

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 9054

Dated 15-11-23

C.M. Application No: \_\_\_\_\_/2023

IN

Service Appeal No. 1827/2022


**Fazal-e-Rabbi**

**VS**

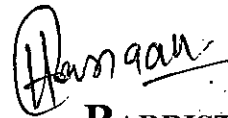
**Government of KP and Others**

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APPELLANT / APPLICANT

Through

  
**BARRISTER**  
**MUHAMMAD HASSAN ADIL**

Dated: 10-11-2023

①

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

C.M. Application No: \_\_\_\_\_/2023

IN

Service Appeal No. 1827/2022

**Fazal-e-Rabbi**

Son of Sahar Gul,  
Resident of Flat No. 840, Mohalla Kochi Khan, Sard Chah Gate, Peshawar

....APPLICANT

*Vs*

**1. Government of Khyber Pakhtunkhwa**

Through Chief Secretary, Civil Secretariate,  
Peshawar

**2. Secretary to Government of Khyber Pakhtunkhwa,**

Health Department, Civil Secretariate,  
Peshawar

**3. Director General (DG),**

Health Service, Warsak Road,  
Peshawar

**4. District Health Officer (DHO),**

Grand Trunk Road,  
Tehsil and District Peshawar.

....RESPONDENTS

-----  
**APPLICATION FOR INTERIM RELIEF THEREBY  
RESTRAINING THE RESPONDENTS FROM MAKING  
APPOINTMENTS AGAINST THE VACANCIES OF JUNIOR  
CLERK IN THE DIRECTORATE GENERAL, HEALTH  
SERVICES, KHYBER PAKHTUNKHWA.**  
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**Respectfully Sheweth;**

- 1) That the above-captioned appeal is pending for adjudication before this Hon'ble tribunal and is fixed for 14.12.2023.
- 2) That the brief facts necessitating the filling of instant application are that on 11.10.2023, the Departmental Promotion Committee, in its meeting, recommended the promotion of Naib Qasids to the post of Junior clerk (BPS-11) with immediate effect, which was duly followed and they were promoted to the said post on 30-10-2023 by the promoting authority.

**(Copy of the impugned list of the Naib Qasids' promotion to the post of junior clerks is hereby annexed as Annexure – "A" respectively)**

- 3) That the matter regarding the promotion of Class – IV to the post of junior clerk in Directorate Health department is already sub-judice before this Hon'ble tribunal, wherein on the previous date, the Hon'ble tribunal has ordered the respondents to produce the record of junior clerks posts and vacancies since 2010.
- 4) That the respondents tried to mislead this Hon'ble tribunal because in their reply / comments, submitted before this Hon'ble tribunal, they have specifically contended that not even a single vacant post of junior clerk is available in the respondent's department, in response to which the appellant submitted an application for bringing on record some documents regarding the availability of vacant posts in the department. However, the department is now, illegally, promoting junior employee / Naib Qasids to the post of Junior clerks just to fill up the vacancies, so that the department could contend regarding the non-availability of any post, which clearly transpires *mala fide* on part of the respondents.
- 5) That petitioner has prima-facie, a strong case and is very sanguine about its success, besides, balance of convenience also leans in favour of grant of interim relief.
- 6) That if the respondents were not restrained from promoting other employees and leaving the present appellant / applicant unpromoted despite his being eligible for promotion and no fault on his part, such act of the respondent's department would cause an irreparable loss to the present applicant / appellant.
- 7) Any other ground deemed appropriate would be raised at the time of arguments, with the permission of this Hon'ble tribunal.

**PRAYER:**

It is therefore, humbly prayed that on acceptance of this application, the impugned promotions to the post of junior clerk may kindly be suspended and the respondents be restrained from making promotions against the impugned posts till the final decision of the appeal.

APPLICANT / APPELLANT

Through

BARRISTER

MUHAMMAD HASSAAN ADIL

Dated: 10-11-2023

**AFFIDAVIT**

I, **Fazal-e-Rabbi** Son of Sahar Gul, Resident of Flat No. 840, Mohalla Kochi Khan, Sard Chah Gate, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble tribunal.

DEPONENT





**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services  
Peshawar and not to any official by name E-Mail Address [K.P.Kohy@yahoo.com](mailto:K.P.Kohy@yahoo.com)  
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

(4)

**OFFICE ORDER**

*Annexure 'A'*

Consequent upon approval accorded by the Departmental Promotion Committee in its meeting held on 11/10/2023, under the Chairmanship of Director General Health Services Khyber Pakhtunkhwa, Peshawar, the following Matriculate Class-IV are hereby promoted to the post of Junior Clerk (BPS-11) against the vacant posts reserved under 33% quota with immediate effect:-

| S. No | Name of Official          | Present Place of Posting |
|-------|---------------------------|--------------------------|
| 01    | Muhammad Adil             | DGHS Office Peshawar     |
| 02    | Gulrajud Din, Naib Qasid  | DGHS Office Peshawar     |
| 03    | Musarat Shah, Naib Qasid  | DGHS Office Peshawar     |
| 04    | Sadat Khan Naib Qasid     | DGHS Office Peshawar     |
| 05    | Shehzad Ali, Naib Qasid   | DGHS Office Peshawar     |
| 06    | Sikandar Khan, Naib Qasid | DGHS Office Peshawar     |
| 07    | Abdul Aziz, Naib Qasid    | DGHS Office Peshawar     |

On their promotion to the post of Junior Clerk (BPS-11) the following Posting/transfer are hereby ordered:-

| S. No | Name of Officials           | From                     | To                         |
|-------|-----------------------------|--------------------------|----------------------------|
| 01    | Muhammad Adil               | Budget SNE (Merged area) | Ministerial Promotion Cell |
| 02    | Gulrajud Din, Junior Clerk  | Homeo Section            | Homeo Section              |
| 03    | Musarat Shah, Junior Clerk  | Gate No.4                | HRMIS Section              |
| 04    | Sadat Khan, Junior Clerk    | Medical Section          | Medical Section            |
| 05    | Shehzad Ali, Junior Clerk   | DG Staff                 | Personnel Section          |
| 06    | Sikandar Khan, Junior Clerk | Public Health Section    | Public Health Section      |
| 07    | Abdul Aziz, Junior Clerk    | DHO, Nowshera            | DHO, Nowshera              |

Arrival / Departure should be submitted to this Directorate for record.

**SD X X X X**  
Director General Health Services  
Khyber Pakhtunkhwa Peshawar

No. **2784-90** Ministerial Promotion Cell

dated **30/10/2023**

Copy forwarded to the.

- 1 AG Office Khyber Pakhtunkhwa, Peshawar.
- 2 Deputy Director (Accounts) DGHS, Peshawar.
- 3 District Health Officer, Nowshera.
- 4 Incharge Concerned Sections.
- 5 PA to DGHS Khyber Pakhtunkhwa, Peshawar.
- 6 Mr. Bilal Khan President Class-IV DGHS Peshawar.
- 7 Officials concerned.

For information and necessary action.

**Director General Health Services**  
Khyber Pakhtunkhwa Peshawar

*ATT*

Annexure "B"

(5)

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

Khyber Pakhtunkhwa  
Service Tribunal

Service appeal No.1827/2022

Diary No. 5229

Dated 9/5/2023

Fazal-e-Rabbi

-----Appellant

Versus

Govt of Khyber Pakhtunkhwa & Others

-----Respondents

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| 02    | Parawise Comments        |          | 02-03    |
| 03    | Copy of Seniority List   | A        | 04-06    |

04 Authority Letter -

07

  
Deponent

  
ATTORNEY

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

**Service Appeal No.1819 to1859 /2022.**

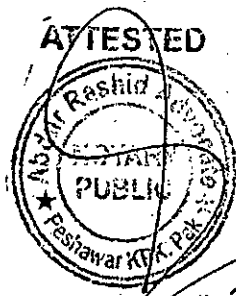
**Haroon ur Raheed &Others Vs Govt: of KP (Health ) -----Petitioner**

**AFFIDAVIT**

I Dr, Mubarak Zeb khan S/O Mr, Alam Zeb Khan DHIS Coordinator. Office of DHO Peshawar, do hereby solemnly affirm and declare on oath that content of the instant replay are true and correct to the best of my knowledge & belief and nothing has been concealed from this honorable Court. Furthermore it is added that all the 41 service Appeals having same nature & having same stance /materials.

**DEPONENT** 

Dr, Mubark Zeb  
DHIS Coordinator  
Office of DHO Peshawar  
NIC No: 17101-6493994-5



4/5/2023

**ATTESTED** 

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

*Service Appeal No. 1827/2022.*

Fazal e Rabbi

-----Appellant

**Versus**



- 1: Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Peshawar.
- 2: Secretary Health, Govt of Khyber Pakhtunkhwa Peshawar
- 3: Director General Health Services Khyber Pakhtunkhwa Peshawar .
- 4: District Health Officer, Peshawar.

-----Respondents

**PARAWISE REPLY ON BEHALF OF RESPONDENTS No. 01 to 04.**

**Respectfully Sheweth:**

**Preliminary Objections:-**

- 1. That the appellant has got neither cause of action nor did locus standi to file the instant appeal.
- 2. That the appellant has filed the instant appeal just to pressurize the respondents.
- 3. That the instant appeal is against the prevailing Law and Rules.
- 4. That the appeal is not maintainable in its present form and also in the present circumstances of the issue.
- 5. That the appellant has filed the instant appeal with mala-fide intention hence liable to be dismissed.
- 6. That the appellant has not come to this Honorable Tribunal with clean hands.
- 7. That the appeal is barred by law and limitation.
- 8. That the Honorable Tribunal has no Jurisdiction to adjudicate upon the matter.
- 9. That the instant appeal is bad for mis- joinder of unnecessary and non-joinder of necessary parties.
- 10. That there is no original or appellate order which is pre requisites of section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 hence under 2006 SCMR 1630 the honorable Tribunal has no jurisdiction to adjudicate the matter.

**FACTS**

- 1. Pertains to record.
- 2. Incorrect , Needless to mention that as the appellant is working at District level, his Seniority list is maintained in Respondent No.4 office and is attached as **Annexure-A**.
- 3. Correct to the extent of promotion of class-iv employees to the post of junior clerk on the basis of 33% reserved quota in accordance with the rules.

**ATTESTED**  
  
**EXAMINER**  
**Khyber Pakhtunkhwa**  
**Service Tribunal**




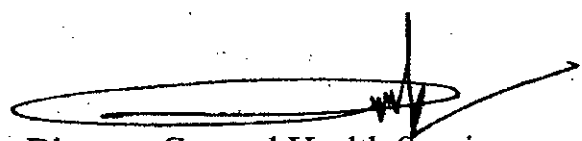
- 4. Incorrect. There is no vacant post available where the appellant may be promoted as junior clerk. It is worth to mention that no post of junior clerk has been advertised, nor did anyone recruited against the same.
- 5. Already explained in para-04.
- 6. Incorrect. Already replied in para 04 above. It is worth to mention that a joint departmental appeal has been filed in violation of the appeal rules therefore, the instant appeal is badly time barred.
- 7. No comments.


**GROUNDS:-**

- A: - Incorrect, as there is not a single vacant post of junior clerk (BPS-11) in the office of Respondent Department to which the appellant may be promoted.
- B: - Incorrect, the appellant is not entitled for promotion to the post of junior clerk as there is no vacant post of junior clerk in their share under 33% reserved quota.
- C: - Incorrect. The appellant has been placed at his proper place in the seniority list
- D: - The Respondents have already acted in accordance with law and rules.
- E: - Incorrect, already explained in above paras.
- F: - The respondents seek leave to raise additional grounds at the time of arguments.

It is therefore requested that on acceptance of the instant parawise comments the appeal of the appellant may kindly be dismissed.

  
 Chief Secretary *through*  
 Secretary Health Khyber Pakhtunkhwa  
 Peshawar  
 (Respondents No-01&02)

  
 Director General Health Services  
 Khyber Pakhtunkhwa Peshawar  
 (Respondent No-03)

  
 District Health Officer  
 Peshawar  
 (Respondent No-04)  
 Certified to be true copy  
 EXPLAINER  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

23/08/2023  
 Date of Presentation 2/-  
 Number of Pages 10/-  
 Copying 5/-  
 Urgent 15/-  
 Total  
 Name of  
 Date of Compl.  
 Date of Delivery  
 25/08/2023

Annexure A (4)

### Seniority List Of Class IV Employees Working Under DHO Peshawar

| O  | Name              | Father Name         | NIC Number      | Date of Entry in Job | Designation     | Qualification          |
|----|-------------------|---------------------|-----------------|----------------------|-----------------|------------------------|
| 1  | Zaffar Ali        | Najaf Ali Shah      | 17301-1698582-3 | 7/5/1988             | Naib Qasid      | Matric                 |
| 2  | Tahir Shah        | Amir Zada           | 17301-8905148-5 | 2/1/1992             | Chowkidar       | Matric                 |
| 3  | Muhammad Riaz     | Nasar Ullah         | 17301-1675304-7 | 16/03/1995           | Ward Orderly    | Matric                 |
| 4  | Hamad             | Shahid Hamid        | 17301-5090803-1 | 6/4/1997             | Ward Orderly    | BA                     |
| 5  | Ashfaq Ahmad      | Sulaiman Khan       | 17301-1814298-7 | 5/1/1999             | Chowkidar       | Matric                 |
| 6  | Ahmad Jan         | Ghazi Khan          | 17301-1274726-3 | 30/04/1999           | Naib Qasid      | FA                     |
| 7  | Salman Shah       | Fazle Qadar         | 17301-7456183-7 | 9/1/2003             | Ward Orderly    | FA                     |
| 8  | Muhammad Zubair   | Ibrahim             | 17301-8067632-3 | 22/11/2003           | Naib Qasid      | FA                     |
| 9  | Fazal Rabi        | Sahar Gul           | 17301-9586454-7 | 11/8/2006            | Ward Orderly    | Matric                 |
| 10 | Sahibzada Aamir   | Mukhtiar Ahmad      | 17301-05982459  | 12/8/2006            | Ward Orderly    | BA Health Diploma      |
| 11 | Muhammad Ishfaq   | Mir Akbar           | 17301-9823680-1 | 28-11-2006           | Ward Orderly    | Mphil Microbiology+DIT |
| 12 | Sohail Ashiq      | Muhammad Ashiq      | 17301-4002508-5 | 12/1/2009            | Sanitary Petrol | BA                     |
| 13 | Ghulam Mujtaba    | Ghulam Mustafa      | 17301-7148125-9 | 26/12/2009           | Ward Orderly    | BA                     |
| 14 | Ijaz Ahmad        | Taza Gul            | 17301-5419523-7 | 31-12-2009           | Chowkidar       | FA                     |
| 15 | Munir Hussain     | Faqir Hussain       | 17301-1311673-1 | 23/02/2010           | Naib Qasid      | Matric                 |
| 16 | Naveed Khan       | Muhammad Nawaz Kham | 17301-6584400-1 | 3/3/2010             | Naib Qasid      | BA                     |
| 17 | Muhammad Ibrar    | Gul Mast Khan       | 17301-4408732-9 | 4/3/2010             | Behishti        | SSC                    |
| 18 | Muhammad Sulaiman | Musafar             | 17301-6117689-7 | 24-05-2010           | Behishti        | BA                     |
| 19 | Sajjad Ahmad      | Liaqat Ali Khan     | 17301-8599458-3 | 13-06-2011           | Behishti        | FA                     |
| 20 | Torgat Auzal      | Javid Akhtar        | 16101-7487588-9 | 19-10-2011           | Chowkidar       | FA                     |
| 21 | Syed Kifayat Shah | Naurooz Shah        | 17301-1458161-3 | 31/12/2011           | X-ray Attendent | MA+ Health Diploma     |
| 22 | Saad Ullah Khan   | Sahib Zada          | 17301-16557279  | 21/12/2011           | Chowkidar       | BA                     |
| 23 | Abdul Shahab      | Abdul Jabbar        | 17301-7776929-5 | 27/12/2012           | Behishti        | MSC Economics          |
| 24 | Muhammad Imran    | Qaleem Ullah        | 17301-3090264-1 | 29/12/2012           | Chowkidar       | MA                     |
| 25 | Asif Naveed       | Naveed Ahmad        | 17301-5904442-3 | 31/12/2012           | X-ray Attendent | FA                     |

ATTACHED

(6)

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|    |                     |                  |                 |            |              |                        |
|----|---------------------|------------------|-----------------|------------|--------------|------------------------|
| 26 | Muhammad Altaf      | Subhan ullah     | 17301-5887445-5 | 29-04-2013 | Behishti     | DAE                    |
| 27 | Shahid Islam        | Faqir Gul        | 17301-3550466-9 | 4/2/2014   | Ward Orderly | FSC+ Surgical Diploma  |
| 28 | Asfandyar Khan      | Musharaf Khan    | 17301-6996238-7 | 4/2/2014   | Ward Orderly | BA                     |
| 29 | Shams Ul Athhar     | Shams Ul Qamar   | 17301-8058948-7 | 27-03-2015 | Behishti     | SSC                    |
| 30 | Zia-ul-islam        | Muhammad Qayum   | 17301-5067106-3 | 30/03/2015 | Ward Orderly | MA+ Health Diploma     |
| 31 | Salman Misbah       | Misbah Ud din    | 17101-4426272-5 | 7/4/2015   | Behishti     | BA                     |
| 32 | Shahid Islam        | Faqir Gul        |                 | 16-1-2016  | Ward Orderly | Surgical Diploma       |
| 33 | Muhammad Sulaiman   | Qabil Khan       | 17301-8449980-3 | 3/8/2016   | Ward Orderly | FSC                    |
| 34 | Murshid Ali         | Gohar Khan       | 17301-4164590-9 | 3/8/2016   | Naib Qasid   | BSc                    |
| 35 | Nadeem Khan         | Sher Zaman       | 17301-8762303-1 | 12/8/2016  | Behishti     | FA                     |
| 36 | Fareed Ullah        | Afridi Khan Safi | 17301-4505337-1 | 3/8/2016   | Naib Qasid   | BA                     |
| 37 | Umair Khan          | Pervaiz Khan     | 17301-8066889-5 | 29/05/2017 | Naib Qasid   | FA                     |
| 38 | Sabir Shah          | Zaiban Shah      | 17201-6576098-3 | 19/01/2018 | Chowkidar    | Matric+ Health Diploma |
| 39 | Waqar Younis        | Shaferas Khan    | 17301-9197840-5 | 19/01/2018 | Ward Orderly | FSC                    |
| 40 | Syed Ghous Ali Shah | Syed Abid Shah   | 17301-1800560-9 | 19/01/2018 | Ward Orderly | MA                     |
| 41 | Muhammad Arif       | Faiz Muhammad    | 17301-2618886-7 | 19/01/2018 | Ward Orderly | BSc                    |
| 42 | Muhammad Ihtisham   | Dilshad Khan     | 17301-2621626-3 | 19/01/2018 | Ward Orderly | M.COM                  |
| 43 | Zeeshan Ahmad       | Fareed Khan      | 17301-5237207-1 | 20/02/2018 | Ward Orderly | BA                     |
| 44 | Faisal Ahmad        | Habib ur Rehman  | 17301-6599340-5 | 3/10/2018  | Chowkidar    | FA                     |
| 45 | Muhammad Saboor     | Manzoor Khan     | 17301-9784416-5 | 3/10/2018  | Chowkidar    | FA+ Health Diploma     |
| 46 | Farooq Haidar       | Khan Bahadur     |                 | 3/10/2018  | Ward Orderly | FA                     |
| 47 | Imran Khan          | Izzat Khan       | 17101-1892366-1 | 30/10/2018 | Chowkidar    | FA+Electric Diploma    |
| 48 | Rahim Shah          | Sardar Khan      | 17301-8692584-1 | 27/10/2020 | Ward Orderly | DAE+ DIT               |
| 49 | Shehryar Khan       | Faqir Hussain    | 17301-2332817-7 | 27/10/2020 | Ward Orderly | MA+DIT Diploma         |
| 50 | Jehan Ullah         | Ihsan Ullah      | 17301-1797449-1 | 27/10/2020 | Ward Orderly | FA                     |

ATTSTED

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|    |                     |                 |                  |            |              |                      |
|----|---------------------|-----------------|------------------|------------|--------------|----------------------|
| 51 | Ahmed Khan          | Zaka Ullah      | 17301-0416153-5  | 27/10/2020 | Ward Orderly | FSc                  |
| 52 | Muhammad Nouman     | Noor Muhammad   | 17301-3280446-5  | 27/10/2020 | Ward Orderly | BA                   |
| 53 | Muhammad Arif       | Usman Khan      | 17301-86494820-9 | 27/10/2020 | Ward Orderly | BA                   |
| 54 | Mueen Qasmi         | Muhammad Hanif  | 17301-6540441-7  | 27/10/2020 | Ward Orderly | MBA                  |
| 55 | Imran Khan          | Abdul Sattar    | 17301-6952992-5  | 27/10/2020 | Chowkidar    | Matric               |
| 56 | Shahid Ahmad        | Habib ur Rehman | 17301-6701436-9  | 27/10/2020 | Ward Orderly | FA                   |
| 57 | Haroon Ur Rashid    | Muhammad Dawood | 17301-8767271-3  | 27/10/2020 | Chowkidar    | BA                   |
| 58 | Aqib Zahoor         | Zahoor Ud Din   | 17301-5569170-9  | 27-10-2020 | Chowkidar    | Matric               |
| 59 | Tahir Hafeez        | Abdul Hafeez    | 17301-5242528-1  | 27-10-2020 | Ward Orderly | B.COM.               |
| 60 | Hamza Shah          | Jalal Shah      | 17301-6527188-7  | 27-10-2020 | Ward Orderly | FA                   |
| 61 | Muhammad Tayyab     | Masood Ahmad    | 17301-1955764-1  | 27-10-2020 | Ward Orderly | FSc+Health Diploma   |
| 62 | Shehryar Hussain    | Nighah hussain  | 17301-6255930-7  | 27-10-2020 | Ward Orderly | BSC Computer Science |
| 63 | Momin Khan          | Johar Ali       | 17301-7058253-5  | 27-10-2020 | Ward Orderly | SSC                  |
| 64 | Imran Shah          | Sabir Shah      | 17301-3206617-7  | 8/12/2020  | Ward Orderly | FSC                  |
| 65 | Anwar ul Haq        | Zia Ul Haq      | 17301-5541278-7  | 2/3/2021   | Behishti     | FA                   |
| 66 | Salman Khan         | Dilawar Khan    | 17301-3443294-5  |            | Ward Orderly | Matric               |
| 67 | Muhammad Aftab udin | Shahab u din    | 17301-4947979-7  | 27-10-2020 | Chowkidar    | Matric               |
|    |                     |                 |                  |            |              |                      |

ATTACHED

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**OFFICE OF THE DISTRICT HEALTH OFFICER  
PESHAWAR  
Phone No. 091-9225387**

**AUTHORITY LETTER**

Syed Mastan Ali Shah Litigation Assistant ,Office of DHO Peshawar,  
NIC No: 17101-0365818-9 is authorized to submit parawise comments reply in the  
case Service appeal NO.1827/2022 titled Fazal e Rabbi Vs Govt of KP in Service  
Tribunal ,Peshawar.

*District Health Officer,  
Peshawar*

District Health Officer  
Peshawar

ATTACHED

# بعدالت



Appellant/Applicant

2023ء منجانب

مورخہ 13/11/2023

Fazal Razi نام Govt. of  
KP & others

مقدمہ Stay AP

دعویٰ  
جرم

## باعث تحریر آنکہ

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

آن مقام پشاور کیلئے جسٹس صاحب حسان عادل

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Attested & Accepted

Handwritten signature

2023ء

ماہ نومبر

المرقوم

العبد د گ واه العبد

کے لئے منظور ہے۔

مقام پشاور

منقل راجی ویل سمر فل سندہ حلاہ کوئی خاک بوشلو