


FORM OF ORDER SHEET

Court of _____

Appeal No. 2052/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/10/2023	<p>The appeal of Sr. Muhammad Zahid presented today by Mr. Muhammad Nauman Sher Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>16-10-23</u> Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: DR. M. ZAHEED vs Govt of KP (Others)

S#	CONTENTS	Yes	No
1.	This Appeal has been presented by <u>M. NAUMAN SHEER</u>		
2.	Whether counsel / appellant / respondent / deponent have signed the requisite document?	✓	
3.	Whether appeal is within time?	✓	
4.	Whether appeal enactment under which the appeal is filed is mentioned?	✓	
5.	Whether enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal / annexure are properly pagged?	✓	
9.	Whether certificate regarding filling any earlier appeal in the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/ clear?	✓	
13.	Whether copies of appeal is delivered to AG/ DAG?		
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?	✓	
15.	Whether number of referred cases given are correct?	✓	
16.	Whether appeal contains cutting / overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies are attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are completed?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether security and process fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____		
26.	Whether copies of comments / replay/ rejoinder submitted? On _____		
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- M. NAUMAN SHEER

Signature:- M. Nauman Sheer

Dated:- 12/10/23

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

Service Appeal No. 2052/2023

Dr. Muhammad Zahid

vs

Govt of KP & Others

INDEX

S.No.	Description	Annexure	Pages
1.	Service Appeal		1-4
2.	Application for suspension		5.
3.	Affidavit		6.
4.	Memo of address		7.
5.	Copy of notification dated 20-03-2023	"A"	8.
6.	Copy of the impugned notification dated 10-07-2023	"B"	9.
7.	Copy of bank statement	"C"	10.
8.	Copy of representation/ appeal	"D"	11-12
9.	Copy of notification of ECP	"E"	13-15.
10.	Court Fee/-		
11.	Wakalatnama		

APPELLANT

Dated: _____/2023

Through

Muhammad Adnan Sher
Advocate, High Court Peshawar

&


Muhammad Nauman Sher
Advocate, High Court Peshawar

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

Service Appeal No. 2052/2023

Dr. Muhammad Zahid

Directorate General Health Services Khyber Pakhtunkhwa, Peshawar

.... (Appellant)

vs

1. Government of Khyber Pakhtunkhwa
Through
Chief Secretary Civil Secretariat, Peshawar

2. **Secretary Health** Government of KP
Civil Secretariat, Peshawar

3. **Director General Health Services**
Old Fata Secretariat, Warsak Road,
Peshawar

4. **Dr. Muhammad Shoaib**, Medical Superintendent DHQ, Charsadda.

.... (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974

Respected Sir,

1. That the Appellant joined the Health Department as Medical Officer (BPS-17) and during his long 28 years' service, he remained posted on various important posts throughout the province. Presently he is serving in Grade-19.
2. That the Respondent No.2 vide notification no. SOH (E-V)/4-4/2023 dated 22-03-2023 transferred the Appellant from the post of Principle Medical Officer DHQ Hospital Charsadda to Medical Superintendent DHQ Hospital Charsadda.
(Copy of notification dated 22-03-2023 is annexed as "A").
3. That the Appellant had only assumed the charge of his new post when Respondents concerned vide Notification No. SOH(E-V)/2-2/2023 dated 10-07-2023 (*hereinafter referred to as Impugned Notification*) transferred the Appellant and directed him to report to Directorate General Health Services KP, Peshawar.
(Copy of the *Impugned Notification dated 10-07-2023* is annexed as "B").
4. That the Appellant in compliance of the *Impugned Notification* mentioned above, relinquished the charge of the said post and reported to the office of DG Health KP.

5. That despite of the arrival report to the office of DG Health, the concerned Respondents without any legal justification/ reason stopped his salary with effect from 1st august 2023. (Copy of bank statement is annexed as "C").
6. That the Appellant being aggrieved of the **Impugned Notification** submitted representation/ Appeal to the competent authority for the redressal of his grievance but despite of lapse of 3 months statutory period, the same not responded so far. (Copy of representation is annexed as "D").
7. That the Appellant approached the Hon'ble High Court in its writ jurisdiction but the same could not be entertained for want of jurisdiction.

Now the Appellant approaches this Hon'ble Tribunal for setting aside the **Impugned Notification** and reinstatement on his previous post inter alia on the following grounds:

GROUND:

- A. That the **Impugned Notification** by Respondents is absolutely illegal, void-ab-initio and nullity in the eyes of law.
- B. That the previous post of MS DHQ Hospital Charsadda held by the Appellant was tenured-one, hence without completion of the tenure, he should not have been transferred but even then, vide the **Impugned Notification**, he was transferred from the said post in sheer violation of law.
- C. That the present case of the Appellant otherwise seems to be that of political victimization as even after compliance of an illegal and unlawful **Impugned Notification** the salary of the Appellant has been stopped by the Respondent/ Respondents concerned without any legal justification till date.
- D. That the Appellant has 28 years' service at his back and during this long period, he never gave a chance to the high-ups or public at large of any type of complaint relating to his job, but even then he has not been treated in accordance with the law.
- E. That the Election Commission of Pakistan vide notification F.No.2(1)/2023-Cord. dated 22nd January, 2023 banned all types of posting transfers of government officials and officers but even then Respondents in utter disregard of the said notification transferred the Appellant without any justification and sound reason. (Copy of notification of ECP is annexed as "E").
- F. That even otherwise the act of the Respondent/ Respondents concerned is clear violation of Article 4,25 & 27 of the Constitution of Islamic Republic of Pakistan,1973.

G. Any other ground that may be raised at the time of hearing of instant appeal.

It is, therefore, respectfully prayed that on acceptance of instant service appeal this Hon'ble Tribunal may be pleased enough to “

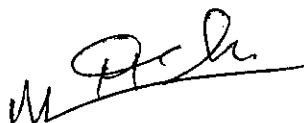
- a. **Declare** the **Impugned Notification** dated 10-07-2023 as illegal, unlawful and without legal authority and set-aside the same &
- b. **Direct** the Respondent/ Respondents concerned to reinstate that Appellant to his previous post as Medical Superintendent DHQ Hospital Charsadda.
- c. Any other remedy as deemed fit and proper by the Hon'ble Tribunal, may also be granted.

APPELLANT

Through

**Muhammad Adnan Sher
Advocate, High Court Peshawar**

&


**Muhammad Nauman Sher
Advocate, High Court Peshawar**

Certificate: it is certified that no such like Appeal has earlier been filed or pending before this Hon'ble Tribunal.



Note: Case law and relevant books on the subject will be produced during the final arguments on the case.

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

Service Appeal No. _____/2023

Dr. Muhammad Zahid

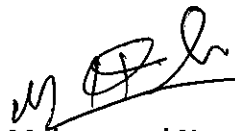
vs

Govt of KP & Others

AFFIDAVIT

I, **Muhammad Zahid Directorate General Health Services Khyber Pakhtunkhwa** do hereby solemnly affirm and verify on oath that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this august Tribunal necessary to disclose.

Identified by:



Muhammad Nauman Sher
Advocate, High Court Peshawar

DEPONENT



Muhammad Zahid
CNIC: 17101-3421658-3

5

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

C.M No. _____/2023

Service Appeal No. _____/2023

Dr. Muhammad Zahid

vs

Govt of KP & Others

APPLICATION FOR SUSPENSION OF THE IMPUGNED NOTIFICATION SOH(E-V)/2-2/2023
DATED 10-07-2023 TILL THE FINAL DECISION OF MAIN APPEAL

Respected Sir,

1. That the Petitioner has challenged the **Impugned Notification** through instant appeal which is Sub-Judice but no date for hearing has been fixed so far.
2. That the Petitioner has Prima facie a strong case and there is every likelihood of its success. Similarly balance of convenience also lies in the favor of the Petitioner being transferred pre-mature in utter violation of the law on the subject.
3. That if the **Impugned Notification** is not suspended, the Petitioner will suffer irreparable loss.

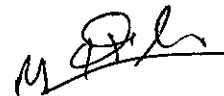
It is, therefore, requested that on acceptance of this application the **Impugned Notification** may kindly be suspended till the final decision of the main appeal. Similarly, further requested that the Respondents concerned be directed to release the salary of Petitioner forthwith.

PETITIONER

Through

Muhammad Adnan Sher
Advocate, High Court Peshawar

&



Muhammad Nauman Sher
Advocate, High Court Peshawar

(6)

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

C.M in Appeal No. _____/2023
Service Appeal No. _____/2023

Dr. Muhammad Zahid

vs

Govt of KP & Others

AFFIDAVIT

I, **Muhammad Zahid Directorate General Health Services Khyber Pakhtunkhwa** do hereby solemnly affirm and verify on oath that the contents of the accompanying Application are true and correct, and nothing has been concealed from this august Tribunal.

DEPONENT



Muhammad Zahid

CNIC: 17101-3421656-3

In the Hon'ble Khyber Pakhtunkhwa Service Tribunal
Peshawar

Service Appeal No. _____/2023

Dr. Muhammad Zahid

vs

Govt of KP & Others

MEMO

APPELLANT

Dr. Muhammad Zahid

Directorate General Health Services Khyber Pakhtunkhwa, Peshawar

Vs

RESPONDENTS

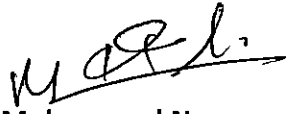
1. **Government of Khyber Pakhtunkhwa**
Through
Chief Secretary Civil Secretariat, Peshawar
2. **Secretary Health** Government of KP
Civil Secretariat, Peshawar
3. **Director General Health Services**
Old Fata Secretariat, Warsak Road,
Peshawar
4. **Dr. Muhammad Shoaib**, Medical Superintendent DHQ, Charsadda.

PETITIONER

Through

Muhammad Adnan Sher
Advocate, High Court Peshawar

&


Muhammad Nauman Sher
Advocate, High Court Peshawar



**GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

②

Dated Peshawar the 20th March, 2023

NOTIFICATION

NO.SOH (E-V)/4-9/2023. The following posting/ transfer of doctors are hereby ordered with immediate effect, in the best public interest:-

S.NO	NAME OF DOCTOR	FROM	TO
1.	Dr. Jehanzeb Khan, Management Cadre (BS-19)	Medical Superintendent (BS-19), DHQ Hospital Charsadda in OPS	At the disposal of DHQ Peshawar for further adjustment against the vacant post of PMO (BS-19)
2.	Dr. Muhammad Zahid, General Cadre (BS-19)	Principal Medical Officer (BS-19) attached to DHQ Hospital Charsadda	Medical Superintendent (BS-19), DHQ Hospital Charsadda in OPS. Vice S.No.01.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT**

No. E/3-72 Notification of even No. & dated:
Copies forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa.
3. Medical Superintendent, DHQ Hospital Charsadda.
4. District Accounts Officer, Charsadda.
5. PS to Secretary Health Department Khyber Pakhtunkhwa.
6. Deputy Director (IT), Health Department, Peshawar.
7. Both the concerned doctors.
8. PS to Special Secretary (E&A and B&D), Health Department.
9. Personal files of both the concerned doctors.

(FAZAL AMIN)

SECTION OFFICER (E-V)

Certified to be true Copy

SHAH FAISAL ILYAS
Secretary to Government



20
GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Dated Peshawar the 10th July, 2023

NOTIFICATION

NO. SOH(E-VV2-2/2023)

The Competent Authority (Chief Minister, Khyber Pakhtunkhwa) is pleased to order posting/ transfer of the following doctors, with immediate effect, in the best public interest:-

S.NO	NAME	FROM	TO
1.	Dr. Muhammad Shoaib, General Cadre (BS-19)	Medical Superintendent, Cal-D Hospital Lachi, Kohat	Medical Superintendent (BS-20), DHQ Hospital, Charsadda in OPS. Vice S.No. 2
2.	Dr. Zahid Ullah Khan, General Cadre (BS-19)	Medical Superintendent (BS-20), DHQ Hospital, Charsadda in OPS	Report to Directorate General Health Services, Khyber Pakhtunkhwa
3.	Dr. Adil Khan, Specialist Cadre (BS-18)	District Specialist (ENT) BS-18, DHQ Hospital, Charsadda	Medical Superintendent (BS-19), Women & Children Hospital Rajar, Charsadda in OPS against the vacant post

SECRETARY HEALTH
GOVERNMENT OF KHYBER PAKHTUNKHWA

No. 9708-19 Endst. of even No. & Date

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, Kohat.
4. Medical Superintendent, DHQ Hospital, Charsadda.
5. Medical Superintendent, Women & Children Hospital Rajar, Charsadda
6. District Accounts Officer, Kohat & Charsadda.
7. Deputy Director (IT), Health Department, with the direction to upload the notification on official website.
8. PS to Minister for Health Department, Khyber Pakhtunkhwa.
9. PS to Secretary Health Department, Khyber Pakhtunkhwa.
10. All concerned doctors.

(FAZAL AMIN)
SECTION OFFICER (E-V)

Certified to be true Copy

SHAH FAISAL ILYAS
Director Supreme Court

Scanned with CamScanner

National Bank of Pakistan

Account Statement

10

Name: DR. MUHAMMAD ZAHID S/O H. QAISER A.K

Address: VILLAGE JALLA BANDA PO TARNAB
DISTT CHARSAQDA

Town:
District:
City:
Province/State:
Country:
Product Name: PLS Savings Account
Currency:
CIF No: 11005188
Account No: 3109859171
IBAN:

Postal Code:

Branch Code/Name: 410 Tehsil Bazar Branch Charsaddah
Region Name: Peshawar

Statement Printing Date: 11-Oct-2023

User: 00018243 Branch: 410

Terminal: VDI-PSH1

B/F Balance: 356,627.04

From: 01-May-2023

To: 11-Oct-2023

S. No.	Date	Particulars	Insino	Memo	Debit	Cre
51	29-Jul-2023	WITHDRL				
52	29-Jul-2023	ATM CASH WITHDRAWL			23.44	0.00
53	29-Jul-2023	WITHDRL			20,000.00	0.00
54	29-Jul-2023	WHT ON CASH WITHDRL			23.44	0.00
55	29-Jul-2023	ATM CASH WITHDRAWL			360.00	0.00
56	29-Jul-2023	WITHDRL			20,000.00	0.00
57	29-Jul-2023	WHT ON CASH WITHDRL			23.44	0.00
58	29-Jul-2023	ATM CASH WITHDRAWL			120.00	0.00
59	29-Jul-2023	WITHDRL			20,000.00	0.00
60	29-Jul-2023	WHT ON CASH WITHDRL			23.44	0.00
61	31-Jul-2023	SALARY			120.00	0.00
62	06-Aug-2023	ATM CASH WITHDRAWL		31	0.00	234,748.00
63	06-Aug-2023	WITHDRL			20,000.00	0.00
64	06-Aug-2023	ATM CASH WITHDRAWL			23.44	0.00
65	06-Aug-2023	WITHDRL			20,000.00	0.00
66	06-Aug-2023	ATM CASH WITHDRAWL			23.44	0.00
67	06-Aug-2023	WITHDRL			20,000.00	0.00
68	06-Aug-2023	WHT ON CASH WITHDRL			23.44	0.00
69	06-Aug-2023	ATM CASH WITHDRAWL			360.00	0.00
70	06-Aug-2023	WITHDRL			20,000.00	0.00
71	06-Aug-2023	WHT ON CASH WITHDRL			23.44	0.00
72	06-Aug-2023	ATM CASH WITHDRAWL			120.00	0.00
73	06-Aug-2023	WITHDRL			20,000.00	0.00
74	06-Aug-2023	WITHDRL			23.44	0.00
75	05-Aug-2023	WHT ON CASH WITHDRL			120.00	0.00
76	28-Sep-2023	ATM CASH WITHDRAWL			20,000.00	0.00

This is a computer generated statement and does not require any signature

70.

The Chief Minister
Health Khyber Pakhtunkhwa Peshawar.

Subject:
Dear Sir,

APPEAL FOR CANCELLATION TRANSFER ORDER.

With due admiration it is stated that I have been posted to DHO Hospital Charasadda on 21st March 2022. But after a 3 months period I was again transferred from DHO Hospital Charasadda vide SOH(E-V)/2-22023 dated 10th July 2023. (Photo copy of Order is attached) for ready reference.

In view of the above mentioned I want to submit the following Para wise basic points in this regard.

1. That I have not completed my tenure at this station.
2. That there is no complaints / inquiries pending against the undersigned.
3. That my transferred was made on the basis of political victimization.

In light of the basic points, mentioned above, it is requested that I may kindly be retained at the said station and necessary Order may please be issued for withdrawal of the order mentioned above.

I shall be very thankful to you in this regard.

2

REGULATIONS

For Insurance purposes...
 So type attached except in case of
 dimensional letters of not more than
 the usual weight prescribed in the
 First Schedule to the Act which are
 to be retained in the file.

...with the word "Insurance" ...
 for Rs. (in figures) ...

... (in words) ...

... name and address of sender

Yours obediently

Zahid
Dr. Muhammad Zahid
MS DHO Hospital Charasadda.

TO,

*The Chief Secretary
Khyber Pakhtunkhwa Peshawar,*

Subject: APPEAL FOR CANCELLATION OF TRANSFER ORDER.

Dear Sir,

With due admiration it is stated that I have been posted to DHQ Hospital Charsadda on 21st March 2022. But after a 3 months period I was again transferred from DHQ Hospital Charsadda vide SOH(E-V)/2-2/2023 dated 10th July 2023. (Photo copy of Order is attached) for ready reference.

I view of the above mentioned I want to submit the following Para wise basic points in this regard.

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In light of the basic points, mentioned above, it is requested that I may kindly be retained at the said station and necessary Order may please be issued for withdrawal of the order mentioned above.

I shall be very thankful to you in this regard.

Yours obediently

*Dr. Muhammad Zahid
MS DHQ Hospital Charsadda.*

ELECTION COMMISSION OF PAKISTAN
NOTIFICATION

13

Islamabad the 22nd January, 2023

F.No.2(1)/2023-Cord.- WHEREAS, the Provincial Assemblies of Punjab and Khyber Pakhtunhwa under Article 112 of the Constitution of the Islamic Republic of Pakistan stand dissolved on 14th and 18th January, 2023 respectively.

AND WHEREAS, the Election Commission of Pakistan is mandated with the constitutional duty to organize and conduct elections in terms of Article 218(3) of the Constitution and to make such arrangements as are necessary to ensure that the elections are conducted honestly, justly, fairly and in accordance with the law and that corrupt practices are guarded against;

AND WHEREAS, it has become imperative that the Election Commission shall take all necessary steps under the Constitution and prevalent law for smooth conduct of General Elections to the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa.

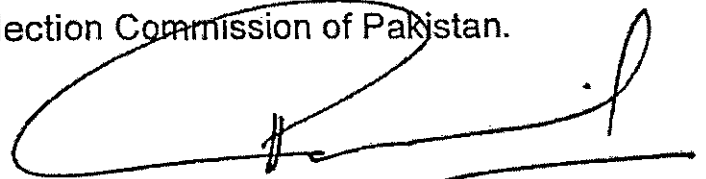
NOW THEREFORE, in exercise of the powers conferred upon it under Articles 218(3), 220 of the Constitution of the Islamic Republic of Pakistan, Sections 4, 5, 8(c) read with Section 230 of the Elections Act, 2017 and as supported by the Workers' Party case through Akhtar Hussain Advocate, General Secretary and 6 others Versus Federal of Pakistan and 2 others reported in PLD 2012 SC 681, and all the other powers enabling it in that behalf, the Election Commission of Pakistan, to ensure transparent election and to provide a level playing field for all contesting candidates and political parties, hereby directs the Caretaker Governments of Punjab and Khyber Pakhtunkhwa:-

- (a) To assist the Election Commission to hold elections in accordance with law as provided under section 230(1)(b) of the Elections Act, 2017.
- (b) To ensure the compliance of all the notifications, directives and the provisions as laid down in Section 230 of the Act *ibid*.
- (c) Not to post or transfer any public official after the issuance of this notification within and to / from Punjab & Khyber Pakhtunkhwa without prior approval in writing of the Election Commission as laid down in Clause 2(f) of Section 230 of the Elections Act, 2017.
- (d) Ensure that all kinds of recruitments in any Ministry, Division, Department or Institution under the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunkhwa are banned with immediate effect, except recruitments by the Provincial Public Service Commissions and those government organizations where test / interviews have already been conducted before this day.
- (e) Not to announce / execute any kind of Development Schemes in Punjab and Khyber Pakhtunkhwa Provinces except those which are ongoing and approved before the issuance of this notification. Moreover, the Provincial Governments and Local Governments of Punjab and Khyber Pakhtunkhwa shall not issue tenders of such schemes till culmination of General Elections of both Assemblies.

Contd...Page-2

- 3) All development funds relating to Local Government institutions of Punjab and Khyber Pakhtunkhwa and Cantonment Boards falling in the jurisdiction of Punjab and Khyber Pakhtunkhwa shall stand frozen with immediate effect till announcement of results of the said General Elections.
- (g) To ensure immediate termination of services of all heads of the institutions appointed on political basis and to send their lists to the Commission forthwith.
- (h) To ensure vacation of the government residential facilities from Ex-Chief Ministers and their advisors, Ex-Provincial Ministers and Ex-Members of the Provincial Assemblies of Punjab and Khyber Pakhtunkhwa, besides ensuring withdrawal of official vehicles from them. Furthermore, the dignitaries shall be provided security / protocol as per their entitlement and any extra deployment of security / protocol be withdrawn from them forthwith.
- (i) The Caretaker Governments shall perform their functions and attend to day-to-day matters which are necessary to run the affairs of the Provinces in accordance with law.
- (j) The Chief Minister or a Minister or any other member of Caretaker Governments shall, within three days from the date of assumption of office, submit to the Commission, a statement of assets and liabilities including assets and liabilities of his spouse and dependent children as on the preceding 30th day of June on Form B.

This issues with the approval of Election Commission of Pakistan.



(Omar Hamid Khan)

Secretary

Election Commission of Pakistan

Copy forwarded for information to the:

- (1) Secretary to the President, Aiwan-e-Sadr, Islamabad.
- (2) Secretary to the Prime Minister, Prime Minister's Secretariat, Islamabad.
- (3) Secretary, Ministry of Parliamentary Affairs, Govt. of Pakistan, Islamabad.
- (4) Secretary, Ministry of Interior, Government of Pakistan, Islamabad.
- (5) Secretary, Ministry of Planning, Development and Reforms, Government of Pakistan, Islamabad. (for implementation and Circulation to all relevant Departments)
- (6) Secretary, Senate Secretariat, Islamabad.
- (7) Secretary, National Assembly of Pakistan, Islamabad.
- (8) Secretary, Ministry of Defence, Government of Pakistan, Rawalpindi.
- (9) Secretary, Establishment Division, Government of Pakistan, Islamabad. (for implementation and Circulation to all concerned)
- (10) Principal Secretary to the Governor, Punjab, Lahore.
- (11) Principal Secretary to Chief Minister of Punjab, Lahore.
- (12) Chief Secretary, Government of Punjab, Lahore.
- (13) Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar. } For Implementation and Circulation to all subordinate Departments
- (14) Registrar, Supreme Court of Pakistan, Islamabad.
- (15) Registrar, Lahore High Court, Lahore.
- (16) Registrar, Peshawar High Court, Peshawar.
- (17) Provincial Election Commissioner Punjab, Lahore.
- (18) Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar.
- (19) Inspector General of Police, Punjab, Lahore.
- (20) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

II. Copy also forwarded to the:

- (1) Director General (Law)
- (2) Director General (IT- Policy & Planning)
- (3) Additional Director General (Training)
- (4) Additional Director General (GSI)
- (5) Additional Director General (Elections-II)
- (6) Principal Staff Officer to Hon'ble CEC
- (7) Director to Hon'ble CEC
- (8) Director (Elector Rolls)
- (9) Director (MIS)
- (10) Director (Political Finance)
- (11) Director (MCO)
- (12) Deputy Director (Budget)
- (13) Deputy Director (Election-I & II)
- (14) Deputy Director (Confid.)
- (15) Deputy Director (Political Finance)
- (16) Deputy Director (Training)
- (17) Deputy Director (Web)
- (18) Deputy Director (Law)
- (19) PS to Hon'ble Members - I, II, III & IV.
- (20) Staff Officer to Secretary
- (21) Assistant Director (Monitoring)
- (22) PS to Additional Secretary (Admn)
- (23) JPA to Special Secretary (ECP)

ECP Secretariat, Islamabad.

Shahid Iqbal
 (Shahid Iqbal)
 Additional Director General
 (Elections)

وکالت نامہ

بعدالت پشاور ہائی کورٹ پشاور

۱۵-۱۰-۲۰۲۳

مورثہ

مقدمہ

دعویٰ

جرم

سرحد اپیل

277

گورنٹ آف کے پی

ڈاکٹر زائد سہ منجانب سرحد
بنام

باعث تحرے آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ پیروی و جواب دہی وکل کاروائی، متعلقہ

آن مقام پشاور کیلئے محمد عمران شہر محمد نسلان شہر پشاور کی طرف سے

۱۹/۲-۱۹-۲۰۲۳

مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل موصوف کو مقدمہ کی کل کاروائی کا مکمل اختیار حاصل ہوگا۔

نیز وکیل صاحب کو عرضی دعویٰ داخل کرنے، جواب دعویٰ، اپیل، نظر ثانی کا بھی اختیار حاصل ہو

گا نیز وکیل صاحب بصورت ڈگری برخلاف من اختیار دہندہ اپیل، نگرانی، نظر ثانی از عدالت ابتداء

تا عدالت انتہا یعنی سپریم کورٹ آف پاکستان دائر کر سکتا ہے وکیل موصوف بصورت عدم پیروی

کاروائی یکطرفہ یا ڈگری یکطرفہ کیخلاف درخواست دائر کر سکتا ہے اور وکیل موصوف میری جانب

سے مقدمہ میں بصورت ڈگری چیک یا نقد روپیہ کی شکل میں وصولی کر سکے گا اور مزید یہ کہ وکیل

موصوف مقدمہ متذکرہ کی کل یا جزوی کاروائی کیلئے اپنی بجائے دیگر وکیل بھی اپنے ساتھ مقرر کر سکتا

ہے جس کو بھی وہ جملہ اختیار حاصل ہونگے جو کہ وکیل موصوف کو حاصل ہیں مجھے اس صورت میں

تمام ساختہ پر داختم منظور و قبول ہوگا لہذا میں نے وکالت نامہ ہذا تحریر کر کے اس پر دستخط / نشان

انگشت ثبت کر دیا ہے تاکہ سند رہے۔

Accept

المرقوم ۱۵ ماہ ۲۳ ۲۰

وہ ال کے لئے منظور ہے۔ بمقام پشاور

۱۹/۲-۱۹-۲۰۲۳