


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1959/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/09/2023	<p>The appeal of Mst. Zahida Perveen presented today by Mr. Muhammad Alamzeb Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>02-10-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

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

Service Appeal No. 1959 /2023

Zahida Parveen.....Appellant

**VERSUS**

Govt. of KPK & others.....Respondents

**I N D E X**

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-2
2.	Addresses of parties		3
3.	Copy of appointment order		4-
4.	Copy of posting order to GGPS Mir Ahmad Khan Koroona and relevant documents		5-7
5.	Copy of withdrawal order		8-9
6.	Copy of Departmental Appeal		10-23
7.	Wakalatnama		24

Through Appellant

  
Tariq Kamal

&

Muhammad Alamzeb Khan  
Advocates High Court  
Cell No.0345-455477

(1)

**Before The Khyber Pakhtunkhwa Services Tribunal Peshawar**

S.A. 1959 2023

Zahida Parveen, Ex. PST, GGPS, Mir Ahmad Khan Koroona, Khada Banda, Karak

.....APPELLANT

**VERSUS**

1. Govt of Khyber Pakhtunkhwa through Secretary E&SE Civil Secretariat Peshawar
2. Director E& SE at Firdaus GT Road Peshawar
3. DEO Female District Karak

.....RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE SERVICES TRIBUNAL ACT 1974 AGAINST THE ORDER DATED: 12/05/2023, WHEREBY APPOINTMENT ORDER DATED: 17/03/2023 HAS BEEN WITHDRAWN**

**PRAYER IN APPEAL:**

**ON ACCEPTANCE OF THE INSTANT APPEAL THE ORDER DATED: 12/05/2023 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY PLEASE BE REINSTATED INTO SERVICE WITH ALL THE ACCRUING BACK BENEFITS ADMISSIBLE UNDER THE RULES**

**Respectfully Sheweth:**

1. That the appellant has been appointed against the deceased employee quota under the provision of section 10 (4) of the APT rules 1989 vide order dated: 17/03/2023. (Copy of Appointment Order Annexed)
2. That the appellant was posted at Govt Girls Primary School- GGPS, Mir Ahmad Khan Koroona, Khada Banda, Karak. (Relevant Documents Annexed)
3. That without any prior notification or show cause, the respondent NO.3 withdrew the appointment order dated 17/03/2023 vide order dated: 12/05/2023 and communicated the same to the appellant via Whats App on 03/06/2023. (Copy of the Withdrawal Order Annexed)
4. That after the communication of the impugned order the appellant preferred departmental appeal to the Respondent No. 1 and after lapse of the statutory period the instant appeal is being preferred on the following grounds. ( Copy of Departmental Appeal Annexed)

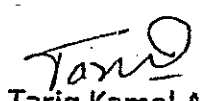
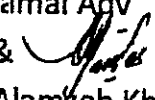
**GROUNDS:**

- A. That the impugned order is illegal and against the basic norms of justice, hence liable to be set aside.
- B. That the Respondent No.3 has relied upon the letter of establishment department dated: 28/04/2023 in respect of appointments under Rule 10(4) of APT 1989, the same if read in juxtaposition with Rule 10(4) of APT, the same would show that the clarification dated: 28/04/2023 is misconstrued and is misinterpretation of the relevant provision of law. (Copies of Rules /Orders Annexed)
- C. That the Respondent No.3 has misused her authority and without proper inquiry or investigation passed the impugned order which amounts to violation of fundamental rights of hearing guaranteed under the constitution.
- D. That the impugned order has been passed in slipshod manner and in violation of article 4 and 25 of the constitution.
- E. That the respondents have not provided any opportunity of personal hearing to the appellant which is violation of article 10(A) of the constitution.
- F. That any additional ground in respect of the instant appeal will be raised during course of arguments with the permission of the honourable court.

It is, therefore, requested that on acceptance of the instant appeal, the order dated: 12/05/2023 may please be set aside, while the order dated: 17/03/2023 may please be restored with all accruing back benefits admissible under the rules.

  
Appellant

Through

  
Tariq Kamal Adv  
&   
Muhammad Alamzeb Khan Adv

Dated: 27/09/2023

**AFFIDAVIT:**

I do hereby solemnly declare that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

  
Deponent

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

Service Appeal No. \_\_\_\_\_/2023

Zahida Parveen.....Appellant

**VERSUS**

Govt. of KPK & others.....Respondents

**MEMO OF ADDRESSES OF PARTIES**

**APPELLANT**

Zahida Parveen, Ex-PST,  
GGPS, Mir Ahmad Khan Koroona,  
Khada Banda, Karak  
**Presently residing at** Usmania Street, Lalazar Colony,  
Near Peshawar University House No.25, Peshawar

**RESPONDENT:**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar
2. Director Elementary & Secondary Education at Firdaus, GT Road, Peshawar
3. District Education Officer Female District Karak

Through  
*Tariq*  
Tariq Kamal  
&

**Muhammad Alamzeb Khan**  
Advocates High Court

Annex H (4)



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Address: KDA Karak.

Phone: 0927-291177  
Email: emiskarak@yahoo.com

APPOINTMENT.

Under the provision of rule 10 (4) of the Government of NWFP Civil Servants (Appointment, Promotion & Transfer) Rules 1989 and further Amended by the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No. SO (R-VI) E&AD/1-3/2015 dated 19/4/2016, Miss: ZAHIDA PARVEEN D/O MUHAMMAD RAUF EX-PST NIC NO. 14203-3076904-2 is hereby appointed against the vacant post of PST BPS 12 at GGPS GGPS MIR AHMAD KHAN KOROONA (@Rs. 19770-1430-62570) plus usual allowances as admissible under the rules and existing policy of the Provincial Policy of the Provincial Government, in (Deceased/Medical Board/Son/Daughter/Wife Quota) on the terms & condition given below with effect from the date of her taking over charge:-

TERMS & CONDITION.

1. No TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. She should not be handed over charge if she exceed 35 years or below 18 years of age.
4. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned). Anyone found producing bogus certificate will be reported to the law enforcing agencies for further action and appointment will stand withdrawn.
5. Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
6. Her pay will not be drawn until and unless verification of the Degrees of the appointee are verified from the concerned Boards/Universities by this office and her pay will be released properly with the signature of the undersigned.
7. The Appointee should join her post within 15 days of the issuance of this notification. In case of failure, her Appointment will expire automatically and no subsequent Appeal etc shall be entertained.
8. Health & Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. She will be governed by such rule & regulation as may be issued from time to time by the Government.
10. Her services shall be terminated at any time, in case her performance as found unsatisfactory during her contract period. In case misconduct, she will be proceeded under the rules framed from time to time.
11. Her pay will be drawn w.e. from her taking over charge.
12. In case it is identified that any child/widow of the deceased mentioned in this order has already availed this opportunity, her order will be considered cancelled.
13. The appointee is required to undergo nine (9) months in service mandatory Professional training at Regional Institute for teacher Education, (RITE) OR (PITE).

*Attested*  
*Tasir*  
/ |  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst: No. 3574-78 /AE-II/ Apptt/PST dated Karak the 17/3 /2023.

Copy for forwarded for information & necessary action to:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Karak with the request that not to draw pay of the officials until and unless of the proper verification & pay release of the undersigned.
3. Registrar Peshawar High Court Bannu Bench.
4. SDEO (F) T/Nasratul for necessary action.
5. Candidates concerned.
6. Master file.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Annexure B<sup>3</sup>

5

OFFICE OF THE DISTRICT EDUCATION OFFICER ( FEMALE ) KARAK

CHARGE REPORT  
(For New Appointee Only)

Certified that Miss./Mr. Zahida Parveen Father Name Muhammad Rauf  
Resident of Khada Banda is hereby appointed against the post of PST on School based in  
BPS. 12 at (School Name) GGPS Mir Ahmad Koroona under  
the District Education Officer Endstt No: 3574-78 Dated 17/3/2023 at  
time Forenoon.

[Signature]  
Signature of the  
Official (New Appointee)

[Signature]  
Attested  
Teacher

FOR HEAD OF THE SCHOOL ONLY

File No. \_\_\_\_\_

Certified that we have on the (fore/afternoon) Forenoon of this day (date) 18/3/2023  
respectively and gave a charge of post PST in above mentioned school to this charge report holder,  
and received his/her require documents file for school record.



Seal & Signature  
Head of the School

[Signature]

Tick to whom Copy of the above is forwarded to:

1. Head of the concern school.
2. ASDEO Circle Office ( Female ) T/Nasrati Karak
3. The Sub Divisional Education Officer (SDEO)( Female ) T/Nasrati Karak.
4. Deputy District Education Officer (Dy.DEO) (Female ) Karak.
5. District Education Officer (DEO) Office Karak.
6. District Account Officer Karak.
5. Concern for his/her Record.

Annex ②



**OFFICE OF THE DISTRICT EDUCATION  
OFFICER (FEMALE) KARAK.**

Phone: 0927-291177 Address: KDA KARAK Email: emiskarak@yahoo.com

**PROVISIONALLY PAY RELEASE ORDER.**

Consequent upon on Pay release in respect of Mst: ZAHIDA PARVEEN D/O MUHAMMAD RAUF CNIC NO. 14203-3076904-2 appointed vide this office Endst: No. 3574-78/AE-II/Appt/PST dated 17/3/2023 are hereby accorded provisionally with the following terms & conditions:-

- Note-1- If her documents declared bogus be reported to the law enforcing agencies for further action and her appointment will stand withdrawn.
- 2. If her verified documents not received to this Office from the concerned Boards/Universities with in three months of the issuance of this order, her pay will be stopped automatically.

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Endst: No 443-26 /F-I/V-I/P.Release/PST/KK: Dated Karak the 3/4 /2023.

Copy to the:-

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar please.
2. District Accounts Officer Karak.
3. Sub Divisional Education Officer (F) T/Nasratl.
4. Teacher concerned.
5. Office copy.

DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK.

*Attested  
Tariq*





Ammen (2)

**OFFICE OF THE MEDICAL SUPERINTENDENT DHQ HOSPITAL KARAK  
HEALTH AND AGE CERTIFICATE**

Name Zahida Parveen  
Father's Name Hush Muhammed Ghayas ul Islam  
Nationality Pakistani  
Cast: Khattaki  
Residence Zero Banda T. Nasrati DRA Karak

Date of Birth 25.10.1983 Height 5-3

Personal Mark of Identification:

**HEAD OF OFFICE**

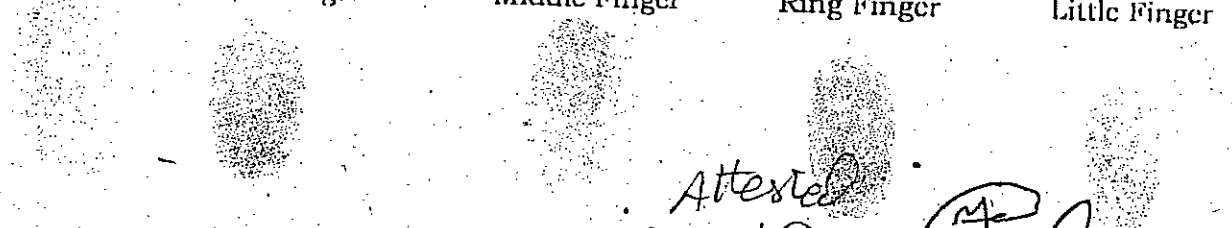
I hereby certify that I have examined Mr/ Miss. Zahida Parveen  
a candidate for employment in the Office of the DEO (F) Karak  
Department and cannot discover that he/she has any communicable disease  
constitutional affection or bodily infirmity except

I do not consider his/her disqualification for employment in the AK same  
Department.

His/her age according to his/her own statement is (39) years  
and by physical appearance in my opinion he/she is about thirty nine years  
of age.

**LEFT/RIGHT HAND THUMB & FINGERS IMPRESSION.**

Thumb Fore Finger Middle Finger Ring Finger Little Finger



Attested  
Tasir

[Signature]  
Medical Superintendent  
DHQ Hospital Karak

18/3/2023

Medical Superintendent  
DHQ Hospital Karak



Nawab Babu DE...

3 June, 8:44 am



8

OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Phone: 0927-291177

Email: emiskarak@yahoo.com

Address: KDA Karak.

Annexure - Annex 3

NOTIFICATION

WHEREAS one Mst. ZAHIDA PARVEEN D/O MUHAMMAD RAUF R/O KHADA BANDA had applied for appointment as PST under deceased Child/Medical Board quota.

AND WHEREAS she had submitted her documents to this office indicating that she had not got married to any one and is still living with her parents.

AND WHEREAS no one pointed out that she has got married and is not living with her parents at the time of scrutiny of her documents.

AND WHEREAS it is quite evident from Rule 10(4) of APT Rules 1989, that the child or the widow/wife as the case may be appointed against the post for which he or she is eligible and possesses the minimum qualification prescribed for appointment to the post.

AND WHEREAS the competent authority i.e DEO Female Distt Karak constituted a committee for the scrutiny of documents as well as appointments against the vacant posts for which such application were received to the office.

AND WHEREAS the committee recommended her for appointment as PST being deserving and eligible candidate.

AND WHEREAS she was appointed as PST at GGPS Mir Ahmad Khan Korona Distt Karak by the appointing authority under the quota reserved for deceased employees children.

AND WHEREAS a complaint was received in the office of DEO Female Karak regarding provision of wrong information and concealing the facts and keeping in dark the appointing authority. It was brought into the notice of the authority concerned that she has got married and is not living with her parents while at the time of appointment she has concealed this fact from the office.

AND WHEREAS it is evident from the Notification issued by Establishment Deptt Khyber Pakhtunkhwa No SO(Polcy)/E&AD/1-3/2023/APT rules dated Peshawar the 2/8/2023, that the daughter after contracting marriage becomes liability of her husband and hence not entitled for such appointments under Rule 10(4) of the APT Rules 1989

NOW WHEREAS I, am DEO Female Distt Karak being competent authority is satisfied that Mst Zahida Parveen D/O Muhammad Rauf appointed as PST at GGPS Mir Ahmad Khan Korona Distt Karak was not entitled and eligible for appointment as per the aforementioned reasons, under the relevant Rules and thus "withdraw her appointment order issued vide Endst No 3574-78 dated 17/3/2023" with effect from the date of its issue.

*Attested*  
*Yousaf*  
District Education Officer(F)  
Karak

Endst: No: 5721-25 Dated Karak The 12/05/2023.

Copy of the above is forwarded for information to the

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Karak.
3. SDE(F) Takht-e-Nasrati Distt: Karak

District Education Officer (F)  
Karak



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) KARAK

Amended 3

4

Address: KDA Karak.

Phone: 0927-291177

Email: emiskarak@yahoo.com

NOTIFICATION

5

WHEREAS one Mst: ZAHIDA PARVEEN D/O MUHAMMAD RAUF R/O KHADA BANDA had applied for appointment as PST under deceased Child/Medical Board quota.

AND WHEREAS she had submitted her documents to this office indicating that she had not got married to any one and is still living with her parents.

AND WHEREAS no one pointed out that she has got married and is not living with her parents at the time of scrutiny of her documents.

AND WHEREAS it is quite evident from Rule 10(4) of APT Rules 1989, that the child or the widow/wife as the case may be appointed against the post for which he or she is eligible and possesses the minimum qualification prescribed for appointment to the post.

AND WHEREAS the competent authority i.e DEO Female Distt Karak constituted a committee for the scrutiny of documents as well as appointments against the vacant posts for which such application were received to the office.

AND WHEREAS the committee recommended her for appointment as PST being deserving and eligible candidate.

AND WHEREAS she was appointed as PST at GGPS Mir Ahmad Khan Koroonia Distt Karak by the appointing authority under the quota reserved for deceased employees children.

AND WHEREAS a complaint was received in the office of DEO Female Karak regarding provision of wrong information and concealing the facts and keeping in dark the appointing authority. It was brought into the notice of the authority concerned that she has got married and is not living with her parents while at the time of appointment she has concealed this fact from the office.

AND WHEREAS it is evident from the Notification issued by Establishment Deptt Khyber Pakhtunkhwa No SO(Policy)/E&A/D/1-3/2023/APT rules dated Peshawar the 24/8/2023, that the daughter after contracting marriage becomes liability of her husband and hence not entitled for such appointments under Rule 10(4) of the APT Rules 1989.

NOW WHEREAS I, am DEO Female Distt Karak being competent authority is satisfied that Mst Zahida Parveen D/O Muhammad Rauf appointed as PST at GGPS Mir Ahmad Khan Koroonia Distt Karak was not entitled and eligible for appointment as per the aforementioned reasons, under the relevant Rules and thus "withdraw her appointment order issued vide Endst No 3574-78 dated 17/3/2023" with effect from the date of its issue.

Attested  
Yasir

District Education Officer(F)  
Karak

Endst: No: 5721-25 Dated Karak The 12/05/2023.

Copy of the above is forwarded for information to the:

1. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Karak.
3. SDE(F) Takht-e-Nasrati Distt: Karak

District Education Officer (F)  
Karak

10

Annexure-D

55

SUBJECT: REPRESENTATION AGAINST THE ORDER DATED: 12/05/2023

Respectfully Submitted:

- 1) That the appellant had been recommended and appointed against the Deceased Employee Quota under section 10(4) of the APT rules 1989 vide order dated: 17/03/2023. (Annex 1)
- 2) That in pursuance to the order dated 17/03/2023, the appellant joined her duties at GGPS Mir Ahmad Khan Korona Khada Banda. (Annex 2- Relevant Documents)
- 3) That out of the blue, the District Education Officer Female Karak withdrew the order dated 17/03/2023 vide order dated: 12/05/2023, communicated on 03/06/2023 via WhatsApp of the appellant. (Annex 3 - Screen Shot)
- 4) That the order dated: 12/05/2023 is liable to be set aside on the following grounds:
  - a. That the impugned order has been passed in haste and arbitrary manner.
  - b. That no prior notice or show-cause has been issued to the appellant in the instant matter so that to clarify the situation.
  - c. That the appellant has been condemned unheard and no proper inquiry or investigation has been conducted in the instant case.
  - d. That the DEO female Karak has misused her authority and in slipshod manner passed the impugned order of which she has no competency.
  - e. That the appellant has rightly /legally been appointed against the quota reserved for the children of the deceased employee under the rules and an illegality has been committed in this respect.

It is, therefore, requested that on acceptance of the instant representation, the order dated: 12/05/2023 may please be set aside, while the order dated: 17/03/2023 may please be restored with all accruing back benefits admissible under the rules.

Thanking in anticipation

Attested  
Yours

Note: The amendment made in 2020 (making a married daughter ineligible) cannot be justifiably applied to us because of the absence of male heir of my father.

Obediently yours

Zahida Perveen -PST  
GGPS Mir Ahmad Khan Korona  
Khada Banda.

Dated: 16/06/2023

DEO "P" Karak

Please issue appointment order under S-10 (h) after fulfilling all legal formalities

Pratik  
Khan  
D/O Karak  
S-10

SOPPEIT

Please take up with DEO F-Karak for release of all legal formalities.

16/6/23

(11)

The Secretary  
Department of Elementary and Secondary Education (E&SE)  
Government of Khyber Pakhtunkhwa

Subject: REPRESENTATION AGAINST THE ORDER DATED: 12/05/2023

Respectfully Submitted:

1. That the appellant has been recommended for appointment against the Deceased Employee Quota under section 10(4) of the APT rules 1989 vide order dated: 17/04/2023. (Annex 1)
2. That in pursuance to the order dated 17/04/2023, the appellant joined her duties at GGPS Mir Ahmad Khan Koroona Khada Banda. (Annex 2- Relevant Documents)
3. That out of the blue, the District Education Officer-DEO Female Karak withdrew the order dated 17/04/2023 vide order dated: 12/05/2023, communicated on 03/06/2023 via what's-App of the appellant. (Annex 3 -Screen Shot etc.)
4. That the order dated: 12/05/2023 is liable to be set aside on the following grounds:
  - a. That the impugned order has been passed in haste and arbitrary manner.
  - b. That no prior notice or show-cause has been issued to the appellant in the instant matter so that to clarify the situation.
  - c. That the appellant has been condemned unheard and no proper inquiry or investigation has been conducted in the instant case.
  - d. That the DEO female Karak has misused her authority and in slipshod manner passed the impugned order of which she has no competency.
  - e. That the appellant has rightly /legally been appointed against the quota reserved for the children of the deceased employee under the rules and an illegality has been committed in this respect.

It is, therefore, requested that on acceptance of the instant representation, the order dated: 12/05/2023 may please be set aside, while the order dated: 17/04/2023 may please be restored with all accruing back benefits admissible under the rules.

Thanking in anticipation

*Attested*  
*Tasir*

Sincerely yours

Appellant/Applicant  
Zahida Perveen -PST  
GGPS Mi Ahmad Khan Koroona  
Khada Banda

Dated: \_\_\_/06/2023



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT  
CIVIL SECRETARITE PESHAWAR

12

No. SO (P/F)/E&SED/2-2/Apptt/Zahida Parveen /2023  
Dated Peshawar the, 20<sup>th</sup> June, 2023

To

The District Education Officer (Female),  
Karak.

Subject: - REPRESENTATION AGAINST THE ORDER DATED 12.05.2022

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Zahida Parveen PST GGPS Mir Ahmad Khan Koroona Khada Banda District Karak, with the direction to process the instant appointment case in light of Rule-10 (4) of APT Rules, 1989 and as per remarks on the face of application and dispose of the case at her own level being competent authority.

Encl.As above.

SECTION OFFICER (PRIMARY/F)

Copy forwarded to the PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY/F)

Attended  
Tariq

13  
57  
(P/A)  
Read with  
F/E

To

The Secretary  
Elementary and Secondary Education Department (E&SED)  
Government of Khyber Pakhtunkhwa

**Subject: Complaint against DEO (Female) Karak for cancellation of my PST appointment order.**

Sir,

Most respectfully it is stated that after lodging my first complaint with this office against the cancellation of my appointment as PST by the DEO (Female) Karak, this office issued her a letter, No. SO (P/F)/E&SED/2-2/Apptt/Zahida Parveen/2023, dated 20<sup>th</sup> June 2023, for my reinstatement. But she refused to comply with the saying that as long as the amendment notified in 2020 and the reminder in 2023 exist, she cannot comply with it. So I again approach your good self to help me.

I shall be very thankful to you for this favour.

Copy of my first complaint and the other necessary documents are attached with the application.

pe exam a Prarsi  
SO (P/F) F  
03.07.2023

Attended  
Yasir  
Yours Obediently,  
Zahida Parveen, PST,  
GGPS Mir Ahmad Khan Koroon, Khada Banda  
Dated: \_\_/06/2023

Print up on relevant  
file  
5/7



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block- "A" Opposite M PA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223587

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No. SO (P/F)/E&SED/2-2/Appt/Zahida Parveen /2023  
Dated Peshawar the, 25<sup>th</sup> July, 2023

To

The Director,  
E&SE Khyber Pakhtunkhwa,  
Peshawar.

*[Handwritten signature]*  
31/7

Subject: - COMPLAINT AGAINST DEO (F) KARAK FOR CANCELLATION OF  
HER PST APPOINTMENT/ORDER.

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application alongwith its enclosures submitted by Zahida Parveen, PST. GGPS Mir Ahmad Khan Koroona Khada Banda District Karak for necessary action as per law/rules being appellate authority in this case. please.

Encl. As above.

*[Handwritten signature]*  
SECTION OFFICER (PRIMARY/F)

Copy forwarded to the PS to Secretary, E&SE Department Khyber Pakhtunkhwa

*[Handwritten signature]*  
SECTION OFFICER (PRIMARY/F)

Attested  
Tasid





**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA, PESHAWAR.**

15

No. 238 /F.No.A-12/PF DEO(F)Karak(2)

Dated Peshawar the 16 /08 /2023.

To,

The District Education Officer (Female)  
Karak.

Subject:

**COMPLAINT AGAINST DEO(F)KARAK FOR CANCELLATION OF  
HER APPOINTMENT ORDER.**

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of complaint lodge by Mst Zahida Parveen PST GGPS Mir Ahmad Khan Koroona Khada Banda received from the Section Officer(Primary)Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department bearing letter No.SO(P/F)E&SED/2-2/Apptt/Zahda Parveen/2022 dated 25.07.2023 and to ask you to submit detail report/comments within a week time positively.

*[Signature]*  
Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst No. \_\_\_\_\_ /-

*Attested*  
*Tariq*

Copy forwarded for information to the:-

1. Section Officer Primary)Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department w/r to his No. cited above.
2. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.

*sdh*  
Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) (16)  
KARAK

Address: KDA Karak.

Phone: 0927-291177  
Email: emiskarak@yahoo.com

NO 8622 Dated Karak the 16 / 8 2023

To,

The Section Officer,  
Primary (Female) Govt:of Khyber Pakhtu khawa  
Elementary and Secondary Education Department Peshawar.

**SUBJECT:- REPRESENTATION AGAINST THE ORDER DATED 12.5.2023.**

Memo,

Reference your good Office No.SO(P/F)E&SED/2-2/Apptt:Zahida Parveen /2023 dated 20<sup>th</sup> June 2023 on the subject cited above.

It is stated for your kind honour that one MUHAMMAD RAUF Ex PST R/O KHADA BANDA has been Died in Service on 5/8/1984.

His Daughter Zahida Parveen had submitted her documents to this Office for appointment against Deceased Son/Daughter quota under Rule 10(4) of APT Rules 1989. The rules is quite clear that the child or the widow/wife as the case may be appointed against the post for which he or she is eligible and possesses the minimum qualification prescribed for appointment to the post.

The undersigned constituted a committee for the scrutiny of documents as well as appointments against the vacant posts for which such application were received to the office, and the committee recommended her for appointment as PST being deserving and eligible candidate and she was appointed as PST at GGPS Mir Ahmed Khan Koroona Distt Karak under the quota reserved for deceased employees children vide this Office No.3574-78 dated 17.3.2023.

A complaint was received in the office of DEO Female Karak regarding provision of wrong information and concealing the facts and keeping in dark the appointing authority. It was brought into the notice of the authority that she has got married and is not living with her parents while at the time of appointment she has concealed this fact from the office.

So it is evident from the Notification issued by Establishment Deptt Khyber Pakhtunkhwa No SO(Policy)/E&AD/1-3/2023/APT rules dated Peshawar the 28.4.2023, that the daughter after contracting marriage becomes liability of her husband and hence not entitled for such appointments under Rule 10(4) of the APT Rules 1989.(Copy attached for ready reference).

Hence the undersigned being competent authority is satisfied that Mst.Zahida Parven D/of Late Muhammad Rauf wife of Muhammad Ghayas Ul Islam Distt Karak was not entitled and eligible for appointment as per the aforementioned reasons, under the relevant Rules and thus "withdrawn her appointment order issued vide Endst No 5721-25 dated 12,5,2023 with effect from the date of its issue.

*Attested*  
*Tasid*  
DISTRICT EDUCATION OFFICER(F)  
KARAK

Endst: No: \_\_\_\_\_ Dated Karak The \_\_\_\_\_ /2023.

1. Copy of the above is forwarded for information to the:  
Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 238/F.No.A-12/PF DEO(F) Karak(2).

DISTRICT EDUCATION OFFICER (F)  
KARAK

(17)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARIATE PESHAWAR**  
**(PHONE NO. 091-9223587)**

No. SO (P.F)/E&SED/2-2/Appt/Zahida Parveen/2023  
Dated Peshawar the 29<sup>th</sup> August, 2023

To

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Establishment Department,  
Peshawar.

Subject: - APPOINTMENT UNDER DECEASED SON'S QUOTA.

Dear Sir,

I am directed to refer to the subject noted above and to state that one Mst. Zahida Parveen was appointed PST by DEO (Female) Karak under deceased son quota (copy attached). However, letter on the said order was withdrawn due to the fact that she was contracting marriage before her appointment (copy enclosed).

2. it is pertinent to mention here that as per report of DEO concerned (copy enclosed) her father was died in 1984.

3. In view of above, advice of Establishment Department is solicited that in the aforementioned scenario as to whether Mst. Zahida Parveen D/o Late Muhammad Rauf wife of Muhammad Ghayas Ul Islam is entitled for appointment under deceased son quota or not and withdrawal of her appointment order is valid or otherwise.

Encl: As Above.

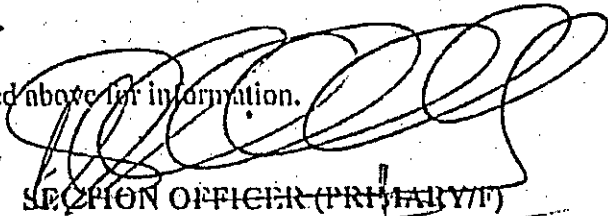
*Attended  
Tariq*

Yours faithfully,

  
SECTION OFFICER (PRIMARY/T)

Copy forwarded to:

1. PS to Secretary, E&SE Department.
2. Directorate E&SE Khyber Pakhtunkhwa.
3. DEO (Female) Karak w/r to his letter quoted above for information.

  
SECTION OFFICER (PRIMARY/T)

THE <sup>1</sup>KHYBER PAKHTUNKHWA CIVIL SERVANTS  
(APPOINTMENT, PROMOTION & TRANSFER) RULES, 1989

PART-I

GENERAL

1. **Short title and commencement:** - (1) These rules may be called the <sup>2</sup>[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
- (2) They shall come into force at once.
2. **Definitions:**-(1) In these rules, unless the context otherwise requires:-
- (a) "Appointing Authority" in relation to a post, means the persons authorized under rule 4 to make appointment to that post;
- (b) "Basic Pay Scale" means the Basic Pay Scale for the time being sanctioned by Government, in which a post or a group of posts is placed;
- (c) "Commission" means the <sup>3</sup>[Khyber Pakhtunkhwa] Public Service Commission;
- <sup>4</sup>(d) "Departmental Promotion Committee" means a committee constituted for making selection for promotion or transfer to such posts under a Department, or offices of Government, which do not fall within the purview of the Provincial Selection Board;
- <sup>5</sup>(dd) "Departmental Selection Board" means a Board constituted for the purpose of making selection for initial recruitment /appointment to posts under a Department or office of Government in Basic Pay Scale 17 not falling within the purview of the Commission:
- Provided that more than one such committees may be constituted for civil servants holding different scales of pay".
- (e) "Departmental Selection Committee" means a committee constituted for the purpose of making selection for initial appointment to posts under a department, or office of Government [in Basic Pay Scale 17 and below not falling within the purview of the Commission];
- (f) "Post" means a post sanctioned in connection with the affairs of the Province, but not allocated to all Pakistan Unified Grades ; and

<sup>1</sup> For the words "NWFP" or "North-West Frontier Province", wherever occurred, the words "Khyber Pakhtunkhwa" substituted by the Khyber Pakhtunkhwa Laws (Amendment) Act, 2011 (Khyber Pakhtunkhwa Act No. IV of 2011) published in the Khyber Pakhtunkhwa Government Gazette Extraordinary dated 2<sup>nd</sup> April, 2011

<sup>2</sup> Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>3</sup> Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>4</sup> Substituted by Clause (d) of sub-rule (1) of Rule 2 vide Notification No. SOR-I (S&GAD) 4-1/80 (Vol-II) dated 14-01-92.

<sup>5</sup> Clause (dd) added by Notification No. SOR-III (S&GAD) 2-7/86, dated 8-12-1994

Attested  
Tariq

- (iv) the person concerned is a bona fide resident of the <sup>19</sup>[Khyber Pakhtunkhwa].
- (v) a vacancy exists to accommodate the request for such a transfer; and
- (vi) Provided further that in most deserving cases, the merit of which shall be determined on case to case basis and the decision of the Competent Authority in that behalf shall be final, Government may allow transfer of a civil servant in BPS-16 and above, subject to the aforesaid conditions.

(2) A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-à-vis other members borne on the cadre.

(3) It will be the sole discretion of the appointing authority to accept or refuse a request for transfer under this rule and any decision made in this behalf shall be final and shall not be quoted as precedence in any other case.

9. **Appointment on Acting Charge or current Charge Basis.** (1) Where the appointing authority considered it to be in the public interest to fill a post reserved under the rules for departmental promotion and the most senior civil servant belonging to the cadre or service concerned, who is otherwise eligible for promotion, does not possess the specified length of service the authority may appoint him to that post on acting charge basis;

<sup>20</sup>Provided that no such appointment shall be made, if the prescribed length of service is short by more than <sup>21</sup>[three years].

<sup>22</sup>[ (2) ].

(3) In the case of a post in Basic Pay Scale 17 and above, reserved under the rules to be filled in by initial recruitment, where the appointing authority is satisfied that no suitable officer drawing pay in the basic scale in which the post exists is available in that category to fill the post and it is expedient to fill the post, it may appoint to that post on acting charge basis the most senior officer otherwise eligible for promotion in the organization, cadre or service, as the case may be, in excess of the promotion quota.

(4) Acting charge appointment shall be made against posts which are likely to fall vacant for period of six months or more. Against vacancies occurring for less than six months, current charge appointment may be made according to the orders issued from time to time.

(5) Appointment on acting charge basis shall be made on the recommendations of the Departmental Promotion Committee or the Provincial Selection Board, as the case may be.

(6) Acting charge appointment shall not confer any vested right for regular promotion to the post held on acting charge basis.

PART-III

INITIAL APPOINTMENT

*Attested  
Yasir*

<sup>19</sup> Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>20</sup> Full stop at the end of Rule 9 (1) replaced with colon and proviso added by Notification No. SOR-I (S&GAD)4-1/80/Vol-II, dated 20-10-1993.

<sup>21</sup> The words one year substituted by Notification No. SOR-I(S&GAD)4-1/80/III, dated 14.3.96.

<sup>22</sup> Sub rule (2) of rule-9 deleted vide by Notification No. SOR-VI(E&AD)1-3/2009/Vol-VIII, dated 22-10-2011.

10. **Appointment by Initial Recruitment :-**(1) Initial appointment to posts <sup>23</sup>[in various basic pay scales] shall be made-

- (a) if the post falls within the purview of the Commission, on the basis of Examination or test to be conducted by the Commission; or
- (b) if the post does not fall within the purview of the Commission, in the manner as may be determined by Government.

<sup>24</sup>(2) Initial recruitment to posts which do not fall within the purview of the Commission shall be made on the recommendation of the Departmental Selection Committee, after vacancies have been advertised in newspapers.

<sup>25</sup>Provided that nothing contained in this sub-rule shall apply to the household staff of the Chief Minister House Peshawar, <sup>26</sup>[Khyber Pakhtunkhwa] House Islamabad, <sup>27</sup>[Khyber Pakhtunkhwa] Rest Houses Bannu, Swat and Abbottabad, <sup>28</sup>[Khyber Pakhtunkhwa] House Nathia Galli and Shabi Mehman Khana, Peshawar and any other House to be established by the Government:

<sup>29</sup>Provided further that the appointment in Basic Pay Scale-1 to 4 shall be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned, <sup>30</sup>[or, where in a District, the office of the Employment Exchange does not exist, after advertising the posts in the leading newspapers] <sup>31</sup>[ ]

(3) A candidate for initial appointment to a post must possess the educational qualification or technical qualifications and experience and except as provided in the rules framed for the purpose of relaxation of age limit, must be within the age limit as laid down for the post, provided that-

- (i) <sup>32</sup>where recruitment is to be made on the basis of written examination, then, notwithstanding anything to the contrary contained in any other rules for the time being in force, age shall be reckoned on 1st January of the year in which the examination is proposed to be held;
- (ii) in other cases as on the last date fixed for submission of applications for appointment.

<sup>23</sup> The words in basic pay scale-16 to 21 substituted by Notification No. SOR-I(S&GAD)1-117/91 (C), dated 12-10-1993.

<sup>24</sup> Sub rule (2) of Rule-10 substituted by Notification No. SOR-I(S&GAD) 1-117/91 (C), dated 12-10-1993.

<sup>25</sup> Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 03-07-2003.

<sup>26</sup> Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>27</sup> Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>28</sup> Sub.by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>29</sup> Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 16-03-2004

<sup>30</sup> Sentence added in the Proviso vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 23-01-2006.

<sup>31</sup> 2nd Proviso in sub-rule (2) of Rule 10 was deleted vide Notification No. SOR-VI(E&AD)1-3/2008 dated 09-05-2008 and added again vide Notification No. SOR-VI(E&AD)1-3/2008 dated 03-11-2008.

<sup>32</sup> Clause (i) substituted vide Notification No. SOR-I(S&GAD)4-1/80, dated 17-5-1989.

Attested  
Tariq

Where a civil servant dies or is rendered incapacitated/invalidated permanently during service then notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant, or if the child has not attained the age prescribed for appointment in Government Service, the widow/wife of such civil servant, to a post in any of the Basic Pay Scales 1-10:

Provided that the child or the widow/wife as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows/wives of the deceased civil servant, preference shall be given to the elder widow/wife:

Provided also that the appointment under this sub rule is subject to availability of a vacancy and if more than one vacancies in different pay scales are available at a time, and the child or the widow/wife, as the case may be, possesses the qualifications making him or her eligible for appointment in more than one post, he/she shall ordinarily be appointed to the post carrying higher pay scale:

Provided further that this shall not apply to any post in BPS-1-10 falling in the purview of the.<sup>34</sup> [Khyber Pakhtunkhwa] Public Service Commission.

<sup>35</sup>(5) Notwithstanding anything contained in any rule for the time being in force, two percent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for disabled candidates and ten percent of all posts meant for initial recruitment shall be reserved for female candidates:

Explanation-I—For the purpose of reservation under this sub-rule "disability" does not include such disability which hampers in the smooth performance of the duties required of a disabled candidate.

Explanation-II—Ten per cent quota reserved above shall be in addition to the posts exclusively reserved for female candidates.

<sup>36</sup>(6) Notwithstanding anything contained in any rule for the time being in force, five per cent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates hailing from earthquake affected areas of District Mansehra, Battagram, Shangla, Kohistan and Abbottabad (Calamity hit area) for a period of three years commencing from 1st February, 2006.

<sup>37</sup>(7) Notwithstanding anything contained in any rule for the time being in force, <sup>38</sup>[three] percent of all the posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates belonging to minorities in addition to their participation in the open merit:

Provided that, the reservation shall not apply to—

<sup>33</sup> Sub rule (4) substituted vide Notification No. SOR-VI (E&AD)1-3/2011/Vol-VIII, dated 31-08-2012.

<sup>34</sup> Sub. by the Khyber Pakhtunkhwa Act No. IV of 2011.

<sup>35</sup> Sub rule (5) substituted vide Notification No. SOR-VI (E&AD)1-10/03 (VI), dated 04-12-2007.

<sup>36</sup> Sub rule (6) inserted vide Notification No. SOR-VI(E&AD)1-3/03 (VI), dated 01-02-2006

<sup>37</sup> Sub rule (7) added vide Notification No. SOR-VI(E&AD)1-3/08, dated 06-01-2009

<sup>38</sup> Subs. vide Notification No. SORIV/E&AD/1-10(Minority)/2008, dated 08.01.2014.

Attested  
Tariq



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

22

NO. SO(Policy)E&AD/1-3/2019/APT Rules  
Dated Peshawar the February 21<sup>st</sup>, 2020

To

1. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa,
2. All the Administrative Secretaries to Govt. of Khyber Pakhtunkhwa,
3. All the Commissioners, Khyber Pakhtunkhwa,
4. All Heads of the Attached Departments in Khyber Pakhtunkhwa,
5. All the Deputy Commissioners, Khyber Pakhtunkhwa.

Subject: GUIDANCE/CLARIFICATION REGARDING EMPLOYMENT  
DEPENDENT OF INCAPACITATED OR INVALIDATED PERMANENTLY  
OR RETIRED ON MEDICAL BOARD.

Dear Sir,

I am directed to refer to the subject noted above and to state that under Rule 10 (4) of APT Rules, 1989, the facility of employment to one of the children of deceased/invalidated Govt. Servant is given in view of their dependence on their parents. This facility is equally available to male and female children. However in case the female has contracted a marriage, she loses this right. Hence a married daughter is not eligible for this facility (copy enclosed).

02 The above instructions may be brought into the notice of all concerned for compliance in letter & spirit.

Attested Yours faithfully,  
Yarid

SECTION OFFICER (POLICY)

Encl. Of even No. & date  
Copy forwarded to the:-

- 1 Accountant General, Khyber Pakhtunkhwa,
- 2 Chairman, Service Tribunal, Khyber Pakhtunkhwa,
- 3 Chairman, Public Service Commission, Khyber Pakhtunkhwa,
- 4 All Additional Secretaries, Establishment Department,
- 5 All Deputy Secretaries, Establishment Department,
- 6 PS to Chief Secretary, Khyber Pakhtunkhwa,
- 7 PS to Secretary, Establishment Department,
- 8 PS to Special Secretary (Regulation/Establishment), Establishment Department

26/2  
SOC(Policy)

SECTION OFFICER (POLICY)





GOVT. OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

23

No. SO(Policy)/E&AD/1-3/2023/APT Rules  
Dated Peshawar, the April 28, 2023

To

1. The Additional Chief Secretary, Khyber Pakhtunkhwa.
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. All Divisional Commissioners in Khyber Pakhtunkhwa.
5. All Heads of Attached Departments in Khyber Pakhtunkhwa.
6. All Deputy Commissioners in Khyber Pakhtunkhwa.

Subject: CLARIFICATION REGARDING APPOINTMENT UNDER RULE 10(4) OF THE  
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENTS,  
PROMOTION & TRANSFER) RULES, 1989

Dear Sir,

I am directed to refer to the subject noted above and to state that Rule 10(4) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 provides for appointment of one of the children, widow or wife of such civil servant who dies during service or is rendered incapacitated/invalidated during service or retired on medical grounds.

2. In this regard, clarification was issued vide this Department's letter of even No. dated 21.02.2020 that daughter after contracting marriage becomes liability of her husband and hence not entitled for such appointment under Rule 10(4) of the APT Rules, 1989.

3. It is to further clarify that a married daughter after separation from her husband and dependent on her parents is also entitled to appointment under Rule 10(4) of APT Rules, 1989 subject to the conditions that:

- i. In case the married daughter is separated judicially, she has to produce a divorce certificate duly issued by NADRA.
- ii. In case she has separated customarily she has to produce a certificate from the Deputy Commissioner concerned to the effect that she is separated and is fully dependent on her parents after separation.

Attested  
Tariq

Yours faithfully,

(Issa Mujahid Khan)  
SECTION OFFICER (POLICY)

Encls: No & Date Even.

A copy of the above is forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Registrar, Peshawar High Court, Peshawar.
4. Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
5. Provincial Ombudsman, Khyber Pakhtunkhwa.
6. All Heads of Authorities/Autonomous/Semi-Autonomous bodies in Khyber Pakhtunkhwa.
7. Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
8. All Special Secretaries/Additional Secretaries/Deputy Secretaries/Section Officers in E&A Department.
9. PS to Chief Secretary, Khyber Pakhtunkhwa.
10. PS to Secretary, Establishment Department.

SECTION OFFICER (POLICY)

# بعد الیت فیسیر، کٹونو کھوسو اسروس ٹرا بیو میل لیسٹا ور



2023، پنجاب ای میلانٹ

زایدہ بیرون بیٹام حکومت

26 ستمبر

مقدمہ

دعویٰ

27

زایدہ بیرون  
Mansoor

## باعث تحریر آ نکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی اور جواب دہی دیکل کارروائی متعلقہ  
آن مقام لیسٹا ور کیلئے عا لہنریب خان / طارق کمال ایڈووکیٹ

کو مقرر کر کے اتر کر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دیا۔ نیز  
دیکل صاحب کو راضی نامہ کرنے و تقریر حالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعوئی اور  
باسورت ڈگری کرنے اجراء اور وصولی چیک دردیہ اور عرضی دعوئی اور درخواست ہر قسم کی تصدیق  
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مشورتی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیرونی کرنے کا اختیار ہوگا۔ از بسورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور دیکل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جات التوائے مقدمہ کے سبب سے رہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہوا تو دیکل صاحب پابند ہوں گے۔ کہ بیرونی  
دیکل کریں۔ لہذا وکالت نامہ لکھدیا کہ مندر ہے۔

الرتوم: 26  
واہ ستمبر 2023

Attested  
Accepted  
Tariq  
2019/023  
cell 03015932818

مقام لیسٹا ور  
tarikamal1979@gmail.com  
BC-10-6195

CNIC: 14203-3076904-2