

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWAR

APPEAL NO.30/2023

AKHTAR MUNIR

VERSUS

**SECRETARY, HEALTH
DEPARTMENT KP &
OTHERS**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6028

Dated 14/6/2023

INDEX

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	PAGE NUMBERS
1	PARA WISE COMMENTS	IN ORIGINAL	01 - 04
2	AFFIDAVIT	IN ORIGINAL	05
3	COPY OF APPOINTMENT ORDER	"A"	06
4	COPY OF DISCIPLINARY PROCEEDINGS	"B"	07 - 37
5	COPY OF OFFICE ORDER DATED 12-09-2022	"C"	38 - 39
6	VAKALATNAMA	IN ORIGINAL	40

THROUGH,



BARRISTER IBRAHIM KHAN AFRIDI

DATED:14-06-2023

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWAR

APPEAL NO.30/2023

AKHTAR MUNIR

VERSUS

SECRETARY, HEALTH
DEPARTMENT KP &
OTHERS

PARA-WISE COMMENTS ON BEHALF OF THE RESPONDENT NO. 3 & 4

RESPECTFULLY SHEWETH;

The Answering Respondents most earnestly seek permission of this Learned Tribunal to submit as under;

PRELIMINARY OBJECTIONS

- I. That no cause of action has accrued to the Appellant nor has any discernible cause of action been pinpointed by the Appellant.
- II. That no right of the Appellant has been infringed as such the Appeal is not maintainable.
- III. That the Appellant has come to this court with sullied hand, by concealing material facts.
- IV. That neither any rule, law or regulation has been specified by the Appellant, which has either been infringed by the Answering Respondent or from the application of which the Appellant feels aggrieved.
- V. That the services of the Appellant have been relieved/repatriated back to DGHS as per law, therefore, the subject appeal is misconceived.
- VI. That the Appellant has rightly been repatriated as per law, moreover, being a matter of policy the same cannot be lightly interfered with.

FACTS

- 1. Paragraph Numbered 1 is subject to proof.
- 2. Paragraph Numbered 2 is correct to the extent of Appellant having worked in the Respondent Institution. The Appellant was appointed by the Government of Khyber Pakhtunkhwa, it is pertinent to note that by virtue of clause 4 of the appointment order, the Appellant could be transferred anywhere in Khyber Pakhtunkhwa.

COPY OF THE APPOINTMENT ORDER IS ANNEX A

- 3. Paragraph Numbered 3 is incorrect, hence sternly denied. During the course of his service, the Appellant was given several explanations, warnings and an enquiry. However, he has not been stigmatized while repatriating him from the Respondent Institution.

COPY OF DISCIPLINARY PROCEEDINGS IS ANNEX B

- 4. Paragraph Numbered 4 is sternly denied being incorrect. Detailed reply is given in above Para.
- 5. Paragraph Numbered 5 is correct to the extent of issuance of the Office order dated 12-09-2022, however, the remaining paragraph as drafted is incorrect and thus sternly denied.

COPY OF THE OFFICE ORDER DATED 12-09-2022 IS ANNEX C

- 6. Paragraph Numbered 6 is correct. However, the Appellant service history is full of disciplinary violations of the Respondent Disciplinary policy.
- 7. Paragraph Numbered 7 is denied. The Appellant was appointed by the Government of Khyber Pakhtunkhwa, and by virtue of clause 4 of the appointment order, the Appellant could be transferred anywhere in Khyber Pakhtunkhwa. The DGHS have all the means to adjust the Appellant in any other Hospital in the Province of Khyber Pakhtunkhwa.
- 8. Paragraph Numbered 8 is correct.
- 9. Paragraph Numbered 9 needs no comments on part of the Answering Respondents, however in view of the replies to the preceding paragraphs, there exists no grievance of the Appellant and as such the appeal of the Appellant is ill founded.

GROUND

- A. Ground A is incorrect, hence denied. Transfer and posting of a civil servant is not justiciable.

- B. Grounds B is denied being incorrect. The services of the Appellant have been repatriated back to his parent department without an iota of stigma.
- C. Ground C is denied being incorrect. As explained earlier no illegality can be pinpointed by the Appellant.
- D. Ground D is incorrect, place of posting or choice of posting is not a vested right of the Appellant. Moreover, the Answering Respondents have effectively only repatriated the Appellant back to his parent department for onward process without an iota of stigma.
- E. Ground E is incorrect, hence denied. The order impugned is appropriate and legal, warranting no interference being a purely administrative matter.
- F. Ground F is incorrect thus denied. The disciplinary infringements have already been detailed, moreover the Appellant has not been stigmatized in repatriation order.
- G. Ground G is incorrect, hence sternly denied. Detailed reply is given in above Paras. Moreover, the Respondents too seek permission and reserve the right to agitate any further legal and factual ground at the time of hearing of the subject petition in the interest of fairness and justice.
- H. That any other fact/ground not specifically accepted herein shall be deemed to have been denied by the Respondents.

PRAYER

It is therefore most humbly submitted that that this Learned Tribunal may very graciously be pleased to;

- i. **Dismiss** the subject appeal with costs being meritless and non-maintainable.
- ii. **Grant** any other relief to the Respondents as deemed appropriate in the facts and circumstances of the case.

RESPONDENTS,

THROUGH,

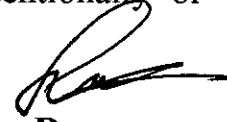


BARRISTER IBRAHIM KHAN AFRIDI

DATED:14-06-2023

VERIFICATION

Verified on oath on this 14/06/23 Day of JUNE 2023 at Peshawar that the contents of these comments, including all the objections, paragraphs and grounds are true and correct to the best of my knowledge and nothing have been concealed from this honourable Tribunal either intentionally or otherwise.



DEPONENT

ATTESTED
Gul Daraz Khan
C-11
Commissioner
Advocate High Court Peshawar
14/6/23

LEGAL OFFICER MTI LRH

BEFORE THE LEARNED SERVICE TRIBUNAL, PESHAWAR

APPEAL NO.30/2023

AKHTAR MUNIR

VERSUS

**SECRETARY, HEALTH
DEPARTMENT KP &
OTHERS**

AFFIDAVIT

I, **Sabira Naz Qureshi** Legal Officer MTI LRH & duly authorized officer and well conversant with the facts of this case do hereby solemnly swear and affirm on oath that as per the instructions of the Answering Respondents stipulated the contents of these comments are true and correct to the best of my knowledge and nothing has been concealed from this honourable Tribunal either intentionally or otherwise.

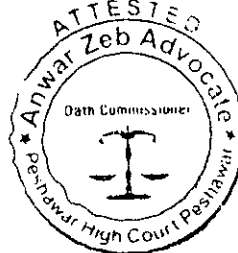
It is further stated on oath that in this appeal the answering respondents have neither been placed ex-parte nor their defense has been struck off.

[Signature]
DEPONENT

[Signature]

IDENTIFIED BY COUNSEL

[Signature]



14-6-2023



OFFICE OF THE HOSPITAL DIRECTOR

Lady Reading Hospital, Medical Teaching Institution, Peshawar

Phone # 0092-919211402

Fax: 0092-919211401

www.lrh.gov.pk

Office Order

Miss Sabira Naz Qureshi Legal Officer LRH-MTI Peshawar is hereby authorized to sign, submit the comments/reply on behalf of the respondents / Hospital Director LRH-MTI with immediate effect in the public interest.

No. 305-9 /HD/LRH

Copy forwarded to the: -

1. Dean LRH-MIT
2. Director HR LRH-MTI
3. Miss Sabira Naz Qureshi Legal Officer LRH-MTI
4. Secretary to Board of Governors LRH-MTI
5. Secretary to Hospital Director LRH-MTI

For information and necessary action.

Sd/-

Hospital Director,
Lady Reading Hospital, MTI
Peshawar

Dated 16/02/2022

16/2/22 MS
Hospital Director,
Lady Reading Hospital, MTI
Peshawar

Attested
MC

OFFICE ORDER

Mr. Akhtar Muneer S/O Taos Gul,
is hereby appointed as Ward Orderly. SPS -2
Rs. 625-16-945/- plus usual allowances as admissible to him
under the Rules at Govt: Lady Reading Hospital, Peshawar.

His appointment is purely on temporary basis and is
liable to termination at any time without assigning any reason.

His appointment is subject to production of Medical
Fitness Certificate.

He will be governed by all such rules and orders etc
relating to Pay, T.A., Leave and Medical Charges etc as may be
issued by the Government from time to time for category of Govt:
Servants.

He will be liable to transfer to corresponding post
any where in the NWFP.

He will be on probation for a period of Two Years.

If he wishes to resign from service, he will have to
give one months notice in advance and will continue to serve the
Government till the acceptance of his resignation by the competent
Authority and communication to him in writing or will deposit One
Month Pay in lieu thereof.

If he accepts the offer on the terms and conditions
mentioned above, he should report for duty to the undersigned within
10 days of the receipt of this offer failing which the offer will be
considered as withdrawn.

ADMINISTRATOR
GOVT: LADY READING HOSPITAL
PESHAWAR.

No. 19080-84 /LRH Dated 10 /10/1900

Copy forwarded to:-

- 1- Dy: Medical Supdt:
- 2- Accounts Officer,
- 3- Head of Class-IV
- 4- Akhtar Muneer S/O Taos Gul, R/o
- 5- Mologo, Peshawar.

Attended
[Signature]

[Signature]
ADMINISTRATOR

BRIEF HISTORY (AKHTAR MUNIR, EX-WARD ORDERLY).


Reference email dated 10-5-2023

1. Mr. Akhtar Munir appointed as Ward Orderly via order No. 19080-84/LRH, dated 10-10-1990 and reported for duty on 16-10-1990 (Copies attached).
2. Explanation was called via No: 11612/LRH dated 13-06-1995 on account of cam late for duty.
3. Explanation was called via No: 4698-4704/LRH dated 09-03-1996 on account of absent from duty.
4. Explanation was called via No: 7137-39/LRH dated 20-05-1997 on account of absent from duty.
5. Explanation was called via No: 122086/LRH dated 16-06-1998 on account of absent from duty.
6. Explanation was called via No: 14701/LRH dated 25-07-1998 on account of absent from duty.
7. Explanation was called via No: 3393-3413/LRH dated 19-04-1999 on account of absent from duty.
8. Explanation was called via No: 14594-96/LRH dated 04-06-2004 on account of left duty place without information.
9. Warning issued via No: 672-74/LRH dated 08-01-2008 on account of absent from duty.
10. Explanation was called via No: 3546/LRH dated 08-02-2010 on account of absent from duty.
11. Explanation was called via No: 7881-83/LRH dated 30-03-2010 on account of absent from duty.
12. Explanation was called via No: 20445/LRH dated 07-08-2010 on account of absent from duty.
13. Explanation was called via No: 23046/LRH dated 03-07-2013 on account of misbehaved with Charge Nurse.
14. Warning issued via No: 24599/LRH dated 15-07-2013 on account of misbehave with Charge Nurse.
15. Explanation was called via No: 27776/LRH dated 15-08-2013 on account negligence in discharging of duty.
16. Explanation was called via No: 8073/LRH dated 06-02-2017 on account of absent from duty.
17. Enquiry was constituted via No: 9651-53/LRH dated 21-03-2017 on account of absent from duty, in light of recommendations of enquiry committee his 02-days absent period termed unpaid & finally warned to be careful in future via No: 11107/LRH dated 14-04-2017.
18. Explanation was called via no: 29943/LRH dated 13-11-2020 on account of habitual late comer.
19. Warning was issued via No: 32202-03/HR-III dated 08-12-2020 on account of habitual late comer.
20. Warning was issued via No: 34192-93/HR-IV/LRH dated 31-12-2020 on account of absent from duty.
21. Warning was issued via No: 8240-42/HR-IV dated 07-04-2021 on account of absent from duty.
22. Warning was issued via No: 16731-34/HR-IV dated 06-07-2021 on account of absent from duty.
23. Warning was issued via No: 16960-63/HR-IV dated 08-07-2021 on account of absent from duty.

Attch
AS

24. Warning was issued via No: 17793-96/HR-IV dated 14-07-2021 on account of absent from duty.
25. Warning was issued via No: 18512-14/HR-IV dated 27-07-2022 on account of absent from duty.
26. Warning was issued via No: 18811-13/HR-IV dated 29-07-2022 on account of absent from duty.
27. The official was relieved to DGHS KP via No: 22670-78/HR-IV dated 12-09-2022 on account of taking money from patient attendant, further he was given an opportunity of personal hearing but failed to defend him self thus the relieving order stand intact via No: 36976-80/HR-IV dated 28-12-2022.

8

A Hested


گفوریہا ڈی. سی. ایم. - رسد سب - لیدی ریڈیفیڈ سٹیٹ ہسپتال پشاور

(7)
(9)

رپورٹ غیراضری

مناب سہی! - مودیت کت ریش حصہ - انٹرنیشنل وارڈ اور ڈی

نیوروسرجری وارڈ ٹیٹا ہسپتال انڈیا 4-3-96 و

غیر اطلاع ایف ڈی ڈی سے غیراضری

لینا اطلاع عرفیت

پیکتا سید اور گولہ راجہ
4-3-1996
نیوروسرجری
ٹیٹا ہسپتال

جوان بیگم
Attached
J

GOVT. MEDICAL SUPERVISOR

4698-4701 (10)

Date: 9/03/1966

W-21

- 1- Akhtar Munir, orderly, 04-3-58, S. Surgery,
 - 2- Iqbal Masih, doctn Block, -do- Sweeper
 - 3- Ashiq Hussain, Boh shti -do-
 - 4- Jahanzeb w/o Aurangzeb, orderly 02/03/58,
- Govt: Lt., Reshwar.

Subject: ABSENT FROM DUTY:

It has been reported by the your Incharges that you were found absent from your duties without any information on days noted above.

You are directed to explain your position as to why not disciplinary action should be taken against you under the rules-1972.

Your replies must reach the office within three days of the receipt of this letter.

By: Medical Supt: (Admin)
Govt: Govt. Medical Hospital
Reshwar.

4702-4704

- 1- Govt: Lt., Reshwar.
- 2- Head orderly -do-
- 3- Official concerned for further enquiry.

For information and necessary action.

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Attended
Jamil

By: Medical Supt: (Admin)
Govt: Govt. Medical Hospital
Reshwar.

.....

10-A

BETTER COPY

GOVT LADY READING HOSPITAL PESHAWAR

NO. 4698-47;LRH

DATED 09-03-1996

To,

1. Akhtar Munir, W/Orderly, 04-3-96, N. Surgery
2. Iqbal Masih, Boltan Block, -do- sweeper
3. Ashiq Hussain, Bahishti, -do-
4. Jehanzeb S/O Aurangzeb, w/Orderly 09-03-96

Subject ABSENT FROM DUTY

Memo:

It has been reported by the your Incharges that you were found absent from your duties without any information on days noted above.

You are directed to explain your position as to why not disciplinary action should be taken against you under the rules-1973.

Your replies must reach this office within three days of the receipt of this letter.

Dy: Medical Supdt: (Admin)

Govt; Lady Reading Hospital

Peshawar.

No. 4702-4704/LRH, Peshawar.

Copy to:

1. D.M.S (Admin Govt LRH Peshawar)
2. Head Ward Orderly -do-
3. Official concerned for their personal file.

For information and necessary action.

Dy. Medical Supdt (Admin)

Govt, Lady Reading Hospital

Peshawar

Attested
[Signature]

ایف اے ڈی ایف اے
15/5/97
A. A. Khan

11

OFFICE OF THE ADMINISTRATOR GOVT LADY READING HOSPITAL PESHAWAR.

No: 7137-39 /LHM, Peshawar
Dated: 25.5.1997

To,

W/O orderly

1. Mr. Khatkhatah Akhtar Manior S/O Iqbal Khan 11.5.97
Cardiothoracic Ward Night Duty.
2. Mr. Fayaz Rafiq Sweeper H. Surgical 8 & 12.5.1997
3. Mr. Rafique Sweeper Night Duty Casualty Deptt: 11.5.97

Subject: EXPLANATION;
Memo:-

It has been reported by the Head Ward Orderly that you were absent from your duties without any intimation and application on the above dates.

Your absence from duties is treated as leave without pay and are directed to explain the reason as to why not disciplinary action should be taken against you under the rules 1973.

Your reply of this explanation must reach to this office within three days of the receipt of the letter.

AK
Dy: Medical Superintendent (Admin)
Govt. Lady Reading Hospital,
Peshawar.

7/40-49
NO: /LHM, Peshawar.

Copy to:-

1. DMS (Admin)
2. Sr. Account Officer to deduct their pay
3. I/C Casualty Department
4. Head Ward Orderly
5. Head Sweeper

for information and necessary action.

Attested
JOB

AK
Dy: Medical Superintendent (Admin)
Govt. Lady Reading Hospital,
Peshawar.

(4) (12)

GOVT. MEDICAL SUPERVISOR
PESHAWAR

To: /Ldn, Peshawa.

Dated: 16/06/1998.

To,

- 1) - Akhter Munir, "ard Orderly,
- 2) - Halder Ali, Chowkidar,
- 3) - Younis Fardar, Sweeper,

Cardiology block Ldn

Subject: ABSENCE FROM DUTY:
"emo"

It has been reported by the Head Utilizer that you were found absent from your duties without any information on 28-6-98, which is contrary to rules and regulations.

You are directed to explain your position as to why not disciplinary action should be taken against you under the rules 1973.

Your replies must reach this office within three days of the receipt of this letter.

No: 12287-90
Copy to: /Ldn, Peshawar.

By: [Signature]
Govt: Medical Superst: (Admin):
Govt: Lady Reading Hospital
Peshawar.

- 1- Ldn (Ad)
- 2- For information and necessary action.

Jan*

By: [Signature]
Govt: Medical Superst: (Admin):
Govt: Lady Reading Hospital
Peshawar.

Attested
[Signature]

OFFICE OF THE ADMINISTRATOR
GOVT: LADY READING HOSPITAL
PESHAWAR.

49
13

No. 14701 /LRH Dated 25/7/1998.

To,

Mr. Akhtar Munir, Ward Orderly
Govt: L.R.H, Peshawar.

Subject: Explanation.

Memo:-

It has been reported by the DMS New Block, that you were absent on 19/7/98 from duty without any application/information.

Further that on 16/6/98 explanation were called from you regarding the absence, but you have not submitted the reply uptill now.

Therefore your two days absence period is hereby treated as leave without pay.

You are ^{hitherto} ~~therefore~~ directed to submit the reply within 3 days of the receipt of this letter, otherwise strict action will be taken against you under the rule 1

[Signature]
Administrator
Govt: Lady Reading Hospital
Peshawar.

No. 14702-4 /LRH Dt: 25/7/98

Copy to :-

- 1- D.M.S. (Admn:) .. LRH,
- 2- Sr:Accounts-Officer LRH,
- 3- .. Head-Ward Orderly, LRH,

for information and necessary action.

Attested
[Signature]

[Signature]
Administrator
Govt: Lady Reading Hospital
Peshawar.

no. 11612 / 10/11 Dated 13/6/95.

(21)

(121)

To

Mr. Akhtar Munir / orderly
L.R.N. Resawar.

Subject; APPLYING
M.S.C.

It has been reported that you on 11/6/95
you come late for duty.

You are directed to explain reason as
why to why disciplinary action should not be taken
against you.

Your explanation should reach the
undersigned within 24 hours of the receipt of this
letter.

[Signature]
DR. J. M. S. S. S. S. (ADMIN)
GOVT. GARDY READING HOSPITAL
RESAWAR.

no. 11613

/ 10/11

Copy to head orderly Noorullah

L.R.N. Resawar for information.

[Signature]
DR. J. M. S. S. S. S. S. (ADMIN)
GOVT. GARDY READING HOSPITAL
RESAWAR.

BIF

Affected
[Signature]

MINISTRAT

کھنڈی کلا ایم ایس

(15)

(15)

ریورٹ برائے

R-H-
Pesh

ضابطہ کار کا ایک
نویسٹریٹری وارڈ ٹاؤن
کے لئے (طبع) ایک ڈسکری
فرم

لینا اطمینان

ایکٹا ہائیڈروجن ہائیڈروجن
6-4-99

Handwritten scribbles

Call Explanation
of deduction of pay.

A/

Attached
[Signature]

OFFICE
GOVT:

ADMINISTRATOR
READING HOSPITAL

16

OFFICE ORDER:

It has been reported by the L. (New Block), H/ Ward orderly & by the Head sweeper that the following officials were found absent from their duties without any information & prior permission on days noted against each:-

- 1- Subhana Bibi, Dai..... 24-23-99
- 2- Bilgees Bibi, Dai..... 06-4-99.
- 3- Saifullah, L/Oprtr..... 06-4-99, 31-3-99 & 01-4-99.
- 4- Akhter Munir, W/O..... 06-4-99
- 5- Jamila Sadiq, Svpres.. 09-4-99
- 6- Mehanzeb, M/Swr..... 12, 13-4-99.
- 7- Nargis Bano, Dai..... 31-3-99.
- 8- Shahid S/O Maz W/O.... 32-3-99.
- 9- Shahnaz Akhter, Swepress. 10-4-99, 17-4-99.
- 10- Janat Gul, L/Oprtr. 13-4-99.
- 11- Mishtaq Yaoub, Swepr.... 15-4-99.
- 12- Waliun Saah " 15-4-99
- 13- Mukhtiar S/O Gulfam W/O 15-4-99
- 14- Zakir Ullah W/O 15-4-99.
- 15- Akhter Munshi, Swpr..... 12, 13, 14, 15/4/99.
16. Naushad Ali S/o Haikal.. 15, 16, 17-4-99
17. Jan Sultan, Dai..... 16, 17-4-99.

Their absence from duty is treated as leave without pay and they are directed to explain their position as to why not disciplinary action should be taken against ~~xxx~~ them under the rules 1973.

Their reply must reach this office within three days of the receipt of this letter.

3393-3413
No: _____ /LRH, Pesh:
Dated: 19 / 04 / 99.

Dy: Medical Supt:(Admn.)
Govt: Lady Reading Hospital
Peshawar.

- Copy to:-
- 1- D.M.S (Admn.)
 - 2- D.M.S (NEW BLOCK)
 - 3- Head Ward Orderly
 - 4- Head Sweeper

for information and necessary action.

Dy: Medical Supt:(Admn.)
Govt: Lady Reading Hospital
Peshawar.

Attest
[Signature]

GOVT. LADY READING HOSPITAL PESHAWAR.

NO. _____ /LRH

Dated 04 / 16, 2004

17

To

- 1. Mr. Zakir ulah Ward Orderly } Neuro-surgery unit, LRH
- 2. Mr. Akhtar Munir " " }

Sub: EXPLANATION

It has been reported by Registrar Neuro-Surgery unit, LRH that you both left the ward at 12-Noon on 28.5.2004 without information.

You are directed to explain the reason within three days after the receipt of this letter, failing strict disciplinary action will be taken against you.

MEDICAL SUPERINTENDENT
GOVT. LADY READING HOSPITAL PESHAWAR

NO. 14594-96/LRH.

Copy for information to:-

- 1. The D.M.S. (Admn) LRH, Pesh.
- 2. The Registrar Neuro-surgery unit, LRH, Pesh.

MEDICAL SUPERINTENDENT
GOVT. LADY READING HOSPITAL PESHAWAR

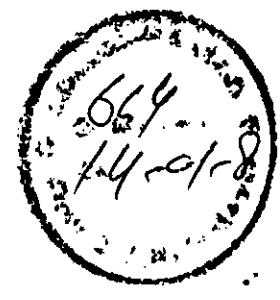
Handwritten Urdu text: *فائل کے لئے ڈی. پی. او. کے پاس*

Handwritten Urdu text: *سید*

Handwritten Urdu text: *آپ کا جواب دینے کے لئے ضروری ہے کہ*

H/N. *Arjuman*
c/o *Rifaqat*

Handwritten signature: *Affected -*



OFFICE ORDER:

Two days absence on 15[&]16-12-2007 of Mr. Akhter Munir S/O Taus Gul. Ward Orderly is hereby treated as leave without pay.

More-over he is warned to be careful in future.

78/-
MEDICAL SUPERINTENDENT
GOVT: LRH, PESHAWAR.

No: 672-74 /LRH, Peshawar.

Dated: 08 /01/2008.

Copy to:-

- 1)- The budget & Accounts Officer)
- 2)- Ch. Head CLASS-IV) Govt: LRH.
- 3)- Official concerned.)

For information & necessary action.

For: *(Signature)*
MEDICAL SUPERINTENDENT
GOVT. LADY WARDEN HOSPITAL
PESHAWAR.

Attested
(Signature)

34 (19)

OFFICE OF THE DY: MEDICAL SUPDT (Admin)
GOVT LADY READING HOSPITAL PESHAWAR.

No 3546 /LRH/E-IV, Peshawar
Dated 28/01/2010.

To,

Mr. Akhtar Munir, Ward Orderly,
Neuro-Surgery Ward,
LRH, Peshawar.

Subject: EXPLANATION.

It has been reported that you were absent from your duty on 20/01/2010, without any information/application, which is contrary to rules.

You are hereby directed to explain the reason of your absence within three days, after issuance of this letter, failing which strict disciplinary action will be taken against you.

[Signature]
Dy. Medical Supdt. (Admin)
For MEDICAL SUPERINTENDENT
Govt Lady Reading Hospital
Peshawar

No 347-4 /LRH/E-IV, LRH Peshawar.
Copy to

- 1. The Medical Cardiology Block, LRH Peshawar
- 2. Sub Director of Cardiology Block, LRH Peshawar
- 3. Official concerned, LRH Peshawar

For information and necessary action.

[Signature]
Dy. Medical Supdt. (Admin)
For MEDICAL SUPERINTENDENT
Govt Lady Reading Hospital
Peshawar

Jamd

Attested
[Signature]

GOVT LADY READING HOSPITAL PESHAWAR
OFFICE OF THE MEDICAL SUPERINTENDENT

36
20

No. 7881-83 /L.R.H./E-IV
Dated 30 /03/2010.

To,

1. Mr Saifur Khan S/O Hakim Khan 07 & 10/3/2010.
2. Mr. Akhtar Muneer S/O Taus Khan 13/3/2010
3. Mr. Zaheer Ullah S/O Nasrullah 13/3/2010
Ward Orderly L.R.H. Peshawar

Subject:- EXPLANATION.

It has been reported that you remained absent from duty on the date mentioned against your name with out any information/Prior Permission which is against the rules.

You are hereby directed to explain the reason of absentee with in three days after the issuance of this letter failing which strict disciplinary action will taken against you under the rules.

Medical Superintendent,
Lady Reading Hospital
Peshawar

Attested
[Signature]

20445-

7

EXHIBIT

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20445-48

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[Handwritten signature]

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2/16/68

attached
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21-A

BETTER COPY

GOVT LADY READING HOSPITAL PESHAWAR

NO. 20445/LRH

DATED 07-08-2010

To,

Akhtar Munir S/O Tawas Khan

Ward Orderly LRH Peshawar

Subject ABSENT FROM DUTY

It has been reported that you were absent from duty on 29-07-2010 without any information prior permission which is against the rule.

You are hereby directed to explain your position within three days from the issuance of this letter, failing which strict disciplinary action will be taken against you under the rules.

Medical Superintendent

Lady Reading Hospital

Peshawar.

No. 20445-48 E-IV

Copy to:

1. D.M.S Admin LRH Peshawar
2. Budget and Accounts Officer LRH Peshawar to stop his pay till further order
3. C. Head Ward Orderly LRH Peshawar.

For information and necessary action.

Medical Superintendent

Lady Reading Hospital

Peshawar.

Attended
[Signature]

22

42

LADY READING HOSPITAL PESHAWAR

No 23046 /LRH/E.IV Dated 03 /07/2013

Mr Akhtar Munir S/O Taus Gul
Ward orderly I.C.U L.R.H Peshawar.

Subject; EXPLANATION.

It has been reported that you are not working properly and you misbehaved with the Charge Nurse and refused her order on 25-06-2013, It shows your negligence and dis-interest to Government duty.

you are directed to explain the reason of disobedience & negligence within three days of the issuance of this letter, otherwise strict disciplinary action will be taken against you.

Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar.

No. 23047 ⁴⁹ /LRH/E.IV
Copy to the:-

- 1- Budget & Account Officer to stop his pay till further order (Disbursement only)
- 2- P.A to Medical Superintendent LRH Peshawar.
- 3- Head Orderly LRH Peshawar.
for information and n/action.

ole

03/7/13
Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar.
3/7

Affected
[Signature]

o/s issue warning letter 13/7/13

Ward Manager

LADY READING HOSPITAL PESHAWAR.

No. 24589 /LRH/E.IV Dated 15 /07/2013

To

Mr Akhtar Munir S/O Taus Gul
Ward orderly Neurosurgery I.C.U
L.R.H Peshawar.

Subject;

WARNING

Reference your reply of explanation dated 08/07/2013 is not satisfactory. However taking lenient action this time, you are hereby warned to be careful in future

[Signature]
13/7/13
Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar

No. 24600 /LRH/E.IV
Copy forwarded to:-

- Budget and Account Officer LRH to release his pay.
- 2-P.A to Medical Superintendent LRH Peshawar.
- 3- Head orderly L.R.H Peshawar.
for information & n/action.

[Signature]
13/7/13
Dy;Medical Supdt(Admn)
Lady Reading Hospital
Peshawar.
[Signature]
13/7

Attested
[Signature]

In Patient Manager
LRH, MTI Peshawar

LADY READING HOSPITAL PESHAWAR

24
~~48~~

No. 27776 /LRH/E-IV Dated 15 /08/2013.
To

Mr. Akhtar Munir S/O Taus Khan
Ward Orderly Neurosurgery unit
Morning shift LRH Peshawar.

Subject: EXPLANATION.
Memo.

It has been reported by Registrar of Neurosurgery unit of this instruction that you are irresponsible and reluctant.. it shows your negligence and dis-interest in Govt; duty, which is contrary to rules.

You are directed to explain reason within three days of the issuance of this letter, otherwise strict disciplinary action will be taken against you.

[Signature]
Dy; Medical Supdt:(Admn)
Lady Reading Hospital
Peshawar.

No. 27777 ⁸⁰ /LRH/E-IV

Copy to:-

- 1) D.M.S (Cardiology Block) LRH for information with the remarks to make internal arrangement at cardiology block.
- 2) Budget & Account Officer to stop his pay till further order(Disbursement only)
- 3) Registrar Neurosurgery unit LRH Peshawar.
- 4) Head Orderly LRH Peshawar.
for information and n/action.

[Signature]
Dy; Medical Supdt:(Admn)
Lady Reading Hospital
Peshawar.
15/8

Attested
[Signature]

admin.
28/03/11
In Patient Manager
LRH, MTI Peshawar
[Handwritten notes]

25

**LADY READING HOSPITAL PESHAWAR
MEDICAL TEACHING INSTITUTION.**

No. 8073 /LRH/E-IV

Dated. 06/02 /2017.

To

Mr. Akhtar Munir S/O Tawas Khan
Ward Orderly Surgical C Unit
LRH / MTI, Peshawar.

Subject: - **EXPLANATION.**
Memo:

It has been reported that you were absent from your duty on 23/02/2017, without information / prior permission. You are not punctual in your duty, which is contrary to rules.

You are hereby directed to explain the reason within 03 days after the issuance of this letter; otherwise strict disciplinary action will be taken against you under the rules.

No. 8074-76 /LRH/E-IV

[Signature]
Dy: Medical Supdt: (Admn:) LRH/MTI Peshawar. 02/3/17

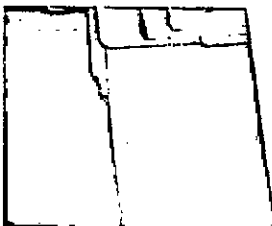
Copy to:

1. Registrar Surgical "C" Unit LRH/MTI, Peshawar.
2. Budget & Accounts Officer, the absent period may be treated as leave without pay.
3. Supervisor Class IV, LRH/MTI Peshawar.

[Signature]
Dy: Medical Supdt: (Admn:) LRH/MTI Peshawar. 02/3/17

Attested
[Signature]

Explanation File



*To
action.*

20/03/17
In Patient Manager
LRH, MTI Peshawar

[Handwritten notes]

Patient Manager Patient Manager

26

جیان عالی

مفتی بزرگ ترائس صاحب اختیار مشیر و لاہور کے خاں
 وادھا کی نیورولاجی - 17 جون 2017
 کو بھرتی کے لئے باجوہ اور اس کے غیر حاضر
 جیان عالی، یہاں ڈیپوٹی ایف ایف کے لئے
 کرائی کے لئے کارروائی کی جائے گی
 حاضرین کے لئے - 17 جون 2017

اللہ

4310
15.3.17

Head

Dr. Tariq

8/3/17

Notice

Prod to Mr. Tariq (OPM)
 for further disciplinary
 action.
 20/03/17
 In Patient Manager
 LRH, MTI Peshawar

Accepted
 O/S
 As reported he is not
 available for work
 suggested by
 O/S for approval.
 21/3/17
 OPM
 26/17

~~507~~
27

**LADY READING HOSPITAL PESHAWAR
MEDICAL TEACHING INSTITUTION.**

OFFICE ORDER.

An enquiry committee comprising of the following officers of this hospital is hereby constituted to conduct enquiry against Mr. Akhtar Munir S/O Tawas Khan Ward Orderly regarding will full absence from duty on 03/03/2017 & 08/03/2017.



- i). Dr. Sher Ali RMO, LRH/MTI, Peshawar.
- ii). Mr. Tahir Shahzad Facility Manager, LRH/MTI, Peshawar.

The enquiry officers should look into the matter and submit their findings / recommendations (i.e. who allowed them for social work and which basis they are serving without salaries what are their source of income to this office within 05 days.

No. 9651-53 /LRH/E-IV,
Copy forwarded to:-

1. Dr. Sher Ali RMO, LRH/MTI, Peshawar.
 2. Mr. Tahir Shahzad Facility Manager, LRH/MTI, Peshawar.
 3. Official Concerned.
- For information and necessary action.

Sd/-
Hospital Director
LRH/MTI Peshawar.
Dated. 21/03/2017.


Dy: Medical Supdt: Admn:
LRH/MTI Peshawar. 
12/03/17

Attested


59

28

**LADY READING HOSPITAL,
MEDICAL TEACHING INSTITUTION PESHAWAR**

No. 11107 /LRH/E-IV, Dated. 14 / 4 /2017.

To

Mr. Akhtar Munir S/O Tawas Khan
Ward Orderly
LRH/MTI, Peshawar.

Subject:- **FINAL WARNING.**
Memo:

Reference Inquiry No. 9651-53/E-VI, Dated 21/03/2017.

Your reply is not satisfactory; however this time a lenient action is taken against you. You are hereby finally warned to be careful in future.

No. 11108-10 /LRH/E-IV
Copy to:

1. DMS A & E Unit , LRH/MTI, Peshawar.
2. Budget & Account Officer. to consider his two days absence period treated as leave without pay.
3. Registrar Surgical "C" Unit, LRH/MTI, Peshawar.
For information and n/action.

[Signature]
Dy: Medical Supdt: (Admn)
LRH/MTI Peshawar.
13/4/17
Dated 14 / 4 /2017.

[Signature]
Dy: Medical Supdt: (Admn)
LRH/MTI Peshawar
13/4/17

Attested
[Signature]



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

67
29

No. 28943 /HR-IV

Dated. 13/11/2020

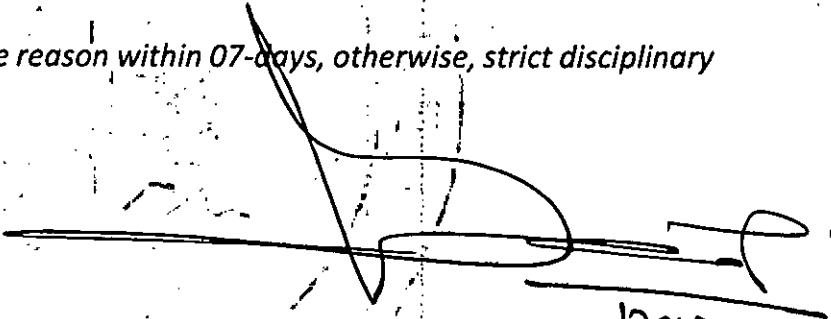
To


Mr. Muneer Akhtar S/o Tawas Gul,
Ward Orderly (HRID: 0130)
LRH-MTI Peshawar

Subject: EXPLANATION

It has been communicated that you are habitually late comer and misbehaved with seniors.

I am directed to ask you to explain the reason within 07-days, otherwise, strict disciplinary action will be initiated against you.


HR Management Officer
LRH Medical Teaching Institution,
Peshawar
12/11/2020

Attested


Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR PAKISTAN

No. 32207 /HR-III

Dated 08/12/2020

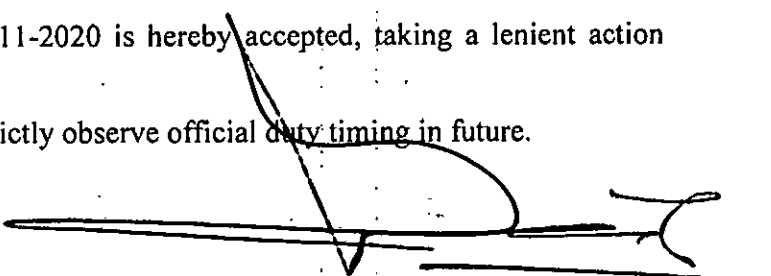
To

Mr. Akhtar Muneer S/o Tawas Khan,
Ward Orderly (7-0130)
LRH

Subject: WARNING

Your clarification dated 24-11-2020 is hereby accepted, taking a lenient action this time.

You are hereby warned to strictly observe official duty timing in future.


HR-Management Officer,
Lady Reading Hospital-MTI
Peshawar

Cc:

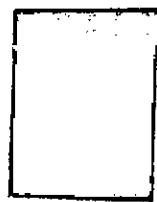
Manager House Keeping LRH for information.

Human Resources Department
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221
www.lrh.edu.pk

Attended




LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR



25
31

No. 34192 /LRH/HR-V
Dated 31/12/2020

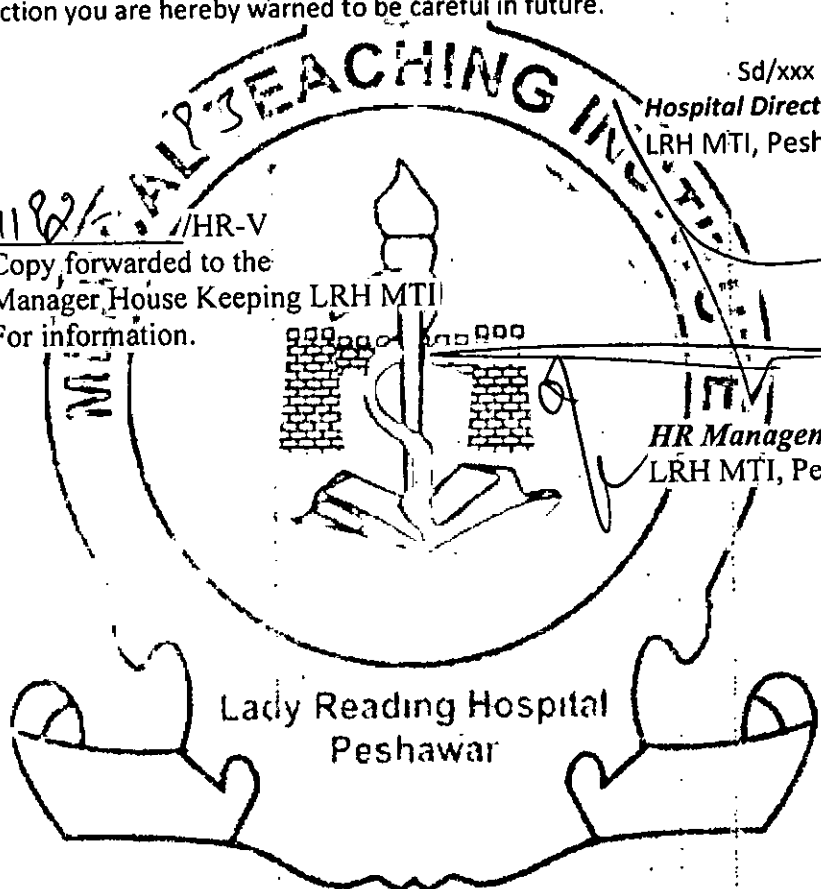
To,
Mr. Akhtar Muneer S/O Tawas Khan
Ward Orderly (HR ID- 7-130)

Subject: WARNING.

Though your reply to explanation is not satisfactory however, this time taking lenient action you are hereby warned to be careful in future.

Sd/xxx
Hospital Director
LRH MTI, Peshawar.

No. 34192 /HR-V
Copy forwarded to the
Manager House Keeping LRH MTI
For information.



HR Management Officer
LRH MTI, Peshawar

Appraised
27/12/20
27

from -thri+ you is de



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

32

HR ID: 0130

OFFICE ORDER

Whereas Mr. Akhtar Munir S/o Tawass-~~Khad~~ Ward Orderly remained absent from duty from 18-19/03/2021. Therefore, his 02-daya absence is hereby treated as unpaid.

He is hereby warned to be careful in future.

Sd/xxx

Hospital Director
Lady Reading Hospital - MTI,
Peshawar

No. 8240-42 /HR-IV,

Dated 6/7/21 /2021

Copy forwarded to:

1. Director Finance
 2. Manager Housekeeping
 3. Official concerned
- For necessary action.

HR Management Officer 07421
Lady Reading Hospital - MTI,
Peshawar

7/14/2021

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221

Attested
[Signature]

10/6
22



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

33

OFFICE ORDER

Absent period of the following Class-IV is hereby treated as unpaid and they are warned to be careful in future. Details mentioned below: -

S#	Name	Absent Days	Total absence	HR ID
1	Fakhr e Alam	12-17/06/2021	06-days	1307
2	Qaiser Khan	17&19/06/2021	02-days	1149
3	Muhammad Sadiq	22/06/2021	01-day	0390
4	Akhtar Munir	22/06/2021	01-day	7-130
5	Amjad	07-11/06/2021	05-days	0206
6	Irshad Nasir	16/06/2021	01-day	1079

Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

No. 16731/HR-IV,

Dated 06/07/2021

Copy forwarded to:

1. Director Finance
 2. Manager Housekeeping
 3. Officials concerned
 4. Personal file
- For necessary action.

HR Management Officer
Lady Reading Hospital - MTI,
Peshawar

Human Resources Department, LRH-MTI, Peshawar
Tel: 991 9212716 Exch: 9211430-34 Ext: 1200, 1201, 1221

Accepted

10/6/21



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

87
34

OFFICE ORDER

Absent period of the following Class-IV is hereby treated as unpaid and they are warned to be careful in future. Details mentioned below: -

S#	Name	HR ID	Absent Days	Total absence
1	Zahid Ali	0959	01 & 10/06/2021	02-days
2	Akhtar Munir	0130	21/06/2021	01-day

Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

Dated 6/8/2021

No. 16966- /HR-IV,

Copy forwarded to:

1. Director Finance
 2. Manager Housekeeping
 3. Officials concerned
 4. Personal file
- For necessary action.

7c
HR Management Officer⁰⁷⁷²¹
Lady Reading Hospital - MTI,
Peshawar
06/2021

Human Resources Department, LRI MTI, Peshawar
Tel 091 7212715 Fax 091 7212716 Ext 1200, 1201, 1221

Attested
[Signature]



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

35

OFFICE ORDER

Absent period of the following Class-IV employees is hereby treated as unpaid and they are warned to be careful in future: Details mentioned below: -

S#	Name	HR ID	Absent Days	Total absence
1	Muhammad Saleem	0187	28/06/2021	01-day ✓
2	Muhammad Raziq	2370	24-28/06/2021	05-days ✓
3	Akhtar Munir	0130	28/06/2021	01-day ✓
4	Fakhre Alam	1307	29/06/2021	01-day ✓
5	Faiz ur Rahman	0596	19/04/2021	01-day ✓
6	Aizaz Ali	0340	29-30/06/2021	02-days ✓
7	Tahir Ali	1403	03-07/05/2021	03-days ✓

Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

Dated 14/07/2021

No. 17783-96 /HR-IV,

Copy forwarded to:

1. Director Finance
 2. Manager Housekeeping
 3. Officials concerned
 4. Personal file
- For necessary action.

HR Management Officer
Lady Reading Hospital - MTI,
Peshawar

Human Resources Centre, Lady Reading Hospital - MTI, Peshawar
Tel: 091 222216 Ext: 1200, 1211, 1221

Attested
P.T.O

HRMbg

may be interview for

7/02/07/2021



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

86
36

OFFICE ORDER

The absent period of the following Class IV Staff, date mentioned against their names is hereby termed as unpaid.

S. #.	HRID	NAME	DESIGNATION	ABSENT DATE	NO. OF DAYS
1	6-3718	Laiq Ahmad	Porter	16-06-2022	(01-Day)
2	7-0670	Siraj Nabi	Chowkidar	16 & 17-06-2022	(02-Days)
3	6-3274	Javed Khan	Porter	17-06-2022	(01-Day)
4	6-0390	Muhammad Sadiq	Ward Orderly	21-06-2022	(01-Day)
5	6-0184	Aurangzeb	Ward Orderly	22-06-2022	(01-Day)
6	6-4895	Nargis Bibi	Dai	22-06-2022	(01-Day)
7	6-3269	Ashfaq	Porter	23-06-2022	(01-Day)
8	6-0587	Lubna Noreen	Aya	23-06-2022	(01-Day)
9	6-1405	Haleema Bibi	Dai	24-06-2022	(01-Day)
10	7-0130	Akhtar Munir	Ward Orderly	27-06-2022	(01-Day)
11	6-0596	Faiz Ur Rehman	Beheshti	30-06-2022	(01-Day)
12	6-1609	Roman Khan	Dish Washer	30-06-2022	(01-Day)
13	6-0256	Arshad Khan	Ward Orderly	30-06-2022	(01-Day)
14	6-3754	Shah Faisal	Porter	30-06-2022	(01-Day)

PTB 47
Cikw/51
PTB 20
w/22A
w/57
D/225
D/18
AYA 14
DH 4
w/273
BEH
DSW/3
w/107
PTB 65

Moreover, they are hereby warned to be careful in future.

Sd/-xxxx
Hospital Director
Lady Reading Hospital MTI,
Peshawar.

No. 12512-14/HR-IV/LRH Dated. 27/07/2022

- Cc:
1. Director Finance, LRH-MTI.
 2. Manager Housekeeping, LRH-MTI.
 3. Officials Concerned, LRH-MTI.

Assistant Director HR
Lady Reading Hospital MTI,
Peshawar.

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 921430-34 Ext. 1200, 1201, 1221

Alfred
[Signature]

from that written
time. In other case



ADING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

37

W. 273

No. 18811-13 /HR-IV/LRH
Dated 27/07/2022.

To

Mr. Akhtar Munir,
Ward Orderly (HRID: 7-0130),
LRH-MTI.

Subject: WARNING

It has been reported that you were absent from duty on 20-05-2022 without prior permission/information. Also you are habitually late comer, misbehaved several times with staff members. You have been warned several times to improve your performance and attitude but did not improve yourself. Such type of unprofessional attitude is against the rules/regulations of the institution.

You are therefore, warned to be careful in future. Otherwise disciplinary proceedings will be initiated against you under the rules.

Assistant Director HR
Lady Reading Hospital MTI,
Peshawar.

Cc:

1. Director Finance, LRH-MTI to treat his one-day absent i-e 20-05-2022 as unpaid.
2. Manager Housekeeping, LRH-MTI.

6/6

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221

Affected
[Signature]

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from that written
In other Co

05/11/22
no 273



LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

Annex C⁰¹ GB

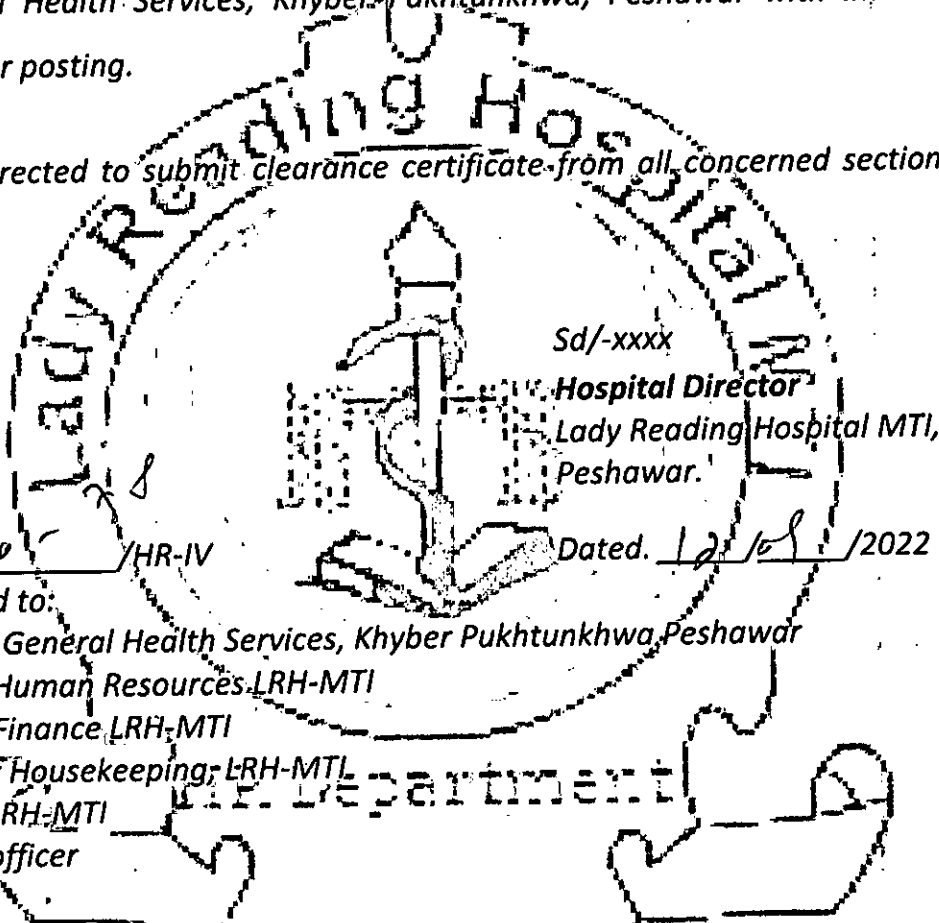
38

ID: 7-0130

OFFICE ORDER

Mr. Akhtar Munir S/o Tawas Gul, Ward Orderly (Civil Servent) is hereby relieved from Lady Reading Hospital MTI and his services are hereby placed at the disposal of Diector General Health Services, Khyber-Pakhtunkhwa, Peshawar with immediate effect for further posting.

He is hereby directed to submit clearance certificate from all concerned sections of LRH.



Sd/-xxxx


Hospital Director
Lady Reading Hospital MTI,
Peshawar.

No. 206705 /HR-IV

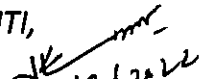
Dated. 12/10 /2022

Copy forwarded to:

1. Director General Health Services, Khyber Pukhtunkhwa Peshawar
2. Director Human Resources LRH-MTI
3. Director Finance LRH-MTI
4. Manager Housekeeping LRH-MTI
5. Provost LRH-MTI
6. Dealing officer
7. HRMIS
8. Incharge Recruitment Cell, LRH-MTI
9. Mr. Akhtar Munir S/o Tawas Gul, Ward Orderly, LRH-MTI


Hospital Director
Lady Reading Hospital MTI,
Peshawar.

o/c


08/11/2022

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221

Attest



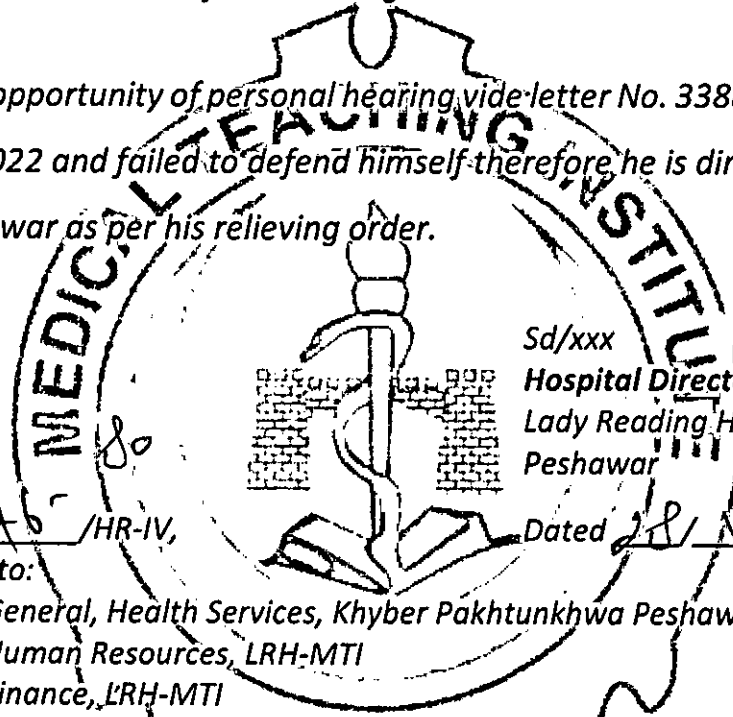

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION, PESHAWAR

39

OFFICE ORDER

Whereas Mr. Akhtar Munir, Ward Orderly (HRID: 7-0130) relieved to DGHS Khyber Pakhtunkhwa Peshawar vide officer order No. 22670-78/HR-IV, dated 12/09/2022 and subsequent request of DGHS KP via letter No. 10670/Personnel, dated 20/09/2022 for withdrawal of his relieving order.

He availed the opportunity of personal hearing vide letter No. 33883-85/HR-IV/LRH, dated 06/12/2022 and failed to defend himself therefore, he is directed to report to DGHS KP Peshawar as per his relieving order.



Sd/xxx
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

No. 36970 /HR-IV,
Copy forwarded to:

Dated 28/12 2022

1. Director General, Health Services, Khyber Pakhtunkhwa Peshawar.
2. Director Human Resources, LRH-MTI
3. Director Finance, LRH-MTI
4. Manager Housekeeping, LRH-MTI
5. P.A to Associate Hospital Director, LRH-MTI Peshawar
6. Mr. Akhtar Munir, Ward Orderly

NK
Hospital Director
Lady Reading Hospital - MTI,
Peshawar

CC 26/12/22 NK 26/12/22

Human Resources Department, LRH-MTI, Peshawar
Tel. 091-9212216 Exch. 9211430-34 Ext. 1200, 1201, 1221

Attested
[Signature]

Appeal No: 30/23

40

Khyber Pakhtunkhwa Service Tribunal, Peshawar



Respondent No: 384

Sec. Health Officer Akhtar Munir

موزنہ
مقدمہ
دعوی
جیم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کاروائی متعلقہ

ان مقام Barrister Ibrahim Khan Afridi Peshawar کیلئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار ہوگا۔ نیز
ذکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ پر حلف دینے کے جواب دہی اور اقبال دعویٰ اور
اسورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز اسورت عدم پیروی یا ڈگری یا بظرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظارتی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور ذکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیاراٹ حاصل ہوں گے اور اس کا ساختہ
پرداختہ مندرجہ ذیل ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشینہ الزامی مقدمہ کے سبب ہوتا ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو ذکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا ادکالت نامہ لکھ دیا کہ مندر ہے۔

التیوم 04 ماہ 04 2023

Accepted by

Barrister Ibrahim Khan Afridi

Peshawar

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Asst Director Legal
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