

07.11.2014

Appeal No. 1247/2014
Mr. Khadeem Hussain

Counsel for the appellant, Mr. Usman Ghani, Sr.GP and Mr. Kabirullah Khattak, Asst: AG for official respondents present. Muhammad Asif Yousafzai, Advocate also present and filed Wakalat Nama on behalf of private respondent No.8. Preliminary arguments heard and record perused.

Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The impugned order/Notification dated 15.10.2014 is against law, facts of the case, suffers from political interference, tainted with malafide, and based on mis-conception of law on the subject; that the impugned order/notification dated 15.10.2014 has been passed in blatant violation of posting/transfer policy of the Government of Khyber Pakhtunkhwa, hence the instant appeal on 17.10.2014. Counsel for the appellant further relying on PLJ 2014 Tr.C.(Services)41, 2012 PLC (C.S) 648 [Balochistan Service Tribunal] and 2014 PLC (C.S) 999 [Supreme Court (AJ&K)].

The learned counsel for private respondent No.8 contended that the instant appeal is pre-mature without filing departmental appeal before the appellate authority, therefore the instant appeal is not maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act,1974. He further argued that the similar nature of cases have been dismissed by the superior Courts. He relied on 2011 SCMR 1111, 1994 PLC (C.S) 1262 and 2009 PLC (C.S) 122 and requested that the instant appeal may be dismissed with cost.

The learned Senior Government Pleader also relied on the arguments put forth by the learned counsel for private respondent No.8 and added that vide judgment dated 10.02.2014 of larger Bench of this Tribunal passed in Service Appeal No. 1648/2013 titled Arif Abbas-vs-Govt of KPK through Chief Secretary, case of similar

nature has been dismissed in limine on the ground of maintainability and jurisdiction. He also requested that the instant appeal may be dismissed in limine.

From arguments advanced by the learned counsels for the parties and perusal of record, the Tribunal is of the view that the present appeal without preferring departmental appeal, is not maintainable under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. Hence, the appeal is dismissed in limine. File be consigned to the record.

ANNOUNCED

07.11.2014


Member

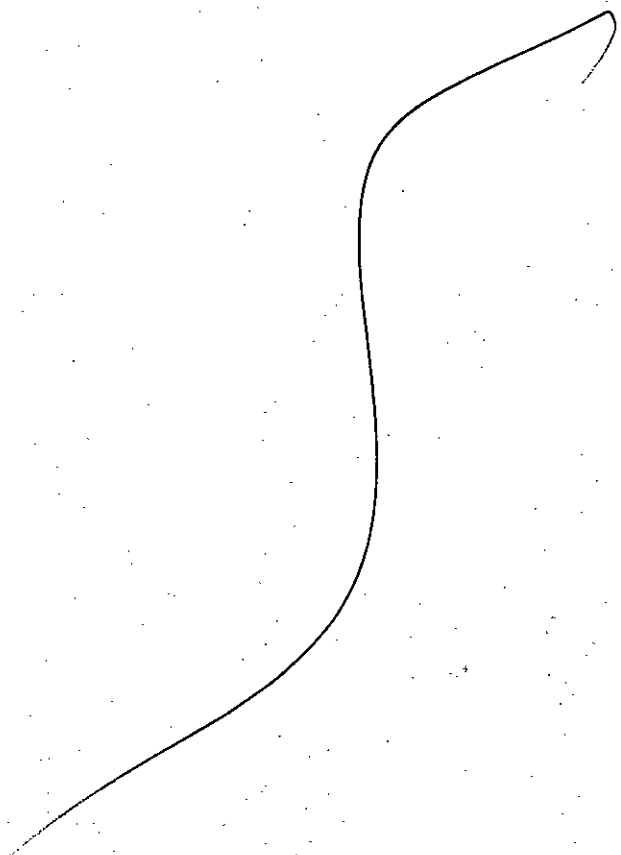
3.

20.10.2014

Counsel for the appellant present. Preliminary arguments partly heard and case file perused. Appellant has impugned transfer order dated 15.10.2014 against which he filed the instant appeal on 17.10.2014. After institution of the instant appeal the office of this Honorable Service Tribunal raised a legal objection on the maintainability of service appeal as the instant appeal is not competent without filing departmental appeal which was returned to the counsel for the appeal for completion and resubmission within 15 days. The learned counsel for the appellant submitted reply to office objection on 17.10.2014 wherein he relied on PLJ 2014 Tr.C.(Services) 41 and 2012 PLC (C.S.) 648. Counsel for the appellant also filed an application for interim relief.

The matter required further clarification, therefore, pre-admission notice be issued to the AAG/GP to assist the tribunal on the point of maintainability To come up for preliminary hearing on 07.11.2014. Till then status-quo be maintained

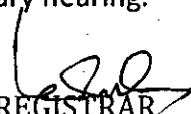

Member



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1247/2013

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17/10/2014	<p style="text-align: center;">As per direction of the worthy Chairman the present appeal filed by Mr. Khadim Hussain through Mr. Zia-ur-Rehman Kazi Advocate may be entered in the Institution Register and put up to the Primary Bench for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2- <i>20-10-2014</i> To come up for preliminary hearing on <i>20-10-2014</i>.</p> <p style="text-align: right;">MEMBER</p>

The appeal of Mr. Khadim Hussain Assistant/Head Clerk XEN C&W Highway Division D.I.Khan received today i.e. on 17.10.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of departmental appeal and its rejection order are not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.
- 3- Ten more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1496 /S.T.

Dt. 17/10 /2014.

690
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Zia-ur-Rehman Kazi Adv. D.I.Khan.

*separate detailed reply was
recently submitted for kind perusal.
The obj*

*Ziaur Rehman
Kazi
17/10/14*

*The observation of this office and reply of the b/Advocate
are submitted for perusal and orders please*

*Honble
The Chairman*

17/10/14

*Be placed before
primary Bench for
consideration of the reply
in the light of the
objection of the office*

17/10/14

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

Service Appeal No of 2014

Khadim Hussain

Versus

Govt of K.P.K etc

SERVICE APPEAL

REPLY TO OFFICE OBJECTION DATED 17.10.2014

Respectfully Sheweth,

1. **That** the above captioned appeal has been filed today before this Honorable Tribunal.
2. **That** the office of this Honorable Tribunal raised a legal objection on the maintainability of service appeal.
3. **That** it has been objected that a service appeal is not competent with out filing departmental appeal. It is a matter of record that impugned Order/Notification Dated 15.10.2013 pertains to the transfer of appellant. In an akin situation, a civil servant filed a direct service appeal with out filing departmental appeal before the Honorable Service Tribunal Balochistan and his appeal was allowed. The official Respondents raised objection on the competency of direct service appeal, but the Honorable Tribunal overruled the same. The Appellant of the precedent case challenged his Transfer order/Notification Dated 18.07.2013 on the very next date i.e 19.07.2013 by filing a direct service appeal. The Honorable Tribunal allowed the direct service appeal holding therein that matter of posting/transfer are of urgent nature, hence no need to file departmental appeal in such like matters. The matter is reported in **PLJ 2014 Tr.C 41**. Copy enclosed for kind perusal.

*The precedent case is based on the judgment of
the Augusti supreme court of Pakistan (PLD 2013 SC195)*

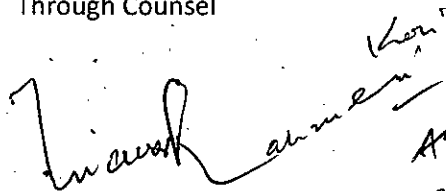
4. That fundamental rights guaranteed under the Constitution of Islamic Republic of Pakistan, 1973 mandates that every citizen of the country should be equally treated. When a direct service appeal in the precedent case is allowed by taking an exception, so keeping in view the equality clause in the Constitution, similar treatment may please be meted out to the Appellant.
5. That Appellant humbly request to allow his counsel to argue the maintainability point before the Honorable Tribunal in view of the other relevant Judgments of the superior courts.

Dated:- 17.10.2014

Your Humble Appellant

Khadim Hussain

Through Counsel



Zia-ur-Rahman Kazi

Advocate High Court

Dera Ismail Khan

03018792378

17.10.2014

BEFORE THE HONOURABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No ¹⁸⁴⁷ of 2014

Khadim Hussain

Versus

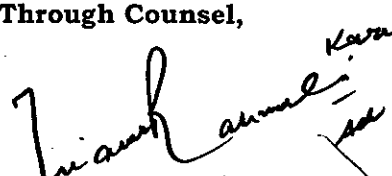
Govt of K.P.K etc

INDEX

S. No.	Particulars	Annexure	Page
1.	Memo of Service Appeal along with memo of addresses of the parties & CM		1-12
2.	Copy of the appointment Order	"A"	13
3.	Copy of the office Order Dated 19.06.2013	"B"	14-
4.	Copy of the Letter Dated 05.6.2014	"C"	15-19
5.	Copy of the Letter No 1361/6,E Dated 22.01.2014	"D"	20-22
6.	Copy of the Posting/Transfer Policy of the Govt of K.P.K	"E"	23-25
7.	Copy of the impugned Office Order/Notification Dated 15.10.2014	"F"	26
8.	Wakalatnama	"G"	27

17th October 2014

Petitioner
Through Counsel,


Zia-ur-Rahman Kazi
Advocate High Court
Dera Ismail Khan

1

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2014

Civil Miscellaneous No of 2014

Khadim Hussain**Petitioner**

Versus

Government of K.P.K etc.....**Respondents**

SERVICE APPEAL

AN URGENT APPLICATION FOR INTERIM RELIEF IN THE SHAPE SUSPENDING
THE OPERATION OF IMPUGNED TRANSFER ORDER/NOTIFICATION DATED
15.10.2014

Respectfully Sheweth,

1. **That** the contents of main Petition may please be read as part of this application.
2. **That** the Petitioner has raised strong points of law in the main Petition, which shall require thorough probe and adjudication.
3. **That** presently, an impuned Order/Notification Dated 15.10.2014 has been issued which will take effect to the detriment of the Petitioner and if the operation of the same is not suspended till the final disposal of instant writ petition on merits, the Petitioner would suffer irreparable loss and it will also affect the merits of the case rather the instant petition will become infructuous.
4. **That** refusal of interim relief might generate numerous complications as well as shall expose the Petitioner to colossal losses and the very purpose of filing the service petition shall stand defeated.

Handwritten notes:
Khadim Hussain
17.10.2014

5. **That** the refusal of interim relief shall place the Petitioner in an inconvenient situation vis-à-vis Respondent.

It is thus humbly prayed that *pendente lite*, the interim relief in the shape of suspending the operation of impugned Order/Notification Dated 15.10.2014 issued by Respondent No 2.

Dated:-/17.10.2014

Your humble Petitioner
Through Counsel
Zia-ur-Rahman Kazi
Zia-ur-Rahman Kazi
Advocate High Court

AFFIDAVIT

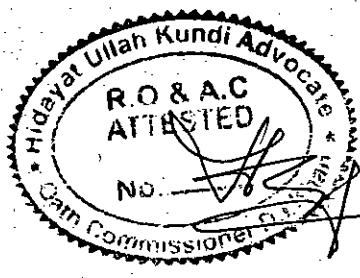
I, Zia-ur-Rahman Kazi Advocate High Court, District Dera Ismail Khan, the Petitioner, do hereby solemnly affirm and declare on oath:-

1. **That** accompanying application has been drafted by me following instructions of his client
2. **That** all parawise contents of the application are true and correct to the best of my knowledge, belief and information;
3. **That** nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

Dated:-/17.10.2014

Deponent

Counsel for Petitioner
Zia-ur-Rahman Kazi
Zia-ur-Rahman Kazi
Advocate High Court
Dera Ismail Khan



[Signature]
16710719

3

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No ¹²⁴⁷ of 2014

SIWIF. Peshawar
1270
17-10-2014

Khadim Hussain son of Rab Nawaz, /Head Clerk, XEN C & W Highway Division
Dera Ismail Khan

Petitioner

Versus

1. **Government of Khyber Pakhtunkhwa** Through Secretary Communication & Works Department, Peshawar
2. **Chief Engineer** (Centre) Communication & Works Department, Peshawar
3. **Chief Engineer** (FATA) Works and Services Department, Peshawar
4. **Superintending Engineer**, C & W Circle Dera Ismail Khan
5. **Executive Engineer**, C & W Highway Division Dera Ismail Khan
6. **Executive Engineer**, C & W Building Division Dera Ismail Khan
7. **District Account Officer**, Dera Ismail Khan
8. **Muhammed Jamshed Iqbal**. Assistant. S-E C & W Circle. D.I.Khan

Respondents

17.10.2014
AKU
17.10.2014

17/10/14

4

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED TRANSFER OFFICE ORDER/NOTIFICATION NO 217-
E/1221/CE/C & WD DATED 15.10.2014 PASSED BY RESPONDENT NO
2/CHIEF ENGINEER (CENTRE) PESHAWAR BEING ILLEGAL,
ARBITRARY, PERVERSE, TAINTED WITH MALAFIDE AND POLITICAL
PRESSURE

PRAYER IN APPEAL

To set aside the impugned transfer office
order/Notification No 217-E/1221/CE/C & WD Dated
15.10.2014 passed by Respondent No 2/Chief Engineer
(Centre) Peshawar being illegal not sustainable in the
eyes of law, arbitrary, perverse, tainted with malafide and
political pressure and to restore the earlier posting order
of the Petitioner Dated 19.06.2013.

Note:- Addresses given above shall suffice the object of service

Respectfully Sheweth,

1. **That** the Petitioner is bonafide resident of village Kirri Khaisor, Tehsil Paharpur District Dera Ismail Khan and was born on 19.05.1958.
2. **That** Petitioner joined the services of the department on 05.01.1977 and reaching the age of superannuation. Copy of the appointment Order is enclosed as **Annexure "A"**.
3. **That** at presently, the Petitioner is working as Assistant/Head Clerk, XEN C & W Building Division, Dera Ismail Khan from 19.06.2013 and normal tenure of the petitioner is three years as per Government of K.P.K Posting/Transfer policy. Copy of the Office Order Dated 19.06.2013 is enclosed as **Annexure "B"**.

Handwritten signature

17.10.2014

4. **That** at present , Akbar Ayub, MPA is Adviser to Chief Minister, Khyber Pakhtunkhwa, for Communication & Works Department. In order to achieve his nefarious political designs, he demanded details of service tenure of all the employees of C & W department through out province from the head of the department. Contents of the Letter No 161-E/526/CE/C&WD Dated 05.08.2014 issued by Chief Engineer (CENTRE) are self explanatory and are enclosed as **Annexure "C"**. The main object of demand of details of service tenure of all the employees of the department was nothing but to achieve political mileage and to make posting/transfer order of his own choice.
5. **That** in order to appease political advisor to Chief Minister, K.P.K namely Akbar Ayub, MPA, the department furnished complete details of all the employees of their service tenure. Copy of the Letter No 1361/6,E Dated 22.01.2014 is enclosed as **Annexure "D"**.
6. **That** it is the Transfer/Posting policy of the Government of K.P.K, that normal tenure period on a particular post is three years subject to exceptional circumstances. Copy of the Transfer/Posting policy is enclosed as **Annexure "E"**.
7. **That** at last, the political bigwig, adviser to Chief Minister, K.P.K succeeded in political interference in the smooth functioning of the department. On the political pressure exerted by adviser to Chief Minister, namely Akbar Ayub, the Respondent No 2 issued illegal transfer impugned order/Notification Dated 15.10.2014 which is very detrimental to the legal interest of the Petitioner. It is also worth mentioning that Akbar Ayub is close friend of local ex-MPA namely Javed Akbar who is political rival of private family members of the Petitioner. Copy of the impugned Order/Notification Dated 15.10.2014 is enclosed as **Annexure "F"**.
8. **That** feeling aggrieved from the impugned Order/Notification Dated 15.10.2014 passed by Respondent No 2 and having left with no other option but to agitate the matter through filing of present direct service appeal for seeking redressal of his grievances on the following amongst others grounds.

G R O U N D S

- a. **That** the impugned Order/Notification Dated 15.10.2014 is against law, facts of the case, suffers from political interference, tainted with malafide, and based on mis-conception of law on the subject, hence not legally tenable and liable to be struck down by this Honorable Tribunal in its appellate jurisdiction, rather the Petitioner has not been treated in accordance with law.

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17.10.2014

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- b. **That** the impugned Order/ Notification Dated 15.10.2014 has been passed in clear cut contravention of fundamental rights guaranteed by the Constitution of Islamic Republic of Pakistan 1973 in Article 4,10 hence liable to be set aside.
- c. **That** the impugned Order/ Notification Dated 15.10.2014 has been passed in blatant violation of posting/transfer policy of the Government of Khyber Pakhtunkhwa, hence liable to be set aside on this score alone.
- d. **That** the political interference in the Government Departments has been depreciated by the apex court of the country in a celebrated Judgment reported in **PLD 2013 SC 195** wherein posting/transfer orders passed under political pressure were struck down by the August Supreme Court of Pakistan.
- e. **That** posting/transfer matters are of urgent nature, hence the filing of departmental appeal is dispense with by the superior courts of the country.
- f. **That** the impugned Order/Notification has been passed in a very haphazard manner and that too through political interference, hence not sustainable in the eyes of law, rather the discretion has not been exercised in accordance with law.
- g. **That** the legal and factual aspects of the controversy have not been appreciated in its true perspective while passing the impugned transfer notification Dated 15.10.2014.
- h. **That** the Petitioner has been transferred through impugned Notification with out any plausible legal justification, hence the impugned order smack malafide on the face of it, hence liable to be set aside.
- i. **Counsel** for the Petitioner may please be allowed to urge additional grounds at the time of hearing.

It is, therefore, most respectfully prayed that on acceptance of service appeal, this Honorable Tribunal may be pleased to set aside/struck down impugned Order/Notification No 217-E/1221/CE/C&WD Dated 15.10.2014 being patently illegal, perverse, tainted with malafide and political pressure and to restore the earlier posting order No 217/E/1314/CE/C&WD Dated 19.06.2013 of the Petitioner.

17.10.2014
17.10.2014
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Grant any other relief which this Honorable tribunal deems appropriate in the given circumstances of the case may please be given to the Petitioner.

Dated: 16.10.2014

Your Humble Petitioner

Khadim Hussain
Khadim Hussain

Petitioner

Through Counsel

Zia-ur-Rahman Kazi
Zia-ur-Rahman Kazi

Cell No:- 03018792378

Zia-ur-Rahman Kazi

Advocate High Court

Dera Ismail Khan

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2014

Khadim HussainPetitioner

Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

AFFIDAVIT

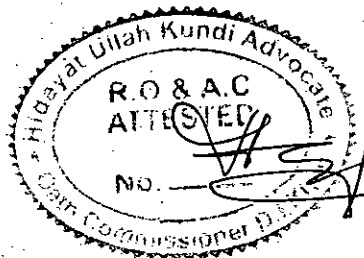
I, Zia-ur-Rahman Kazi Advocate High Court, District Dera Ismail Khan, the
Petitioner, do hereby solemnly affirm and declare on oath:-

1. **That** accompanying service appeal has been drafted by me following instructions of his client
2. **That** all parawise contents of the service appeal are true and correct to the best of my knowledge, belief and information;
3. **That** nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

Dated:-17.10.2014

Ziaur Rahman Kazi
Deponent 17.10.14

Counsel for Petitioner



16/10/14

9

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2014

Khadim HussainPetitioner

Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

CERTIFICATE

Certified that this is first writ petition involving the instant subject matter and that the Petitioner has not filed any other petition earlier in this Honorable tribunal regarding the above stated controversy.

Petitioner

Through Counsel

Zia-ur-Rahman Kazi
Zia-ur-Rahman Kazi 17-10-2014

Advocate High Court

Dera Ismail Khan

10

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2014

Khadim HussainPetitioner

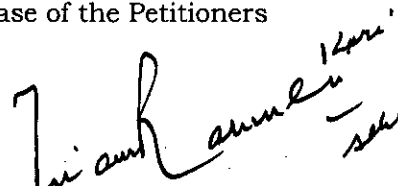
Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

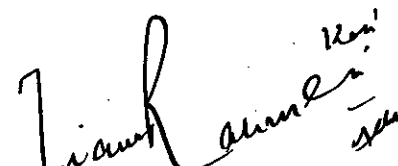
List of Books refereed:

1. Code of Civil Procedure, 1908
2. The Constitution of Islamic Republic of Pakistan, 1973
3. The K.P.K Civil Servant Act, 1973
4. K.P.K Appointment, Promotion, Transfer Rules 1989
5. K.P.K Service Tribunal Act, 1974
6. Judicial Precedents, favouring the case of the Petitioners


Counsel for Petitioner

Note:-

Service Appeal with annexures along with three sets thereof are being presented in three separate enclosed covers.


Counsel for Petitioner

11

BEFORE THE HONORABLE SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2014

Khadim HussainPetitioner

Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

MEMO OF ADDRESSES OF THE PARTIES

PETITIONER

Khadim Hussain, Head Clerk, XEN C & W Highway Division Dera Ismail Khan

RESPONDENTS

1. **Government of Khyber Pakhtunkhwa** Through Secretary Communication & Works Department, Peshawar
2. **Chief Engineer** (Centre) Communication & Works Department, Peshawar
3. **Chief Engineer** (FATA) Works and Services Department, Peshawar
4. **Superintending Engineer**, C & W Circle Dera Ismail Khan
5. **Executive Engineer**, C & W Highway Division Dera Ismail Khan
6. **Executive Engineer**, C & W Building Division Dera Ismail Khan
7. **District Account Officer**, Dera Ismail Khan

Handwritten signature
17.10.2014

12

Dated:- 17.10.2014

Your Humble Petitioner
Through Counsel

Zia-ur-Rahman Kazi
17.10.2014

Zia-ur-Rahman Kazi
Advocate High Court
Counsel for Petitioner

OFFICE ORDER.

Annexure
A-21/12/1976

No. 101-E/6796-99/AEC3 Dated Peshawar the 21/12/1976.

Mr. Khadim Hussain s/o Rab Nawaz
resident of Vill: Kalapani (Kiri Khavzor) Teh: + Dist: D.I. Khan
is hereby offered a post of Temporary Junior Clerk at Rs. 150/- p.m.
in the scale of Rs. 150-6-180/8-220/10-250 (N.P.S.No. 5) plus usual
allowances as admissible under the Rules.

2. His appointment is purely temporary and his services can be terminated at one month's notice at any time without any reasons being assigned irrespective of the fact that he may be holding a post other than the one to which he was originally recruited, or on payment of one month's pay in lieu of the notice. *The appointment is purely stop gap subject to final clearance by the Dept. Selection Committee.*

3. In case he wishes to resign at any time, ~~one month's~~ 14 days notice shall be necessary otherwise one month's pay shall be forfeited.

4. He shall be governed by such rules and orders relating to leave, T.A. Medical, Attendance Pay, pension etc. as may be issued by Government from time to time for category of Government Servants to which he will belong.

5. He will join duty at his own expenses.

6. He will have to produce a Medical Certificate of fitness of his service continues beyond Six months.

7. The offer is subject to conditions that he is domicile of North West Frontier Province.

8. If he accepts the post on these conditions, he should report for duty to the Executive Engineer B&R Division Dir upto 14-1-77 failing which the offer will be considered as cancelled.

9. He should produce original certificate in connection with his qualifications, domicile and age at the time of joining the service.

10. He will have to serve any where in the N.W.F.P. and in any Department of the Government of Pakistan when he is called upon to do so in the interest of public service.

No. _____ Dated Peshawar the 21/12/1976.

Copy to:-

The Executive Engineer, B&R Division Dir/S.E. Malakand

B&R Circle, Sandhu Sharif for information. The date of arrival may please be intimated to this office.

He has been taken against the vacant post of Junior clerk in this Division

Muhammad Hashim
Chief Engineer, (Dev) 2,
B&R Department, N.W.F.P.
Peshawar.

Sd. Ghulam Nabi
Chief Engineer, (Dev)
B&R Department N.W.F.P.
Peshawar.

77-1-5
1978-5-19
18-7-16

14

Office Of The Chief Engineer (Centre)
Communication & Works Department
Khyber Pakhtunkhwa Peshawar.
No 217/F/ 1311 (C/W) Peshawar
Dated Peshawar the 19 / 06 / 2013

Amendment
"B"

OFFICE ORDER

The following posting/transfer of Assistants / Head Clerks in the Communication & Works Department is hereby ordered, with immediate effect in the public interest:-

Sl. No.	Name	From	To	Remarks
1.	Mr. Mumtaz Khan	Head Clerk O/O the Executive Engineer (FATA) Division FR-Tank / D.I.Khan.	Head Clerk O/O the Executive Engineer C&W Division D.I.Khan.	Vice No. 4.
2.	Mr. Abdul Aziz.	Head Clerk O/O the Executive Engineer C&W Division D.I.Khan.	Assistant O/O the Superintending Engineer C&W Circle D.I.Khan.	Against the existing
3.	Mr. Hashmat Ullah.	Assistant O/O the Chief Engineer (Centre) C&W Peshawar	Services placed at the disposal of C.E (FATA) W&SD Peshawar, for turner posting.	As substitute of Serial No. 1.
4.	Mr. Muhammad Jamshed Iqbal.	Assistant O/O the Chief Engineer (FATA) W&S Department Peshawar	Head Clerk O/O the Executive Engineer Highway Division D.I.Khan	Vice No. 5.
5.	Mr. Khadim Hussain.	Assistant O/O the Executive Engineer Highway Division D.I.Khan.	Superintending Engineer C&W Circle Bannu.	Against the existing.

Alleshi

(ENGR. SHAUKAT ALL SHAH)
CHIEF ENGINEER (CENTRE)

Copy forwarded to the:-

- 1) Secretary to Govt. of Khyber Pakhtunkhwa, C&W Department Peshawar with reference to verbal discussion dated 18/06/2013.
- 2) Accountant General Khyber Pakhtunkhwa Peshawar
- 3) Accountant General (PR Sub Office) Peshawar.
- 4) Chief Engineer (FATA) W&S Department Peshawar w/r to his letter No. 1177/2/11-E dated 06-06-2013.
- 5) Superintending Engineers C&W Circle Bannu / D.I.Khan.
- 6) Executive Engineer Building Division D.I.Khan.
- 7) Executive Engineer Highway Division D.I.Khan.
- 8) Executive Engineer C&W FATA Division FR-Tank / D.I.Khan at D.I.Khan.
- 9) District Accounts Officers Bannu / D.I.Khan.
- 10) Head Clerk (C&W)
- 11) Officials Concerned.

SUB DIVISION OFFICER
C&W Highway & Division
Road-2 D.I.Khan

Shah
CHIEF ENGINEER (CENTRE)

MOST IMMEDIATE

15

*Amir Khan
(C)*

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 161-E / 526 / CE / C&WD

Dated Peshawar the 05 / 06 / 2014

To

- (1) All the Chief Engineers in C&W Deptt. (I/c FATA).
- (2) The Managing Director PKHA Peshawar.
- (3) All the Superintending Engineers in C&W Deptt.
- (4) All the Executive Engineers in C&W Deptt.

2071 / 16E
13-6-2014

Subject: **5-YEAR SERVICE TENURE OF STAFF.**

The Adviser to Chief Minister for C&W Department has desired to provide 5-year service tenure of all the Superintendents, Assistants/Head Clerks, Accounts Clerks, Senior Clerks/SDAs, Junior Clerks, Sub Engineers and all Drawing Establishment of C&W Department on the following format: -

Sl: No.	Name of Official with BPS	Present Posting	Period (Last 5-year)		Remarks
			From	To	
1	2	3	4	5	6

You are therefore requested to provide the desired information within 3-days positively.

[Signature]
CHIEF ENGINEER (CENTRE)

Copy to PS to Advisor to Chief Minister for C&W Department Khyber Pakhtunkhwa Peshawar with reference to his letter No. PS/Advisor to CM/C&W/2014 dated 02-06-2014 for information.

[Signature]
CHIEF ENGINEER (CENTRE)

Ull
See info
DAO/HC
[Signature]
[Signature]
6/6/2014

No. 2147 / 16-E

Dated D.I.Khan the 06/06/2014

To

The Chief Engineer (Center)
Govt. of Khyber Pakhtunkhwa
C&W Department (C&W Secretariat)
Peshawar.

Subject: 5-YEAR SERVICE TENURE OF STAFF.

Reference: Your letter No. 161-E/526/CE/C&WD dated 05/6/2014.


As desired the requisite information on prescribed format is enclosed herewith triplicate for favour of onward submission to the quarter concerned please.

DA / As above


Executive Engineer
C&W Division D.I.Khan

Copy to:-

1. The Superintending Engineer C&W Circle D.I.Khan with reference to above for favour of information please.
2. The Divisional Accounts Officer (Local) for information.


Executive Engineer
C&W Division D.I.Khan

SDA Building-II
Sub Division D.I.Khan

26-9-2013

To till date.

Executive Engineer
C&W Division D.I.Khan



Sl: No.	Name of Official with PBS	Present Posting	Period (Last 5-year)		Remarks
			From	To	
6.	Shaukatullah Senior Clerk / SDA (BPS-09)	Executive Engineer C&W Division D.I.Khan	1-1-2009	8-2-2010	As a Junior Clerk Deputy Director (Building) Works & Service Deptt: D.I.Khan
			22-2-2010	31-3-2011	Promoted as a Senior Clerk w.e.f 8-2-2010 Executive Engineer C&W Division D.I.Khan
			1-4-211	22-4-2013	Executive Engineer (S/Clerk) C&W Highway Division D.I.Khan
			16-4-2013	To till date	Executive Engineer C&W Division D.I.Khan
7.	Muhammad Younis Javed Senior Clerk /SDA (BPS-09)	Executive Engineer C&W Division D.I.Khan	1-1-2009	27-2-2010	Executive Engineer C&W Division D.I.Khan
			28-2-2010	8-3-2011	Executive Engineer C&W Highway Division D.I.Khan
			10-3-2011	15-1-2014	Executive Engineer C&W Division D.I.Khan
			16-1-2014	12-5-2014	Executive Engineer C&W Division Tank
			13-5-2014	To till date	Executive Engineer C&W Division D.I.Khan
8.	Imran Gul Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
9.	Nimatullah Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
10.	Tariq Mehmood Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	1-1-2009	9-9-2011	As a Laboratory Assistant Deputy District Officer WS&S Lakki Marwat
			13-09-2010	To till date	Promoted as a Junior Clerk w.e.f 12-9-2011 Executive Engineer C&W Division D.I.Khan
11.	Waseem Yousif Qureshi Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	8-2-2010	1-12-2010	Superintending Engineer C&W Circle D.I.Khan
			1-12-2010	To till date	Executive Engineer C&W Division D.I.Khan
12.	Inamullah Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
13.	Ramiz Raja Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	9-2-2010	To till date	Executive Engineer C&W Division D.I.Khan
14.	Noor-ul-Amin Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	9-2-2010	To till date	Executive Engineer C&W Division D.I.Khan
15.	Hamidullah Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	15-2-2010	31-3-2010	Executive Engineer C&W Division Kohat
			1-4-2010	25-1-2011	Executive Engineer C&W Division Hangu
			25-1-2011	To till date	Executive Engineer C&W Division D.I.Khan
16.	Fazal Hussain Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	1-1-2009	31-3-2011	As a Naib Qasid Executive Engineer C&W Division D.I.Khan
			1-4-2011	To till date	Promoted as a Junior Clerk w.e.f 1-4-2011 Executive Engineer C&W Division D.I.Khan

Sl. No.	Name of Official with PBS	Present Posting	Period (Last 5-year)		Remarks
			From	To	
1	2	3	4	5	6
17.	Abdul Hafeez Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	7-5-2012	14-2-2013	Executive Engineer Building Division SWA Tank
			15-2-2013	To till date	Executive Engineer C&W Division D.I.Khan
18.	Wasim Akram Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	4-1-2013	To till date	Executive Engineer C&W Division D.I.Khan
19.	Muhammad Ali Junior Clerk (BPS-07)	Executive Engineer C&W Division D.I.Khan	4-1-2013	11-12-2013	Executive Engineer C&W Division Tank
			12-12-2013	To till date	Executive Engineer C&W Division D.I.Khan
20.	Hizbullah Khan Gandapur Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	1-2-2012	Executive Engineer Central Civil Division Pak PWD D.I.Khan
			1-2-2012	15-12-2013	Executive Engineer C&W Division Karak
			16-12-2013	To till date	Executive Engineer C&W Division D.I.Khan
21.	Abdul Waheed Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	1-12-2012	Deputy Director (Building) W&S Department D.I.Khan
			1-1-2013	8-2-2013	Executive Engineer C&W Highway Division D.I.Khan
			14-2-2013	5-12-2013	Executive Engineer C&W Division Lakki Marwat
			6-12-2013	To till date	Executive Engineer C&W Division D.I.Khan
22.	Fazal Mehmood Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	11-9-2012	Deputy Director (Building) W&S Department D.I.Khan
			18-9-2012	29-11-2013	Executive Engineer C&W Division Karak
			1-12-2013	To till date	Executive Engineer C&W Division D.I.Khan
23.	Muhammad Yaqoob Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	1-3-2011	Executive Engineer W&S FR Tank / D.I.Khan
			4-3-2011	4-5-2012	Executive Engineer Highway Division SWA Tank
			7-5-2013	To till date	Executive Engineer C&W Division D.I.Khan
24.	Khalil Noor Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	31-1-2010	W&S Deptt: NWFP Peshawar
			1-2-2010	31-01-2014	Executive Engineer C&W Highway Division D.I.Khan
			31-1-2014	To till date	Executive Engineer C&W Division D.I.Khan
25.	Muhammad Arif Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
26.	Fazal Rehman Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
27.	Abdul Khalil Mughal Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
27.	Muhammad Farooq Sarwar Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
28.	Muhammad Shakeel Athar Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
29.	Muhammad Idrees Alizai Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan

19

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Sl. No.	Name of Official with PBS	Present Posting	Period (Last 5-year)		Remarks
			From	To	
30.	Malik Arif Sub Engineer (BPS-11)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Executive Engineer C&W Division D.I.Khan
31.	Muhammad Ramzan Jatoi Head Draftsman (BPS-13)	Executive Engineer C&W Division D.I.Khan	1-1-2009	9-10-2013	Promoted as a Head Draftsman w.e.f 9-10-2013 Executive Engineer C&W Division D.I.Khan
			10-10-2013	3-12-2013	Executive Engineer Highway Division SWA Tank
			4-12-2013	To till date	Executive Engineer C&W Division D.I.Khan
32.	Nadir Zaman Draftsman (BPS-10)	Executive Engineer C&W Division D.I.Khan	1-1-2009	1-1-2011	Deputy Director W&S Department Tank
			8-1-2011	To till date	Executive Engineer C&W Division D.I.Khan
33.	Zahid Nawaz Draftsman (BPS-10)	Executive Engineer C&W Division D.I.Khan	1-1-2009	To till date	Promoted as a Draftsman w.e.f 6-5-2013 Executive Engineer C&W Division D.I.Khan
34.	Hanifullah Khan Tracer (BPS-05)	Executive Engineer C&W Division D.I.Khan	17-1-2011	To till date	Executive Engineer C&W Division D.I.Khan
35.	Fahad Nazir Tracer (BPS-05)	Executive Engineer C&W Division D.I.Khan	19-5-2014	To till date	Executive Engineer C&W Division D.I.Khan

26

26

No. 1361 / 6, E
To

dated DIKhan the 27/01/2014.

The Chief Engineer (Centre),
C&W Department Khyber Pakhtunkhwa,
Peshawar.

Amir Khan
"D"

Subject: - TENURE OF HEAD CLERKS/SUB ENGINEERS/SDAs.

Reference: - Your No. 161-E/990/CE/C&WD dated 21.1.2014.

The requisite information on the subject in respect of this Division is given as under please:-

S/No.	Name of Official	Designation	Domicile	Tenure/Date of last posting.
1.	Haji Abdul Aziz	Head Clerk	DIKhan	06.08.2013.
2.	Shaukatullah	SDA	DIKhan	25.09.2013.
3.	Asmatullah	SDA	DIKhan	25.09.2013.
4.	Abdul Naeem	SDA	DIKhan	15.01.2014.
5.	Kalim Javed	SDA	DIKhan	09.08.2010
6.	Abdul Waheed	Sub-Engineer	DIKhan	05.12.2013
7.	Abdul Khalil Mughal;	Sub-Engineer	DIKhan	19.11.1998.
8.	Fazal Rehman	Sub-Engineer	DIKhan	1.10.1998
9.	Muhammad Shakeel Athar	Sub-Engineer	DIKhan	14.04.2003.
10.	Farooq Sarwar	Sub-Engineer	DIKhan	28.09.2007.
11.	Muhammad Arif Diyal	Sub-Engineer	DIKhan	23.04.2008.
12.	Hizbullah	Sub-Engineer	DIKhan	19.12.2013.
13.	Muhammad Yaqoob	Sub-Engineer	DIKhan	07.05.2012.
14.	Abdur Rashid Butt	Sub-Engineer	DIKhan	11.09.2012.
15.	Fazal Mehmood	Sub-Engineer	DIKhan	29.11.2013.
16.	Muhammad Arif	Sub-Engineer	DIKhan	23.04.2008
17.	Muhammad Idris	Sub-Engineer.	DIKhan	02.09.2008

[Signature]
EXECUTIVE ENGINEER
C&W DIVISION D.I.KHAN

MOST IMMEDIATE

(21)

~~21~~

Office of the Executive Engineer
C & W Division D.I.Khan.

Diary No. 1356

Dated: 29/01/14

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 161-E / 990 / CE / C&WD

Dated Peshawar the 21 / 01 / 2014

- (1) All the Chief Engineers in C&W Deptt. (i/c FATA).
- (2) All the Superintending Engineers in C&W Deptt. (i/c FATA).
- (3) All the Executive Engineers in C&W Deptt. (i/c FATA).

Subject: TENURE OF HEAD CLERKS / SUB ENGINEERS / SDAs.

I am directed to invite your attention to the subject noted above and to say that the competent authority (Secretary C&W) has directed to submit the details and tenure of Head Clerks / Sub Engineers and SDAs to his office immediately.

You are therefore requested to intimate the details and tenure of Head Clerks / Sub Engineers and SDAs working under your kind control / respective jurisdiction, on the format given below, within 03-days to this office, for its onward submission to the higher ups as desired by them :-

Sl: No.	Name of Official	Designation	Domicile	Tenure / Date Of Last Posting

This may be given Top Most Priority.

AK
Information sent to CE(C) may file
[Signature]

[Signature]
(ABDUR BASHID TAREEN)
ADMINISTRATIVE OFFICER

22

~~22~~

No. 1384, 6, E
To

dated DIKhan the 28/01/2014.

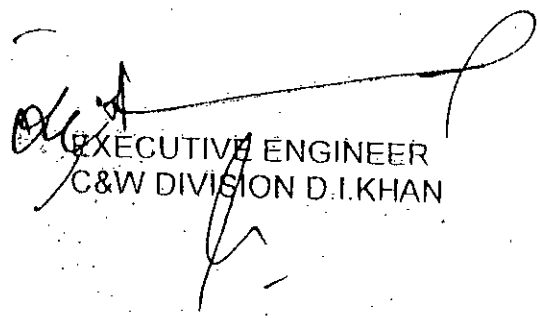
The Superintending Engineer,
C&W Circle DIKhan.

Subject: - TENURE OF HEAD CLERKS/SUB ENGINEERS/SDAs.

Reference: - Your Endst. No. 2180/2-E dated 22.1.2014.

The requisite information on the subject in respect of this Division has since been submitted to the Chief Engineer (Centre) C&W Department Peshawar vide this office No. 1361/6-E dated 21.1.2014. However a copy of the same is enclosed herewith favour of reference & record please.

DA/As above


EXECUTIVE ENGINEER
C&W DIVISION D.I.KHAN



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT

(Regulation wing)

23

No. SOR-VI/E&AD/1-4/2008/Vol-VII
Dated Peshawar, the 11th September, 2009

~~23~~

Amendments
"E"

To

1. The Additional Chief Secretary, Govt of NWFP P&D Department.
2. The Additional Chief Secretary (FATA), Peshawar.
3. The Additional Chief Secretary Home Department.
4. The Senior Member, Board of Revenue, NWFP.
5. All Administrative Secretaries to Government of NWFP.
6. The Secretary to Governor, NWFP.
7. The Principal Secretary to Chief Minister, NWFP.
8. All Divisional Commissioners in NWFP.
9. All DCOs in NWFP/Political Agent in FATA.

Subject: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

Dear Sir,

I am directed to refer to the subject and to convey that the competent authority has been pleased to amend Para-IV of the existing, posting/ transfer policy of the Provincial Government circulated vide letter No.SOR-VI(E&AD)/Misc/Updation/09 dated 13 January, 2009 as under.

4675
30/9/2009
Handwritten notes and signatures

Para IV: Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive /hard areas shall be reduced to two (02) years for settled areas, 01 1/2 years for unattractive areas and one year for hard areas.

Handwritten signature and initials: A.C.S. (FATA) N/A

2. The above amendment is hereby circulated for information/compliance.

3. Nonetheless the status quo of posting/transfer in FATA will be maintained.

Yours faithfully,

(KALEEM ULLAH)
SECTION OFFICER (REG-VI)

Handwritten notes and signatures at the bottom left, including 'to all Secs', '1-28-45', and '9-2009'.



OFFICE OF THE CHIEF ENGINEER (FATA)
WORKS & SERVICES DEPARTMENT
PESHAWAR

28

24

No. 179 12/11-E
Dated Peshawar the 25/07/2008

To

All Executive Engineers,
In Works & Services Department(FATA).

w/s. Jamil B Khan

No. 2/53/5 E

dt. 31/7/08 Subject:

TRANSFER/POSTINGS FROM SETTLED TO FATA
INCLUDING F.Rs. TO DISTRICTS.

all enclosed
[Signature]
31/7/08
D/C

Enclosed herewith please find herewith a copy of Section Officer (Regulation-I), Services & General Admn: Department NWFP, Peshawar letter No. SORI(S&GAD)1-188/96, Dated 28.4.1997 for information and strict compliance.

In light of the instructions contained in the above referred letter that "It may be kept in view that in case of provincial/Divisional cadre post, the substitute shall have to move first to join his post in FATA", you are therefore directed not to relieve any officer/official as and when his substitute has not reported arrival in their Division in line with the standing orders of the Provincial Govt. of NWFP.

DA/As above

[Signature]
(Engr. Amir Shahbaz/Khan)
Chief Engineer

5-E | 101
31/7/08

[Signature]
SUB DIVISIONAL ENGINEER
Road Division

(98) 96

Government of NWFP
Services and General Admn: Department,
(Regulation Wing)

NO. SORI(S&GAD)1-188/96

Dated: 28th April, 1997.

25

C. N. (NWFP 96)
DIARY No.
DATE
TO: 5197
FROM: C. N.
SUBJECT:

- 1. All the Administrative Secretaries to Government of NWFP.
- 2. The Secretary to Governor, NWFP.
- 3. The Secretary to Chief Minister, NWFP.
- 4. All Commissioners in NWFP.
- 5. All Heads of Attached Departments in NWFP.
- 6. All Deputy Commissioners/Political Agents in NWFP.
- 7. All District and Session Judges in NWFP.
- 8. The Registrar, Peshawar High Court, Peshawar.
- 9. The Secretary, Board of Revenue, NWFP, Peshawar.
- 10. The Secretary, NWFP, Public Service Commission.
- 11. The Registrar, Service Tribunal, NWFP, Peshawar.

Transfer/postings from settled to FATA including F.Rs to Districts.

Sir,

I am directed to refer to the subject cited above and to state that necessary instructions have been issued time and again to the effect that no postings and transfers to and from FATA, including F.Rs, shall be made unless approval from the Agent to the President (i.e. Governor, NWFP) is obtained. In this connection, a circular letter was issued by the Governor's Secretariat, NWFP addressed to all the Administrative

Departments vide No. SO(P)GS/16(2)1/96/365-84, dated 12.2.1996 with the direction that all cases for grant of NOC for transfer from FATA to settled Areas may be submitted to the Governor's Secretariat only by the Department concerned and not by the individual officials.

2. It has been observed that the above instructions are not being followed accordingly. Under the circumstances, it is once again re-iterated that the above instructions may kindly be adhered to strictly.

3. It is, however, clarified that when an employee completes his prescribed tenure of posting in FATA/F.Rs, the requisite NOC in such cases, shall not be required. The competent authority may dispose of such cases subject to observance of all other codal formalities and subject to the provision of a substitute. It may be kept in view that in case of Provincial/Divisional cadre post, the substitute shall have to move first to join his post in FATA.

Your obedient servant,

(Shakirullah)
Section Officer (Regulation-I)

SUBJECT: C&W Division Road

1161
2-597

26

Amir Qureshi
 "C" "F"

Office Of The Chief Engineer (Centre)
 Communication & Works Department
 Khyber Pakhtunkhwa Peshawar.

No. 217-E / 1221 / CE / C&WD

Dated Peshawar the 15 / 10 / 2014

OFFICE ORDER

The following posting/transfer of Assistants/Head Clerks, in the Communication & Works Department is hereby ordered, with immediate effect, in the public interest: -

Sl No	Name	From	To	Remarks
1.	Abdul Aziz (Assistant)	Head Clerk O/O XEN C&W Building Division D.I.Khan.	Services placed at the disposal of C.E. (FATA) W&SD Peshawar.	As substitute of Sl. No. 2.
2.	Hashmat Ullah (Assistant)	Assistant O/O C.E. (FATA) W&SD Pesh.	Head Clerk O/O XEN C&W Building Division D.I.Khan.	Vice No. 1.
3.	Khadim Hussain (Assistant)	Head Clerk O/O XEN C&W Highway D.I.Khan.	Assistant O/O S.E. C&W Circle D.I.Khan.	Vice No. 4.
4.	Muhammad Jamshed Iqbal (Assistant)	Assistant O/O S.E. C&W Circle D.I.Khan.	Head Clerk O/O XEN C&W Highway D.I.Khan.	Vice No. 3.

[Signature]
 CHIEF ENGINEER (CENTRE)

Copy forwarded to the :-

- 1) Secretary to Govt. of Khyber Pakhtunkhwa C&W Deptt. Peshawar.
- 2) Accountant General (PR Sub Office) Peshawar.
- 3) Chief Engineer (FATA) W&S Department Peshawar.
- 4) PSO to Advisor to C.M. for C&W Department Khyber Pakhtunkhwa.
- 5) SuperIntending Engineer C&W Circle D.I.Khan.
- 6) Executive Engineers Highway & Building Divisions D.I.Khan.
- 7) District Accounts Officer District D.I.Khan.
- 8) Officials Concerned.

[Signature]
 CHIEF ENGINEER (CENTRE)

[Signature]

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

WAKALAT-NAMA

27

Amir Khan
"G"

Khadim Hussain.....Petitioner

Versus

Govt of K.P.K etcRespondent

SERVICE APPEAL

I, Khadim Hussain son of Rab Nawaz /the Petitioner, do hereby appoint and constitute Mr. *Zia-ur-Rahman Kazi Advocate High Court* as my counsel in the subject proceedings/Service Appeal and authorize him to file, appear, act, plead etc compromise, withdraw or refer the matter for arbitration for me/us without any liability for their default and with the authority to engage/appoint any other Advocate/Counsel at our/my expense and receive all sums and amount payable to me and do all such acts which they may deem necessary for protecting my/our interest in the matter. He is also authorized to appear, in present service appeal on my behalf /appeal/revision/review/application for restoration/application for contempt proceedings or application for setting aside ex-parte decree and proceedings/Miscellaneous Applications on my/our behalf.

16th, October, 2014

Accepted

Zia-ur-Rahman Kazi
Zia-ur-Rahman Kazi Advocate
Counsel for Petitioner

17-10-14

Khadim Hussain
Khadim Hussain
Petitioner

VAKALAT NAMA

NO. 1247 /2014.

IN THE COURT OF Service Tribunal Peshawar.

Khadiim Hussain (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

C & W Dept. (Respondent)
(Defendant)

I/We, Muhammad Jamshed Iqbal (Respt: 8)

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate, Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

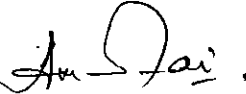
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20



(CLIENT)

ACCEPTED


M. ASIF YOUSAFZAI
Advocate.

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)