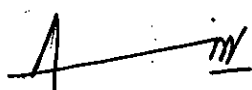


FORM OF ORDER SHEET

Court of _____

Appeal No. 1068/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/05/2023	<p>The appeal of Mr. Sharif Ullah presented today by Mr. Muhammad Arif Jan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on-</p> <p>By the order of Chairman</p> <p> For REGISTRAR</p>

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1068 / 2023

Sharif Ullah Junior Clerk.....Appellant

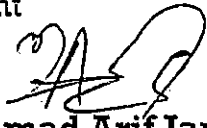
VERSUS

Secretary Elementary and Secondary Education, & others
....Respondents

I N D E X

S#	Description of documents.	Annexure	Pages
1.	Service Appeal with affidavit		1-5
2.	Stay application with affidavit		6-7
3.	Addresses of the parties		8
4.	Copy of letter dated 24-03-2023	A	9
5.	Copies of list of posting/transfer	B & B/1	10-11
6.	Copy of letter dated 31-03-2023	C	12
7.	Copy of departmental appeal and order dated 10-04-2023 & 09.05-2023	D & E	13-16A
8.	Copy of letter dated 13-04-2023	F	17
9.	Wakalatnama		18

Appellant
Through


Muhammad Arif Jan
Advocate High Court

Chamber:

212, New Qatar Hotel, Sikandar
town G.T Road, Peshawar
Cell: 0333-2212213

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1068 / 2023

Sharif Ullah Junior Clerk SDEO (F) Battagram.

.....Appellant

VERSUS

- 1) Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Education Department, Peshawar.
- 2) Director Elementary and Secondary Education, Khyber Pakhtunkhwa, G.T road, Peshawar.
- 3) Additional Director (Estab) Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa, G.T road, Peshawar.
- 4) District Education Officer (F), Battagram.
- 5) District Education Officer (M), Battagram.
- 6) Mr: Niaz Ul Haq Junior Clerk SDEO (M), Battagram.

.....Respondents

**APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUGNED
ORDER DATED ~~24-04~~ 2023 VIDE WHICH
DEPARTMENTAL APPEAL OF THE
APPELLANT WAS FILED AND THE
ORIGINAL POSTING/TRANSFER ORDER
DATED 31-03-2023 WAS KEPT UPHELD.**

(2)

Respectfully Sheweth:

Appellant humbly submits as under:-

- 1) That names and addresses of the parties given in the head note of this service appeal are true and correct for effecting services upon the parties.
- 2) That the appellant was posted as Junior Clerk and was performing his duties with full zeal and zest and to the entire satisfaction of his superiors.
- 3) That on 15-03-2023 the worthy Director (respondent No-2) was retired and vide office letter dated 24-03-2023, respondent No-3 was assigned the additional charge of Director in addition to his own duties to look after the matters of Directorate. **(Copy of letter dated 24-03-2023 is attached as ANNEX-A).**
- 4) That the worthy Advisor to Chief Minister for Elementary and Secondary Education sent two different lists of posting/transfer to respondent No-2 for further necessary action/approval on 27-03-2023. **(Copies of lists of posting/transfer are attached as ANNEX-B & B/1 respectively).**
- 5) That in compliance to the above, respondent No-2 if without any cause with mala fide intention transferred the appellant to the office of SDEO (F) Battagram Alai vide office letter dated 31-03-2023. **(Copy of letter dated 31-03-2023 is attached as ANNEX-C).**
- 6) That the appellant filed representation/appeal against the impugned order dated 31-03-2023 before respondent No-1 which was filed on ~~31-03-2023~~ **09-05-2023**. **(Copies of representation/appeal and order dated 09-05-2023 are attached as ANNEX-D & E).**

- (3)
- 7) That the impugned order dated 31-03-2023 and further rejection of appeal dated ~~10-04-2023~~ are based upon α political influence, illegal, without jurisdiction, arbitrary, discriminatory, mala fide, void ab-initive against the law and facts on the following grounds.

GROUND:

- A. Because, the act, commission and omission of respondents and the office order/ Notification dated 31-03-2023 passed by respondent No-2 (hereinafter impugned up-to the extent of appellant) and further the rejection of departmental appeal of the appellant by respondent No-1 is patently illegal, unlawful, without lawful authority, of no legal effect, having no value in the eyes of law, thus liable to be set-aside/ withdrawn and the appellant may kindly be allowed to keep and continue his duties on his previous post and designation with all service benefits without any further delay, reason and justification.
- B. Because, admittedly the care taker government of Khyber Pakhtunkhwa took over the charge just to look after the daily affairs of Provincial Government but knowingly all these facts and banned over the posting/transfer of civil servants, intentionally intercepted and directed respondent No-2 for issuance of impugned order without any good reason and justification or the reason best known to them.
- C. Because, it is strange enough that somewhere there is no availability of post against which the transfer has been made rather against non sanctioned post (Copy of letter dated is attached as ANNEX-F as reference), moreover the transfer of the appellant along with other employees are made illegal and

unlawfully just to punish, harass and humiliate the innocent employees (appellant).

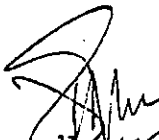
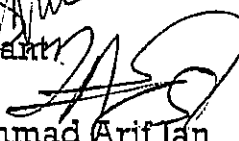
- D. Because, from the bare perusal of the afore referred impugned order dated 31-03-2023, it is very much clear that the same has not been passed in the exigency of the service, but it is very much clear on the instance of some political person, hence the department adopted pick and choose and dealing with the appellant in discriminating way despite the facts that the appellant has not completed the specified period, thus the impugned transfer order has no legal sanctity in the eyes of law and this type of practice is always condemned by this Hon'ble Tribunal as well as apex court of this country.
- E. Because, the transfer order is against the policy relating to the transfer and posting being issued by the government of KP from time to time.
- F. Because, the impugned transferred order is otherwise not sustainable for being based on mala fide and having without application of independent mind and thus liable to be set at naught by this Hon'ble Tribunal.
- G. Because, the appellant is serving the department with his full devotion and to the entire satisfaction of his superiors which is evident from his unblemished service record.
- H. Because, there is no any complaint, enquiry or any other departmental proceeding pending or initiated against the appellant till date but respondents issued the impugned order which is against the law, rules and regulations governing the subject matter thus invites consideration of this Hon'ble Tribunal.

5

I. That any other grounds, with the permission of this Hon'ble Tribunal will be raise at the time of arguments.

It is, therefore, most humbly prayed, that on acceptance of the instant appeal, the impugned order dated 31-03-2023 passed by respondent No-2 against the appellant may graciously be set aside/withdrawn being against the law rules and regulation governing the subject matter (up-to the extent of appellant) and the appellant may kindly be allowed to keep and continue his official duties with previous post/designation etc with all service benefits.

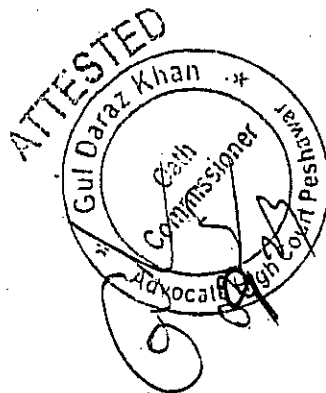
Any other relief deemed fit in the circumstances of the case may also be granted in favor of appellant.


Appellant
Through 
Muhammad Arif Jan
Advocate High Court

AFFIDAVIT

I, Sharif Ullah Junior Clerk SDEO (F) Battagram do hereby affirm and declare on oath that the contents of instant Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


Deponent



(6)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____ / 2023

Sharif Ullah Junior Clerk.....Appellant

VERSUS

Secretary Elementary and Secondary Education, & others
.....Respondents

APPLICATION FOR SUSPENSION OF OPERATION OF
IMPUGNED ORDER/ NOTIFICATION DATED 31-03-2023
TILL FINAL DECISION OF TITLED APPEAL.

Respectfully Sheweth: -

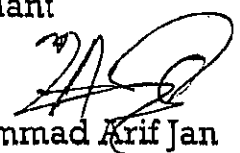
- 1) That the above titled appeal is being filed before this Hon'ble Tribunal along with instant application.
- 2) That the grounds of main appeal may kindly also be considered as part and parcel of this application.
- 3) That appellant has a good prima-facie case in his favour and is also sanguine about its success.
- 4) That balance of convenience also lies in favour of appellant.
- 5) That if the relief as prayed for is not granted and the impugned order is acted upon then the very purpose of titled appeal will become infructuous, hence this application.

2

It is, therefore, prayed that on acceptance of this application, the relief as prayed for in the heading of this application may graciously be granted.

Appellant

Through



Muhammad Arif Jan
Advocate High Court

AFFIDAVIT

I, Sharif Ullah Junior Clerk SDEO (F) Battagram do hereby affirm and declare on oath that the contents of instant Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.


DEPONENT

ATTESTED
Gul Daraz Khan
Oath
Commissioner
Advocate High Court Peshawar



8

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No _____ / 2023

Sharif Ullah Junior Clerk.....Appellant

VERSUS

Secretary Elementary and Secondary Education, & others
....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Sharif Ullah Junior Clerk SDEO (F) Battagram.

RESPONDENTS:

1. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Education Department, Peshawar.
2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, G.T road, Peshawar.
3. Additional Director (Estab) Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa, G.T road, Peshawar.
4. District Education Officer (F), Battagram:
5. District Education Officer (M), Battagram.
6. Mr. Niaz Ul Haq Junior Clerk SDEO (M), Battagram.

Appellant
Through


Muhammad Arif Jan
Advocate High Court



9

Annex-A

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated: 24th March, 2023

NOTIFICATION

NO.SO(MC)E&SED/4-16/2022/PT/MC/Director E&SE: Keeping in view the retirement of Director, Directorate of E&SE Peshawar on 15.03.2023 and to ensure the disposal of the routine office work, Dr. Iqbal Khan, Additional Director (Estab) Directorate of E&SE Peshawar is assigned the Look-After charge of the office of Directorate of E&SE Peshawar, in addition to his own duties, till further order, in the best public interest.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
5. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
6. Officers concerned.
7. Master file.

111 / 7 / 24/3/2023
(IMRAN ZAMAN)

SECTION OFFICER (Management Cadre)

ATTESTED

10

Annex-B

Name of Officer/Official	Present Place of Posting	Proposed Place	Remarks
Amir-Ur Rehman Assistant B-16	DEO (M) Battagram	SDEO (M) Battagram	Vice S. No 02
Shahideen Assistant B-16	SDEO (M) Battagram	DEO (M) Battagram	Vice S. No 01
Abdu Razaq Assistant B-16	DEO (M) Battagram	DEO (F) Battagram	Vice S. No 04
Syed Riaz Hussain Shah Assistant B-16	DEO (F) Battagram	DEO (M) Battagram	Vice S. No 03
Murshid Alam Computer Operator B-16	DEO (F) Battagram	DEO (M) Battagram	A.V.P
Bakht Zada CT B-15	DEO (M) Battagram	GT S Batangl Pashro Ailai	A.V.P
Muhammad Faiq SST (G) B-17	DEO (M) Battagram	GT S No 02 Battagram	A.V.P of HM
Fida Ur Rehman SST (B/C) B-16	GHS No 02 Battagram	DEO (Male) Battagram	Vice S. No 07
Shaukat SST (G) B-16	GHS Paghora	DEO (M) Battagram	Vice S. No 06
Nasir Ali SPET B-16	GHS Shamlai	DEO (M) Battagram	Vice S. No 11
Ibne-Amin SPET B-16	DEO (M) Battagram	GT S Shamlai	Vice S. No 10

Director B.S.E
 P. Transfer

27/3/23

Rahmat Salam Khattak
 Advisor to Chief Minister
 For Elementary &
 Secondary Education

DD - I + DD (F) + A. Min

ATTESTED

30/3/23

11

Annex - B/1

S.No	Name of Officer/Official	Present Place of Posting	Proposed Place	Remarks
1	Taj Uddin Senior Clerk B-14	GHS Patala Sharif	DEO (F) Battagram	Vice S. No 2
2	Muhammad Sharif Senior Clerk B-14	DEO (F) Battagram	GHS Patala Sharif	Vice S. No 1
3	Haq Nawaz Senior Clerk B-14	SDIO (F) Allai	DEO (F) Battagram	Vice S. No 4
4	Abdul Majid B-14	SDIO (F) Battagram	SDIO (F) Battagram	Vice S. No 3
5	Zahoor Ahmad Senior Clerk B-14	GHS Khams Pur Ail	GCHMSS Battagram	Vice S. No 7
6	Muhammad Noman Senior Clerk B-14	GHS Thakot	GHS Khams Pur Ail	Vice S. No 5
7	Hayat Muhammad Khan Senior Clerk B-14	GCHMSS Battagram	GHS Thakot	Vice S. No 6
8	Atta Ur Rehman Junior Scale Stenographer B-14	DEO (F) Battagram	DEO (M) Kohistan Lower	A.V.P
9	Sharif Ullah J/C B-11	SDIO (F) Battagram	GHS Biland Kot	Vice S. No 11
10	Hasham Khan J/C B-11	SDIO (M) Battagram	SDIO (F) Battagram	Vice S. No 9
11	Shoukat Ali Khan J/C B-11	GHS Biland Kot	SDIO (M) Battagram	Vice S. No 12
12	Niaz Ul Haq J/C B-11	SDIO (M) Battagram	SDIO (F) Battagram	A.V.P

Dhawan B.S.P.

H. Comari
Rahmat Salam Khan
Advisor to Chief Minister
For Elementary &
Secondary Education

27/3/27
ADVE (Adviser)
DD (F)

ATTESTED



(12) Annex - C

TO BE SUBSTITUTED WITH SAME NO & DATE
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
Phone: 091-9225344 Email: admin_ese@gnptill.com

Office Order

The Posting/Transfer in respect of the following Ministerial staff are hereby ordered on their own pay and scale in the interest of public service with immediate effect.

S.#.	Name & Designation	From	To	Remarks
1.	Mr. Taj Uddin S/Clerk BS-14	GHS Palinal Sharif	DEO(F) Ballagram	Vice S.No.2
2.	Mr. Muhammad Sharif S/Clerk BS-14	DEO(F) Ballagram	GHS Palinal Sharif	Vice S.No.1
3.	Mr. Han Nawaz S/Clerk	SDEO(F) Allal	DEO(F) Ballagram	Vice S.No.4
4.	Mr. Abdul Majid S/Clerk BS-14	SDEO(F) Ballagram	SDEO (F) Ballagram Allal	Vice S.No.3
5.	Mr. Zahoor Ahmad S/Clerk BS-14	GHS Khanis Pur Aid	GCHMSS Ballagram	Vice S.No.7
6.	Mr. Muhammad Noman BS-S/Clerk 14	GHS Thakot	GHS Khanis Pur Aid	Vice S.No.5
7.	Mr. Hayat Muhammad Khan S/Clerk	GCHMSS Ballagram	GHS Thakot	Vice S.No.6
8.	Mr. Sharif Ullah J/Clerk	SDEO(F) Ballagram	GHS Bland Kot Ballagram	Vice S.No.11
9.	Mr. Hasham Khan J/Clerk	SDEO(F) Ballagram	SDEO(F) Ballagram	Vice S.No.9
10.	Mr. Shoukat Ali Khan J/Clerk	GHS Bland Kot Ballagram	SDEO(M) Ballagram	Vice S.No.12
11.	Mr. Niaz Ullah J/C	SDEO(M) Ballagram	SDEO(F) Ballagram	A.V.P.
12.	Mr. Amir Ur Rehman Assistant B-15	DEO(M) Ballagram	SDEO(F) Ballagram	Vice S.No.2
13.	Mr. Shahideen Assistant Bs-16	SDEO(M) Ballagram	DEO(M) Ballagram	Vice S.No.01
14.	Mr. Abdu Razaq Assistant Bs-16	DEO(M) Ballagram	DEO(F) Ballagram	Vice S.No.04
15.	Mr. Syed Riz Hussain Shah Assistant Bs-16	DEO(F) Ballagram	DEO(M) Ballagram	Vice S.No.03
16.	Mr. Murshid Alam Comp. Operator	DEO (F) Ballagram	DEO (M) Ballagram	A.V.P.

Note:

1. Charge report should be submitted to all concerned.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. /F.No. A-23/MS/posling Transfer/2021/Vol-1 Dated 31/03/2023

Copy forwarded to the:-

1. District Education Officer (Male/Female) Concerned
2. SDEO(M/F) concerned
3. District Accounts Officer Concerned.
4. Principal/HM Concerned.
5. Official concerned.
6. Master File.
7. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

ATTESTED

Assistant Director (Admn)
Directorate of E&SE KPK, Peshawar

خدمت خاص - سکریٹری صحت ایجوکیشن محمد نسیم KPR ایس ڈی
ایسٹ برادر القادری منسوی غیر قانونی طور پر اسرار ڈر

حساب عالی

مورد بیانہ گذارنا ہے کہ ہم سائلوں جناب کے زیر سوابہ صلح مستحکم
سے S/A اور S/A ایسا طریقہ اس طریقہ سے سرکاری نام رکھتے تھے
احیاء نگران گورنمنٹ نے مورخہ 31/03/2023 کو نگران فواری ملکہ صاحبہ
سے ہمارے بلاور پر اسرار ڈر پر 2455-60 مورخہ 31/3/2023
کو دور دراز علاقوں اور دورے کھیل میں جاری کیا گیا ہے۔ سائلوں
بعض سگ (Sanctioned Post) دستاویز ہیں اور رائٹ آرڈر جاری
کرا ہے۔ جس کے ہم سائلوں کے شیور بھی بہت کم ہے مطلوبہ
شیور کے۔ ہم درج ذیل سائلوں کے ساتھ سب سے زیادتی اور
سے انصاف اس صدارت راجستان المبارک سے منظور ہے۔

سر ایس بی سائلوں کے شیور دی کر کے سائلوں کو اسرار ڈر مذکورہ سبوح
میں مارا شکور فرمائیں

5. مرتد عالم - 13202-2923110
6. مرتد عالم - 13202-0773302
7. شاہدین
8. مرتد عالم - 13202-3515850
9. مرتد عالم - 13202-0770809
10. مرتد عالم - 13202-0664521
ATTESTED

(14)

~~Annexure~~

The knowledge of DTI J.A. II. and
 HADY District.

Hence I suggest that
 instead of 1000 clerks
 S. No. 5, 7, all money be
 allowed to work on their
 original post.
 Submitted for further order
 P approval pt

Gen file

ATTESTED

P

DIRECTOR
 Elementary & Secondary Education
 Khyber Pakhtunkhwa, Peshawar

15

Better Copy

Add Dir.

Transfer order wherefrom this Directorate at page No.230 but without fulfilling powers of transfer on 31-03-2023. Moreover the above transfer order issued by this Directorate is not in the knowledge of DD—and ADD (Director) Admin.

Hence, I suggest that instead of two clerks i.e S.No-6, 7 all may be allowed to work on their original post.

Submitted for further order and approval please.

Sd

10-04-2023

Seen/filed.

Sd

Director

Elementary and Secondary Education

Khyber Pakhtunkhwa, Peshawar.

10-04-2023

ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223507)

No.S0 (Primary-M)/E&SED/2-1/Transfer & Posting/2023
Dated Peshawar the April 10th 2023

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa

Subject: - APPEAL AGAINST TRANSFER ORDER.

I am directed to refer to the subject noted above and to enclose herewith a copy self-explanatory application along with its enclosures received from Mr. Abdul Majid along with 06 others of District Balgram regarding cancellation of illegal transfers for further necessary action and report, please.

Encl:As above.

(ARSALAN AHMED)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the: -

- 1-2. District Education Officer, (Male / Female) Balgram
3. PS to Secretary, E&SE Department Khyber Pakhtunkhwa

SECTION OFFICER (PRIMARY MALE)

ATTESTED



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION**

KHYBER PAKHTUNKHWA PESHAWAR.
No 3333 /F.No.61A-23/MS/Abbottabad Vol-VI

Dated 9/5 Peshawar the
/2023

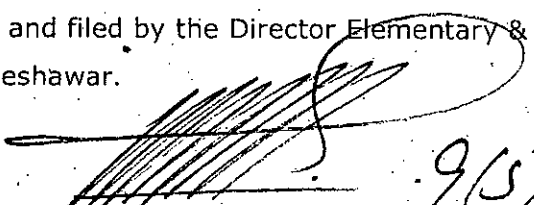
To

Mr. Hayat Muhammad Khan
Senior Clerk GCMHS Battagram

Subject: **Request for Transfer Adjustment**

Memo:

I am directed to refer to the subject cited above and to inform you that your appeal alongwith others has been seen and filed by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.



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

9/5/2023

Endst; No. _____/

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Master File


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

Annex F

17



**OFFICE OF THE
SUB-DIVISIONAL EDUCATION OFFICER
(FEMALE) Battagram**

No. 2528

Dated 13/04/2023

To,

The District Education Officer (F)
Battagram

Subject: OFFICE ORDER ISSUED UNDER ENDST NO. 2455-60 DATED 31-03-2023

Refrence to the subject mentioned above, it is stated for you kind information that office order issued under Endst No 2445-60 Dated 31-03-2023 from Directorate E&SE Khyber Pakhtoon Khwa, the transfer order at S.No 04 against the post of S/Clerk is wrong due to Non availability of post of S/Clerk in the office of SDEO(F) Allai as per sanction post of Budget Book copy attached and the transfer order Mentioned at S.No. 12 and 11, there was also no any vacancies of Assistant BPS 16 and J/Clerk of BPS 12 vacant, in the office of SDEO(F) Battagram so that the transfer position of S.No 04, 11, and 12 are incorrect

Hence report is submitted for information please

SUB-DIVISION EDUCATION OFFICER (F)
BATTAGRAM

ATTESTED
[Signature]

(18)

WAKALATNAMA

BEFORE THE HONBLE KP Service Tribunal Peshawar

Shamifullah

Plaintiff(s)
Petitioner(s)
Complainant(s)

VERSUS

Secretary Education

Defendant(s)
Respondent(s)
Accused(s)

By this, power-of-attorney I/we the said Shamifullah in the above case, do hereby constitute and appoint **MUHAMMAD ARIF JAN** Advocate as my attorney for me/us in my/our name and on my/our behalf to appear, plead, give statement, verify, administer oath and do all lawful act and things in connection with the said case on my/our behalf or with the execution of any decree or order passed in the case in my/our favour/ against which I/we shall be entitled or permitted to do myself/ourselves, and, in particular, shall be entitled to withdraw or compromise the case or refer it to arbitration or to agree to abide by the special oath of any person and to withdraw and receive documents and money from the Court or the opposite party and to sign proper receipts and discharges for the same and to engage and appoint any other pleader or pay him as his fee irrespective of my/our success or failure in case, provided that, if the case is heard at anyplace other than the usual place of sitting of the Court the pleader shall not bound to attend except on my agreeing to pay him a special fee to be settled between us.

Signature of Client

Accepted.



Muhammad Arif Jan
Advocate High Court
Peshawar

Office No.210, Mumtaz Plaza
G.T Road, Hashtnagri Stop,
Peshawar City.
CNIC No.17201-2275748-7
Bc No.10-6663
Cell: 0333-2212213

