employee" means an adhoc or a contract employee appointed by Government on adhoc or contract basis or second shift/night shift but does not include the employees for project post or appointed on work charge basis or who are paid out of contingencies;

(c) "Government" means the Government of the Khyber Pakhtunkhwa ;

(d) "Government Department" means any department constituted under rule 3 of the Khyber Pakhtunkhwa Government Rules of Business, 1985;

(e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants; and

(f) "post" means a post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commission.

(2) The expressions "adhoc appointment" and "civil servant" shall have the same meanings as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. Regularization of services of certain employees.--- All employees including recommendees of the High Court appointed on contract or adhoc basis and holding that post on 31st December, 2008 or till the

P/5(e)

Extra-Assistant Commissioners -cum-Illaq Qazi (regularization of Services) Act, 2012 403

commencement of this Act shall be deemed to have been validly appointed on regular basis having the same qualification and experience for a regular post:

Provided that the service promotion quota of all service cadres shall not be affected.

4. Determination of seniority.--- (1) The employees whose services are regularized under this Act or in the process of attaining service at the commencement of 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 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 interse of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

Provided that if the date of continuous officiation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

4A. Overriding effect.--- Notwithstanding any thing to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

5. Repeal.--- The Khyber Pakhtunkhwa Employees (Regularization of Services) Ordinance, 2009 (Khyber Pakhtunkhwa Ordinance No. VII of 2009) is hereby repealed.

**Khyber Pakhtunkhwa
Extra-Assistant Commissioners -cum-Illaq Qazi
(regularization of Services) Act, 2012**

(Khyber Pakhtunkhwa Act No.V11 OF 2012)

An Act to provide for the regularization of the services of certain Extra-Assistant Commissioners- cum- Illaq Qazis appointed on contract basis

19th March 2012

Preamble.---WHEREAS it is expedient to provide for the regularization of the services of certain Extra -Assistant Commissioners -cum-Illaq Qazi, appointed on Contract basis, in the public interest;

It is hereby enacted as follows :



**IN THE COURT OF LUBNA ZAMAN
ADDITIONAL SESSIONS JUDGE-VI, MARDAN**

Petition No.464/BBA of 2022

ANNEXURE

Badshah Khitab versus *The State.*

ATTESTED
Adam Khan
ADAM KHAN

364
23

ORDER-5
10.01.2023

13/1/23 *10/1/23* *23/11/22* *464/BBA*

Accused/petitioners on ad-interim bail present.

Counsel for accused/petitioners and APP for the state present. Ms. Shahana Gul Advocate, local commission submitted her report, which is placed on file.

Accused/petitioners Badshah Khitab son of Sardar Khitab and Murad son of Rasool Shah r/o Gujar Garhi, Mardan seek their pre-arrest bail petition in case FIR No.273 dated 30.04.2013 under sections 302/324/34 PPC of police station Saddar, Mardan.

Arguments heard and file perused.

Perusal of record reveal that accused/petitioners were charged for the murder of deceased Muhammad Tayyib, however, his father/complainant namely Muhammad Younas appeared before the court on 05.01.2023, who recorded his statement wherein he stated that the matter has been compromised privately with the accused/petitioners through intervention of local elders and being legal heir of deceased waived off his right of Qisas and Diyat. He further stated that he has got no objection on

Lubna Zaman
LUBNA ZAMAN
ADDITIONAL SESSIONS JUDGE MARDAN

Certified To Be True Copy

16 JAN 2023

Examiner Copying Branch
Session Court Mardan

e

confirmation of BBA of accused/petitioners as well as on their acquittal at trial stage. In this respect compromise deed alongwith affidavits is EX.PA. Local elders namely Saqib un Nihar son of Haji Gulzad Mir and Raj Wali Shah son of Dilbar Shah also verified the factum of compromise between the parties and in this respect their joint statement also recorded wherein they also stated that legal heirs of deceased Muhammad Tayyib have pardoned the accused/petitioners in the name of Almighty Allah by waving off their rights of Qisas and Diyat. Statement of mother of deceased namely Mst.Nihar Begum wife of Muhammad Younis recorded through local commission, in her statement she stated that she has pardoned the accused/petitioners, pardoned them unconditionally by waiving off her right of Qisas and Diyat and has got no objection on confirmation of BBA of accused/petitioners as well as on their acquittal at trial stage. In this respect Ms.Shahna Gul Advocate as local commission submitted her report EX.CW1/1, her statement is also placed on file.

Since the parties have settled the dispute outside the court and complainant/legal heirs of deceased have got no objection upon confirmation of pre-arrest bail of accused-petitioners, therefore, instant pre-arrest bail stands accepted purely on the basis of compromise and ad-interim

Certified To Be True Copy

16 JAN 2023

Examiner Copying Branch
Session Court Mardan

(9)

bail already granted to the accused-petitioners is confirmed on the strength of existing bail bonds."

File be consigned to record room after its completion. Record be returned back to the quarter concerned.

Announced
10.01.2023

(Signature)
(Lubna Zaman)
Additional Sessions Judge-VI,
Mardan

(Signature)

Name of Application: _____
No. of Application: 682
Date of presentation of application: 10/01/23
Date of preparation of copies: 16/01/23
Number of Pages: 24
Court Fees: 1000
Urgent Fees: _____
Signed of copyist/Examiner: (Signature)
Date of Delivery: 16/1/2023

Certified To Be True Copy

(Signature)
16 JAN 2023

Examiner Copying Branch
Session Court Mardan

(10)

Annexure "J"
ATTESTED Adam Khan
ADAM KHAN

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN.

OFFICE ORDER.

In exercise of Khyber Pakhtun Khwa removal from service (Special Powers) ordinance 2000, revised in devolution of powers w.e.f. 27.09.2010 conferred upon as competent authority ordered the initiation of disciplinary proceedings against Mr. Bacha Khitab Chowkidar GPS, Miangano Cham Gujar Garhi Mardan.

You, Mr, Bacha Khitab Chowkidar GPS, Miangano Cham Gujar Garhi Mardan remained well full absent/absconder from duty w.e.f 01.05.2013 till date.

And whereas show cause notice was published in 2 (two) newspapers, which you did not responded.

Now, the undersigned as competent authority is satisfied that the charges against you are proved and therefore ordered your removal from service w.e.f 01.05.2013.

(NOOR ZADA KHALOZAY)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Dated 5/10/2013

Endst: No 9724-26 /P.F

- Copy forwarded to the:-
1. Sub-Divisional Education Officer (M) Pry: Takht Bhai.
 2. District Comptroller of Accounts Mardan.
 3. Official Concerned.

ATC
[Signature]
SDEO (MA)
Takht Bhai
Mardan

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

D

ATTESTED
ADAM KHAN

through SDEO (M) Takht Bhai

Restoration of Service and Salary

submit a
final finding
report
please

With utmost reverence it is stated that the
appellant was serving as Chaukidar/watchman under
under kind supervision at GPS Mianjano Cham Gujjar Gufki
since 18-10-1994 (appointment date).

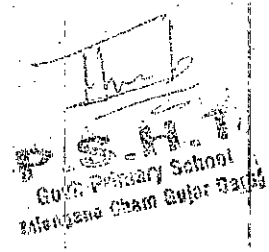
It is further added, that due to lodging of an FIR
under allegation upon the applicant, he was unable
to continue his service, and his salary was also
with held by the authority since 30-04-2013 till date
that, the applicant has been honorably acquitted
by court and the case has been dismissed.

Therefore, you are hereby requested to issue service
and salary restoration order of the applicant, and
post him at nearest duty station if possible.

shall be highly grateful to you for your
kind consideration upon this deserving case.

Yours Sincerely,

Bacha Khatib - ~~Supervisor~~
Ex-Chaukidar/watchman
GPS Mianjano Cham,
Gujjar Gufki Mardan


P.S.H.T.
Govt. Primary School
Mianjano Cham Gujjar Gufki

E

To

The DRO (Male),
The Secondary Education,
Mardan.

(12)

Annexure

^m
F
ATTESTED
Adam Khan
ADAM KHAN

Subject: Appeal dated 17.01.2023 against the
Order vide Rndst NO. 9724-26/PK dated
5/10/2013.

Sir,

It is submitted that I have preferred
Representation dated 17/01/2023, against the above
captioned order, through proper channel. Copy attached.

Since, the Representation lies to the Appellate
Authority i.e. The Director of Education, Peshawar,
the same is required to be forwarded to the
Appellate authority.

It is requested that the representation/
Appeal question may be forwarded to The Director
of Education, U.S. Peshawar.

Yours obediently
Bakhtyar
(Bache Khitab)

DT 15.11.2023

Chowkidar
G.P. Mirangans Cham,
Gujarashi
Mardan.

Copy to The Director of Education, U.S. Peshawar.

F

DISTRICT EDUCATION OFFICE (M) MARDAN

Phone & Fax #: 0937933151
Email: deomalemardan@gmail.com



No. 1399

Dated 15-02-2023

Annexure

"G"
ATTESTED

ADAM KHAN

TO

The SDEO(M) Takht Bhai

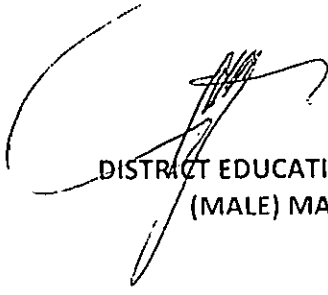
SUBJECT: RESTORATION OF SERVICE IN R/O MR. BACHA KHITAB EX-CHOWKIDAR GPS MIANGAN CHAM

Memo:

Reference your letter No:2194 dated 18-01-2023 on the subject cited above.

In this connection the appeal in r/o above named applicant is rejected as he has already been removed from services and his restoration into service is beyond jurisdiction/competency of this office.

He may be informed to approach the proper forum accordingly.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN

49

To,

(14)

The Director,
Elementary & Secondary Department
Khyber Pakhtunkhwa, Peshawar.

Subject: Representation against the order of the DEO (Male) Mardan,
Contained in Endost. No.9724-26/PF dated 05-10-2013,
Removing the Applicant from Service

Sir,

Reference the above captioned order, whereby the appellant is awarded the punishment of removal from service, vide Endst No.9724-26/PF dated 05-10-2013.

It is submitted that the impugned order is unjustified, illegal and the same is liable to be set-aside on the following amongst many other grounds:-

1. That the impugned order was not ^{sent} ~~suit~~ to appellant.
2. That the appellant was falsely charged in the relevant criminal case along with other relative on account of family enmity.
3. That the said criminal case resulted in acquittal of the appellant.
4. That the alleged absence of the appellant was not willful. But, the same was on account of criminal charge and it was beyond the control of the appellant.
5. That the appellant was condemned unheard through out & he was not afforded right of proper defence according to law.
6. That on ^{acquittal} ~~acquired~~, the appellant has the right to be instated into service.
7. That on acquittal, the appellant learnt about his removal from service and he represented there against to the DEO Mardan, who rejected the appeal/representation and advised the

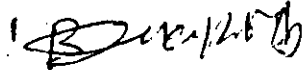
(15)

appellant to approach the proper forum. Hence, this appeal/representation is within time. (Copy attached)

It is requested that setting aside the impugned order, the appellant may be reinstated into service with back service benefits.

Date: 27-02-2023

Appellant



(BACHA KHITAB)
Ex Chowkidar
GPS Miangano Cham
Gujar Garhi Mardan
Add: Mohallah Miangan
Village Gujar Garhi Mardan

16

Annexure "I"

ATTESTED
ADAM KHAN

No. 783 RGL106162242
RAD01250018

uninsured letters of not more than the postal weight prescribed in the Post Office Guide or of which no acknowledgment is due.

Received a registered addressed to _____ Date-Stamp _____

Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Office _____ Insured for Rs. (in figures) _____ (in words) _____

If insured, Insurance fee Rs. _____ Weight _____ (in words) _____

Name and address of sender _____

125/2/2

RECEIVED
25 FEB 23
POST OFFICE

P/19 42
VAKALAT NAMA

In the Court of Service Tribunal Peshawar

Appeal No. _____ of 2023

Bacha khitab

(Petitioner)
(Plaintiff)
(Appellant)

VERSUS

The Secretary etc;

(Respondent)
(Defendant)

I/~~we~~ Bacha khitab the
above noted Appellant do
hereby appoint and constitute **Muhammad Adam Khan, Advocate Mardan** as
Counsel in subject proceedings and authorize him to appear, plead etc., compromise, withdraw or
refer to arbitration for me/us, as my/our Advocate in the above noted matter, without any liability
for his default and with the authority to engage/appoint any other Advocate/Counsel at my/our
behalf all sums and amounts payable or deposited on my/our account in the above noted matter..

Dated: 20.03.2023.

N.W.F.P. Bar Council
ADVOCATE
High Court
ADAM KHAN
No. BC-09-0600
A. Jahan
Secretary's Signature
Father's Name: BADSHAH GUL
Address: VILL. GOJAR GARH DISTT. MARDAN
Office Tel: 0931-630132 Fax: 0931-63450
Enrolment Date L.C: 03/08/1978
Enrolment Date H.C: 31/05/1990
Place of Practice: MARDAN
Date of Birth: 04/04/1945
Blood Group: AB+VE
N.I.C.No: 16102-4612619-C
N.W.F.P. BAR COUNCIL

(Bacha khitab)
(Signature of Client)

Adam Khan
Accepted
MUHAMMAD ADAM KHAN
B.A LLB Advocate
High Court Mardan