FORM OF ORDER SHEET

Court of Appeal No. 2339 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/11/2023	The appeal of Mst. Shamim Akhtar presented
	· · ·	today by Mr. Muhammad Ghazanfar Ali Advocate. It is fixed
ء 	,	for preliminary hearing before touring Single Bench at
		D.I.Khan on
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		By the order of Chairman
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TRIBUNAL PESHAWAR

In service Appeal No. <u>2339</u>/2023

1 Page

Shamim Akhtar VERSUS (Appellant)

Govt. of KPK etc (Respondents)

S. No.	Particulars of documents	Annexure	Page
1.	Memorandum Service appeal with affidavits		1-8
· 2.	CM petition with affidavit		9-10
3.	Copy of the transfer order dated 20/12/2022	A	11_13
4.	Copy of the impugned order dated 26/05/2023	В	14
5,	Copies of the departmental appeal along with postal receipt	C & D	15-17
6.	Vakalatnama	 .	18

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Dated: 14 /11/2023

Humble Appellant

Shamim Akhtar Through Counsel

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Muhammad Ghazanfar Ali Advocate High Court

TRIBUNAL PESHAWAR

Service Appeal No.___

2389 /2023

Mst. Shamim Akhtar wife of Muhammad Tahir Khan resident of Dera Ismail Khan presently serving as SDEO (F) Daraban, District Dera Ismail Khan

.... <u>Petitioner</u>

<u>VERSUS</u>

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Education Department KPK Peshawar.
- 2. The Secretary Education Department Khyber Pakhtunkhwa Peshawar.
- 3. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 4. District Education Officer (Female) Dera Ismail Khan.
- 5. District Accounts Officer, Dera Ismail Khan.
- 6. **Mst. Noor Khadija** serving as SDEO (F) Wana South Waziristan.

......Respondents

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974 AGAINST THE POLITICAL BASED POSTING TRANSFER NOTIFICATION#SO(MC) E&SED/4-16/2023 DATED 26/05/2023 VIDE WHICH THE APPELLANT IS TRANSFERRED FROM SDEO (FEMALE) DARABAN TO SDEO (F) JANDOLA DISTRICT TANK.

PRAYER

On acceptance of this service appeal the impugned transfer order No. SO(MC)E&SED/4-16/2023 dated 26/05/2023 may kindly be set aside. Similarly any other order, if issued by the respondents upon the departmental appeal of appellant may also be set aside.

3

Any other relief deemed appropriate in the given circumstances may also be granted to the appellant in the large interest of justice.

Note: Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

Respectfully Sheweth;

The appellant humbly submits as under;

- 1. That appellant has been serving the Elementary & Secondary Education Department Khyber Pakhtunkhwa as SDEO (Female) and always performed her duties with zeal, zest and to the entire satisfaction of her superior and did not leave any stone unturned towards her high ups. In this respect service record of appellant is very much evident.
- 2. That appellant was transferred to Samar Bagh (Khall Dir lower) vide notification No. SO(SM)E&SED/3-2/2018 dated 21/02/2019 and thereafter transferred from Khall Dir lower to SDEO (F) Kakki Bannu vide notification No. SO(SM)E&SED/3-2/2018 dated 05/03/2019 and the appellant despite of lady, performed her duties in far-flung areas of the province as per wishes of her high-ups.
- 3. That the appellant was transfer from SDEO Kakki Bannu to SDEO Parova Dera Ismail Khan vide notification No. SO(MC)E&SED/4-16/2022 dated 10/11/2022. Appellant was

performing her duties as SDEO (F) Parova with zeal, zest and to the entire satisfaction of her superiors but ironically the appellant was once again transferred from SDEO (F) Parova to SDEO (F) Daraban District Dera Ismail Khan vide office order No. SO(MC)E&SED/4-16/2022 dated 20/12/2022 on the basis of political victimization and the private respondent#4 is posted against the post of appellant. Copy of the transfer order dated 20/12/2022 is annexed as **Annexure-A**.

4. That the respondents once again transferred the appellant from SDEO (F) Daraban District Dera Ismail Khan to SDEO (F) Jandola District Tank vide impugned transfer order No. SO(MC)E&SED/4-16/2023 dated 26/05/2023 without any lawful justification. Copy of the impugned order dated 26/05/2023 is annexed as <u>Annexure-B</u>.

- 5. That appellant preferred a departmental appeal/representation duly forwarded to the respondent#2 on 14/07/2023 which is still pending for decision. Although 90 days has been lapsed but the departmental appeal is not been decided as yet, which also shows mala-fide on the part of respondents. Copies of the departmental appeal along with postal receipt are annexed as **Annexure-C & D**
- 6. That feeling aggrieved by the impugned transfer order dated 26/05/2023, the appellant does not have any other efficacious remedy but to invoke the appellate jurisdiction of this Honourable Tribunal, by way of instant appeal, on inter alia the following grounds:-

GROUNDS:-

A. That the impugned transfer orders dated 26/05/2023 is premature, illegal, against service laws and policy, hence, liable to be cancelled. B. That it is humanly impossible for a woman in the milieu of Pakistani society to look after her family and carry out her professional obligations at the same time under such circumstances.

- C. That the impugned transfer order is based on political influence, hence, not sustainable in the eyes of law as well as service policy.
- D. That as per policy the posting tenure is minimum three years but in the instant case the appellant is transferred only after few months which clearly reveals that the appellant is politically victimized.
- E. That the appellant diligently served in far-flung areas of the province, she has undoubtedly proven her dedication and competence. However, Jandola District Tank presents a unique set of challenges, particularly for a woman from a settled area because the security situation in Jandola District Tank, being a war-affected tribal area, is undeniably precarious. It is crucial to consider the safety and well-being of personnel, especially when their deployment may pose a potential risk to their security. Appellant is not only an experienced and competent professional but is also an eastern woman, which adds an additional layer of complexity to her posting in such a challenging environment. Hence, on this sole ground the impugned transfer order is liable to be cancelled.
- F. That appellant requests the reconsideration of the impugned transfer order and the cancellation of the same. It is not my intention to undermine the importance of equitable distribution of resources and personnel, but rather to highlight the unique circumstances that may jeopardize her safety and effectiveness in this particular posting.

G. That the impugned transfer notification dated 26/05/2023 is against law and facts. Moreover, the impugned transfer order has been issued just after few months of previous transfer which is pre-mature and on the basis of political influence, hence, on this sole ground, the impugned transfer order is liable to be set aside.

. 6.

- H. That Counsel for the appellant may please be allowed to raise additional grounds during the course of arguments.
 - It is therefore respectfully prayed that the instant appeal may please be accepted as prayed for in the headnote and contents of appeal.

Dated: 14/11/2023

Humble Appellant

Shamim Akhtar Through Counsel

Muhammad Ghazanfar Ali Advocate High Court

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<u>TRIBUNAL PESHAWAR</u>

In service Appeal No.____/2023

Shamim Akhtar VERSUS (<u>Appellant</u>) GOVT of KPK etc (Respondents)

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Court.

Dated ____/11/2023

Appellant

NOTE:

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated ____/11/2023

Appellant's counsel

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<u>TRIBUNAL PESHAWAR</u>

In service Appeal No.____/2023

Shamim AkhtarVERSUSGOVT of KPK etc(Appellant)(Respondents)

<u>AFFIDAVIT</u>

I, **Shamim Akhtar**, the appellant herein, do hereby solemnly affirm on oath:-

- That the accompanying appeal has been drafted by counsel following my instructions;
- That all parawise contents of the appeal are true and correct to the best of my knowledge, belief and information;
- 3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Deponent

Dated 14/11/2023

Identified By:tron zanfar Ali⁄ Muhammad Gl Advocate High Court

TRIBUNAL PESHAWAR

CM No. ____/2023

In service Appeal No.____/2023

Shamim Akhtar VERSUS Govt. of KPK etc APPLICATION FOR INTERIM RELIEF BY SUSPENDING THE OPERATION OF IMPUGNED TRANSFER ORDER DATED 26/05/2023 TILL FINAL DECISION OF THE INSTANT SERVICE APPEAL.

Respectfully Sheweth,

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4.

- That the above titled service appeal is being filed before this Honourable Tribunal and the instant application may kindly be considered as part of it.
 - That the appellant has prima facie case and balance of convenience is also tilts in favour of the appellant.
 - appellant to Jandola District Tank on political victimization and if the operation of impugned transfer order is not suspended then the appellant will face irreparable loss and instant appeal will become futile.
 - That this honourable tribunal has got vast and ample powers to entertain the application in hand.

It is, therefore, humbly requested that in view of the above submissions, the interim relief may kindly be issued in favour of appellant till the final decision of the instant service appeal.

Humble Appellant

Dated: ___/11/2023

Shamim Akhtar Through Counsel

Muhammad Ghazanfar Ali Advocate High Court

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TRIBUNAL PESHAWAR

In service Appeal No.____/2023

Shamim AkhtarVERSUSGovt of KPK etc(Appellant)(Respondents)

AFFIDAVIT

I, **Shamim Akhtar**, the appellant herein, do hereby solemnly affirm on oath:-

- 1. That the accompanying CM petition has been drafted by counsel following my instructions;
- 2. That all parawise contents of the CM petition are true and correct to the best of my knowledge, belief and information;
- 3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated _14/11/2023

Deponent

Identified_By:than

Muhammad Ghazanfar Alí Advocate High Court

BETTER COPY

GOVERNMENT OF KHYBER PAKE TUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

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NOTIFICATION

Dated: 20th December, 2022

<u>No 50 (MC) E&SED/4-16/2022/Posting /transfer/MC/:</u> The following posting/transfer are hare by ordered with immediate effect, in the best public interest:

Sr.No	Name of officer	From	To	Pemaiks
1	Mst. Shamim akhter MC BS-17	SDEO Parova	SDEO (Female)	
		D.I.Khna	Daraband D.I.Khan	
2	Mist. Nighat Shaheen	SDEO (Female)	SDOE Prova D.I.Khan	Vice S.No 1
		Kakki Bannu	· ·	ļ

2. The above posting/transfer will take effect from the promot on of the present incumbent to deputy DEO (Female BS 18).

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

Endst: of ecen No& date:

Copy forwarded for information to the:.

- 1. Accountant general Khyber pakhtunkhwa, Peshawar.
- 2. Director, E&SE Khyber pakhtunkhwa, Peshawar.
- Director EivilS, E&SE Department with the request to upload the same on the official website of the department.
- 4. District education officers (Femåle) Bannu D.I. khan.
- 5. District accounts officers bannu D.I.Khan.
- 6. PS to minister E&SF Khyber pakhtunkhwa.
- 7. PS to secretary, E& SE department Khyber pakhtunkhwa.

8. Master file

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C. A. STORAGE

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NASEER ABBAS KHALIL SI:CTION OFFICER (MANAGEMENT)

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oovernment of Keyber Pakhtunkhwa ELEMENTARY AND SECOND, RY EDUCATION DEPARTMENT Block-"A" Opposite MPA's Hestel, Civil Secretariat Peshawar 1000 110 U91-022 3,52)

NORTH STATEN

Dated Peshawar 10th November, 2022

NO.SO(MC)E&SED/4-16/2022/Posting/Transfer/MC/: The following posting/ transfer. are hereby ordered with immediate effect, in the best public interest: -

No	Name of officer	From	То	Remarks
1	Mat. Shamim Akhtar MC BS-17	- A. 2010 M.	SDEO Parova	Vice SINo.2
2.	Mst Nighet Shaheen MC BS-17		Dil Khan SDEO Kakki Bannu	Vice S.No.1

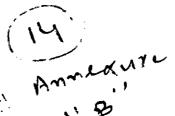
RETARY TO GOVE OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

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Copy forwarded for information to the:

- 1. Accountant General, Khyber Pathun Hya Pe, hawer
- Director, E&SE Khyber Pakhtunkhwa Reshaw I 2.
- 3. Director EMIS, E&SE Department with the request thrupload the same on the official website of the department
- 4. District Education Officers (Female) BannuD () Khan
- 5. District Accounts Officers Bannuroli Khan
- 6. PS to Minister E&SE Knypen Rekstunkhwa
- 7. PS to Secretary, E&SE Department Khyber Flakhtunkhwa
- 8. Mäster file.

CASEER ABBAS KHAUILI



GOVERNMENT OF KHVBER PAKHTUNEHWA ELEMENTATO AND SECONDARY DEL VEDE OF ALE DETER ERCLETATOPPOSITE MEAN DE DEL VEDE FOLLEMAT PLOUS PROCESSION PROCESSION PROCESSION and the second

NOTIFICATION

sc.	Name & Designation	1 zean	to the best per states	$V_{\mu\nu\mu}$
NO 1	Samina Shahoaz 11248-17	li SDED Lemale Jandola Lauk ' SDEO Female	 Constant and the second second	
	Shanishnd Bibi 557-68-17	Pabarpur Diktore	E MGE - E M The Existenciation	. •
	Noor Khadija MC 935, F	Mana Couth Wana Couth Waxastan	SDLO Female Jand	
	Shamim Akhtar NC BS 17	¹ SDEO (Female) Daraband Kalan	, SDLO Heman Ser Fank	

No TA/DA is allowed. 2.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

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- Endst: of even No.& date: Copy forwarded for information to the -1 Accountant General, Khyber Pakhtunkhwa, Peshawar, 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar 3. Director EMIS, E&SE Department with the regulast to upload the name of the directored

 - websile of the department 4 District Education Officer (Fomale) D ! Khan

 - 5. District Accounts Officers D.I Khan. 6 PS to Advisor to Chief Minister on E&SE Khyber Pakhlunkhwa
 - PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
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SECTION OFFICER (Management Codres

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GOVERNMENT OF KHYBER PARHTUNKHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Block A Opposite MPAs Hostel Civil Secretariat Peshawar Phone 091-9210626

Dated 26th May 2023

NOTIFICATION

NO. SO (MC) E&SED/4-16/2023/posting/Transfer/MC/DIR: The following postings/transfer are hereby ordered with immediate effect in the best public interest.

S NO	Name & designation	From	То	Remarks
1.	Samina Shahnaz MC BS-17	SDEO Female Jandola Tank	SDEO Female Paharpur	V.S No.2
2.	Shamshad Bibi	SDEO Female	Report to	
· · · ,	MC BS-17	Paharpur DI Khan	Directorate of E&SE	
3.	Noor Khudija	SDEO	SDEO Female	V/S-No 4
	MC BS-17	(Female) Wana South Waziristan	Daraband Kalan D.I Khan	
4.	Shamim Akhtar	SDEO	SDEO Female	V.S No. 1
•	MC BS-17	(Female) Daraband	Jandola Tank	
		Kalan D.I Khan		2

2. No TA/DA is allowed

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA E&SE DEPARTMENT

Endst of even No & date Copy forwarded for information to the:-

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- 3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 4. District Education Officer, (Female) D.I Khan.
- 5. District Accounts Officers, D.I Khan.
- 6. PS to Advisor to Chief Minister on E&SE, Khyber Pakhtunkhwa.

7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.

IMRAN ZAMAN

SECTION OFFICER (Management Cadre)

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- that the appellant was transform (from SDEC₁SE), day Knikk (from SDEC₁SE), day (knikk (from SDEC₁SE), day (knikk (from SDEC)), DEO, Paroa, Deta filmail Rhan vide Notification (ke, SOENE), 28550 16/2022 dated 10/31/2022.
- 4 That the appellant was performing her actus an exact and to the entire satisfaction of ner from SDEU(Femble : Tabla Transferred to SDEO(F), Daraban Kalan, Distr; Durkhan vide office order the SO(MC), E&SED/4 16/2022 dated 20/12/2022, on the basis of political victimization : copy of the transferred is annexed.
- 5. That it is pertinent to mention here that one SDEO was transferred from SDEO(F) paroa to SDEO(Female), Kakki Bannu vide notification NO.SOMC) E&SED/4-16/2022 dated 10/11/2022 but she did not obey the transfer order That it is also pertinent to mention here that no sent of SDEO(Female), is

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	3 that is good self has got vari lower to accept the instant Departe end typeai
	It is therefore humbly requested that the implighted than there is the formation of the set as the set as the SECO/4-16/22023 dated 26 th May, 2023 may kindly be set as ide

With Warmest Regard ŦÈ Ż 14 - 0

Dated, 14 07-2023

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Mist: Shanilm Akhtar, SDEO(Female), Daraban Kalan, Distt; D.J.Khan

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Copies in advance to:

The Secretary, Elementary & Secondary Education, Khyper Pakhtunkliwa, Pessawar The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Pesha var. 1. •

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Τo

The Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa

Through Proper channel

SUBJECT:- <u>DEPARTMENTAL APPEAL/REPRESENTATION AGAINST</u> <u>THE POLITICAL BASED POSITNG TRANSFER NOTIFICATION # SO</u> (M) <u>E&SED/4-16-2023</u> <u>DATED 26TH MAY 2023</u> <u>VIDE WHICH THE</u> <u>APPELLANT IS TRANSFERRED FROM SDEO FEMALE DARABAN</u> <u>KALAN DISTRICT DI KHAN TO SDEO FEMALE JANDOLA SOUTHW</u> <u>WAZIRISTAN.</u>

Respected Sir

Appellant humbly submits as under:-

- 1. That the appellant has been serving the E&SE Department Khyber Pakhtunkhwa as SDEO (Female) and always performed her duties with zeal and zest any stone unturned is very much evident.
- 2. That the appellant was transferred samar Bagh (Dir Lower) vide notification No. SOM E&SED/3-2/2018 dated 21.02.2019 and therefore transferred from Dir Lower to SDEO Female Kakki Bannu vide notification No SOMC E&SED/3-2/2018 dated 05.03.2019 and the appellant dispite of lady performed her duties in the far-flange areas of the province as per wises of her higher. (Copies annexed for ready references).
- That the appellant was transferred from SDEO (Female) Kakki Bannu to SDEO Paroa D.I Khan vide.notification No SQMC E&SED 4-16/2022 dated 10.11.2022.
- 4. That the appellant was performing her duties as SDEO (Female) Paroa with zeal and zest and to the entire satisfaction of her from SDEO Female paroa to transferred to SDEO (Female) Paroa to transferred SDEO Female Draban Kalla District DI Khan vide Office Order No. SO MC E&SED/4-16/2022 dated 20.12.2022 on the basis of political victimization.

- 5. That it is pertinent to mention that one SDEO was transferred from SDEO Paroa to SDEO Kakki Bannu vide notification No SOMC E&SED/4-16/2022 dated 10.11.2022 but she did not obey the transfer order that it also pertinent to mention here that seat SDEO Female lying vacant in Tehsil Draban Kalla but the impugned transfer order is based on political influence hence not sustainable in the eye of law as well as service policy.
- 6. That it is stated to your kind owner that I could not complete my normal tenure to here and transferred to Sub Division Draban Kalla District DI Khan to Sub Division Jandola, South Waziristan once again remote area exit after four month without completion tenure.
- 7. That it is lodged appeal to your good office due response is awaited that in the meanwhile file service appeal before service tribunal, vide case No 802/2023 dated April 2023 case is under trail against the impugned transfer order are dated 26.06.2023 is liable to be set aside.

8. That is good self has got vest power to accept the departmental appeal.

It is therefore most humbly requested that the impugned transfer order SOMS E&SED 4-16/2023 dated 26th May 2023 may kindly be set aside.

Mst Shamim Akhtar SDEO (Female), Daraban Kalan District DI Khan

Copies in advance to:-

- 1. The Secretary, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

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Service Tribinal pegnower in the Cinut: Lepk 14 Shaming Alleter دعویٰ یا جرم __ Service Append _ print باعث تحريراً نكه مقدم مندرجه بالاعوان شرا براغطرف واسط بروكما وجوابد عى برائ بيش باتعفيه مقدم بمقام Mohammad Epice And Advocate کومسب و کل شرائط و دیکی عود کیا ہے ، کریک بروشی پر فوق بارو بر و معالی دو بر دعدالت حاضر او تا دود کا - اور بروقت ایکا و - برجائے مقدمد دیکل مدا حب موسوف کوا الملاح ایکرمانیر موالت کر ساکا اکریٹی پرمنابرخا مترند موارد اود مقدمہ یمرکی خیرما منردکا کی جدے کمکا طود مریرے برطالب ہو کیا۔ او مساحب سوسوف است کم مرج و درداد ندول کرد و مکل مناحب موسوف مدور منام محموی ک ملاده کی جک با مجموی ک اوالات سے بہلے با بیچے بامرد العليل مى دى كرتے ك الدرارند بول کے ستار ایکن صاحب مہم ف صدر مقام بجمری کے طادہ کمی جگہ یا بجمری کے ادقات سے پہلے یا بچے یا مرد السلیل میروی کر لے کے الدر ارت مول کر اور متد سرمدر کومرک اس اود او جگد ما من مون یا برداد تعلیل با تجرری کاوقات سے ایم بیج بیش مونے مظهر کوکو کی تعدّ ان بانچ قواس کر در داد با اس ک داسلے کی معادشہ ک از کر بلے با محار داہی کرنے سے کی موسوف ا مددار ند موں کے بر محکوکی ساخت باد اخلد معاجب موسوف طن کر اد ذات خود منظور وألول موكاراد مساحد وموال كومرض ومؤلوم بإجراب وتركن يادد فحواست اجراح واكرى وأنطره الى الألم كحرافى وبرخم ورخواست برد متخط وتسدير تركر في ك می احتیاد وال - اور کی تلم یا اگری آ نے اور ارتم کا دروید وصول کر سے اور وسید وسینه اور داخل کر نے اور ایر کم کے دیاں وسینه اور اس برالی بادان با مدد فیل بر علو کر ہے ، اقبال دورڈ کا میں اعتبا ، دکا ؛ اور لاسورت مقرر ہونے تاریخ فیش مقدمہ ندکورہ ہےدن از کچھری مدور ہے دی مقدمہ خدکورہ نظر دانی و اتبل دکتر انی و برآ رک ، ستوب باستونی ذکری بکترب با درد ست بحم احتاق با ترق یا کرل دلی بخی از لیسل جزائے اکرک بجی ساحب موسوف کو اشرط ادالی طیحدہ میںنہ ہی دکا احتیاد ادکا الاقمام ما المت بوداخت ما حنب موموا بال کرده المات فودمنقود و قول بوکارادد بسرورت خرددت مدا حب موسول کو بر مکل اعتبار بوکا کد متلدمد خدکود، با استف ک جزء ك كاردال يا بعودت دونواست نظرو ف الط وأكراني باديكر معالمه مقدمة لمركور ممى دوس وكمل با ورس كواسية بمباسط بالسية عمراه مقردكري .. دادرا يس مشيرة الون كو محک برامر ش دی اور دینے الاترابة = مسل بول ک ، من ماهب موسوف کو مامل این اور دو دان مقدمد ش جر کو برجاند الواد برایا ، دو ماحب موسوف کائن بولا ، مرماحب موم ، کو اول لیم تاریخ وال سے بہل ادار کردن کا رو ماحب موسوف کو اور العماد بوکا کردہ مقدمد کی جدو ل ند کر می ادر المن مودت بین مراکد کا مطالبہ کی قسم کا مد سب وسوف کے برطا الم تین اوگا۔ لبدادكالت ناسكعدياب تاكرمندر مضمون وكالت نامدين لياب اوراجعي طرر سمجوليا باور منظوم الغب____د العيسي Petitions: Shomim Allutur