


FORM OF ORDER SHEET

Court of _____

Appeal No. 1303/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	12/06/2023	<p>The appeal of Mr. Niaz Gul resubmitted today by Mr. Hassan Nasir Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>14-06-2023</u>.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Niaz Gul son of Awal Gul Librarian Provincial Assembly KP Peshawar received today i.e on 26.05.2023 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 has not been filed.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- The paper used in printing of the grounds of appeal is very low standard which is not acceptable.

No. 1539 /S.T,

Dt. 29/5 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hassan Nasir Adv.
High Court Peshawar.

Respectfully Sirs

re-submitted

objections.

after you compliance



A Appellant Counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service appeal No:- 1303 -P/2023

Niaz Gul

Versus

Govt. of KPK & others

..... Appellant

..... Respondents



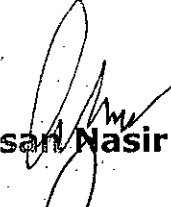

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S#	Description of the Documents	Annex	Pages
1.	Grounds of Appeal alongwith affidavit	*	1-6
2.	Copy of the Notification dated 25-09-2007	"A"	7-9
3.	Copy of the Notification dated 07-05-2021	"B & C"	10-18
4.	Copy of the Notification dated 02-10-2022	"D"	19
5.	Copy of the application/appeal dated 28-01-2023	"E"	20
6.	Wakalat Nama		21

Dated:-

Appellant

Through:-


Hassan Nasir
&

Abdulla Shah
Advocates High Court
Peshawar

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ORDER DATED 12/10/2022 OF THE RESPONDENT NO 4
WHEREBY THE POST OF SENIOR RESEARCH OFFICER,
RESEARCH OFFICER AND SUPERVISOR GENERAL WERE RE-
DESIGNATED AS ADDITIONAL DIRECTOR RESEARCH AND
LIBRARY, DEPUTY DIRECTOR RESEARCH AND LIBRARY,
ASSISTANT DIRECTOR RESEARCH AND LIBRARY AND
RESEARCH OFFICER AND THEREAFTER THE APPELLANT
CHALLENGED THE SAID ORDER THROUGH DEPARTMENTAL
APPEAL DATED 28/01/2023, BUT THE RESPONDENTS
REMAINS MUM TILL DATE MEANING THEREBY THE APPEAL OF
THE APPELLANT WAS DISMISSED BY THE RESPONDENT NO 4
ILLEGALLY, UNLAWFULLY, BASED UPON MALAFIDE AND
UNCONSTITUTIONALLY.

Prayer in Appeal:

On acceptance of instant appeal, the orders dated 12/10/2022 may kindly be set aside be declared unlawful, illegal, unconstitutional.

Respectfully Sheweth:-

- 1. That the appellant is highly educated and having master in the library science & information and works as a librarian in the Provincial Assembly Khyber Pakhtunkhwa since 2010.*
- 2. That it is pertinent to mention here that after the induction as a librarian in the provincial assembly in BPS17 in the year 2010 the post of the librarian was upgraded from BPS 17 to*

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BPS 18 and since 2016 the appellant was performing his duty with full zeal and enthusiasm.

3. That as per the service rules notified in the official gazette vide notification dated 25/09/2007 the post of Director library and research shall be taken from the librarians and not from the research officers. (Copy of the Rules are attached as annexure A)
4. That again it is pertinent to mentioned that an order dated 07/05/2021 was issued from the Respondent No 4 in which one senior research officer namely Naveela Asim was promoted as Director Library and Research illegally and against the rules while the appellant was ignored irrespective of the facts that the appellant was eligible in all respect for the said post so the appellant have no alternate remedy but to approach and challenge the said notification and rules before this Hon,able court after fulfilling all the pre-requisite legal requirements and which appeal is still pending before this hon,able court. (Copy of the order dated 07/05/2021 and Appeal is attached as annexure B and C)
5. That during the pendency of the appeal mentioned above the Respondent No 4 again issued another Notification dated 12/10/2022 in which some research officer i-e Respondents No 5 to 7 was promoted in the same scale to Additional

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Director, Deputy Director, and Assistant Director Library and research. (Copy of the notification dated 12/10/2022 is attached as annexure D)

6. *That the appellant after getting the knowledge of the same filed a appeal to the respondent No 4 on 28/01/2023 but after the lapse of the statutory period not decide the same according to the present rules. (Copy of the departmental appeal is attached as annexure E)*
7. *That the appellant being aggrieved from the illegal, unlawful order of the respondent no 4 and having no other alternate remedy but to approach this Hon,able Tribunal on the following grounds.*

Grounds:-

- A. *That the impugned order dated 12/10/2022 is illegal, unlawful and not based upon the rules notified, hence not tenable in the eyes of law.*
- B. *That beside the fact that the said rules was subjudice before the court the respondent no 4 issued the impugned order dated 12/10/2022 illegally having no plausible justification.*

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- C. That the appellant was deprived from the equal protection of law and his fundamental rights was infringed due to the said illegal and unlawful act of the respondent.
- D. That the appellant had not been treated in accordance with law, hence her right has been secured, guaranteed by the law and constitution, but the same has been badly violated by the respondents.
- E. That besides the fact that the rules mentioned above are already subjudice before this Hon,able court the respondents again issued the impugned notification in the said rules with malafide intention and for ulterior motive.
- F. That the post of library is a technical post needs a degree in library science but the respondent also ignored the fact and issued the impugned notification in a very hastily manner liable to be set-aside and is void.
- G. That any other grounds will be taken at the time of arguments with kind permission of this Honorable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, the illegal unlawful notification dated 12/10/2022 issued by the respondent no 4

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may kindly be set aside and may be declared illegal, unlawful, unconstitutional, and void.

Any other remedy which deems fit by this Honourable Tribunal may also be granted in favour of appellant.

Dated:-

Appellant

Through:-

Hassan Nasir & Abdullah Shah
Advocates High Court
Peshawar.

AFFIDAVIT

I, Niaz gul S/O Awal Gul, Librarian (BPS-18), Provincial Assembly, Khyber Pakhtunkhwa, Peshawar (The appellant) do hereby solemnly affirm and declare on oath that the contents of this accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT
CNIC No:-
Cell No:-

ATTESTED

[Signature]
2023

[Signature]
17301-4004968-9
0333-933441

EXTRAORDINARY
GOVERNMENT



REGISTERED NO. P.III

GAZETTE

North-West Frontier Province

Published by Authority

PESHAWAR, MONDAY, 31ST DECEMBER, 2007.

PROVINCIAL ASSEMBLY SECRETARIAT.

NOTIFICATION

Dated Peshawar, the 25th September, 2007.

No.PA/NWFP/Admn:/2007/19866.—In exercise of the powers conferred on him under rule 5(2) of the North West Frontier Province, Provincial Assembly Secretariat Recruitment Rules, 1974, Speaker, Provincial Assembly of NWFP is pleased to make the following order namely:-

1. This order may be called the North West Frontier Province, Provincial Assembly Secretariat Recruitment Order, 2007.
2. It shall come into force at once.
3. The method of recruitment and minimum qualification for the posts of Secretary, Sr. Additional Secretary, Additional Secretaries, Deputy Secretaries, Assistant Secretaries, Secretary to Mr. Speaker, Chief Editor of Debates, Chief Reporter, Director Library and Research, Librarian and Assistant Librarian shall be as indicated in the schedule given hereunder:-

SCHEDULE

S. No.	Name of Posts	Minimum qualification for appointment		Method of Recruitment
		By direct recruitment	By Promotion	
1	2	3	4	5
1	Secretary BPS-21		By Promotion	By Promotion on the basis of seniority cum fitness amongst the senior Additional Secretary and Additional Secretaries with three years service as such or 22 years service in BPS-17 and above.
2	Senior Additional Secretary-BPS-20		By Promotion	By Promotion on the basis of seniority cum fitness amongst the Additional Secretaries with two years service as such or 17 years service in BPS-17 and above.

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1	2	3	4	5
3.	Additional Secretary BPS-19		By Promotion	By Promotion on the basis of seniority cum fitness amongst the Deputy Secretaries with five years service as such or 12 years service in BPS-17 and above.
4.	Deputy Secretary BPS-18		By Promotion	By Promotion on the basis of seniority cum fitness amongst the Assistant Secretaries with five years service in BPS-17.
5.	Assistant Secretary-BPS-17	BA/BSc from a recognized University preference be given to Master degree holder in social sciences with LLB (50% direct recruitment)	50% By Promotion & 50% by direct recruitment	By Promotion (50 %) on the basis of seniority cum fitness amongst the Superintendents with 10 years service in BPS-16 and below.
6.	Secretary to Mr. Speaker BPS-19		By Promotion	By Promotion on the basis of seniority cum-fitness amongst the private secretaries with 5 years service in BPS-18 or 12 years service in BPS-17 and above.
7.	Chief Editor of Debates BPS-19		By Promotion	By Promotion on the basis of seniority cum-fitness amongst the Editors with 7 years service in BPS-18 or 12 years service in BPS-17 and above.
8.	Chief Reporter BPS-18		By Promotion	By Promotion on the basis of seniority cum-fitness amongst the Reporters with 5 years experience of service in BPS-17.
9.	Director Library and Research BPS-19		By Promotion	By Promotion on the basis of seniority from Librarians with 7 years service as such or 12 years service as Librarian in BPS-17 and above.
10.	Librarian BPS-18		By Promotion	By Promotion on the basis of seniority cum fitness from Assistant Librarians with 5 years service.

ATTN

1	2	3	4	5
11.	Assistant Librarian BPS 17	Master in Library Science (second division) preference be given to Law graduates as additional qualification.		

BY ORDER OF MR. SPEAKER

(AMANULLAH)
Acting Secretary,
Provincial Assembly of NWFP.

2007-12-31
2007-12-31

ANNEX(B&C) = 10

PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA
NOTIFICATION

Dated Peshawar, the 7th 05-2021.

NO.PA/KP/Admn:/2021/ 7588 On the recommendation of Departmental Promotion/Recruitment Committee No.1 and in exercise of the powers conferred on him by Rule-10 read with Rule-6 of the Khyber Pakhtunkhwa Provincial Assembly Secretariat (Recruitment) Rules, 1974, Mr. Speaker has been pleased to promote the following officers of the Provincial Assembly Secretariat of Khyber Pakhtunkhwa, against the posts as mentioned against each with effect from 10-05-2021:-

S.No.	Name with Designation & BPS No.	Post against which promoted
1.	Mrs. Naveelah Asim, Senior Research Officer BPS-19 (Personal)	Director, Library & Research (BPS-19)
2.	Mrs. Safia Sultana, Research Officer BPS-18 (Personal)	Senior Research Officer (BPS-18)

BY ORDER OF MR. SPEAKER

Sd/-
SECRETARY
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

E.NO.PA/K.P/Admn:/2021/ 2589-93 Dated 7/05/2021

Copy of the above is forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Officers concerned.
3. The Manager, Government Printing Press, Peshawar, for publication in the next issue of Government Gazette.
4. Pay Bill Clerk, Provincial Assembly of Khyber Pakhtunkhwa.
5. Personal files of the officers concerned.

ASSISTANT SECRETARY (ADMN)
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

(11)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Niaz Gul S/o Awal Gul, Librarian (BPS-18), Provincial
Assembly, Khyber Pakhtunkhwa, Peshawar. . . **APPELLANT**

VERSUS

1. The Chief Secretary to Govt. of Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Governor, Khyber Pakhtunkhwa, Governor
House, Peshawar.
3. The Secretary, Provincial Assembly, Khyber
Pakhtunkhwa, Peshawar.
4. The Speaker, Provincial Assembly, Khyber
Pakhtunkhwa, Peshawar.
5. The Assistant Secretary (Admin) Provincial
Assembly, Khyber Pakhtunkhwa, Peshawar.
6. The Departmental Promotion Committee No.1,
through its chairman/Speaker, Provincial Assembly,
Khyber Pakhtunkhwa, Peshawar.
7. Miss. Naveela Asim, Director Library & Research,
Provincial Assembly, Khyber Pakhtunkhwa,
Peshawar. **RESPONDENTS**

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SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974
AGAINST THE ORDER OF THE WORTHY
SECRETARY PROVINCIAL ASSEMBLY OF
KHYBER PAKHTUNKHWA (RESPONDENT NO.1)
DATED 07.05.2021, WHEREBY RESPONDENT
NO.7 (MISS NAVEELA ASIM, SENIOR RESEARCH
OFFICER), WAS PROMOTED TO THE POST OF
DIRECTOR LIBRARY AND RESEARCH (BPS-19)
AND ORDER OF RESPONDENT NO.4 DATED NIL,
WHEREBY DEPARTMENTAL APPEAL OF
APPELLANT HAS NOT BEEN DECIDED, WITHIN
THE STATUTORY PERIOD OF 90 DAYS.

Respectfully Sheweth:

1. That the appellant is holding the qualification of Masters in Library Sciences.
2. That the appellant was inducted in the Provincial Assembly Secretariat (BPS-17) vide order dated 29.01.2010 and thereafter he assumed the charge of his duty on 01.02.2010. (Copies attached as annexure "A" to "A/___").

ATTESTED

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3. That vide notification dated 29.08.2011, the nomenclature of the post of Assistant Librarian was changed as Librarian within the same scale and since then the appellant is serving his duty as Librarian. (Copy of Notification is attached as annexure "B").
4. That vide notification dated 22.04.2016, the post of Librarian was one step upgraded from BPS-17 to BPS-18 and since then the appellant is performing his duty as Librarian. (Copy of Notification is attached as annexure "C").
5. That as per the Service Rules notified in the official gazette vide notification dated 25.09.2007, the post of Director Research and Library (BPS-19) is to be filled through promotion on the basis of seniority from "Librarians" with 07 years as such or 12 years service as Librarian in BPS-17 and above." (Copy of Rules are attached as annexure "D").
6. That in utter disregard and violation of notified Rules, the Secretary Provincial has issued the impugned order dated 07.05.2021, whereby one Miss. Naveela Asim a Senior Research Officer has been promoted as Director Library & Research (BPS-

- 19). (Copy of the Impugned Notification is attached as annexure "E").
7. That being aggrieved of the impugned order, appellant submitted a departmental appeal to respondents No.1, 2 & 4, however, the same has not been responded till date. (Copies of the Departmental Appeals are attached as annexure "F", "F/1" & "F/2").
8. That the appellant being Librarian, having 07 years experience as such, is aggrieved of the impugned notification/order dated 07.05.2021 and order dated Nil of departmental appellate authority, is constrained to move this Honourable Tribunal for the following amongst other grounds:-

GROUND S:

- A. That as stated above that as per the Service Rules the post of Director Library & Research (BPS-19) is to be filled from amongst the "Librarians" and on the basis of their seniority but in utter disregard of the aforesaid Rules, one Miss. Naveela Asim (who is Research Officer) not a Librarian, has been promoted to the post of Director Library & Research.

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and thus the impugned order is prima facie illegal, unlawful and thus ineffective upon the rights of the appellant.

- B. That the Rules on the subject, i.e. to fill up the post of Director Library & Research is clear and unambiguous that the same is to be filled by way of promotion and on the basis of seniority of "Librarians" and nowhere the incumbent as Senior Research Officer is fine mentioned who could be promoted to the post of Director Library & Research and thus the worthy Secretary Assembly has travelled beyond his authority and thus the impugned order needs to be set aside.
- C. That as stated above that the appellant is fully eligible in terms of his qualification and experience as required for promotion to the post of Director Library & Research (BPS-19) thus having an eligible candidate and an ineligible candidate could not be promoted.
- D. That the impugned notification is against the very clear language of the Statute/Rules, therefore, the same needs to be declared as illegal and unlawful and thus the same may accordingly be struck down.

- E. That all public functionaries are constitutionally bound to implement the law of the land in its true letter, but in the case of appellant, the worthy Secretary has acted otherwise, which necessitated the filing of instant departmental appeal.
- F. That the appellant has been treated against the law and has also been deprived of equal protection of law.

It is, therefore, prayed that by accepting this service appeal, the impugned order dated 07.05.2021 passed by respondent No.3, whereby one Miss. Naveela Asim (respondent No.7) was promoted to the post of Director Library & Research (BPS-19) and order dated Nil of the departmental appellate authority, whereby they did not pass any order over the representations of the appellant within statutory period of 90 days, may please be set aside and consequently the appellant, being the sole, eligible "Librarian" in terms of his qualification and experience may please be promoted to the post of Director Library & Research (BPS-19).

ATTESTED

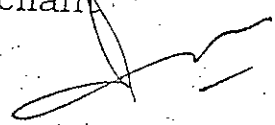
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Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.



Appellant

Through



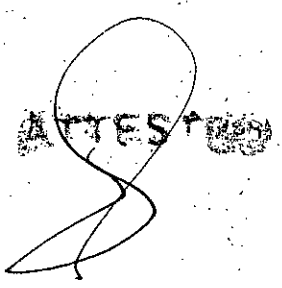
M.I.KHAN
Advocate Supreme Court

&



ADNAN AMAN
Advocate High Court(s)

Dated: 20.09.2021

ATTESTED


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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

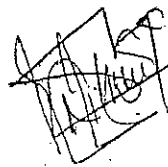
Niaz Gul. APPELLANT

VERSUS

The Chief Secretary to Govt. of Khyber Pakhtunkhwa,
 Civil Secretariat, Peshawar & others. **RESPONDENTS**

A F F I D A V I T

I, Niaz Gul S/o Awal Gul, Librarian (BPS-18), Provincial Assembly, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



D E P O N E N T



ANMR (9) 2 (9)

PROVINCIAL ASSEMBLY OF KHYBER PAKHTUNKHWA

NOTIFICATION

Dated Peshawar, the 12/10/2022.

No.PA/KP/Admn:/2022/ 6072-75 On recommendation of the Departmental Promotion/ Recruitment Committee No.I and in exercise of the powers conferred on him by rule 10 read with rule 6 (2) (a) of the Khyber Pakhtunkhwa, Provincial Assembly Secretariat (Recruitment) Rules 1974, Mr. Speaker has been pleased to promote the following officers of the Provincial Assembly of Khyber Pakhtunkhwa, against their upgraded & redesignated posts as mentioned against each with immediate effect:-

S.No	Name with designation & BPS	Post against which promoted
1.	Mr. Aziz-ur-Rehman, Senior Research Officer BPS-19 (Personal)	Additional Director (Research & Library) BPS-19
2.	Ms. Safia Sultana, Senior Research Officer BPS-18	Deputy Director (Research & Library) BPS-18
3.	Mr. Abid Fahim, Research Officer BPS-18 (Personal)	Assistant Director (Library & Research) BPS-17
4.	Qazi Bashir Ahmad, Supervisor General Administration BPS-17 (Personal)	Research Officer BPS-17

BY ORDER OF MR. SPEAKER

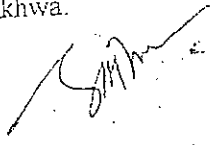

(KIFAYATULLAH KHAN AFRIDI)
SECRETARY

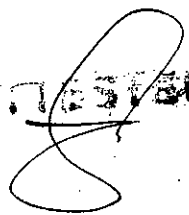
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA

Endt.No.PA/K.P/Admn:/2022/ 6076-80 Dated 12/10/2022.

Copy of the above is forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The officers concerned.
3. The Budget Officer-IV, Finance Department, Khyber Pakhtunkhwa.
4. The Manager, Government Stationary & Printing Department, Khyber Pakhtunkhwa, Peshawar.
5. The Pay Bill Clerk, Provincial Assembly of Khyber Pakhtunkhwa.


ASSISTANT SECRETARY (ADMIN)
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA



To :

Honorable Speaker,
Provincial Assembly,
Khyber Pakhtunkhwa, Peshawar.

ANNEXURE - (26)

**SUBJECT: REQUEST REGARDING REVIEW/ APPEAL AGAINST THE
IMPUGNED ORDER NO. PA/KP/Admn:/2022/6072-75 DATED
12-10-2022**

Respectfully Sheweth,

The Petitioner very humbly submits as under:

- 1) That the petitioner was initially appointed as Assistant Librarian BPS-17 vide order dated 29-01-2010. Moreover the nomenclature of his post was substituted as Librarian BPS-17 on 29-8-2011 and simultaneously he has been appointed as Librarian.
- 2) That in 2016 the post of Librarian was upgraded to BPS-18 and on the recommendation of departmental promotion committee the petitioner was promoted to BPS-18 on 24-4-2016.
- 3) That vide order dated 7-5-2021 a senior research officer who was already working in BPS-19 was promoted as Director Library and Research BPS-19 in contravention of laws, rules and values in vogue.
- 4) That the petitioner filed departmental appeal on 28-5-2021 which was not decided within prescribed time therefore the petitioner filed service appeal before the Khyber Pakhtunkhwa Service Tribunal Peshawar which is still subjudice before the said Tribunal and Fixed for 14-2-2022.
- 5) That the petitioner got knowledge today i.e. 28-1-2023 that vide order No. PA/KP/Admn:/2022/6072-75 dated 12-10-2022 Post of Senior Research Officer and Supervisor General were re-designated as Additional Director Research and Library, Deputy Director Research and Library, Assistant Director Research and Library, and Research Officer respectively on 30-11-2022. That the said officers took charge of the newly designated posts on 30-11-2022. It is pertinent to mention here, there is an appeal pending before the Khyber Pakhtunkhwa Services Tribunal for appointment of the appellant as Director (Library and Research), therefore the impugned orders regarding re-designation dated 12-10-2022 have been kept secret from the appellant.
- 6) That it is very much necessary to note here that the matter of promotion of Director Research and Library is already subjudice before the Honourable Service Tribunal Peshawar therefore making any appointment by promotion, re-designation or changing on nomenclature would be contrary to proceedings of the court and amounts to contempt of court as the same is subject to final decision of the Honourable court.

ATTESTED

21

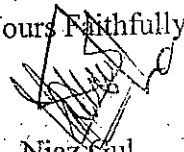
- 7) That such re-designation order has detrimentally effected seniority of the petitioner as next promotion seat of the petitioner is Director Library and Research and vide the impugned re-designation order the officers of research cadre has been granted a way for promotion to post of Director Research and Library.
- 8) That Library & Information Science is a technical education and professional degree as like Law, Medical and Engineering and it is not possible for a research officer, who does not have degree in Library & Information Science to hold responsibilities of Classification, Cataloguing, Accessioning, Weeding Out, Serial management, Resource Sharing, Card Catalogue, Subject Classification, Koha Software, Subject Heading list and so on.
- 9) That to redress the grievance of the petitioner in bonafide intention, the already re-designated post of Additional Director (Research & Library), Deputy Director (Research & Library), Assistant Director (Research & Library) may kindly be modified and re-designated as Additional Director Research, Deputy Director Research, Assistant Director Research, and service structure for Librarian may also be re-designated as Assistant Director Library, Deputy Director Library, Additional Director Library, on analogy of Senate of Pakistan and after wards a separate seniority list may kindly be prepared and maintained.

It is therefore most humbly prayed that impugned order NO. PA/KP-Admn: /2022/6072-75 dated 12-10-2022 may kindly be deferred/ held in abeyance/cancelled/reviewed/rectified/modified till final adjudication of the service appeal of the petitioner for the promotion of the post of Director Library and Research by the Khyber Pakhtunkhwa Service Tribunal.

Dated: 28-1-2023

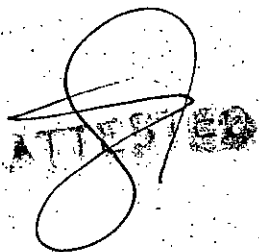
Received
M. Gul
28/1/2023

Yours Faithfully



Niaz Gul
Librarian

Provincial Assembly
Khyber Pakhtunkhwa



ATTACHED

21A

POWER OF ATTORNEY
(WAKALATNAMA)

IN THE Khyber Pakhtunkhwa Services Tribunal
In Ref _____ / _____

Naiz Gul { Appellant }

VERSUS

Chief Secretary to Govt Khyber { Respondents }

I/We Naiz Gul s/o Anwar Gul, Librarian the
Appellant above named hereby appoint **Hassan Nasir** Advocate High

Court in the above mentioned case, to do all the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal/Forum/Authority or any other Court/Tribunal/Forum/ Authority in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits, and applications for compromise or withdrawal, or for submission to Arbitration of the said case, or proceedings or prosecution or defense of the said case at all its stages.
3. To receive payments of, issue receipts for, all money that may be or become due and payable during the course or on the conclusion of the proceedings.
4. To all other acts, deeds and things which may be deemed necessary or advisory during the course of the proceedings.

AND HEREBY AGREE:

- a. To ratify whatever the said Advocate may do in the proceedings.
- b. Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of their absence from Court/Tribunal/Forum/Authority when it is called hearing.
- c. That the Advocate shall be entitled to withdraw from the proceedings of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof I/We have signed this Power of Attorney / Wakalatnama hereunder, the contents of which have been read/explain to me/us and fully understood by me/us this 26th day of May at Peshawar

Hassan Nasir
Advocate High Court, Peshawar
BC-14-4833
Mob: 0314 9214909
Email: Hassan_sub@hotmail.com
Off Add: 610, Pak Medical centre,
Khyber Bazar, Peshawar

Signature of executant/s

Accepted subject to the terms regarding payment of fee