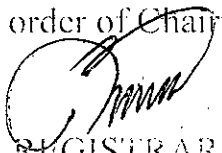


# FORM OF ORDER SHEET

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

**Appeal No. 2207/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/10/2023	<p>The appeal of Mst. Rubina Begum resubmitted today by Mr. Bilal Ahmad Kakaizai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Rubina Begum PSHT GGPS Lalma Razzin Khar Badli Pt. Peshawar received today i.e on 20.10.2023 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Annexures of the appeal are unattested.
- 3- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3447 /S.T.

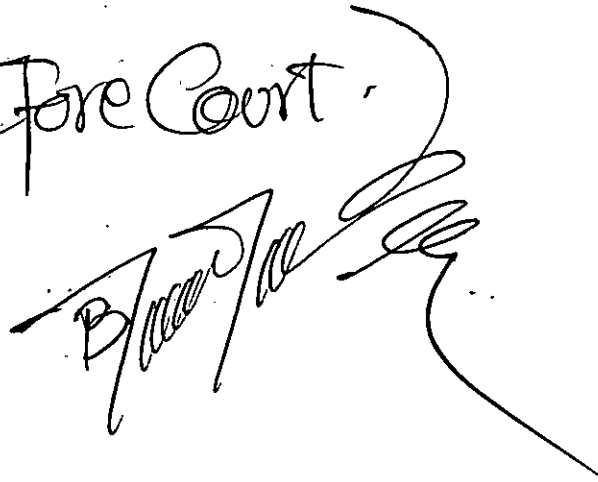
Dt. 23/10 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Bilal Ahmad Kakaizai Adv.  
High Court Peshawar.

Objections (at S. No. 1 to 3) removed.  
Please put before Court.




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

Service Appeal No: 2207/2023

RUBINA BEGUM *Vs* Government of Khyber Pakhtunkhwa etc

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Wakalatnama		

  
Appellant

Through:

  
BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL.

Nothia Branch, Peshawar Cantt.

0300-9020098.

(2)

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

Service Appeal No: 2207/2023

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 8443

Dated 20-10-2023

RUBINA BEGUM,  
Retired PSHT, GGPS, Lalma Razam Khan, Badh Ber, Peshawar.  
R/o Mohallah Hussain Khan, Village & Post Office Takkar,  
Tehsil Takht Bhai, District Mardan.

..... **APPELLANT**

**Versus**

1. GOVERNMENT OF KHYBER PAKHTUNKHWA,  
Through Secretary Education,  
Block A, 3rd Floor, Building-A, Civil Secretariat Peshawar.
2. DIRECTOR,  
Elementary & Secondary Education,  
Directorate of Education,  
Hashtnagri Chowk, Near Qila Bala Hisar, Peshawar
3. DISTRICT EDUCATION OFFICER (FEMALE),  
Directorate of Education,  
Education Department, Hashtnagri, Peshawar.
4. DEPUTY DISTRICT EDUCATION OFFICER,  
Directorate of Education,  
Education Department, Hashtnagri, Peshawar.

..... **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL ACT, 1974: -**

1. AGAINST DEDUCTION FROM THE FINAL SETTLEMENT OF THE APPELLANT AMOUNTING TO RS. 240700/-.
2. FOR PAYMENT OF SALARIES SINCE 23.06.2022 TILL 31.08.2022 DUE TO THE FACT THAT RETIREMENT ORDER OF THE APPELLANT WAS ISSUED ON 27.08.2022, RECEIVED BY THE APPELLANT ON 29.08.2022 WITH EFFECT FROM 23.06.2022, WHEN APPELLANT WAS ON DUTY IN CONSEQUENCE WHEREOF APPELLANT IS ALSO ENTITLED TO RECEIVE THE INCREASE IN SALARY WITH EFFECT FROM 01.07.2022, ALONG WITH AN INCREMENT DUE TO MORE THAN 6 MONTHS OF SERVICE, WHICH WILL ULTIMATELY STIMULATE THE PENSION OF THE APPELLANT.

Prayer: That on acceptance of this Departmental Appeal / Representation, the Appellant may please be paid his Salary till 31.08.2022 amounting to Rs. 240700/- along with Increment(s) & increase in Salary with effect from 01.07.2022 and recalculation and payment of pension / pensionary benefits on the basis of increased salary with effect from 01.09.2022, with such other relief, as may deem fit in the circumstances of the case, may also be granted.

Respectfully Sheweth,

Brief facts, giving rise to present Service Appeal, are as under:

1. That, Appellant was inducted into service on 24.02.1983 as PTC Teacher and performed duties till 31.08.2022.
2. That, during the course of employment, the Appellant became medically unfit to perform duties - fell ill, hence was referred to the Standing Medical Board by the Competent Authority, where the Appellant was declared as medically unfit for future employment, hence the Departmental Authority issued her Retirement Order on Medical Grounds on 27.08.2022, which was received by the Appellant on 29.08.2022, when she was on

active service, copies of the Standing Medical Board Recommendations dated 25.05.2022 / 31.05.2022 & Retirement Order dated 29.08.2022 are attached as Annexure A & B.

3. That, Appellant performed her duties till 31.08.2022, however as per contents of Retirement Order, the Appellant's Application for retirement on Medical Grounds was accepted with effect from 22.06.2022. When inquired upon from the Office regarding issuance of Retirement Order on Medical Grounds with retrospective effect, she was not replied satisfactorily for the action taken against her hence she relinquishes the charge of the post held by her under protest, copies of the Attendance Register and Charge Relinquishment Report dated 01.09.2022 are attached as Annexure C & D.
4. That, at the relevant time, when the retirement Order of the Appellant was issued, she was on active service.
5. That, from the Final Settlement of the Appellant, the Salaries / Perks etc received by the Appellant was deducted as she was considered as retired from 22.06.2022, copy of Final Arrear Payment Slip is attached as Annexure E.
6. That, an Application, to this effect, was also submitted by the Appellant on 14.09.2022 but the Department paid no heed to the request of the Appellant.
7. That, after waiting for the considerable period, the Appellant submitted her Departmental Appeal before the Competent Authority for the purpose as mentioned in the heading of the Appeal, copies of the Departmental Appeal along with Courier Receipts are attached as Annexure F.
8. That, the Department / Respondents regretted the Departmental appeal of the Appellant vide Impugned Appellate Order dated 23.09.2023, copy of the Impugned Appellate Order dated 23.09.2023 is attached as Annexure G, hence this Appeal on the following amongst other grounds:

GROUND:

- A. That, actions and inactions of the Respondents Department are illegal, unlawful, void and ineffective.
- B. That, same is against the principles of Natural Justice, also.
- C. That, it is the fundamental and legal right of the Appellant to have been paid for the services rendered by her.
- D. That, acceptance of the Appellant's request for retirement, retrospectively, is not warranted under the law.
- E. That, deducting the salary of the Appellant from 23.06.2022 is also an illegal and unlawful action of the Department.
- F. That, Appellant got retired on medical Grounds on 27.08.2022, which Order was received by the Appellant on 29.08.2022 and she performed her duties till 31.08.2022.
- G. That, pay, perks and wages etc are considered as continuous and recurring cause of action which could be agitated any time before the legal and proper forum.
- H. That, the Department / Competent Authority has malafidely issued the Retirement Order of the Appellant with retrospective effect i.e. 22.06.2022, with the intention that Appellant may not get increase in salary effective from 01.07.2022.
- I. That, with the enhancement of salary with effect from 01.07.2022, the Appellant's Pension will also be recalculated and she will be paid her monthly Pension with effect from 01.09.2022 instead of 23.06.2022.
- J. That, apart from enhancement of salary, Appellant is also entitled to receive an Increment for rendering more than 6 months service in 2022.
- K. That, it is the constitutional and fundamental right of Appellant / Applicant to have receive her due Pension even otherwise as per law formulated by the Judgments of Superior Courts, Pension is no more a bounty rather the

6

same is a right of the incumbent who had rendered valuable services to the state / Department.

L. That, there is no other source of Income of the Appellant.

It is, therefore, requested that subject Appeal be accepted as prayed for.

  
Appellant

Through:

  
BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.



7


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

Service Appeal No: \_\_\_\_\_ / 2023

RUBINA BEGUM Vs Government of Khyber Pakhtunkhwa etc

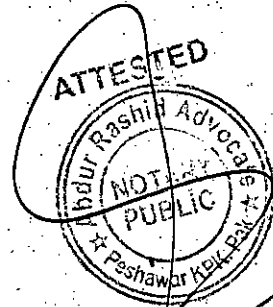
**AFFIDAVIT**

I, RUBINA BEGUM, Retired PSHT, GGPS, Lalma Razam Khan, Badh Ber, Peshawar. R/o Mohallah Hussain Khan, Village & Post Office Takkar, Tehsil Takht Bhai, District Mardan, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

  
Deponent

Identified by:

  
BILAL AHMAD KAKAIZAI  
Advocate, Supreme Court of Pakistan.



20/10/2023

8

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

Service Appeal No: \_\_\_\_\_ / 2023

RUBINA BEGUM vs Government of Khyber Pakhtunkhwa etc

**ADDRESSES OF PARTIES.**

**APPELLANT:**

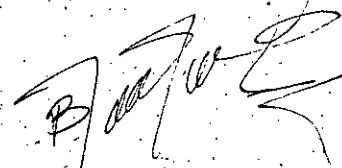
RUBINA BEGUM, Retired PSHT, GGPS, Lalma Razam Khan, Badh Ber, Peshawar. R/o Mohallah Hussain Khan, Village & Post Office Takkar, Tehsil Takht Bhai, District Mardan.

**RESPONDENTS:**

1. Government of Khyber Pakhtunkhwa, Through Secretary Education, Block A, 3rd Floor, Building-A, Civil Secretariat Peshawar.
2. Director, Elementary & Secondary Education, Directorate of Education, Hashtnagri Chowk, Near Qila Bala Hisar, Peshawar
3. District Education Officer (Female), Directorate of Education, Education Department, Hashtnagri, Peshawar.
4. Deputy District Education Officer, Directorate of Education, Education Department, Hashtnagri, Peshawar.

  
Appellant

Through:



**BILAL AHMAD KAKAIZAI**

Advocate, Supreme Court of Pakistan.  
213, Sunehri Masjid Road, Near HBL  
Nothia Branch, Peshawar Cantt.  
**0300-9020098.**


9 A

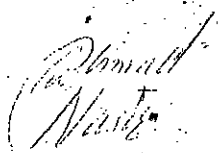
OFFICE OF THE CHAIRMAN STANDING MEDICAL BOARD/MEDICAL SUPERINTENDENT POLICE/SERVICES, HOSPITAL PESHAWAR.

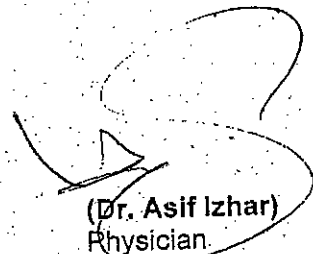
The Standing Medical Board comprising the following members assembled in the office of the Medical Superintendent Police/Services, Hospital Peshawar to examine, Mst. Robina Begum, PSHT.

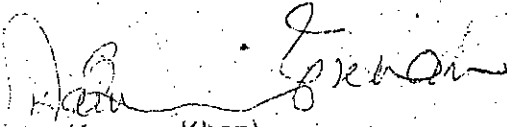
The Standing Medical Board is of the opinion that patient is known case of hypertension, diabetes mellitus, osteoarthritis of knees and low back pain referring to lower limbs. She is using insulin for the last 12 years. She is also complaining of weakness in both thigh muscles secondary to diabetic amyotrophy. She is unable to continue her Government job and may be boarded out on medical grounds.


STATION PESHAWAR  
DATED: 25/05/2022

  
(Dr. Niaz Muhammad)  
Chairman  
Standing Medical Board  
Medical Superintendent  
Police/Services, Hospital,  
Peshawar.

  
(Dr. Naseer Ahmad)  
Ophthalmologist  
Police/Services Hospital,  
Peshawar...Member...

  
(Dr. Asif Izhar)  
Physician  
Police/Services, Hospital  
Peshawar. Member...

  
(Dr. Kamran Khan)  
Orthopedic Surgeon  
Standing Medical Board  
Police/Services Hospital, Peshawar

  
(Dr. Aurangzeb Afridi)  
DMS/Secretary  
Standing Medical Board  
Peshawar.....

10



**OFFICE OF THE  
MEDICAL SUPERINTENDENT  
SERVICES HOSPITAL, PESHAWAR.**

Phone: (Off) 091 9210509. (Exch) 091 9223472 Fax: 091 9210543

No. 5052-53 /MS/SMB/2021-22


Dated: 31/05/2022

Assistant Director (Female)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa  
Peshawar.

Subject - STANDING MEDICAL BOARD

With reference to your office letter No. 7791 dated. 09-03-2022 addressed to Director General Health Services Khyber Pakhtunkhwa on the subject noted above.

Mst. Robina Begum, PSHT was examined by the Standing Medical Board held in this office on 25/05/2022. The proceedings of the Standing Medical Board are sent herewith for further necessary action.

  
Chairman  
Standing Medical Board  
Medical Superintendent  
Police/Service Hospital  
Peshawar

Copy to:  
• Director General Health Services Khyber Pakhtunkhwa Peshawar for information with reference to his letter No. 5479-80/Medical/SMB Dated. 23/05/2022.



(11) B

21

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

**RETIREMENT ON MEDICAL GROUND.**

Under the provision of Rules-21 of the Govt: of Khyber Pakhtunkhwa Civil Servants revised leave rules 1981, Sanction is hereby accorded for the grant of lump sum payment equal to (344- days) leave on full pay in lieu of LPR R/O Mst: Robina Begum D/O Hakimullah Khan PSHT GGPS Lalma Razim Khan, Peshawar as due and admissible to her under the rules.

She is hereby allowed to retire from Govt: service with effect from 23-06-2022 (AN) on Medical Grounds as per Chairman Standing Medical Board, Medical Superintendent Police /Service Hospital Peshawar letter No.5052-53/MS/SMB/2021-22 Dated: 31/05/2022 received through Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa letter memo No.2720/File.No.F-21/M. Board Dated Peshawar the: 24/06/2022.

Date of Birth according to her service Book is. 01-01-1965

Date of 1<sup>st</sup> Appointment according to her Service Book is 24-02-1983

**Note:-**

1. Necessary entry to this effect should be made in her service book.
2. These orders are final and will not be revoked at any stage.

(SAMINA GHANI)  
District Education officer  
(Female) Peshawar

1389-93

Endst: No. \_\_\_\_\_ /P.F/Mst:Robina Begum PSHT GGPS Lalma Razim Khan Dated 29/8/2022

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. DMO/EMA Peshawar.
3. SDEO (Female) Town-IV Peshawar along with s/Book with reference to her letter No.432 Dated: 18/08/2022
4. Assistant Programmer Local Office, Peshawar.
5. Official concerned.
6. Master file

Dy: District Education Officer  
(Female) Peshawar

رجسٹر حاضرہ مدرسین بابت ماہ اگست ۱۹۵۷ء

18

درجہ اول مدرسین، درجہ دوم مدرسین، درجہ تیسرے مدرسین، نام مدرسین

ردیف	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ	ردیف						
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5	Nag	11:30	Nag	7:00	Zahida	11:30	Zahida	7:00	Shahna	11:30	Shahna	7:00	Pbl	11:30	Pbl	7:00	5
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7																	7
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9																	9
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28																	28
29																	29
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سونا

ردیف	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ	نام مدرسین	تاریخ
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KHURSHID PRINC KHAN Govt. High School Malir

CHARGE RELINQUISH REPORT

D  
13

I hereby relinquish the charge of the post PSHT with reference to Order dated: 27/08/2022 received on 29/08/2022 under protest as I am going to contest for my legal rights before the court of Law.

Head Mistress  
GGPS  
Lalma Razam Khan  
Dated: 01/09/2022

(ROBINA BEGUM)  
PSHT  
GGPS Lalma Razam Khan  
Badh Ber, Peshawar

Head Mistress  
GGPS  
Lalma Razam Khan  
Badaber

Head Mistress  
GGPS  
Lalma Razam Khan  
Badaber

Government of Khyber Pakhtunkhwa  
Accountant General Khyber Pakhtunkhwa, Peshawar  
Arrear Payments (05.04.2023)  
(NOT A MONTHLY SALARY STATEMENT)



Personal Information of Mrs ROBINA BEGUM d/w/s of HAKEEM ULLAH KHAN  
Personnel Number: 00101610 CNIC: 1730125320014 NTN:  
Date of Birth: 01.01.1965 Entry into Govt. Service: 24.02.1983

Employment Category: Pension Roll / DCS

Designation:

80649315-DISTRICT GOVERNMENT KHYBE

DDO Code: PR4457-PENSION (SUPERANNUATION & RETD: ALLOW) OTHER

Payroll Section: 002

GPF Section: 001

Cash Center:

Vendor Number:

Pay and Allowances:

Pay scale: Existing Pensioners Pay Scale Type:

BPS: 15

Pay Stage: 00

Wage type	Amount	Wage type	Amount
4050 Commutation (SELF)	2,054,975.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
4064 Recovery Pays & Allowance	-240,700.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Gross Pay (Rs.): 2,054,975.00 Deductions: (Rs.): -240,700.00 Net Pay: (Rs.): 1,814,275.00

Payee Name: ROBINA BEGUM

Account Number: 3106137465

Bank Details: NATIONAL BANK OF PAKISTAN, 231404 ARBAB ROAD PESH ARBAB ROAD PESH,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESHAWAR

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: robinabegum982@gmail.com



OFFICE OF THE HEAD TEACHER GGPS LALMA RAZIM KHAN PESHAWAR

DATE \_\_\_\_\_

15

SERVICE VERIFICATION

It is certified that Mst: Robina Begum Ex-PSHT BPS-15 GGPS Lalma Razim Khan Peshawar has served in the Elementary and Secondary Education Department KPK since 24-02-1983.

At the time of retirement she was serving as PSHT at GGPS Lalma Razim Khan Peshawar. She has retired from service on 23-06-2022 medical grounds.

45  
Assistant  
Sub Divisional Officer (F)  
Circle B/Bher Peshawar

16/01/2023

45  
A. Khan  
16/1/2023  
SDEO (F)  
T-4 Peshawar

45  
Dy. District Education Officer  
(Female) Peshawar

HEAD TEACHER  
GGPS LALMA RAZIMA  
PESHAWAR

45  
Headmistress  
GGPS  
Lalma Razim Khan  
Badaber

To

(16)

F

DISTRICT EDUCATION OFFICER, female.  
Education Department, Peshawar.

**SUBJECT:** DEPARTMENTAL APPEAL / REPRESENTATION FOR PAYMENT OF SALARIES SINCE 24.06.2022 TILL 31.08.2022 DUE TO THE FACT THAT RETIREMENT ORDER OF THE APPELLANT WAS ISSUED ON 27.08.2022, RECEIVED BY THE APPELLANT ON 29.08.2022, WHEN APPELLANT WAS ON DUTY IN CONSEQUENCE WHEREOF APPELLANT IS ALSO ENTITLED TO RECEIVE THE INCREASE IN SALARY WITH EFFECT FROM 01.07.2022 WHICH WILL ULTIMATELY STIMULATE THE PENSION OF THE APPELLANT.

**Prayer:** That on acceptance of this Departmental Appeal / Representation, the Appellant may please be paid her Salary till 31.08.2022 along with increase in Salary with effect from 01.07.2022 and recalculation and payment of pension / pensionary benefits on the basis of increased salary with effect from 01.09.2022, with such other relief as may deem fit in the circumstances of the case, may also be granted.

Respected Sir / Madam,

I, ROBINA BEGUM, Retired PSHT, Government Girls Primary School, Lalma Razam Khan, Badhber, Peshawar R/o Moh. Hussain Khan Vill & P/O TAKKAR TEH. TAKHT. I - BHAI MARDAN, submit instant Departmental Appeal / Representation for your honors sympathetic and benevolent considerations as under:

1. That, Appellant was inducted into service on 24.02.1983 as P.T.E Teacher and performed duties till 31.08.2022.

2. That, during the course of employment, the Appellant fell ill hence was referred to the Standing Medical Board by the Competent Authority, where the Appellant was declared as medically unfit for future employment, hence the Departmental Authority issued her Retirement Order on Medical Grounds on 27.08.2022, which was received by the Appellant on 29.08.2022.
3. That, Appellant performed her duties till 31.08.2022, however as per contents of Retirement Order, the Appellant's Application for retirement on Medical Grounds was accepted with effect from 23.06.2022.
4. That, at the relevant time, when the retirement Order of the Appellant was issued, she was on her duty.
5. That, from the Final Settlement of the Appellant, the Salaries / Perks etc received by the Appellant was deducted as she was considered as retired from 23.06.2022.
6. That, when inquired upon from the Office, she was not replied satisfactorily for the action taken against her hence she relinquishes the charge of the post held by her under protest.
7. That, an Application, to this effect, was also submitted by the Appellant on 14.09.2022 but the Department paid no heed to the request of the Appellant, hence this Appeal on the following amongst other grounds:

GROUNDS:

- A. That, actions and inactions of the Educations Department are illegal, unlawful, void and ineffective.
- B. That, same is against the principles of Natural Justice, also.
- C. That, it is the fundamental and legal right of the Appellant to have been paid for the services rendered by her.
- D. That, acceptance of the Appellant's request for retirement retrospectively, is not warranted under the law.
- E. That, deducting the salary of the Appellant from 23.06.2022 is also an illegal and unlawful action of the Department.

- F. That, Appellant got retired on medical Grounds on 27.08.2022, which Order was received by the Appellant on 29.08.2022 and she performed her duties till 31.08.2022. (18)
- G. That, pay, perks and wages etc are considered as continuous and recurring cause of action which could be agitated any time before the legal and proper forum.
- H. That, the Department / Competent Authority has malafidely issued the Retirement Order of the Appellant with retrospective effect i.e. 23.06.2022, with the intention that Appellant may not get increase in salary effective from 01.07.2022.
- I. That, with the enhancement of salary with effect from 01.07.2022, the Appellant's Pension will also be recalculated and she will be paid her monthly Pension with effect from 01.09.2022 instead of 24.06.2022.
- J. That, it is the constitutional and fundamental right of Appellant / Applicant to have receive her due Pension even otherwise as per law formulated by the Judgments of Superior Courts, Pension is no more a bounty rather the same is a right of the incumbent who had rendered valuable services to the state / Department.
- K. That, there is no other source of Income of the Appellant.

It is, therefore, requested that subject Appeal be accepted as prayed for:

Appellant / Applicant



ROBINA BEGUM,  
Retired PSHT,

GGPS, Lalma Razam Khan,  
Badh Ber, Peshawar.

R/o M/s H. HUSSAIN KHAN

VILL & P/O TAKKAR

TEH: TAKHTI-BHAI DITI MAI

No. 1438

RGL38434794

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Stamps affixed except in case of  
uninsured letters of no more than  
the initial weight prescribed in the  
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Insured

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ACKNOWLEDGEMENT DUE CARD (Registered)

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(پست کوڈ گمانہ پر ہے)





**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email emisfeshawar@gmail.com**

(22)

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No. 7601 / Estab-II/

P/F Robina Begum Ex-PSHT GGPS  
Lalma.RAzim KhN

Dated: 23 / 09 / 2023


To,

Mst. Robina Begum,  
Ex-PSHT GGPS Lalma Razim Khan,  
Town-IV, Peshawar

Subject: - **DEPARTMENTAL APPEAL.**

Memo:

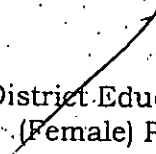
Reference to the subject noted above your appeal for the mentioned purpose is hereby regretted by the Department with the clarification that you have been retired on medical ground in the light of recommendation of Standing Medical Board, held on 25-05-2022 on your own request with effect from 23-06-2022 (A.N)

  
Dy. District Education Officer,  
(Female) Peshawar.

Endst: No. \_\_\_\_\_

Copy of the above is forwarded for information to the:

1. SDEO (F) Town-IV Peshawar w/r to letter No.1272 dated. 04-08-2023.

  
Dy. District Education Officer,  
(Female) Peshawar.



بعدالت جناب خیبر پختونخواہ سروس ٹریبیونل، پشاور

مناجب Appellant

Govt. of KPK etc.

بنام Rubina Begum.

مورخہ

مقدمہ

دعوی

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور کے لیے بلال احمد کے زنی ایڈووکیٹ سپریم کورٹ آف پاکستان مقرر کر کے اقرار کیا جاتا ہے۔ کہ وکیل موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے، جواب دہی اور اقبال دعوی اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعوی اور درخواست ہر قسم کی تصدیق ذرائع پر دستخط کرائے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے۔ اور اس کا ساختہ پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا یا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

الرقوم

بمقام

Attested & Accepted

bilalahmad78@gmail.com

Bar Council No. bc-11-1062

Mobile No: 0300-9020098