

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No-1442/2023

Shakeela Raina

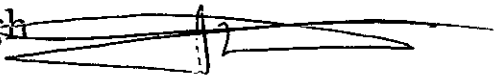
Versus

Government of KPK & Others

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Respondent No.7

Through 

Muhammad Ilyas Orakzai
ASC

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No.1442/2023

Office of the Honorable
Service Tribunal
Diary No. 6960
Date: 10/08/23

Shakeela Raina -----Versus-----Government of KPK

PARA WISE REPLY ON BEHALF OF RESPONDENT
NO.07

Respectfully Sheweth

PRELIMINARY OBJECTIONS

1. That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
2. That the appellant is estopped due to his own conduct to file this appeal.
3. That the appellant has got no cause of action and locus standi to file instant appeal.
4. That the appellant has not come this Tribunal with clean hands and has suppressed all relevant facts.
5. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
6. That the appeal filed by the appellant is time barred and the appellant has concealed the material facts from Honourable Tribunal.
7. That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
8. That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present form and context and is liable for Rejection.
9. That the appeal is weak having no force, fabricated, fictitious, based on ill will, malafide and having no footings in the eyes of law.
10. That as per Section 10 of Civil Servants Act, 1973, every Civil Servant shall be liable to serve anywhere within or outside the province.

11. That the Order Impugned has been acted upon and compliance has been made, therefore, the instant appeal is in-fructuous.
12. That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honourable Tribunal.
13. That as stated In the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

Objections on Facts

- 1) This para pertains to the address of appellant and parties hence no reply.
- 2) Para No.2 of the appeal has no concern with the answering respondent. Hence needs no reply.
- 3) Para No.3 needs no reply.
- 4) Para No.04 is incorrect as per office order dated 23.11.2022 issued by the respondent No.02, whereby the respondent No.07 was transferred from GGHS Gandhi Khan Khel, Lakki Marwat and posted at GGHS Ratta Kulachi, D.I.Khan as Headmistress and Respondent No.07 would assumed charge on the retirement of Headmistress Kalsoom begum and thereafter, the Respondent No.07 took charge as Head mistress of GGHS Ratta Kulachi on 13.02.2023 after relieving previous post at GGHS Gandhi Khan Khel, Lakki Marwat, Hence the alleged transfer order of the appellant dated 15.03.2023 is illegal and against the transfer and posting policy.

(Copies of charge, arrival, relieving report and register attendance are attached herewith)

- 5) Incorrect/not admitted, The appellant approach to the office of the Head Mistress GGIIS Ratta Kulachi DIKhan but the Respondent No.07 already posted and working on the same and furthermore, no communication was made the respondent No.07 of the order mentioned by the appellant through official respondents. Hence, the above mentioned order dated 15.03.2023 was not legally communicated.

6) Para No.06 of the appeal is incorrect, keeping in view the illegal tactics of the appellant filed departmental appeal to the respondent No.01 dated 21.03.2023 wherein the illegal posting and transfer Notification dated 15.03.2023 of the appellant was withdrawn vide order dated 29.03.2023 and retention order of the respondent No.07 at GGHS Ratta Kulchi, D.I.Khan on which, the respondent No.07 was already posted in pursuance of the Notification dated 29.03.2023, the appellant joined her post at GGHS Kacha Mali khel, D.I.Khan and withdrawn the salary from the same furthermore, The Notification dated 29.03.2023 overrides the Notification dated 18.01.2023. Hence, appellant lacks locus standi.**(Copies of withdrawal order, 3 months' salary slip of the appellant attached herewith)**

7) 7) Incorrect/ not admitted.Strongly denied.The transfer Notification dated 15.03.2023 was not properly implemented.The appellant dd not take charge of the post of Head Mistress GGHS Ratta Kulachi DIKhan, therefore she does not annexed her charge report with present service appeal.It is further submitted that the transfer Notification dated 29,03.2023 was Implemented by the both officers of the respondent department. The private respondent No. 07 isworking as Head Mistressat GCHS Ratta Kulachi and the appellant is working as Head Mistress GGHS Kacha MaliKhel DiKhan, hence the transfer order dated 29,.03.2023 is fully implemented with letter and spirit.

8) Incorrect/not admitted.The representation annexed by the appellant with present service appeal reheets that appelant fled representation before the worthy Chief Secretary KP on 31.03.2023.Whereas the appellant fled present service appeal on 06.07.2023 after laps of 97 days,hence the present service appeal is badly time barred.The Section 10(XIV) of the transfer posting policy is reproduced as under;

"Government servants including District Govt. employes feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority/the appointing

authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases.

The representation annexed with present service appeal does not reflect any cogent reason. The appellant took sance that she is patient of diabetes, blood pressure, heart disease etc, but she did not support her claim with annexure. It is, therefore, requested to this Honourable Tribunal to dismiss the service appeal of the appellant being devoid of merit.

OBJECTIONS ON GROUNDS:

- i. Incorrect/not admitted. The impugned order was according to the law. The respondent No.03 accepted the appeal of the appellant and issued the transfer Notification dated 29.03.2023, which clearly reflects that the private respondent No.07 was retained as HeadMistress GGHS Ratta Kulachi, D.I.Khan.
- ii. Incorrect and not admitted. Strongly denied. In the light of Notification dated 15.03.2023 appellant did not assumed the charge of her post from answering respondent No.07. The impugned Notification dated 29,03.2023 was issued by respondent No.3 and Implemented by the appellant and private respondent with letter and spirit.
- iii. Incorrect/ not admitted. Strongly denied. The respondent No. 03 issued Notification dated 23.11.2022 and posted the answering respondent No.07 as HM GGHS Ratta Kulachi D.I.Khan. The answering respondent No.07 assumed the charge of her post w.e.f 13.02.2023 after the retirement of

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Mrs. Kalsoom Begam. The respondent No.03 issued Notification dated 29.03.2023 and retained answering (Mrs.Sadia Naz) as HM GGHS Rata Kulachi as her tenure on this station is about 01 Month & 16 Days.

- iv. Incorrect/not admitted. As discussed above the answering respondent was posted on GGHS Ratta Kulachi vide order dated 23.11.2022 and she assumed charge of her post on 13.02.2023. Therefore, the respondent No.03 rightly retained her as HM GGHS Ratta Kulachi, D.I.Khan as her tenure on the above station one and half months. Thus the respondent No. 03 rightly withdrawn the transfer Notification of appellant and retained her on same post.
- v. Incorrect, hence denied. The impugned order was issued only on the basis of tenure policy. The tenure of answering respondent No.07 is only one and half month, therefore she was retained and the transfer Notification of the appellant was withdrawn in the best interest of justice.
- vi. Incorrect, strongly denied. This para is misleading. The impugned transfer Notification was issued in best public interest and in the light of August Supreme Court of Pakistan judgments. In the light of August Supreme Court the tenure of the private respondent No.07 was honored and she was retained.
- vii. Incorrect and strongly denied, the private respondent had not completed her normal tenure, therefore till the completion of her normal tenure she is retained at GHSS Ratta Kulachi.
- viii. That in the light of transfer posting policy the private respondent did not complete her normal tenure. Therefore,

the respondent No.03 had been pleased to issue Notification dated 29,03,2023 in the light of transfer posting policy.

- ix. Incorrect/ not admitted and is subject to proof.
- x. The counsel for respondent No.07 may kindly be allowed to raise additional grounds at the time of arguments.

Prayer:

It is most humbly prayed that on acceptance of the instant reply, the Service Appeal of the appellant may kindly be dismissed with heavy costs throughout.

Answering Respondent No.07

Through



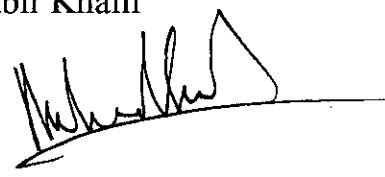
Muhammad Ilyas Orakzai
Advocate, Supreme Court of Pakistan

&



Muhammad Shabir Khalil

&



Mahad Hassan

Advocates.

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

Service Appeal No-1442/2023

Shakeela Raina

Versus

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AFFIDAVIT

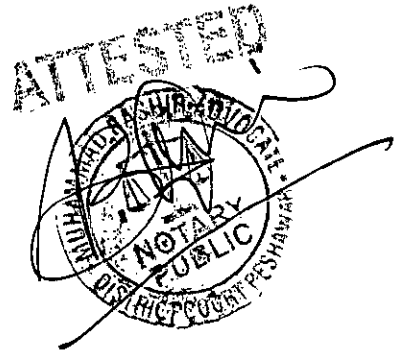
I, **Sadia Naz W/o Muhammad Zubair Khan R/o
Younis House near DPO Office D.I. Khan**, do hereby
solemnly affirm & declare on oath that all contents of the
instant Service Appeal are true & correct to the best of my
knowledge and belief & nothing has been concealed from
this Hon'ble Tribunal.

Sadia
DEPONENT

12101-0897011-0

IDENTIFIED BY:

Mahad Hassan
Mahad Hassan
Advocate



10.



(8)

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

Email: sectionofficersf@gmail.com

091-9223588

Dated Peshawar, November 23rd, 2022

NOTIFICATION

NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer: Mst. Sadia Naz , Headmistress (BS-17), is hereby transferred from GGHS Gandhi Khan Khel Lakki Marwat and posted at GGHS Ratta Kulachi D.I. Khan as Headmistress (BS-17). She will assumes charge on retirement of Mst. Kulsoom Begum Headmistress (BS-17).

**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 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.

Attested
Muhammad Hassan


(SHAWANA HALEEM)
SECTION OFFICER (S/F)

(9)

Reliving Chit

Consequent upon the order of Secretary U&SE Khyber Pakhtunkhwa Peshawar vide Notification No. SO(S/F)E&SED/4-16/2022/Posting/transfer dated 23-11-2022. Mst: Sadia Naz, Head Mistress BPS-17 is hereby relieved from the charge of Head Mistress (DS-17) at GGHS Gandi Khan Khel Lakki Marwat today on 11/02/2023 After/forenoon.

Sadia Naz

Sadia Naz
Head Mistress

Endst. No. 206-09

Dated: 11-02-2023

Copy Forwarded to the:

1. District Education Officer (F) Lakki Marwat.
2. District Account Officer Lakki Marwat.
3. District Monitoring Officer EMA Lakki Marwat.
4. Official Concerned.

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Rozina
Head Mistress
GGHS Gandi Khan Khel
Lakki Marwat
Govt. Girls High School
Gandi Khan Khel
Distt. Lakki Marwat

[Signature]
District Education Officer
(Female) Lakki Marwat

Approved
Mahmad Hassan

CERTIFICATE OF TRANSFER OF CHARGE

- 1) Certificate that we have on the 13/02/2023 forenoon / afternoon of this day respectively made over received charge of this post of Head Mistress GGHS RATTA KULACHI DIKHAN Notification No. SO(S/F) E&SED/A-16/2022/Posting/Transfer. Dated Peshawar the 23/11/2022
- 2) Particular cash and important secret and confidential document handed over are noted on the reverse.

Sik Nughat
 Signature of relived VACANT POST
 Government servant. _____
 Designation. HEAD MISTRES

Station. GGHS RATTA KULACHI DIKHAN.
 Date. 13/02/2023(FN)

Sadia Naz
 Signature of relived _____
 Government servant SADIA NAZ.
 Designation HEAD MISTRESS

OFFICE OF THE HEAD MISTRESS GGHS RATTA KULACHI, DIKHAN.

No. 13-18 GGHS RATTA KULACHI DIK the 13 / 02 / 2023

Copy to the.

- 1) Secretary of Elementary and Secondary education Khyber Pakhtunkhwa Peshawar
- 2) Director of Elementary and Secondary education Khyber Pakhtunkhwa Peshawar
- 3) District Education Officer (Female) DI Khan.
- 4) District Account officer concerned
- 5) Bank Concerned
- 6) Official concerned.

Sadia Naz
 HEAD MISTRESS
 GGHS RATTA KULACHI
 DIKHAN.
 / Head Mistress
 G.G.H.S Ratta Kulachi
 D.I.Khan

Attested
Mahad Hassan

(11)

**OFFICE OF THE HEAD MISTRESS, GGHS RATTA
KULACHI, DERA ISMAIL KHAN**

No. 12 GGHS Ratta Kulachi D.I.Khan the 13 / 02 / 2023

To
The District Education Officer,
(Female) Dera Ismail Khan

ARRIVAL REPORT

In compliance with the notification No. SO(S/F)E&SED/4-
16/2022/Posting Transfer Dated Peshawar November 23-11-2022.

I beg to submit my arrival report today on 13-02-2023, Afternoon /
Forenoon.

Please accept my arrival report and obliged.

H/M
Sadia Naz
Headmistress
GGHS Ratta Kulachi
D.I.Khan

13/02/23

Copy to the:-

1. Secretary to Elementary and Secondary Education Khyber Pakhtunkhwa,
Peshawar
2. Director of Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Female) D.I.Khan
4. Bank Concerned.
5. Official Concerned.

Headmistress
GGHS Ratta Kulachi
D.I.Khan
Head Mistress
GGHS Ratta Kulachi
D.I.Khan

Attested
Mahad Hassan

2023 سال حاضری مقررہ تاریخوں کی بنا پر بابت ماہ مارچ سال 2023

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(Your suggestions will be welcome)

2023 سال حاضری مقررہ تاریخوں کی بنا پر بابت ماہ مارچ سال 2023

مستند ظہیر احمد SST Sci Phy/Maths				مستند سحر بیگم SST Gen				مستند سحرہ تاج Head Mistress				
12101-0887499-0 0345-1947098				12101-0876441-4 0336-7220788				12101-0897011-4 0333-8974509				
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میزان	مال	مال	مال	میزان	مال	مال	مال	میزان	مال	مال	مال	حرف
				3	2	1	3	2	1			آفاق

CS CamScanner

Maham Abbas

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رجسٹر حاضر کی بلڈ بک سہ ماہی
 ڈور اینڈ گریڈنگ سکول سائنس بورڈ بابت ماہ ابرہہ سال 2023

مستزبہ نام			مستزبہ نام			مستزبہ نام			مستزبہ نام			نمبر
SST Sci Phy / Math			SST (Gen)			Head Mistress						
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0345-1947098			0336-7226788			0333-8974509						
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12.00	7.30	12.15	7.30	12.30	7.30	12.30	7.30	12.30	7.30	2		
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12.00	7.30	12.25	7.30	12.30	7.30	12.30	7.30	12.30	7.30	4		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	5		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	6		
Tayyaba 12.15	Tayyaba 7.30	Rana 10.25	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	7		
12.15	7.30	12.35	7.30	12.30	7.30	12.30	7.30	12.30	7.30	8		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	9		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	10		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	11		
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Tayyaba 10.25	Tayyaba 7.30	Rana 10.25	Rana 7.30	12.30	7.30	10.25	7.30	12.30	7.30	14		
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Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	17		
Tayyaba 12.15	Tayyaba 7.30	Rana 12.15	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	18		
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Tayyaba 11:15	Tayyaba 7.30									21		
										22		
										23		
Holiday of Eid-ul-Fitr 21.04.23 to 25.04.23												
Tayyaba 02.135	Tayyaba 7.30	Rana 11.35	Rana 7.30	12.30	7.30	12.30	7.30	12.30	7.30	25		
Tayyaba 1:30	Tayyaba 7.30									26		
Tayyaba 11:15	Tayyaba 7.30									27		
Tayyaba 1:30	Tayyaba 7.30									28		
										29		
Sunday												
Sunday												
Sunday												
3	3	0	5	3	2					31		

Mahrad Hassan

(Your suggestions will be welcome)

رجسٹر حاضری برائے سٹاف گورنمنٹ گریجویٹ اسکول رتہ ملحدی بابت ماہ اگست 2023ء

مسنز طبیہ ار SST Phy/math				مسنز نرسنگ رتہ SST (Gen)				نام: مسنز سحر ناز Head mistress				
12101-0887499-0				12101-0876441-4				12101-0897611-0				
نمبر 03451947098				نمبر 43367220788				نمبر 03338974509				
آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	تاریخ
/	/	/	/	Labour	Duty	/	/	/	/	/	/	1
Tayyaba	1:30	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	2
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	3
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	4
Tayyaba	11:20	Tayyaba	7:30	Rana	11:15	Rana	7:30	on	Duty			5
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	6
/	/	/	/	Sunday	/	/	/	/	/	/	/	7
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	8
Tayyaba		Tayyaba	7:30	Rana	1:35	Rana	7:30	on	Duty			9
			7									10
				agency	leave							11
												12
												13
/	/	/	/	Sunday	/	/	/	/	/	/	/	14
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	15
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	16
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	17
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	1:35	adha	7:30	18
Tayyaba	11:15	Tayyaba	7:30	Rana	11:15	Rana	7:30	adha	11:15	adha	7:30	19
Tayyaba		Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	adha	7:30	20
/	/	/	/	Sunday	/	/	/	/	/	/	/	21
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	adha	7:30	22
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	adha	7:30	23
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	adha	7:30	24
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30					25
Tayyaba	11:15	Tayyaba	7:30	Rana	11:15	Rana	7:30	adha	11:15	adha	7:30	26
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	7:30	adha	27
/	/	/	/	Sunday	/	/	/	/	/	/	/	28
Tayyaba	1:35	Tayyaba	7:30	Rana	1:35	Rana	7:30	adha	12:15	adha	adha	29
Tayyaba	1:35	Tayyaba	7:30	Rana		Rana	7:30	on	leave			30
Tayyaba		Tayyaba	7:30									31

چھٹیوں کی تفصیل

بیماری	انفاقہ	استحقاقہ	میزان	بیماری	انفاقہ	استحقاقہ	میزان	بیماری	انفاقہ	استحقاقہ	میزان
					1				1		
		3			5				3		
		3			6				1		

Michael Hassan

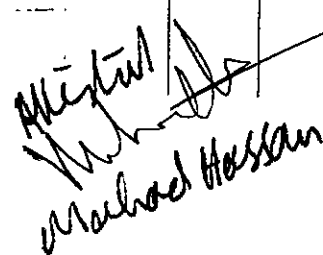
دستخط سربراہ ادارہ

رجسٹر حاضری برائے سٹاف گورنمنٹ کالج برائے نسوان رتھلا جیہہ بابت ماہ جون 2023ء

S.S.T Math - Phy		S.S.T (9cm)		Headmistress		Head Teacher						
12101-0887499-0		12101-0876441-4-1		12101-0897011-0		03338974504						
0345-194797		03367220786										
دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	تاریخ
Tayyaba	1:35	Tayyaba	7:30	P	1:35	P	7:30	Leave				1
Tayyaba	11:15	Tayyaba	7:30	P	11:15	P	7:30				7:30	2
Tayyaba		Tayyaba	7:30	P	1:35	P	7:30				7:30	3
/	/	SUNDAY	/	/	/	/	/	SUNDAY	/	/	/	4
Tayyaba	1:35	Tayyaba	7:30	P	1:35	P	7:30				7:30	5
Tayyaba	1:35	Tayyaba	7:30	P	1:35	P	7:30				7:30	6
Tayyaba	1:35	Tayyaba	7:30	P	1:35	P	7:30				7:30	7
Tayyaba	1:35	Tayyaba	7:30	P	1:35	P	7:30				7:30	8
Tayyaba	11:15	Tayyaba	7:30	P	11:15	P	7:30				7:30	9
Tayyaba		Tayyaba	7:30	P		P	7:30				7:30	10
/	/	SUNDAY	/	/	/	/	/	SUNDAY	/	/	/	11
							7:30					12
												13
												14
												15
												16
												17
/	/	SUNDAY	/	/	/	/	/	SUNDAY	/	/	/	18
												19
												20
												21
												22
												23
												24
												25
												26
												27
												28
												29
												30
												31

چیلٹیوں کی تفصیل

میزان	بیماری	انتقامی	انتقامی	میزان	بیماری	انتقامی	انتقامی	میزان	بیماری	انتقامی	انتقامی


 Michael Hassan



17

GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATIOND EPARTMENT
Email: sectionofficersf@gmail.com
091-9223588

Dated Peshawar the March 29th, 2023

NOTIFICATION

NO.SO(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 (BS-17) is hereby withdrawn and Mst. Sadia Naz Headmistress (BS-17) retained at GGHS Ratta Kulachi D.I Khan, with immediate effect.

**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.

*Muhammad
Mehrez
Muhammad Hassan*


(SHAVIANA HALEEM)
SECTION OFFICER (S/F)

Appellant Salary Slip (G.G.H.S Kacha Malikhel, D.I. Khan).

4:1 P Sec:002 Month:April 2023
 D16205 -MS GGHS KACHA MALI KHEL
 HEAD MISTRESS GGHS KACHA
 Pers #: 00190295 Buckle:
 Name: SHAKEELA RAJHA 48/7
 HEAD MISTRESS
 CNIC No.1210118406310
 GPF Interest Applied
 17 Vocational Permanent
 D16205 -
 MIN:
 GPF #: EDUDR005900
 Old #:

PAYS AND ALLOWANCES:

2001-Basic Pay	113,470.00
2046-Personal Pay(Maxia Grade)	10,260.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2025	5,000.00
1505-Charge Allowance	100.00
1947-Medical Allow 15% (16-22)	3,096.00
1148-15% Adhoc Relief All-2013	1,640.00
1199-Adhoc Relief Allow 81%	1,200.00
315-Special Allowance 2021	6,074.00
Gross Pay and Allowances	170,882.00

DEDUCTIONS:

T Payable 20,419.26 Deducted 98,634.00	TAX: (3609) 10,210.00
PF Balance 1936,319.00	Subsd: 4,270.00
505-GPF Loan Principal Instal Bal: 220,000.00	14,170.10
501-Benevolent Fund	1,500.00
990-Exp.Edn. Fund HRF	270.00
104-R. Benefice & Death Camps	900.00
Total Deductions	31,150.10
	140,532.00

5:2
 Pers #: 00190295 Buckle:
 Name: SHAKEELA RAJHA 48/7
 HEAD MISTRESS
 CNIC No.1210118406310
 GPF Interest Applied
 17 Vocational Permanent

PAYS AND ALLOWANCES:

2341-Dispr. Red All 15% 2022KP	
2347-Adhoc Rel Al 15% 22 (FS17)	
Gross Pay and Allowances	

DEDUCTIONS:

T Payable 20,419.26 Deducted 98,634.00	
PF Balance 1936,319.00	

Total Deductions

Handwritten signature and notes:
 Approved
 M. Hassan
 M. Hassan

19

54:1

Form #: 00190295 Buckle:
Name: SHAMEELA RAJEA 48/7
HEAD MISTRESS
CHIC No. 1210112406310
GPF Interest Applied
17 Vocational Payment

P Soc:002 Month:May 2023
DI6203 -04 GERT KACHA NALI KUZL
HEAD MISTRESS GERT KACHA

MTN:
GPF #: ED000005900
CID #:

DI6203 -

54:2

Form #: 00190295 Buckle:
Name: SHAMEELA RAJEA 48/7
HEAD MISTRESS
CHIC No. 1210112406310
GPF Interest Applied
17 Vocational Payment

PAYS AND ALLOWANCES:
2341-Dispr. Red All 15% 2022KP
2347-Adhoc Rel XI 15% 22(PS17)

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay(Main Grade)	10,760.00
1001-House Rent Allowance 4%	6,650.00
1210-Convey Allowance 2005	5,000.00
1505-Charge Allowance	100.00
1947-Medical Allow 15% (16-20)	3,096.00
2148-15% Adhoc Relief All-2012	1,640.00
2199-Adhoc Relief Allow 8103	1,100.00
2315-Special Allowance 2021	6,074.00
Gross Pay and Allowances	171,682.00

Gross Pay and Allowances

DEDUCTIONS:

IT Payable	10,209.44	Deducted	10209.44
GPF Balance	1956,669.03		

DEDUCTIONS:

IT Payable	10,209.44	Deducted	10209.44	TAX:13609	10,210.00
GPF Balance	1956,669.03			Surpl:	6,350.00
6505-GPF Loan Principal Interal	100,000.00				14,000.00
4200-Professional Tax					1,500.00
3501-Benevolence Plan					1,500.00
3990-Dep. Fund. Fund GPF					270.00
4004-R. Benefits & Death Cont:					300.00

Total Deductions

34,719.00

136,963.00

Total Deductions

Handwritten signature and text:
Shameela Rajea
Head Mistress

29

D. I. Khan

Sr: 1

P Sec:002 Month:June 2023
DI6205 -HM GGHS KACHA MALI KHEL
HEAD MISTRESS GGHS KACHA

Patr #: 00190295 Buckle:
Name: SHAKEELA RAHMA 148/7
HEAD MISTRESS

NIN:
GPF #: EDUDK005900
Old #:

CNIC No. 1210118406310
GPF Interest Applied

17 Vocational Permanent

DI6205 -

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay (Maxir Grade)	10,260.00
1001-House Rent Allowance 45%	6,650.00
1210-Country Allowance 2005	5,000.00
1505-Charge Allowance	100.00
1947-Medical Allow 15% (16-22)	3,096.00
2148-15% Adhoc Relief All-2013	1,640.00
2199-Adhoc Relief Allow 810%	1,100.00
2318-Special Allowance 2021	6,074.00
Gross Pay and Allowances	171,682.00

DEDUCTIONS:

II Payable	0.00	Debucted	119103.00	TAX: (1609)	10,209.00
GPF Balance 1977,019.00				Subtrd:	6,350.00
6505-GPF Loan Principal Instal	192,000.00				14,000.00
3501-Benevolent Fund					1,500.00
3990-Exp.Edu. Fund KEK					270.00
4004-R. Benefits & Death Comp:					900.00

Total Deductions 33,229.00

138,453.00

39 Years 09 Months 011 Days

MASTERS D.I.KH

Handwritten signature and text, possibly "Mastress D.I. Khan"

S# : 1

P Sec:002 Month: July 2023
BI 6205 - EM GUNS MACHL MALLI ZEEL
HEAD MISTRESS GUNS ZACHA

Form #: 00190295 Bucklet:

Name: SHARDELA RAINA 48/7

HEAD MISTRESS

CHC No. 1210118406310

CAF Interest: Applied

17 Vocational Permanent

DATE: 01/07/2023
CPE #: 80000005900
Old #:

BI 6205 -

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay (Makin Grade)	10,268.00
1001-House Rent Allowance 45%	5,134.00
1212-Convey Allowance 2005	5,134.00
1505-Change Allowance	1026.80
1947-Medical Allow 15% (15-22)	3,202.05
2148-50% House Ration 111-2013	14,669.00
2349-Ration Ration Allow 111-2013	1,100.00
2315-Special Allowance 2011	5,134.00
Gross Pay and Allowance	208,137.85

0001-Basic Pay	113,470.00	Deduction	18,511.00	(18-1800)	18,511.00
0002-Gratuity	19,671.00			Gratuity	19,671.00
0003-CAF Loan Outstanding Interest	175,000.00				175,000.00
0004-CAF Loan					1,000.00
0005-CAF Loan					1,000.00
0006-CAF Loan					1,000.00
0007-CAF Loan					1,000.00
0008-CAF Loan					1,000.00
0009-CAF Loan					1,000.00
0010-CAF Loan					1,000.00

Total Deductions

18,511.00

Handwritten signature

Respondent No. 7 Salary Slip (22)
(GGHS Ratta Kulachi, D.I. Khan)

D.I. Khan

S#: 1

P Sec:002 Month:June 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K

Pers #: 00192434 Buckle:

Name: SADIA NAZ 17/7

HEAD MISTRESS

CNIC No.14991017364

NTN:

GPF #: EDUDK010282

Old #: 14991017364

GPF Interest Applied

17 Active Permanent

DI6107 -

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay(Maxim Grade)	13,680.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1947-Medical Allow 15% (16-22)	3,373.00
2148-15% Adhoc Relief All-2013	1,760.00
2199-Adhoc Relief Allow @10%	1,217.00
2316-Teaching Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	11,456.00
Gross Pay and Allowances	281,353.00

DEDUCTIONS:

IT Payable 0.00 Deducted 103444.00	TAX: (3609) 19,291.00
GPF Balance 1103,761.00	Subrc: 6,350.00
3501-Benevolent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00
6001-Adj Benevolent Fund	910.00
6075-Adj GPF	2,592.00
6164-Adj E.E.F NWFP Fund	152.00
6217-Adj R. Ben & Death Comp:	546.00
Total Deductions	32,511.00
	248,842.00

D.O.B

18.02.1971

28 Years 07 Months 022 Days

LFP Quota:

NATIONAL BANK OF PAKMAIN BRANCH

4925-4

Mahad Hassan

D.I.Khan

S# 2

Pers #: 00192434 Buckle:
Name: SADIA NAZ 17/7
HEAD MISTRESS
CNIC No.14991017364
GPF Interest Applied
17 Active Permanent

P Sec:002 Month:June 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K
NTN:
GPF #: EDUDK010282
Old #: 14991017364

DI6107 -

PAYS AND ALLOWANCES:

2347-Adhoc Rel Al 15% 22(PS17)	12,836.00
5002-Adjustment House Rent	4,038.00
5011-Adj Conveyance Allowance	3,036.00
5012-Adjustment Medical All	2,048.00
5150-Adj. Teaching Allow 2021	3,700.00
5155-Adj. Disp. Red All 2022KP	6,955.00
5309-Adj. 15% Adhoc Allowance	1,069.00
5358-Adj. Adhoc Rel Al 15% 22	7,793.00
5801-Adj Basic Pay	68,893.00
Gross Pay and Allowances	281,353.00

DEDUCTIONS:

IT Payable	0.00	Deducted	103444.00	
GPF Balance	1103,761.00			Subrc:

Total Deductions

32,511.00

248,842.00

D.O.B
18.02.1971
28 Years 07 Months 022 Days

LFP Quota:
NATIONAL BANK OF PAKMAIN BRANCH
4925-4

Attested
Mahmud Hassan

D. I. Khan

22

24

S#: 3

P Sec:002 Month:June 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K

Pers #: 00192434 Buckle:
Name: SADIA NAZ 17/7
HEAD MISTRESS
CNIC No.14991017364
GPF Interest Applied
17 Active Permanent

NTN:
GPF #: EDUDK010282
Old #: 14991017364

PAYS AND ALLOWANCES:
5808-Adj Personal Pay

DI6107

8,305.00

Gross Pay and Allowances
DEDUCTIONS:

281,353.00

IT Payable 0.00 Deducted 103444.00
GPF Balance 1103,761.00

Subrc:

Total Deductions

32,511.00

248,842.00

D.O.B
18.02.1971
28 Years 07 Months 022 Days

LFP Quota:
NATIONAL BANK OF PAKMAIN BRANCH
4925-4

Ali Aslam
Michael Hassan

D. I. Khan

S#: 1

P Sec:002 Month:May 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K.

Pers #: 00192434 Buckle:

Name: SADIA NAZ 17/7

HEAD MISTRESS

CNIC No.14991017364

GPF Interest Applied

17 Active Permanent

NTN:

GPF #: EDUDK010282

Old #: 14991017364

DI6107 -

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay (Maxim Grade)	13,620.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1947-Medical Allow 15% (16-22)	3,373.00
2148-15% Adhoc Relief All-2013	1,760.00
2199-Adhoc Relief Allow @10%	1,217.00
2316-Teaching Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	11,456.00
Gross Pay and Allowances	175,516.00

DEDUCTIONS:

IT Payable 6,061.36 Deducted 84,153.00	TAX: (3609) 6,062.00
GPF Balance 1094,819.00	Subrc: 6,350.00
4200-Professional Tax	1,500.00
3501-Benevolent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00

Total Deductions

16,582.00

158,934.00

D.O.B

18.02.1971

28 Years 06 Months 023 Days

LFP Quota:

NATIONAL BANK OF PAKMAIN BRANCH

4925-4

Attestation
Muhammad
Muhammad Hussain

D.I.Khan



S#: 2

P Sec:002 Month:May 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K
NTN:
GPF #: EDUDK010282
Old #: 14991017364

Pers #: 00192434 Buckle:
Name: SADIA NAZ 17/7

HEAD MISTRESS

CNIC No.14991017364

GPF Interest Applied

17 Active Permanent

PAYS AND ALLOWANCES:

DI6107 -

2347-Adhoc Rel Al 15% 22(PS17)

12,836.00

Gross Pay and Allowances

175,516.00

DEDUCTIONS:

IT Payable 6,061.36 Deducted 84,153.00
GPF Balance 1094,819.00

Subrc:

Total Deductions

16,582.00

158,934.00

D.O.B

18.02.1971

LFP Quota:

NATIONAL BANK OF PAKMAIN BRANCH

28 Years 06 Months 023 Days

4925-4

Attested
Muhammad Hassan

D.I.Khan

P Sec:002 Month:April 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K

S#:

Pers #: 00192434 Buckle:

Name: SADIA NAZ 17/7

HEAD MISTRESS

CNIC No.14991017364

GPF Interest Applied

17 Active Permanent

DI6107 -

PAYS AND ALLOWANCES:

0001-Basic Pay	113,470.00
0046-Personal Pay(Maxim Grade)	13,680.00
1001-House Rent Allowance 45%	6,650.00
1210-Convey Allowance 2005	5,000.00
1947-Medical Allow 15% (16-22)	3,373.00
2148-15% Adhoc Relief All-2013	1,760.00
2199-Adhoc Relief Allow @10%	1,217.00
2316-Teaching Allowance 2021	6,074.00
2341-Dispr. Red All 15% 2022KP	11,456.00
Gross Pay and Allowances	175,516.00

DEDUCTIONS:

IT Payable 12,123.14 Deducted 78,091.00	TAX: (3609) 6,062.00
GPF Balance 1088,469.00	Subrc: 4,270.00
3501-Benevolent Fund	1,500.00
3990-Emp.Edu. Fund KPK	270.00
4004-R. Benefits & Death Comp:	900.00

Total Deductions 13,002.00

162,514.00

D.O.B 18.02.1971 LFP Quota: NATIONAL BANK OF PAKMAIN BRANCH 4925-4

28 Years 05 Months 022 Days

Signature
Signature
 Mahrad Hassan

D. I. Khan

28

P Sec:002 Month:April 2023
DI6107 -H.M. GGHS RATA KULACHI D.I
HEAD MISTRESS GGHS RATA K
NTN:
GPF #: EDUDK010282
Old #: 14991017364

Pers #: 00192434 Buckle:
Name: SADIA NAZ 17/7
HEAD MISTRESS
CNIC No.14991017364
GPF Interest Applied
17 Active Permanent
PAYS AND ALLOWANCES:
2347-Adhoc Rel Al 15% 22(PS17)

DI6107 -
12,836.00

Gross Pay and Allowances
DEDUCTIONS:
IT Payable 12,123.14 Deducted 78,091.00
GPF Balance 1088,469.00

175,516.00

Subrc:

Total Deductions

13,002.00
162,514.00

D.O.B
18.02.1971
28 Years 05 Months 022 Days

LFP Quota:
NATIONAL BANK OF PAKMAIN BRANCH
4925-4

Mahad Hassan

خدمت جناب چیف سیکریٹری خلیفہ تختہ خواہ لٹننٹ
21/3/2023

D. No. EX-205

محکمہ ایبل

جناب عالی! محکمہ ایبل جناب سعدیہ ناز ہید مسٹریس
حسب ذیل ہے۔

1- یہ کہ ایبلانٹ سعدیہ ناز گورنمنٹ گرنرہائی سکول
لنڈی خان خیل کی مروت میں تعینات تھی جو کہ
بذریعہ نوٹیفیکیشن نمبری SO(S/F) E & SED/4-16/2022
مورخہ 23/11/2022 جاری کردہ سیکریٹری ای اینڈ ایس ای
ڈیپارٹمنٹ خلیفہ تختہ خواہ ٹرانسفر ہو کر ہید مسٹریس گورنمنٹ
گرنرہائی سکول رٹاکلاچی ڈیرہ اسماعیل تعینات ہوئی
(کاپی نوٹیفیکیشن لف ہے)

2- یہ کہ مذکورہ بالا نوٹیفیکیشن کی رو سے ایبلانٹ نے مورخہ 13/2/2023
کو گورنمنٹ گرنرہائی سکول رٹاکلاچی ڈیرہ اسماعیل خان میں
چار ج لے لیا۔ (کاپیاں چارج رپورٹ، ریلیونگ اور
ارائیو رپورٹ لف ہیں)

3- یہ کہ مذکورہ ٹرانسفر آرڈر بھی ایبلانٹ سے سیکرٹری جنرل ایبلانٹ
گورنمنٹ ہائی سکول رٹاکلاچی ڈیرہ اسماعیل خان میں اپنی
ڈیوٹی سر انجام دے رہی ہے۔

4- یہ کہ مورخہ 15/3/2023 کو سماہ شکیلہ رائٹا جو کہ بذریعہ مہینہ ایک
نوٹیفیکیشن اپنے آپکو ہید مسٹریس گورنمنٹ گرنرہائی سکول
رٹاکلاچی ڈیرہ اسماعیل خان بتلا یا جس میں پہلے ہی ایبلانٹ بطور
چار ج سنبھال چکی تھی۔ مہینہ نوٹیفیکیشن مورخہ 15/3/2023 کا نام
ایبلانٹ کو کوئی علم تھا (در نہ ہی اس نسبت ضلعی افسران کو کوئی علم ہے)

Despatch No: GGH8 Ratta Kuluz In/41

Date: 17/03/2023

Ali Asif
Michael Hassan

اور حیرت کی بات یہ ہے کہ مبینہ نوٹیفیکیشن کا ممبر اور اپیلینٹ کے حق میں جاری کردہ نوٹیفیکیشن مورخہ 23/11/2022 کا ممبر ایک ہے جو کہ قانون اور عقل کے منافی ہے کیونکہ اپیلینٹ کے حق جاری کردہ نوٹیفیکیشن قبل جاری کردہ ہے جو کہ مبینہ نوٹیفیکیشن کے متضاد اور فرضی اور خود ساختہ دکھائی ہے

5- یہ کہ مبینہ نوٹیفیکیشن مورخہ 15-3-2023 کی بناء پر شکیلہ رائتا (بی) اب بزور ہیڈ مسٹریں کی چارج لینے کے لیے ہیں جو کہ غیر قانونی ہے

6- یہ کہ اپیلینٹ کے حق میں ڈسٹرکٹ ایجوکیشن آفیسر ڈیرہ اسماعیل خان نے ایک آفس لیٹر ڈیپارٹمنٹ E & SE کو جاری کیا ہے جس میں اپیلینٹ کو سکول گورنمنٹ ہائی سکول رتہ کلاچی ڈیرہ اسماعیل خان کی ہیڈ مسٹریں کی تصیناتی تبدیلی ہے اور کوئی خالی پوسٹ ہیڈ مسٹریں کا ذکر نہ کیا ہے بدینا و مع شکیلہ رائتا (بی) اپنی نوٹیفیکیشن نیز غیر قانونی ہے (کاپی لیٹرف ہے)

لہذا آپ جناب سے گزارش کی جاتی ہے کہ حکمانہ اپیل کو منظور فرمایا جائے نوٹیفیکیشن مورخہ 15/3/2023 کو غیر قانونی قرار دیکر منسوخ فرمایا جائے اور اپیلینٹ کو اپنی پوسٹ پر کام جاری کرنے کے احکامات نیز صادر ہو سکے۔
الہامی

Michael Hassan

محمد سعید بن ناز ہیڈ مسٹریں گورنمنٹ گرنز ہائی سکول رتہ کلاچی ڈیرہ اسماعیل خان (اپیلینٹ)
CNIC # 12101-0597011-0

کاپی برائے اطلاع عیالی 1- اکاؤنٹنٹ جنرل KPK
2- ڈائریکٹر E & SE
3- ڈسٹرکٹ ایجوکیشن آفیسر فیمل ڈیرہ اسماعیل خان
PTA

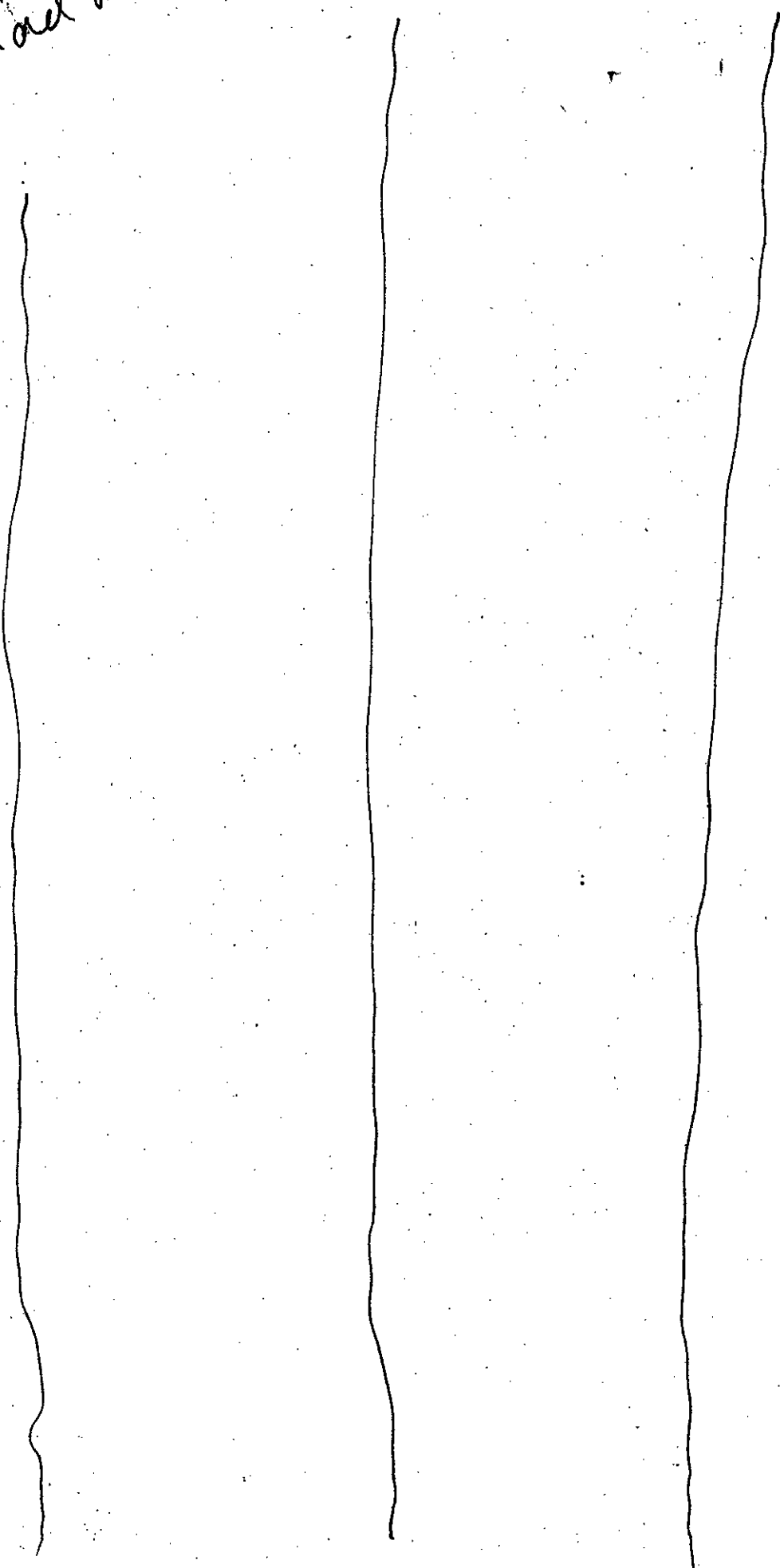
4. ڈسٹرکٹ اکاؤنٹنٹ آفیسر

5- ڈائریکٹریٹ - EMIS

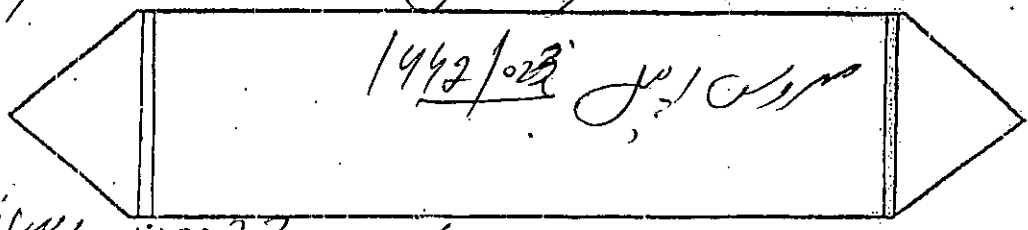
6- پی ایس ڈی ڈیوٹنٹ

7- پی ایس ڈی ڈیوٹنٹ ای (ایس ڈی ایس ای)

~~Michael Hassan~~
Michael Hassan



بعدالت حیدر کھٹون فواد سردیوں کی پیشکش



2023 پنجاب اسپورٹس ایسوسی ایشن
صیانت سٹیڈیم رینا بنام گوانٹنٹ پ. کالونیا

- موزخہ
- مقدمہ
- دعوئی
- ایم

باعث تحریر آنکھ

اصل میں صاحب
نہرو کی
اور وہ

مقدمہ بندرجہ عنوان بالا میں اپنی طرف سے واسطے پیرودی و جواب وہی دکل کلمہ دانی متعلقہ
 آج ان مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو رضی نامہ کرنے سے قبل و تقریر ثالثتہ فیصلہ برحلف دیئے جواب وہی اور اقبال دعویٰ اور
 پاسورٹ ڈگری کرنے کے اجراء اور وصولی چیک در و پیہار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیرودی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مستثنیٰ
 نیز دائر کرنے سے اپیل نگرانی و نظر ثانی و پیرودی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقریر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سہولت
 و اخذ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیرودی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرنوم ۱۰ ماہ اگست 2023

العبد العبد
 العبد العبد
 العبد العبد

صاحب نام
 حیدر کھٹون
 حیدر کھٹون
 حیدر کھٹون