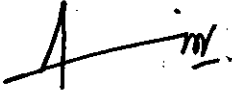


FORM OF ORDER SHEET

Court of _____

Appeal No. 1442/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/07/2023	The appeal of Mst. Shakeela Raina presented today by Mr. Khalid Mahmood Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

Appeal No 1442 /2023

Mst. Shakeela Raina

Versus

Govt of KPK

APPLICATION FOR FIXATION AT
PRINCIPAL SEAT PESHAWAR.

RESPECTFULLY SHEWETH,

1. That the above title case is being filed before this Honorable Court.
2. That the case relates to jurisdiction of camp court D.I.Khan and there is non-availability of bench at D.I.Khan.
3. That it is urgent matter and if not fix then appeal will become infructuous.

It is, therefore, very humbly requested that keeping in view the facts, the same is requested to be fixed for today before the Hon'ble Court.

Dated: 07/07/2023

Appellant

Through 

Khalid Mehmood

Advocate High Court D.I.Khan

Affidavit

That all the contents of the above application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent

12101-8684087-1

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. 1442 of 023

Mst. Shakeela Raina

Versus.

Govt. of Khyber Pakhtunkhwa etc

Service Appeal

INDEX

S#	Description of Documents	Annexure	Page Numbers
1.	Service appeal with Civil Misc.	—	1—8
2.	Copy of the Notification dated 14.11.2017	A	9—11
3.	Copy of notification dated 03.09.2022	B	12—13
4.	Copy of Notification bearing No. SO(S/F) E&SED/ 4-16/2022/ Posting/ Transfer/ dated 15.03.2023	C	14
5.	Copies of the charge report and pay slip of appellant	D	15
6.	Copy of Notification bearing No. SO(S/F) E&SED/ 4-16/2022/ Posting/ Transfer/ dated 29.03.2023	E	16
7.	Copy of Notification dated 23.11.2022 in respect of respondent No.7	F-1	17
8.	Copy of Notification dated 18.01.2023 in respect of respondent No.7	F-2	18
9.	Copy of the Departmental Appeal of appellant	G	19—20
10	Copies postal receipt and AD Card regarding sending of the Departmental Appeal	G-1 & G-2	21—22

Handwritten signature/initials

b

11	Copy of the diary receipt regarding receipt of the appeal in the office of respondent No.2	G-3	23
12	Vakalatnama	-	24-25

Yours Humble Appellant



(Mst. Shakeela Raina)
Through Counsel



Ahmad Ali
Advocate Supreme Court

Dt. 6.07.2023



Khalid Mahmood
Advocate High Court, D.I.Khan.

Stationed at D.I.Khan

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 1442 of 2023

Mst. Shakeela Raina, Headmistress, Government Girls High School,
Ratta Kulachi, D.I.Khan.

APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Chief Secretary to Govt of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
3. Secretary to Govt of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
4. Director, Elementary & Secondary Education Department, Peshawar.
5. District Education Officer, Dera Ismail Khan.
6. District Accounts Officer, D.I.Khan.
7. Mst. Saadia Naz, Headmistress Govt. Girls High School Gandi Khan Khel, Lakki Marwat. *presently working as Headmistress G.G.H.S Ratta Kulachi D.I.Khan*

RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF THE K.P.

SERVICE TRIBUNALS ACT, 1974, AGAINST THE

NOTIFICATION BEARING NO. SO(S/F) E&SED/ 4-

16/2022/ POSTING/ TRANSFER/ DATED

29.03.2023, ISSUED BY THE RESPONDENT NO.3.

PRAYER:

On acceptance of present Service Appeal and by setting aside Notification bearing No. SO(S/F)

E&SED/ 4-16/2022/ Posting/ Transfer/ dated 29.03.2023, the posting of appellant at Govt. Girls High School, Ratta Kulachi, D.I.Khan, as Headmistress may please be retained; and her transfer Notification bearing No. SO(S/F) E&SED/ 4-16/2022/ Posting/ Transfer/ dated 15.03.2023 may please be restored.

Respectfully Sheweth,

1. That the appellant is serving in the Education Department as Headmistress BPS-17; and addresses of parties as given above are correct & sufficient for the purpose of service.
2. That initially the appellant, owing to her promotion from BPS-16 to BPS-17 as Headmistress, was transferred to Govt. Girls High School Attaullah Nurrar, Bannu, vide notification dated 14.11.2017. The said school was situated near the FR Bannu and was a hard station. Copy of the Notification dated 14.11.2017 is enclosed as **Annexure A.**
3. That thereafter, vide notification dated 03.09.2020 (**Annexure B.**) the appellant stood transferred and posted as Headmistress Govt. Girls High School Kacha Mali Khel, D.I.Khan.
4. That after serving ordinary tenure of almost three years at Govt. Girls High School Kacha Mali Khel, D.I.Khan, the appellant stood transferred and posted as Headmistress, Govt. Girls High School Ratta Kulachi, D.I.Khan, vide Notification bearing No. SO(S/F)

E&SED/ 4-16/2022/ Posting/ Transfer/ dated 15.03.2023
(Annexure C).

5. That the appellant accordingly submitted her charge report at Govt. Girls High School Ratta Kualchi, D.I.Khan. Copies of the charge report and pay slip of appellant are enclosed as Annexure D.
6. That just after few days of the issuance of Notification dated 15.03.2023, the respondent No.3 vide another Notification bearing No. SO(S/F) E&SED/ 4-16/2022/ Posting/ Transfer/ dated 29.03.2023 (Annexure E) withdrawn the earlier Notification dated 15.03.2023 in respect of the appellant, and instead, ordered the retention of respondent No.7 at GGHS Ratta Kulachi D.I.Khan despite the fact that she never remained posted at GGHS Ratta Kualchi, D.I.Khan.

It is pertinent to mention that initially the transfer of respondent No.7 at GGHS Ratta Kulachi was notified, subject to retirement of Mst. Kalsoom Begum Headmistress vide notification dated 23.11.2022 (Annexure F-1) which was later-on withdrawn vide Notification dated 18.01.2023 (Annexure F-2).

7. That as the Notification dated 15.03.2023 was acted upon by the appellant by assuming charge at GGHS Ratta Kualchi, therefore, the same could not be withdrawn within the purview of Section 21 of the General Clauses Act. Hence, aggrieved of her premature transfer/wjthdrawal of transfer notification, the appellant preferred a Departmental Appeal to the respondent No.2 on 31.03.2023 which received to the office of respondent No.2 on 04.04.2023 vide Diary No.1456; but despite lapse of three months, the same has not been responded. Copies of the Departmental Appeal with postal receipt and AD Card are enclosed as Annexure G, G-1 &

AMC, RJ

G-2 respectively whereas, diary receipt is enclosed as Annexure G-3.

8. That till date no response of the Departmental Appeal has been received to the appellant; therefore, the appellant has been left with no option but to file present service appeal before this Honourable Tribunal for cancellation of notification dated 29.03.2023 on, inter alia, the following grounds:

GROUND:

i. That the impugned Notification bearing No. SO(S/F) E&SED/ 4-16/2022/ Posting/ Transfer/ dated 29.03.2023 is the outcome of malafide, result of political victimization, without jurisdiction, without lawful authority and having no binding effect upon rights of appellant.

ii. That as the Notification dated 15.03.2023 was acted upon by the appellant by assuming charge at GGHS Ratta Kualchi, therefore, the same could not be withdrawn within the purview of Section 21 of the General Clauses Act.

iii. That the impugned transfer Notification is not in the public interest rather in the interest of respondent No.7 only; hence, a great, great injustice is being done to the appellant.

iv. That it is pertinent to mention that respondent No.7 never remained posted at GGHS Ratta Kualchi, therefore, no question of her retention at the said school could arise at all. In-fact, initially, the transfer of respondent No.7 at GGHS Ratta Kulachi was notified, subject to retirement of Mst. Kalsoom Begum Headmistress vide notification dated 23.11.2022 which was later-on withdrawn vide Notification dated 18.01.2023 before

Alleged

she took the charge at GGHS Ratta Kualchi, D.I.Khan, as the post become vacant on 11.2.2023 upon retirement of Mst. Kalsoom Begum Headmistress.

v. That the impugned office order has been issued to oblige the political figures of the area and therefore, the same is having no legal sanctity and not worth to be maintained.

vi. That it has been held by the superior courts that when the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable. On this score too, the impugned notification is liable to be cancelled.

vii. That the appellant has not yet completed her ordinary tenure of the service and withdrawal of her transfer through the impugned notification is based on mala fide and is due to the political victimization, based on favoritism and also there are no compelling circumstances for the impugned notification before completion of her ordinary tenure.

viii. That under the Khyber Pakhtunkhwa Posting & Transfer Policy normal tenure of service is three years and transfer in the violation of such policy is simply to be recalled. Reliance is placed on 2001 PLC (CS) 172.

ix. That appellant is suffering from various diseases i.e. Diabetes, Blood Pressure, Heart Problems as well as Sciatica and therefore, travelling would add more in her medical complications.

x. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that the present service appeal may graciously be allowed as prayed for and thereby the impugned notification dated 29.03.2023 may kindly be cancelled and as result thereof the posting of appellant as Headmistress GGHS Ratta Kulachi on the basis of notification dated 15.03.2023, may kindly be restored.

Yours Humble Appellant



(Mst. Shakeela Raina)
Through Counsel

Dt. 6.07.2023



Ahmad Ali
Advocate Supreme Court



Khalid Mahmood
Advocate High Court, D.I.Khan.

Stationed at D.I.Khan.

VERIFICATION: I, the appellant, on this day of July-2023, herein mentioned above, do hereby verify that all the contents of this appeal are true & correct and also that it is the first appeal on the subject matter and no such appeal has earlier been filed.



Appellant

AFFIDAVIT: I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.

Identified by Counsel:
Ahmad Ali ASC.




Deponent

12101-1540631-0

7

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Civil Misc. Petition No. _____ of 2023

In Service Appeal No. _____ of 2023

**Mst. Shakeela Raina Vs. Govt. of Khyber Pakhtunkhwa etc
Service Appeal**

APPLICATION FOR SUSPENSION OF THE OPERATION OF
IMPUGNED NOTIFICATION BEARING NO. SO(S/F) E&SED/
4-16/2022/ POSTING/ TRANSFER/ DATED 29.03.2023
ISSUED BY THE RESPONDENT NO.3, TILL FINAL DECISION OF
SERVICE APPEAL AND IN THE MEANWHILE RESPONDENTS
MAY ALSO BE ABSTAINED FROM TAKING ANY ACTION
DETRIMENTAL TO THE SERVICE CAREER OF APPELLANT.

AKR
P

Respectfully Sheweth,

1. That a Service Appeal is being filed before this august court and the grounds of same may please be considered as an integral part of this Petition.
2. That the petitioner/appellant has got a good prima case on law as well as on facts and there is every likelihood of the success of Service Appeal; hence, balance of convenience tilts in favour of the appellant.
3. That the petitioner has been transferred on the basis of nepotism and favouritism; therefore, in case of non-suspension of impugned Notification, the petitioner/appellant will suffer an irreparable loss.

It is, therefore, humbly prayed that on acceptance of the present Civil Misc. Petition, the operation of impugned Notification may please be suspended and respondents may please be desisted from taking any action detrimental to service career of appellant, till decision of Service Appeal, and in the meanwhile, status quo may graciously be ordered to be maintained.

Yours Humble Appellant

(Ms. Shakeela Raina)
Through Counsel

Dt. 6 07.2023

Ahmad Ali
Advocate Supreme Court

Khalid Mahmood
Advocate High Court, D.I.Khan.

Stationed at D.I.Khan

AFFIDAVIT I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above Misc. Application are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.

Identified by Counsel:
Ahmad Ali ASC

Deponent

12101-4840631-0





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 14-11-2017

Annex (A)
9

NOTIFICATION

No. SOCPED/PPC/Mentor (01-10-2017). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following One Hundred and Eighty Five (185) Female SSTs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect.

Sr	Serial No.	Name of Officer and School Address	Proposed place of Posting	Remarks
1	1	Muniaz Begum D/O Ikramul Haq MA/B.Ed GGCMS Taulheed Absar Charsadda	H/M BS-17 GGHS Doshak Char. adda	Against the vacant post
2	32	Jamila Azam SST D/O Saib Azam BA BEd GGHS Khar Bajaur	Service placed at the disposal of FATA	Against the vacant post
3	58	Nahed Aalam SST BA BEd GGMS Jaboori Manshera	H/M BS-17, GGHS Jaboori Manshera	Against the vacant post
4	67	Hidayat SST, MA, BEd D/O Ah Haider GGHS Dadam Baghicha Mkd.	H/M BS-17, GGHS Inzargal Malakand	Against the vacant post
5	71	Tahira Bibi SST, MA, BEd GGHS Dorki Parachinar Kurram Agency	Service placed at the disposal of FATA	Against the vacant post
6	75	Tahira Bibi, SST, BA, BEd GGHS Parachinar	Service placed at the disposal of FATA	Against the vacant post
7	102	Dishal Begum, SST, MA BEd GGMS Shok Dara Swat	H/M BS-17 GGHS Kulam Swat	Against the vacant post
8	103	Bibi Jamila D/O Abdul Hamid, SST, MA, BEd GGMS Drosh Chitral	H/M BS-17 GGHS Drosh Chitral	Against the vacant post
9	104	Bibi Zainab-Nisa D/O Abdur Rabi SST GGMS Jinfirai Chitral	H/M BS-17 GGHS Mardan Chitral	Against the vacant post
10	105	Bibi Khairun Nisa SST BA BEd GGHS Warijam Chitral	H/M BS-17 GGHS Panakot Dir Upper	Against the vacant post
11	106	Khalida Parveen SST BA BEd GGHS Chail Shingai Swat	H/M BS-17 GGHS Chalegay Swat	Against the vacant post
12	107	Nighat Shaheen SST MSc MEd GGHS Dargai Swabi	H/M BS-17 GGHS Mithun Dargai Swabi	Against the vacant post
13	108	Tahaseen SST, MA BEd D/O Ihsanullah GGHS Kharki Mkd	Int. RTE (F) Dargai	Against the vacant post
14	111	Shahida SST, BA, BEd GGMS Syed Abad D. Alhadad MKD	H/M BS-17, GGHS Total Malakand	Against the vacant post
15	112	Malka Bibi SST GGMS Kandaro Mkd	H/M BS-17, GGHS Dag Gosam Dir Lower	Against the vacant post
16	113	Shahida Nabila, SST, MA, BEd GGMS, Shakaqura Peshawar	H/M BS-17, GGHS Inzargay Nowshera	Against the vacant post
17	114	Rubina Bibi D/O Umed Khan SST MA BEd GGHS Atuleh Chitral	H/M BS-17 GGHS Khor Chitral	Against the vacant post
18	115	Zahida Nageen SST BSc. BEd GGMS Swabi	H/M BS-17 GGHS Yaqoobi Swabi	Against the vacant post
19	117	Saniya Farid SST BSc. BEd GGHS No. 1 Manshera	H/M BS-17, GGHS Rerih Manshera	Against the vacant post
20	118	Yasmeen Begum SST BSc BEd GGHS Baghdada Marlan	H/M BS-17 GGHS Guli High Swat Dier Marlan	Against the vacant post
21	119	Riffat Khannam SST BA BEd GGMS Manshera	H/M BS-17, GGHS Shamdahn Manshera	Against the vacant post
22	120	Haseeb Jamal SST MA BEd GGMS Landi Akhon Ahmad Peshawar	H/M BS-17 GGHS Kooper Mardan	Against the vacant post
23	121	Abida Inayat SST BA BEd GGHS Spelano Kas Jaurud	Service placed at the disposal of FATA	Against the vacant post

24.	122	Waheeda SST BSc. BEd GGHS Bann Khel Swabi	H/M BS-17 GGHS Sard Chinn Swabi	Against the vacant post
25.	123	Qamar Begum D/O Muhammad Ali. SST, MA, BEd GGMS, Shoghore Chitral.	H/M BS-17 GGHS Warkup Chitral	Against the vacant post
26.	124	Sania Shumeen SST, BSc, BEd GGHS, Sheikh Abad Peshawar	H/M BS-17 GGHS Mulla Killy Nowshera	Against the vacant post
27.	125	Munilaz Jamal D/O Abdul Hamid SST, BA BEd GGMS, Chumukene Chitral	H/M BS-17 GGHS Berop Chitral	Against the vacant post
28.	128	Hibi Nafees Fatima, SST, BSc, BEd GGHS Bandi Meina A. Abad	H/M BS-17 GGHS Churlaki Kohat	Against the vacant post
29.	131	Dibi Ayesha D/O Abdul Khaliq D. Ed/M. Ed GGHS Nost Mingora Swat	H/M BS-17 GGHS Panjgram Swat	Against the vacant post
30.	134	Bibi Romina, SST, MA, BEd GGHS, Shakh No. 6 Charsadda	H/M BS-17 GGHS Shakh No. 6 Miona Charsadda	Against the vacant post
31.	136	Shabnam Roohi D/O Syed Bakhtiar Hussain D. Ed/M. Ed GGHS No. 1 Kohat	H/M BS-17 GGHS No. 2 Kohat	Against the vacant post
32.	137	Mst. Nusrat Jamal SST (Sc) GGHS Garhi Daulat zai Mardan	H/M BS-17 GGHS Garhi Daulat zai Mardan	Against the vacant post
33.	139	Salma Farid, SST, BA, BEd GGHS Malira Peshawar	H/M BS-17 GGHS Dagal Garden Swabi	Against the vacant post
34.	140	Ghazala Shaheen SST, BA, BEd GGHS, Dabgnri Banate pesh.	H/M BS-17 GGHS Amir Kot Bakhshali Mardan	Against the vacant post
35.	152	Muqadisa Jabeen, SST, BA, BEd GGMS, Roda DI Khan	H/M BS-17 GGHS Bahader Mughul Khel Bannu	Against the vacant post
36.	153	Furhat Jabeen, SST, BA, BEd GGHS, Sulhad A/Abad	H/M BS-17, GGHS Pluck Andersoni Abbottabad	Against the vacant post
37.	159	Bibi Tajamul Naz, SST, E.A. BEd D/o Fazal Mehmood GGMS, Dri Seri Malakond.	H/M BS-17, GGHS Radin Dir Lower	Against the vacant post
38.	160	Nargis Shaheen, SST, BA BEd GGMS Swabi	H/M BS-17 GGHS Dam Khel Swabi	Against the vacant post
39.	161	Rifat Shaheen, SST MA MEd GGHS, Prang Charsadda	H/M BS-17 GGHS Haji Jan rooz Khan Killi Charsadda	Against the vacant post
40.	162	Sarat Bibi, SST BA BEd GGHS Sitakardara Kohat	H/M BS-17 GGHS Dhand Bakhtawara Kohat	Against the vacant post
41.	163	Jehan Ara, SST BA BEd GGMS, Meherdi Mkd	H/M BS-17, GGHS Dagan Duner	Against the vacant post
42.	164	Noor Jehan, SST BA BEd GGHS, Meherdi Mkd	H/M BS-17 GGHS Salim Khan Swabi	Against the vacant post
43.	165	Shakeela Rana SST BA BEd GGHS, Kumbh Di Khan	H/M BS-17 GGHS Atullah Nur Bannu	Against the vacant post
44.	166	Hussan Ara, SST BA BEd GGHS, Maneri Swabi	H/M BS-17 GGHS Maneri Bala Swabi	Against the vacant post
45.	167	Najma Rashid, SST BA BEd GGHS Islamia Collegiate Pesh.	H/M BS-17 GGHS Jahhi Payon Nowshera	Against the vacant post
46.	168	Huran Bibi, SST BA BEd GGMS Warjin Chitral	H/M BS-17 GGHS Shigram Chitral	Against the vacant post
47.	170	Huma shad, SST BA BEd GGHS, Kohati Gate Peshawar.	H/M BS-17 GGHS Dheri Kullang Mardan	Against the vacant post
48.	171	Rehana Begum SST GGHS, Haji Abad Dir	H/M BS-17, GGHS Bagh Dushkhon Dir Lower	Against the vacant post
49.	173	Siraj Begum, SST BA BEd GGHS, Khazana Dir L	H/M BS-17 GGHS Akhgram Dir Upper	Against the vacant post
50.	174	Mehrun Nisa SST BA BEd GGHS College Abadi Kohat	H/M BS-17 GGHS Kerf Shikhan Kohat	Against the vacant post
51.	176	Phul Bibi, SST BA BEd GGMS Rehr Manshra	H/M BS-17 GGHS Nokot Manichra	Against the vacant post
52.	178	Samina Malik, SST BA BEd GGMS Zaryal Colony Pesh.	H/M BS-17 GGHS Shah Alam	Against the vacant post
53.	179	Rana Attaullah D/O Attaullah Khan, SST BA BEd GGMS, Muhammad Ali Killi Mardan	H/M BS-17 GGHS Ali Rustom Mardan	Against the vacant post
54.	181	Tahseen Begum D/O Farid Khan D. Ed M. Ed GGHS.	H/M BS-17 GGHS Bazzari Bala Mkd	Against the vacant post

Handwritten notes in the left margin, possibly indicating a correction or additional information for row 43.

Handwritten number '10' in a circle at the top right corner.

179	422	Irabia Yousaf, SST BA BEd GGHS, Sajkot A/Abad	H/M BS-17 GGHS Sudher Swabi	Against the vacant post
180	424	Asma Iqbal, SST BA BEd GGHS Gwalera Swat	Instructure BS-17 RITE (F) Barikot Swat	Against the vacant post
181	425	Khadja Begum, SST BA BEd GGHSS Khanpur Haripur	H/M BS-17 GGHS Sanga Ahmad Gul Killi Mardan	Against the vacant post
182	432	Nadeema Begum B.Ed/M.Ed GGHS Moranai Dir Lower	H/M BS-17 GGHS Khad Dir Lower	Against the vacant post
183	433	Tafzeela Iqbal, SST BA BEd GGHS Moranai Dir Lower	H/M BS-17 GGHS Moranai Dir Lower	Against the vacant post
184	439	Zubaida Khatoun, SST BA BEd GGHS Shah Dau DIKhan	H/M BS-17 GGHS Dali Mela Karak	Against the vacant post
185	444	Norreen Naheed, SST BA BEd GGHS, Kala killi Swat	H/M BS-17 GGHS Kala Killi Swat	Against the vacant post

Consequential Posting/Transfer

S#	Name of Officer and School Address	Proposed place of Posting	Remarks
186	Amreen Alam HM GGHS Jhangira, Nowshera	HM BS-17, GGHS Palosi Pawan Nowshera	Against the Vacant Post
187	Shahnaaz Farveen HM, GGHS Jalozai Nowshera	SS BS-18, Istimiyat GGHS Peshawar	Against Vacant Post in her own pay and scale
188	Mahmed Akhtar SS Working against the HM post at GGHS No 3 Lakki Marwa	SS BS 17, GGHS Ghazni Khel Lakki Marwa	Against the Vacant Post

2. On their promotion, the Head Mistress concerned will be on probation for a period of one year, in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1987.

3. No TA/ DA allowed.

SECRETARY

Encl. No. & date as above.

Copy to:

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbottabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The Deputy Director (EMIS), E&SE Department, with the request to upload the notification of EMIS Department website (www.kpese.gov.pk).
11. The District Education Officers, Elementary & Secondary Education concerned.
12. The District Accounts Officers concerned.
13. PS to Secretary E&SE Department.
14. Administrators concerned.
15. Office File.


(NAIK MUHAMMAD)
SECTION OFFICER (PRIMARY)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**

Date: Peshawar the September 09th 2020

Amir (B)
12

NOTIFICATION

No. HO/OPS/SSK/4-16/2020/Transfer/Transfer/11. In consequence upon the approval of the Competent Authority, the posting/transfer of following female teachers is hereby announced on the post/stations, as mentioned against each, in the best public interest, with immediate effect.

Sr. #	Name & Designation	From	To
1.	Mrs. Yashmin Bibi, SS Islamiyah (BS-17)	GCHSS Palaoma, Malakand	SS Islamiyah (BS-17) GCHSS Huzama Kot, Malakand (Against vacant post)
2.	Mrs. Shakeela Rahn, Headmistress (BS-17)	GCHSS Atollah Banna	Headmistress (BS-17) GCHSS Kucha Mahi Khel, D.I. Khan (Against vacant post)
3.	Mrs. Shagufta Javed Instructor Physical Education (BS-17)	GCHSS Jahangira, Swat	IP (BS-17) GCHSS Sakhil, Peshawar (Against vacant post)
4.	Mrs. Asia Bibi SS Urdu (BS-17)	GCHSS Nhaa KIL, Lower	Headmistress (BS-17) GCHSS Sakhil, Swat, Bajaur (As stop gap arrangement)
5.	Mrs. Sadaf Jashir Principal (BS-18)	GCHS Manshra	Kaghan, SIPP (BS-18) GCHS Sherwan, Abbottabad (A.V.P as stop gap arrangement)
6.	Mrs. Mumtaz Bibi, Principal (BS-18)	Instructor RTE (B) D.I. Khan	Principal (BS-18) GCHS Paharpur, D.I. Khan (Vice Sr. No. 151/2019)
7.	Mrs. Mubrahim Nushaen, Principal (BS-18)	GCHSS Paharpur, D.I. Khan	Instructor (BS-18) RTE (B) D.I. Khan (Vice Sr. No. 151/2019)
8.	Mrs. Samreen Gul, SS Physics (BS-17)	GCHSS Badwan, Dir Lower	SS Physics (BS-17) GCHSS Habibi, Mardan (Against vacant post)
9.	Mrs. Humaira Noz, Headmistress (BS-17)	GCHS Peshawar	Headmistress (BS-17) GCHS Mohmand Abad, Peshawar (Against vacant post)
10.	Mrs. Nahida Khan, SS Studies (BS-17)	Principal GCHS Spin Wana, South Waziristan II, OPS	SS Urdu (BS-17) GCHS Paroya, D.I. Khan (As stop gap arrangement)
11.	Mrs. Nazam Bibi, Headmistress (BS-17)	Unadjusted Post	Headmistress (BS-17) GCHS Mian Gujjar, Peshawar (As stop gap arrangement)
12.	Mrs. Farhat Bibi, Principal (BS-18)	GCHS Kot Harmol, Mardan	Principal (BS-18) GCHS Bakri Banda, Mardan (As stop gap arrangement in OPS)
13.	Mrs. Farhat Bibi, Principal (BS-18)	GCHS Koper, Mardan	Principal (BS-18) GCHS Rustam Khel, Mardan (Vice Sr. No. 14)

Handwritten signature/initials on the left margin.

Handwritten signature/initials on the right margin.

	Mst. Sadia Mukhtiar Economics (BS-18)	Principal GGHSS Khel, Mardan	Rustam	GGHSS Koper, Mardan (As stop gap arrangement)
	Mst. Sadia Afsheen Principal (BS-18)	GGHSS Ghari/ Abbottabad	Phulgram,	SS (History/Civics BS-18) GGHSS Havelian, Abbottabad (As stop gap arrangement)
16.	Mst. Tanveer Akhtar SS Pak Studies (BS-18)	Unadjusted		Principal (BS-18) GGHSS Ghari Phulgram, Abbottabad (As stop gap arrangement)
17.	Mst. Robina Naseer SS Islamiyat (BS-18)	GGHSS Shabqadri Charsadda	Fort,	Principal (BS-18) GGHSS Behlolan, Charsadda (As stop gap arrangement)
18.	Mst. Rajuly Nuz SS Statistics (BS-17)	GGHSS Badrushi, Nowshera		SS General (BS-17) GGHSS Wadpaga, Peshawar (As stop gap arrangement)
19.	Mst. Lubna Ralman SSI (IT) (BS-16)	GGHSS Attaki, Charsadda		Subject Specialist (IT BS-17) GGHSS Tarnab Farm, Peshawar (Against vacant post in OPS)
20.	Mst. Aysha Noreen SST (IT) (BS-16)	GGHSS Bashir Khan Qilla Umerzai, Charsadda		SS (IT BS-17) RIIE (I) Rajar, Charsadda (Against vacant post in OPS)
21.	Mst. Hifsa Bibi SS Economics (BS-17)	GGHSS Nizam Pur, Nowshera		SS Pashto (BS-17) GGHSS Bilting, Kohat (As stop gap arrangement)
22.	Mst. Echama Shaheen SS Islamiyat (BS-17)	GGHSS Nar Bannu	Shukurullah,	Headmistress (BS-17) GGHSS Eberna Khel, Bannu (As stop gap arrangement)

2. No TA/DA is allowed.

SECRETARY
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT

Ends: of even No. & date:

- Copy forwarded to the:
- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- Director DC TE, Abbottabad.
- Additional Director, NMD, Khyber Pakhtunkhwa Peshawar.
- District Education Officers (Female) concerned.
- District Accounts Officers concerned.
- PS to Minister for E&SE, Khyber Pakhtunkhwa.
- PS to Secretary E&SE Department.
- Director FMIS, E&SE Department for uploading at official website.
- Office order file.

Salam
03/9/2020
(ABDUS SALAM)





(3)

Amr C

114

GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficeof@gmail.com
001-9223588

Dated Peshawar the March 15th, 2023

NOTIFICATION

NO. SO(S/F)E&SED/4-16/2022/Posting Transfer: Ms. Shakeela Raine Headmistress (DPS-17) GGHS Kachin Mall Khol D.I Khan, is hereby transferred and posted at GGHS Ratta Kulachi D.I Khan, against the post of Headmistress (BS-17), with immediate effect.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Enclat: of avan No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) D.I. Khan.
4. District Account Officer D.I. Khan.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department.
8. Teacher concerned.
9. Office order file.

(21)

**(SHAWANA HALEEM)
SECTION OFFICER (S/F)**

Dist. Govt. KP-Provincial
District Accounts Office D.L.K
Monthly Salary Statement (March-2023)

Amey (D) 15



Personal Information of Mrs SHAKEELA RANA 48/7 d/w/s of NAJMUL HASSAN SHAH

Personnel Number: 00190295 CNIC: 1210118406310 NTN:
 Date of Birth: 13.04.1968 Entry into Govt. Service: 21.09.1987 Length of Service: 35 Years 06 Months 012 Days

Employment Category: Active Permanent

Designation: HEAD MISTRESS 10001771-DISTRICT GOVERNMENT KHYBE
 DIO Code: D16107-H.M. GGH/RATA KULACHI D.LK
 Payroll Section: 002 GPF Section: 001 Cash Center:
 GPF A/C No: EDUDK005900 GPF Interest applied GPF Balance: 1,918,049.00 (approximate)
 Vendor Number: -
 Pay and Allowances: Pay scale: BPS For - 2022 Pay Scale Type: Civil BPS: 17 Pay Stage: 20

Wage type	Amount	Wage type	Amount
1001 Basic Pay	113,470.00	1001 House Rent Allowance 45%	6,650.00
1210 Convey Allowance 2005	5,000.00	1505 Charge Allowance	100.00
1947 Medical Allow 15% (16-22)	3,096.00	2148 15% Adhoc Relief All-2313	1,640.00
2199 Adhoc Relief Allow @ 10%	1,100.00	2315 Special Allowance 2021	6,074.00
2341 Dispr. Red All 15% 2022 KP	12,146.00	2347 Adhoc Rel At 15% 22(PS17)	12,146.00

Deductions - General

Wage type	Amount	Wage type	Amount
3017 GPF Subscription	-4,270.00	3501 Benevolent Fund	-1,500.00
3609 Income Tax	-8,928.00	3666 Turkey/Syria EQ Ded KPK	-2,244.00
3900 Emp.Edu. Fund KPK	-270.00	4004 R. Benefits & Death Comp.	900.00

Amey

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	500,000.00	-14,000.00	24,000.00

Deductions - Income Tax

Payable: 115,255.38 Recovered till MAR-2023: 88,474.00 Exempted: 0.70 Recoverable: 26,781.68

Gross Pay (Rs.): 161,422.00 Deductions: (Rs.): -34,112.00 Net Pay: (Rs.): 127,310.00

Payee Name: SHAKEELA RANA 48/7

Account Number: PLS 1355-5

Bank Details: NATIONAL BANK OF PAKISTAN, 231429 SF EIKH YOUSAF D.L.KHAN SHEIKH YOUSAF D.L.KHAN

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: DIKHAN

City: D.L.KHAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: shakeelarana@gmail.com



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Email: sectionofficers@gmail.com
091-9223688

Amr E
16

Dated Peshawar the March 20th 2023

NOTIFICATION

NO.SJ(S/F)E&SED/4-16/2022/Posting/Transfer/: This Department's notification of even number dated: 15.03.2023 in respect of Mst Shakeela Raina Headmistress (BB-17) is hereby withdrawn and Mst. Sadia Naz Headmistress (BB-17) retained at GGHS Ratta Kulachi D.I Khan, with immediate effect.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT.**

Ends: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female), concerned.
4. District Accounts Officers, concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officer concerned.
8. Office order file.

Amr E


(SHAWANA HALEEM)
SECTION OFFICER (S/F)



(F)

Amr (F) (17)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Email: sectionofficer@amel.com

091-9223588

Dated Peshawar, November 23rd, 2022

NOTIFICATION

NO. SO(S/E)E&SED/4-16/2022/Posting/Transfer Mrs. Mat. Sadia Naz, Headmistress (BS-17), is hereby transferred from GGHS Gandi Khan Khol Lakki Murwat and posted at GGHS Ratta Kulachi D.I. Khan as Headmistress (BS-17). She will assume charge on retirement of Mrs. Kulsoom Begum Headmistress (BS-17).

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

Encls: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female), concerned.
4. District Account Officer, concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department.
8. Teacher concerned.
9. Office order file.

(SHAWANA HALEEM)
SECTION OFFICER (S/F)



GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficers@gmail.com

091-9223588

Dated Peshawar, January 18th, 2023

NOTIFICATION

NO.SO(S/F)E&SEC/4-16/2022/Posting/Transfer/ This Department's notification of even number dated: 23.11.2022 in respect of Mst. Sadia Naz Headmistress (BS-17) is hereby withdrawn, ab-initio.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT.**

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female), concerned.
4. District Accounts Officers, concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Officer concerned.
8. Office order file.

(SHAWANA HALEEM)
SECTION OFFICER (S/F)

Chief Secretary,
Khyber Pakhtunkhwa,
Peshawar.

Alex (G)
19

through proper channel

Subject: Departmental Appeal Against the order of Transfer Dated 29/03/2023

Respectfully Sir,

That the appellant humbly submits as below,

BRIEF FACTS:

1. That the appellant is serving in the Elementary and Secondary Education in BPS-17.
2. That the appellant has served in various hard areas in her carrier from time to time. The appellant was earlier posted at GHSS Atta Ullah Nurrar near FR Bannu on 14/11/2017 where the appellant served as Head Mistress till 03/09/2020. On 03/09/2020 the appellant was once again uprooted and transferred to GGHS Kacha Mali Khel, Tehsil Puharpur District D I Khan. Copies of the transfer order are attached.
3. That, however, recently the appellant was transferred and posted vide the order Dated 15/03/2023 to GGHS Ratta Kulachi D I Khan. After the transfer order the appellant assumed the charge and pay was also adjusted against the said post. Copy of the transfer order Dated 15/03/2023 is attached.
4. That the said recent order of transfer was once again withdrawn without assigning any justification on 29/03/2023 and another person namely, Mst Sadia Naz was allegedly retained. Copy of the impugned order Dated 29/03-2023 is attached.
5. That feeling aggrieved from the order Dated 29/03/2023 the appellant is left with no other ground but to file the instant appeal, inter alia, on following grounds.

GROUND:

- A. That Mst. Sadia Naz was earlier ordered vide the order Dated 23/11/2022 to assume charge of Headmistress GGHS Ratta Kulachi on retirement of Mst. Kulsoom Begum. Copy of the order Dated 23/11/2022.
- B. That the said Mst. Kulsoom Begum got retired on 11/02/2023. However, prior to her retirement the order Dated 23-11-2022 of Mst. Sudi Bibi was withdrawn, initial vide order Dated 18/01/2023. The said order was intimated to all quarters concerned, including the said

AMIT (G-1)

(21)

No. 1325

RGL105398625

Rs. AD
80

For use in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

Received a registered addressed to

Date-Stamp

Initials of Receiving Office

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

Insured for Rs. (in words)

(in words)

Insurance fee Rs.

Ps. (in words)

Weight

Kilo

Grams

Name and address of sender

11/1

31-3

Handwritten scribbles

AGL
105396525



Area C-2

22

ACKNOWLEDGEMENT DUE CARD (Registered)

نام: منگولہ، رعنا بیگم، جسٹس، لوہند، ٹرہ ماں، سکول، تہذیبی
پتہ: زیارت، شیخ پور، سرف، ڈیرہ اسماعیل خان
ڈاکخانہ: تحصیل، ضلع ڈیرہ اسماعیل خان
پوسٹ کوڈ:

3	1	3	4
---	---	---	---

 (پوسٹ کوڈ لکھنا ہوتا ہے)

سید
محمد

RP-54

رسید

رجسٹری یا بیمہ پیچھے والے کو پست پر دیئے گئے پتہ پر واپس بھیجا جائے۔

☆ ایک رجسٹری نمبر: _____

برائے (نام): چیف سیکرٹری، جسٹس، ڈیپارٹمنٹ، شیخ پور

بیمہ کی مالیت: _____ وزن (تھون): _____ گرام

کتوب الیہ کے دستخط: _____ تاریخ تقسیم: _____

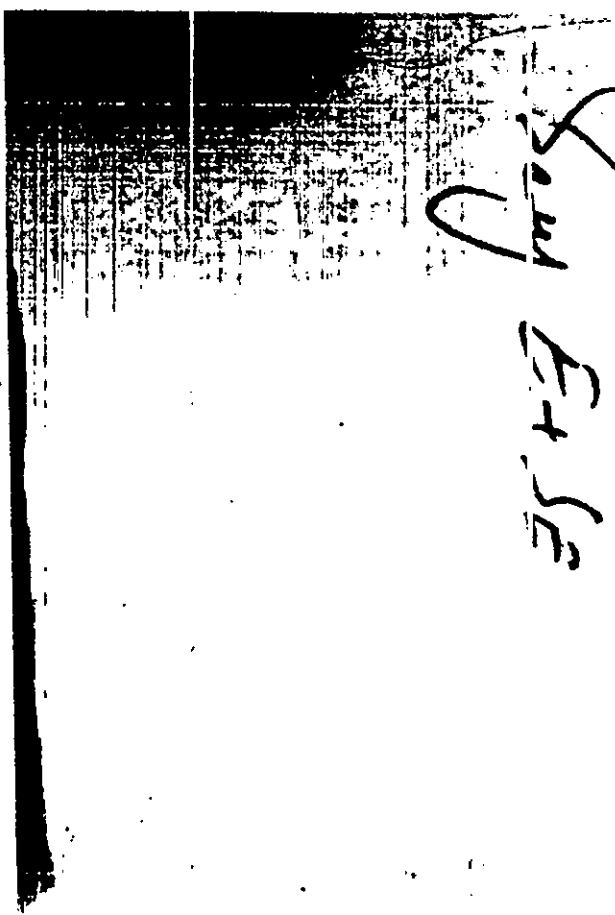
☆ یہاں "پست" کے ساتھ "پست" لکھنا ہوتا ہے۔ بریک صورت میں لفظ "بیمہ" پیلے تحریر کریں۔
☆ اس کارڈ کی کاپی پست کے ساتھ لگانا ہوتی ہے۔ بریک صورت میں لکھنا ہوتا ہے۔

رجسٹریشن فیس روپے -/30 Rs.

قیمت: تین روپے -/20 Rs.

Peshawar

Area (C-3)
24



Sony E+SE

1456. WEP
4.4.2013

ALGAL



KHALID MEHMOOD

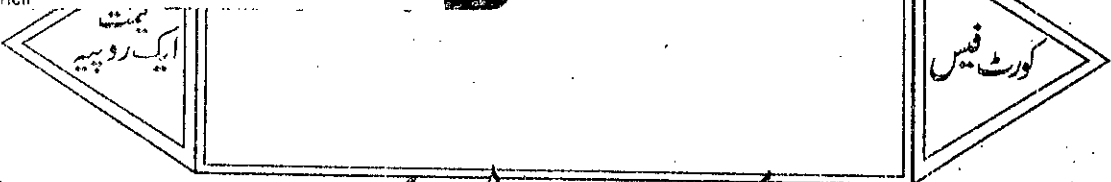
Advocate
bc-15-5415
Date of issue: October 2020
Valid upto: October 2023



ADVOCATE

وکالت

Secretary
KP Bar Council



بعدالت جناب جسٹس خواجہ سید نور محمد پور
منجانب
تفصیل دعویٰ یا جرم
دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشگی یا تصفیہ مقدمہ بمقام
حالت مدد و حصول کورٹ فیہ ہر مضمون
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشگی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت ہمارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشگی پر منظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف
اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل ہیروئی کرنے کے
ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل ہیروئی کرنے کے ذمہ دار نہ
ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بخاندان واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پروا خلد صاحب موصوف مثل کردہ
ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراء کے ذمگی و نظر ثانی اپیل نگرانی دہرم درخواست پر دستخط و تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ذمگی کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثانی یا راضی نامہ و فیصلہ بر
حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشگی مقدمہ مذکورہ ہیروئی از پکھری صدر پکھری مقدمہ مذکورہ نظر ثانی و اپیل نگرانی و برآمدگی
مقدمہ یا مشوقی ذمگی یا تحریف یا درخواست حکم انتہائی یا قرتی یا گرفتاری نکل از فیصلہ اجراء کے ذمگی بھی صاحب موصوف کو بشرط ادائیگی علیحدہ ضمانت ہیروئی کا اختیار ہوگا
اور تمام ساختہ پروا خلد صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا نگرانی یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا پیر سز کو اپنے نبھانے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا، وہ صاحب
موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشگی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی ہیروئی نہ کریں اور ایسی
صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ 6 مارچ 2023

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد العبد

Handwritten signature

Handwritten signature

0336-4330001

12101-1840631-0

وکالت

Attornay / Advocate

کورٹ
فیس

حیدر خان سہیل

پتہ: کلاں، ضلع کلاں، پنجاب

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

پابند تحریر

الحمد للہ علیٰ ما فیہ من النعمان، میں نے اپنے والدین کی وصیت کے مطابق اور عدالت کے حکم پر اپنے والدین کی جائیداد میں سے ایک حصہ اپنے بیٹے کو بخش دیا ہے۔

موصوف کو اطلاع دے کر حاضر عدالت کروں گا اور اگر کسی نے اس پر اعتراض کیا ہے تو اسے عدالت میں پیش کرنا پڑے گا۔
موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے اور مقدمہ صدمہ بھری کے خلاف یا بھری کے اوقات سے پہلے یا پیچھے یا بروز غلطی
بھری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدمہ بھری کے خلاف اور جگہ سماعت ہونے یا بروز غلطی یا بھری کے اوقات کے آگے یا پیچھے پیش ہونے
پر مقدمہ کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے فائدے کسی صورت میں نہ ہوں گے اور اس کے ذمہ دار نہ ہوں گے۔
کوکل سماعت پر وادع صاحب موصوف، شکر کردہ ذات، خود منظور ہو گا اور صاحب موصوف کو عرض دہی یا صاحب دہی یا درخواست اجراء اس لئے ڈگری
نظر ثانی اپیل گمانی ہر قسم درخواست ہر قسم کے بیان دینے اور پر پاشی یا راضی نامہ و فیصلہ برخط کرنے اجازت دہی کا بھی اختیار ہو گا اور بصورت متر ہونے
پر درخواستی مقدمہ مقررہ تاریخ پر عدالت میں حاضر ہونا اور عدالت کے حکم پر عمل کرنا اور عدالت کے حکم پر عمل کرنا اور عدالت کے حکم پر عمل کرنا اور عدالت کے حکم پر عمل کرنا
یا اگر کوئی اپیل از فیصلہ اجراء اس لئے ڈگری بھی صاحب موصوف کو منظور اور اپیل فیصلہ منظور ہونے کا اختیار ہو گا اور تمام سماعت پر وادع صاحب موصوف شکر کردہ
اور خود منظور بقول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ عدالت سے درخواست کرے کہ اس کے کسی جزو کا کاروائی یا بصورت درخواست نظر ثانی
اپیل گمانی یا دیگر سماعت و مقدمہ مذکورہ کسی دوسرے اپیل یا ہیر مٹر کو لپیٹ جائے یا اپنے ہمراہ مقرر کرنی اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دینے
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانب اجراء ہونے کا وہ صاحب موصوف کا حق ہو گا اور
صاحب موصوف کو پوری لین تاریخ پیش سے پہلے اور ذمہ داران مقدمہ میں جو کچھ ہر جانب اجراء ہونے کا وہ صاحب موصوف کا حق ہو گا اور
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوں گا

2023 جولائی 5

مفتی عزیز وکالت نامہ میں لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

مکتبہ رحمت اسلام آباد

12101-1840631-0

Attendance
not accepted Png

53053240000