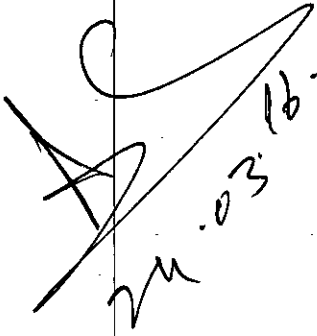
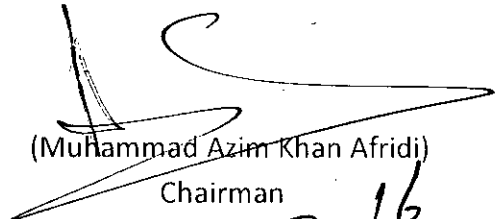


S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	24.03.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR</u></p> <p style="text-align: center;"><u>SERVICE APPEAL NO. 266/2016</u></p> <p style="text-align: center;"><u>(Abdul Qadoos Khan-vs-Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar and others).</u></p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u>      Appellant with counsel present. Appeal requisitioned on the application of learned counsel for the appellant for early hearing of the instant appeal. The same was allowed and learned counsel for the appellant heard today in limine.</p> <p>2.      Learned counsel for the appellant has argued that the appellant was transferred initially vide order dated 29.2.2016 which was subsequently cancelled vide order dated 1.3.2016. That the said order was again withdrawn vide another order dated 11.3.2016 but the said withdrawal order was again annulled vide order dated 16.3.2016 and that presently the initial posting order of the appellant is intact. That the respondents are not accepting the appellant despite orders in his favour and hence the instant service appeal.</p> <p>3.      Since the appellant has not impugned any order the respondents before this Tribunal in the prescribed manners as such the appeal of the appellant, in view of the provisions of section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, is not found maintainable. The same is, therefore, dismissed in limine.</p>

  
24.03.16.

4. Needless to mention that dismissal of the instant appeal shall not authorize the respondents to treat the appellant otherwise than in accordance with the mandate of law and as required of the respondents by law.



  
(Muhammad Azim Khan Afridi)  
Chairman  
24.03.16

ANNOUNCED  
24.03.2016

Form- A  
FORM OF ORDER SHEET

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

Case No. 266/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21.03.2016	<p>The appeal of Mr. Abdul Qadoos received today by Post Through Mr. Muhammad Idrees Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2	22-03-2016	<p>This case is entrusted to Touring S. Bench at D.I.Khan for preliminary hearing to be put up thereon <u>29.3.16</u>.</p> <p> CHAIRMAN</p>

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

CM No. \_\_\_\_\_/2016  
In  
Service Appeal No. 266 / 2016

Mr. Abdul Qadoos Khan          VERSUS

Government of Khyber Pakhtunkhwa Thorough Secretary Health etc.

**I N D E X**

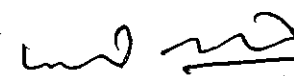
<b>S No.</b>	<b>Description of Documents</b>	<b>Annexure</b>	<b>Page No.</b>
1	Service Appeal with Affidavit		1-4
2	CM with Affidavit		5-6
3	Order dated 04/02/2015	A	7
4	D.O Letter District Nazim dated 12/11/2015	B	8
5	Letter No. 1332 dated 29/01/2015	C	9
6	Letter No. 11799 dated 23/12/2014	D	10
7	1 <sup>st</sup> Departmental Appeal dated 16/11/2015	E	11-12
8	D.O Letter Halqa MPA dated 12/02/20116	F	13
9	Letter No.787 dated 18/02/2016	G	14
10	Letter for imposing of ban dated 19/08/2015	H	15
11	Letter dated 25/02/2016	I	16
12	Transfer order dated 29/2/2016	J	17
13	2 <sup>nd</sup> Departmental Appeal dated 19/2/2016	K	18
14	Cancellation of transfer order dated 1/3/2016	L	19
15	Letter of Sectary Health for Retransfer dated: 11-03-2016	M	20
16	Letter retransfer dated: 11-03-2016	N	21
17.	Departmental Appeal/ Review	O	22
18	Letter Approval of review/appeal dated: 16-03-2016	P	23
19	Letter Cancelation of transfer order dated: 16-03-2016	Q	24
20	Copy of application for joining report	R	25
21	Wakalat nama		26

Dated: 21/03/2016

Your Humble Appellant,

  
Abdul Qadoos Khan

Through Counsel

  
Muhammad Idrees Khan  
Advocate High Court

S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	24.03.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR</u></p> <p style="text-align: center;"><u>SERVICE APPEAL NO. 266/2016</u></p> <p style="text-align: center;"><u>(Abdul Qadoos Khan-vs-Government of Khyber Pakhtunkhwa through Secretary Health, Peshawar and others).</u></p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u> Appellant with counsel present. Appeal requisitioned on the application of learned counsel for the appellant for early hearing of the instant appeal. The same was allowed and learned counsel for the appellant heard today in limine.</p> <p>2. Learned counsel for the appellant has argued that the appellant was transferred initially vide order dated 29.2.2016 which was subsequently cancelled vide order dated 1.3.2016. That the said order was again withdrawn vide another order dated 11.3.2016 but the <del>same</del> <sup>Said Court withdrawal order</sup> was again annulled vide order dated 16.3.2016 and that presently the initial posting order of the appellant is intact. That the respondents are not accepting the appellant despite orders in his favour and hence the instant service appeal.</p> <p>3. Since the appellant has not impugned any order the respondents before this Tribunal in the prescribed manners as such the appeal of the appellant, in view of the provisions of section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, is not <sup>found</sup> maintainable. The same is, therefore, dismissed in limine. <del>File be consigned to the record room.</del></p> <p style="text-align: center;">PTC</p>

4. After receipt of the appeal from the august Supreme Court of Pakistan and parties and their counsel were summoned for arguments. Arguments heard at length. Record perused.

5. The learned counsel for the appellant argued that the appellant was appointed by the respondent department as Sub Engineer on 28.5.1980 and passed Grade A & B examination. Seniority list of Sub Engineers as it stood on 31.12.1998 issued wherein name of the appellant appeared at S.No. 50 while the names of private respondents were at S.No. 52, 61, 63, 72 and 236 respectively. The private respondents were considered for Senior Scale BPS-16 while the appellant has not been considered and ignored. The appellant was not considered by the DPC due to his incomplete record. It was the responsibility of the respondent department to provide official record of the appellant and sent his case to the Departmental Promotion Committee for consideration of his name against Senior Scale BPS-16. If the record was not available, the appellant could not be suffered for the lapses and fault of the respondent department. Junior to the appellant had been promoted while he has been deprived of his legal right for no fault on his behalf. The learned counsel for the appellant further argued that the benefits of Senior Scale BPS-16 have been granted to similarly placed person and the appellant is also entitled to the same treatment under the principles of consistency. The learned counsel for the appellant relied on 2006-SCMR-1082, 2007-PLC(C.S) 683, 1996-SCMR-1185 and 2007 PLC(C.S) 152 and judgment dated 7.5.2009 of this Tribunal in similar appeal No. 791/2008 decided in favour of appellant. The learned counsel for the appellant further argued that in the matter of promotion and pay, question of limitation does not arise. He relied on 2007-PLC(C.S) 1267, 2002-PLC (CS) 1388 and 2003-PLC (CS) 178. In a reported judgment of the august Supreme Court of Pakistan as reported in PLD 2003-Supreme Court 724, decision of the cases on merits always to be encouraged instead of non-suiting the litigants for technical reasons including limitation. He requested that the appeal may be accepted as prayed for.

The learned counsel for private respondents on the other hand argued that the private respondents No. 4 to 8 have been granted Senior Scale BPS-16 on the recommendations of the Departmental Promotion Committee vide orders dated 4.9.2003 and 19.4.2004. The appellant was not considered by the DPC due to his incomplete service record. The appellant did not challenge the seniority earlier seniority lists nor selection grade/Senior Scale at the relevant time and the present appeal is hopelessly time barred. Now the facility of Selection Grade/Move-over has already been withdrawn by the Provincial Government w.e.f. 1.12.2011, vide Finance Department letters dated 15.11.2001 and 6.4.2003 and in the prevalent circumstances, the present appeal has become infructuous. He requested that the

*otherwise than*

*dismissal of the instant appeal shall not authorize*  
to  
*and the results by law.*

4. Needless to mention that the respondents would treat the appellants in accordance with the mandate of law as required of them by law.

(Muhammad Azim Khan Afridi)  
Chairman

ANNOUNCED  
24.03.2016

8A

passed by respondent No. 1, whereby on the recommendation of Departmental Promotion Committee, private respondents No. 4 to 8 had been granted Senior Scale (BPS-16). It has been prayed that on acceptance of the appeal, the impugned orders may be set aside respondent No. 1 may be directed to consider name of the appellant for Senior Scale (BPS-16).

2. Brief facts of the case are that the appellant joined the respondent department as Sub Engineer on 28.5.1980 and in the year 1991 qualified Grade-B and A examination in the years 1996 and 1997 respectively. Final seniority list of Sub Engineers as it stood on 31.12.1998 issued wherein name of the appellant appeared at S.No. 50 while the names of private respondents No. 4 to 8 were placed at S.No. 52, 61, 63, 72 and 236. It shows that the appellant was senior to private respondents No. 4 to 8 who were allowed Senior Scale BPS-16 by respondent No. 1 through orders dated 4.9.2003 and 19.4.2004 while the appellant has been discriminated. When the appellant came to know about the impugned orders, so he immediately filed departmental appeal on 13.8.2004 which elicited no response within the statutory period of ninety days, hence he filed service appeal No. 994/2004 before this Tribunal.

3. The appeal was admitted to regular hearing on 6.1.2005 and notices have been issued to the respondents. The respondents have filed their written replies and contested the appeal. The appellant also filed rejoinder in rebuttal. Vide order dated 27.3.2007, the case was dismissed by this Tribunal. Feeling aggrieved, the appellant filed Civil Petition No. 312-P of 2007 before the august Supreme Court of Pakistan. Vide order dated 4.3.2010, the case has been remanded in the following terms:-

"Learned counsel appearing for the parties, after having argued the case at length contended that as the points involved in this case have not been elaborately discussed by the Service Tribunal including the issue whether the Tribunal can dismiss the appeal on the question of misjoinder of causes of action and whether without making calculation in respect of period of filing and disposal of departmental appeal, the Tribunal can come to the conclusion that the departmental appeal is barred by time, therefore, on setting aside the impugned judgment, case be remanded to the Service Tribunal for decision afresh after hearing to all concerned.

Petition is converted into appeal and allowed as a result whereof that case is remanded to the NWFP Service Tribunal for decision afresh, after providing equal opportunity of hearing to both the sides, expeditiously, as far as possible within a period of three months, after receipt whereof."

Khyber Pakhtunkhwa Service Tribunal  
Petitioner

M



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

Service Appeal No. 2166 / 2016

S.W.F. Province  
 Service Tribunal  
 Diary No. 247  
 Dated 21-03-2016  
 DHO Office

Mr. Abdul Qadoos Khan S/O Muhammad Rauf Office Assistant DHO Office

DIKhan

VERSUS

1. Govt: of Khyber Pakhtunkhwa Through Secretary Health Peshawar.
2. Director General Health Services Khyber Pakhtunkhwa Peshawar.
3. District Health Officer Dera Ismail Khan.
4. District Accounts Officer Dera Ismail Khan.

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974 FOR**  
**IMPLEMENTATION OF ORDER DATED. 16-03-2016 APPROVED BY**  
**COMPITENT AUTHORITY ( RESPONDENT NO. 2) IN ITS TRUE**  
**LETTER AND SPIRT**

**PRAYER:**

Through service appeal in hand appellatant is beseeching to direct respondent No. 3 to deal with the appellatant accordance with law in compliance of office endorsement No. 1876-84/Personnel Dated. 16-03-2016 from the office of respondent No. 2 approved by respondent No. 1 (Appellatant Authority), by allowing him to perform his duty in DHO office D.I.Khan and further to direct the respondent No. 3 and Respondent No. 4 to not stop the benefit/salary of the appellatant

**Note:** The Addresses of the parties are sufficient for the purpose of there services.

**Respectfully Sheweth:-**

1. That the appellatant is serving as Office Assistant at District Health Officer Office DIKhan and has been performing his duties according to the entire satisfaction of his superior, in this respect productivity of the appellatant is evident from the service record. Copy of posting order dated 04/02/2015 is enclosed as **Annexure. A**
2. That on 12/11/2015 one D.O letter issued by District Nazim DIKhan with the direction that one office Assistant namely Manzoor Hussain be transferred to DHO Office DIKhan in place of appellatant, although respondent No.2 has already been issued a letter No.1332 dated 29/01/2015 against the said office assistant, in which he has mentioned that he utilized political pressure and he is unreliable. Copy of D.O letter

Filed to-day  
 21/3/16  
 Registrar

dated 12/11/2015, letter No. 1332 dated 29/01/2015 and letter dated 23/12/2014 are enclosed as **Annexure B,C&D respectively.**

3. That against DO letter, the appellant filed departmental appeal dated 18/11/2015 to Director General Health Services KPK Peshawar (Respondent No.2). Copy of Departmental appeal dated 18/11/2015 enclosed as **Annexure-E**
4. That another D.O letter dated 12/02/2016 was also issued by the Halqa MPA with the remarks of the Chief Minister Khyber Pakhtunkhwa to transfer the appellant. Copy of D.O letter dated 12/02/2016 enclosed as **Annexure-F.**
5. That in response of DO letter, the Director General Health Services (Respondent No.2) has sent a letter No. 787 dated 18/02/2016 to Secretary Health (Respondent No.1) for transfer of appellant from DHO Office D.I.Khan to MMM Teaching Hospital D.I.Khan and has also requested for lifting of ban relaxation and the Secretary Health (respondent No.1) has issue letter dated 25/02/2016 for implementation of DO letter ignoring the Ban and tenure position of the appellant due to political pressure. Copy of letter No. 787 dated 18/02/2016, letter dated 14/09/2015 for imposing of ban & letter dated 25/02/2016 are enclosed as **Annexure G,H&I respectively.**
6. That the respondent No.2 issued the transfer order of appellant vide No.849-57/Personnel/ManzoorAsst: dated 29/2/2016. The copy of transferred letter dated. 29-02-2016 is enclosed as **Annexure-J**
7. That appellant filed another departmental appeal against the letter No.787 dated 18/2/2016. copy of 2<sup>nd</sup> departmental appeal is enclosed as **Annexure-K.**
8. That on 01/3/2016 respondent No. 2 cancelled the order dated: 29-02-2016 after approval of respondent No. 1 (Appellate Authority). Copy of cancellation letter dated: 01/3/2016 is enclosed as **Annexure-L**
9. That Secretary Health respondent No. 1 issued letter No.SO-III/HD/2-1/2016 (Manzoor Hussain) dated 11/3/2016 for re transfer of the appellant. And respondent No. 2 issued re transfer order of appellant Copy of letter dated 11/3/2016 of respondent No. 1 and Respondent No. 2 are enclosed as **Annexure-M&N**
10. That after aggrieved from the letter dated: 11-03-2016, The appellant filed review/appeal against the said letter to respondent No. 1 (Appellate Authority). (Copy of review / appeal dated 11/03/2016 is enclosed as **Annexure-O)**
11. That in consequence upon review/appeal dated: 11-03-2016 the respondent No. 1 (appellate Authority) has approved for cancellation of order dated: 11-03-2016 through letter dated: 16-03-2016 and

respondent No. 2 issued cancellation order of the appellant. Both copies of letter are enclosed as **Annexure-P&Q**

12. The copy of cancellation order was entrusted to the office of respondent No. 3 for compliance in accordance with law/rules, but respondent No. 3 after receipt of order of his superior office, beside endorsing the same to the appellant concealed the same and remained mum and refuse to accept or issue any receipt against joining report, against which having no other remedy appellant preferred this appeal on the following grounds. Copy of joining report dated: 17-03-2016 is enclosed as **Annexure-R**

13. That it is settled law, that impugned Act or action has been protected by a constitutional provision by ouster clause, this Learned Tribunal hence have the jurisdiction to interfere with the matters which lies under the terms & conditions of service and as appellate authority has already used its executive powers against the appellant, the appellant has no efficacious remedy except to invoke the jurisdiction of the honourable tribunal inter alia on following grounds, as the political figures are bent upon on transfer of appellant against law / policy.

**GROUNDS:-**

- i. That acts and deed in the matter cited above issued by respondent No. 3 of malafide in order to create technical hurdles in the way of service of the appellant, in order to destroy the 30 years undisputed public service of the appellant which is very much clear from the conduct of respondent No. 3
- ii. The conduct of respondent No. 3 through non compliance of the order of superior office will lead the appellant to the dead end of his carrier with he is strictly liable to comply the rule/order made by the superior office and the appellant is liable to be dealt in with accordance with law.
- iii. That all the cited malafide acts done by respondent No. 3 are against law/rules and are ineffective upon the rights of appellant and all the unlawful orders are formulated under malafide temptation of political figures.
- iv. That the council of the appellant may also be allowed to raise additional grounds during course of hearing.

It is, therefore, respectfully prayed that on acceptance of this service appeal, the respondent No. 3 may kindly be directed to

deal with the appellant in accordance with law in compliance of office order No. 1876-84/Personnel dated: 16-03-2016 from the office of respondent No. 2 (Director General Health Services KPK) by allowing him to perform duty in DHO office D.I.Khan further to direct the respondent No. 3 and respondent No. 4 to not stop the salary of appellant with benefit.


Any other reliefs deemed appropriate is given circumstances may also be granted in the large interest of justice.

Dated: 21/03/2016

Your Humble Appellant,

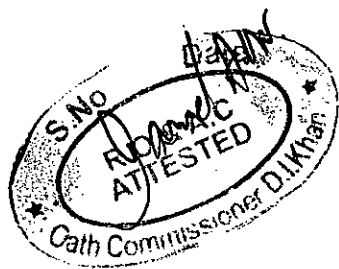
  
Abdul Qadoos Khan

Through Counsel

  
Muhammad Idrees Khan  
Advocate High Court

### **AFFIDAVIT**

I, Abdul Qadus Khan S/O Muhammad Rauf Office Assistant DHO Office DIKhan, do hereby solemnly affirm and declare on oath the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept to concealed from this honourable Tribunal



  
DEPONENT

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

CM No. \_\_\_\_\_/2016

In

Service Appeal No. \_\_\_\_\_/ 2016

Mr. Abdul Qadoos Khan

VERSUS

Govt: of Khyber Pakhtunkhwa Thorough Secretary Health etc.

**APPLICATION FOR INTERIM RELIEF RESTRAINING THE**  
**RESPONDENTS TAKING ANY ACTION DETRIMENTAL TO**  
**THE SERVICE OF THE APPELLANT TILL FINAL DISPOSAL**  
**OF THE TITLE SERVICE APPEAL**

**Respectfully Sheweth:-**

1. That the above titled service appeal is being filed before the honourable Tribunal in which no date of hiring has yet been fixed
2. That there is much likelihood of the success of present service appeal
3. That the balance of convenience also tilts in favour of the applicant


It is therefore, most humbly prayed that acceptance of this application, that the interim relief as prayed for in the heading application may kindly be granted till final decision of appeal

Dated: 21/03/2016

Your Humble Appellant,

  
Abdul Qadoos Khan

Through Counsel

  
Muhammad Idrees Khan  
Advocate High Court

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

CM No. \_\_\_\_\_/2016

In

Service Appeal No. \_\_\_\_\_/ 2016

Mr. Abdul Qadoos Khan

VERSUS

Govt: of Khyber Pakhtunkhwa Thorough Secretary Health etc.

**AFFIDAVIT**

I, Abdul Qadus Khan S/O Muhammad Rauf Office Assistant DHO Office DIKhan, do hereby solemnly affirm and declare on oath the contents of this application are true and correct to the best of my knowledge and belief and nothing has been kept to concealed from this honourable Tribunal



*Abdul Qadus Khan*  
**DEPONENT**



Amr (A)

P-7

**DIRECTORATE GENERAL HEALTH  
SERVICES GOVT: KHYBER  
PUKHTUNKHWA PESHAWAR**

**OFFICE ORDER**

As approved by the competent authority Mr. Abdul Qadoos Office Assistant attached to Gomal Medical College D.I.Khan is hereby transferred and posted to DHO office D.I.Khan against the vacant post of Office Assistant in the best interest of public service with the immediate effect.

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

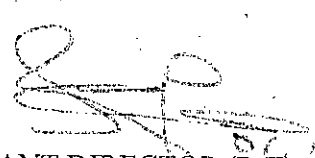
Sd/xxxxxxxxx  
DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K, PESHAWAR.

No.: 1622-28/**Personnel**/Office Asstt: 10 Dated: 04.02.2015.

Copy forwarded to the:-

1. P.S to Minister for Health Khyber Pakhtunkhwa.
2. Principal/ Chief Executive GMC/ DHQ/MMM Teaching Hospital DIKhan w/r to his letter No.261/PF dated 16.01.2015.
3. DHO Dikhan w/r to his letter No.12150 dated 29.12.2014.
4. DAO D.I.Khan.
5. PA to DGHS, Khyber Pakhtunkhwa Peshawar.
6. Official concerned.
7. Master File.

For information and necessary action.

  
ASSISTANT DIRECTOR (P-II)  
DGHS, Govt: of Khyber  
Pukhtunkhwa Peshawar

AN-SCA  
3  
3

4-2-2015

Annex (B) - 8

# Aiz Ullah Khan Alizai

Nazim District Government  
Dera Ismail Khan (KPK)  
Tel +92 966-9280108, Fax 0966-9280390



Dated: 12-11-2015

Ref #:

Dear D.G. Health KPK

ADA

Hoping for your sound health  
with best wishes

Mr. Mangoor Hussain office Asstt  
presently working at NMM Hospital  
D.I. Khan may be transfer to DHO  
(Health) office D.I. Khan as H/clerk in  
place of Mr. Abdul Qadeer office Asstt.  
Mr. Mangoor Hussain office Asstt is honest and  
handworking, he has great Experience about  
- 30  
thing years in govt services.  
So, kindly transfer / Adjust him as H/clerk  
in place of Mr. Abdul Qadeer.

I would be grateful.

Thanks,  
Yours sincerely,

Aiz Ullah Khan Alizai

AM 12/11/15





Annex (C) - P-9



DIRECTORATE GENERAL HEALTH SERVICES, GOVT: OF KHYBER-PAKHUNKHWA, PESHAWAR.  
NO 1332 /Personnel  
DATED 29 /01/2015.

To,  
The Secretary to Govt: of Khyber Pukhtunkhwa Health Department Peshawar.

Subject: **POSTING OF MR. MANZOOR HUSSAIN OFFICE ASSISTANT AT DHO OFFICE D.I KHAN.**

Dear Sir,

Kindly refer to your letter No. SOH-III/2-1/2014(Shah Jehan Office Assistant) dated 05.01.2015, on the subject noted above, I have the honour to state that DHO D.I Khan has informed vide his letter No. 11799 dated 23.12.2014, duly supported by Press Clippings (copies attached), that Mr. Manzoor Hussain Office Assistant attached to MMM Teaching Hospital D. I Khan was promoted as Office Assistant about one year ago and posted to MMM Teaching Hospital D. I Khan. He utilized political presser and then the DGHS issued an office order of the said official and posted to DHO Office D.I Khan. The above named office Assistant is un-reliable and using the name of different officers to black mail the staff in the Health facilities.

He has recommended that an enquiry may be initiated against the above named office Assistant and he should not be given any independent / responsible post in any office of the Health Department in future.

This Directorate agrees with the recommendations of the DHO D.I Khan and proposes that he may not be transferred to the office of the DHO D.I Khan, beside initiation of disciplinary action against him under the E&D Rules 2011.

Yours faithfully

**DIRECTOR GENERAL HEALTH SERVICES, K.P.K PESHAWAR**

Attached



OFFICE OF DISTRICT HEALTH OFFICER  
DERA ISMAIL KHAN

Amro (D) 10

No. 11799 / 1 Dated DIKhan the 23 / 12 / 2014

To

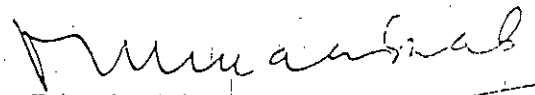
The Director General Health Services,  
Khyber Pakhtunkhawa Peshawar.

Subject: Press Clipping

Reference your office letter No.3397/CC/2801/2014 dated 12-12-2014.

Mr. Manzoor Hussain was promoted as Office Assistant one year above and then he submitted his arrival report in MMM Teaching Hospital DIKhan. He utilized political pressure and the then Director General Health Services, Khyber Pakhtunkhawa Peshawar issued several orders of his posting as Office Assistant / Head Clerk DHO Office DIKhan. He remained DHO Office for nearly 03 months and then again transferred to MMM Teaching Hospital DIKhan on 29-10-2014. His 02 wives are working in health department and several explanations of both the LHV and Dai were called and ultimately Dai pay was stopped. The above Office Assistant is unreliable and was using the name of different Officers to blackmail staff in the health facilities. The undersigned never issued transfer order of any staff members on the recommendation of Manzoor Hussain, but also inform your office vide this office letter No.8504/Enquiry dated 22-09-2014 regarding his inefficiency and malpractice.

It is recommended that sprit Enquiry may be initiated against this Office Assistant and at least he should be not given any independent / responsible post in any Office of Health Department in future.

  
District Health Officer  
Dera Ismail Khan

E:\Dr. Muzaffar Kundi\Press Clipping.doc

Amro  
10

Attended  
3/3/95

6. My manual removal of DHO office Dikhan has not yet completed.

5. Sir, the DHO Dikhan has already been submitted a letter against the head office Asst. Manager Humez and he may not be transfer to DHO office & explain his position with No. 11799 dated 28/12/14. (Prob copy enclosed) "B"

4. In this regard a letter submitted to your honour with letter dated 12/11/15 (Prob copy enclosed) "A"

3. The office Asst. Manager Humez approach to District Nizam Dikhan on political ground for transfer from Dikhan Teaching Hospital Dikhan to DHO office Dikhan in my place.

2. I am continuing working at DHO office Dikhan with the best satisfaction of my superiors and others.

1. S. Mr. Abdul Rashid office Assistant was transferred from DHO office Dikhan to DHO office Dikhan against the vacant post with office order no. 1622-28/Personnel/Office Asst. 10 dated 4/12/15.

Approved against Reserve Transfer  
Most respectfully Yr in submitted No. 1

Sd/-  
R/Sa

The District General  
Health Services KPK  
Fazal Channal

through:

Recd  
No. 14391/PFO  
26/11/2015

File  
E  
PFO (11)

To

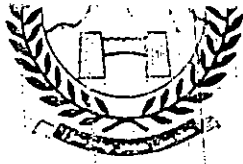
7 (12)

Therefore it is requested to kindly I may not be transferred from DHO office Dikhan in the light of above facts and give me a chance for personal hearing.

I shall be very thankful

Dated 18-11-2015

Yours obediently  
Ajad  
(Ajad Qadus)  
Office Ass't: DHO Office  
Dikhan



Amex (F) 13



THE HONORABLE MINISTER FOR HEALTH  
KHYBER PAKHTUNKHWA,

I shall be highly obliged if your honour please to transfer Manzoor Hussain Office Assistant from Mufti Mehmood Memorial Teaching Hospital to under the control of DHO DIKhan in place of Mr. Abdul Qadous Office Assistant, as Mr. Manzoor Hussain Office Assistant is belongs to my constituency. I know him very well. He is a honest, hardworking, and efficient worker, in view his 30 years experience in Government Service, his services are very much required for DHO Office DIKhan, in the best interest of public.

MR. IHTASHAM AKBAR KHAN  
MPA-PK-68

Amex 13  
33/

Dr. Hamid

May be transferred  
to DIKhan

Chief Minister  
Khyber Pakhtunkhwa

URGENT

Address:  
Niyala House Diyal Road  
Tara Ismail Khan (KPK)  
Tel: +92 300-588 9225

AD/PZ  
12/2/16

Put up  
12/2/2016


DA

System  
29/12

ASWE

30/12

# KHYBER PAKHTUN KHWA PESHAWAR

Annex (9) P-14  


E-Mail Address: [mykpk@yahoo.com](mailto:mykpk@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230  
No. 787 / Personnel Dated: 18/02/2016

To,

The Secretary to Govt: of Khyber Pakhtunkhwa  
Health Department Peshawar.

L.No. 2381  
Date 18-2-16

Subject:  
Dear Sir,

**POSTING / TRANSFER OF MR. MANZOOR HUSSAIN OFFICE ASSISTANT BPS-16.**


ASE DST  
19 (2)  
SECRET

Kindly refer to the remarks of Honorable Chief Minister Khyber Pakhtunkhwa on the letter of Mr. Ihtasham Akbar Khan MPA PK-68 regarding transfer of Mr. Manzoor Hussain office Assistant from MMM Teaching Hospital D.I Khan to DHO Office D.I Khan in place of Mr. Abdul Qados office Assistant, bearing remarks of the Chief Minister Khyber Pakhtunkhwa.

**" May be transferred"**

It is stated that Mr. Abdul Qados office Assistant BS-16 is serving at DHO Office D.I Khan since 2/2015 while Mr. Manzoor Hussain office Assistant is serving in MMM Teaching Hospital D.I Khan since 2/2014 and both have not completed their tenure at Annexure-I&II.

It is requested that necessary ban relaxation may kindly be granted so as to proceed further.

  
DIRECTOR GENERAL HEALTH  
SERVICES, KHYBER PAKHTUNKHWA PESHAWAR.

18/2/2016

Amir  
✓

29/12  
ASU/E  
Sybil  
29/12



inform all concerned **AVOS** **HT** **P-15**  
**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**HEALTH DEPARTMENT**

*[Handwritten signature]*  
 26/8/15

Dated Peshawar the 19.08.2015

OFFICE ORDER

NO.E&A(Health)/2-5/2015. The competent authority has been pleased to impose complete ban on all kinds of transfers/postings in Health Department with immediate effect and till further orders.

In case of exigency of services and recommendees of Public Service Commission, prior NOC of the competent authority shall be obtained.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
 HEALTH DEPARTMENT

OFFICE OF THE DIRECTORATE GENERAL HEALTH SERVICES, KPK,  
PESHAWAR.

No. 9513 /Personnel Dated 14 /09/2015.

Copy forwarded to the:-

1. All Sub: offices in Health Department Khyber Pakhtunkhwa.
2. All ADs in DGHS office Khyber Pakhtunkhwa.
3. All Dealing Assistant DGHS office Khyber Pakhtunkhwa.

For information and necessary action.

*[Handwritten signature]*  
*[Handwritten signature]*

*[Handwritten signature]*  
 ASSISTANT DIRECTOR (P-II)  
 DIRECTORATE GENERAL HEALTH  
 SERVICES, NWFP, PESHAWAR

10/9/15

C.C

SO(General) Health Department Khyber Pakhtunkhwa for information.





Annex I 7816

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. SO III/HD/2-1/2016/Manzoor Hussain  
Dated Peshawar, the 25<sup>th</sup> February, 2016.

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

Subject:

POSTING / TRANSFER OF MR. MANZOOR HUSSAIN OFFICE  
ASSISTANT (BS-16).

I am directed to refer to your letter No. 787/ Personnel dated 18-02-2016 on the subject noted above and to state that the directives / remarks of Hon'ble Chief Minister may be implemented under intimation to this Secretariat.

Section Officer - III

Endst: No & date even.

Copy is forwarded to PS to Secretary Health Department, Khyber Pakhtunkhwa,  
Peshawar.

Section Officer - III

Annex  
7816

Annex: (5) (17)

**DIRECTORATE GENERAL HEALTH SERVICES  
KHYBER PAKHTUN KHWA PESHAWAR**



E-Mail Address: [nvfdgsh@yahoo.com](mailto:nvfdgsh@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

**OFFICE ORDER**

As approved by the competent authority, the following posting/ transfer of Office Assistants are hereby ordered in the interest of public service with immediate effect:

S.No	Name of Officials	From	To	Remarks
1	Manzoor Hussain Office Assistant	MMM Teaching Hospital Dikhan	DHO Office Dikhan	Vice S.No. 2
2	Abdul Qadoos Office Assistant	DHO Office Dikhan	MMM Teaching Hospital Dikhan	Vice S.No. 1

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

Sd/xxxxxxx

DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

Dated 29/2/2016

No. 849-57 /Personnel/Manzoor Asst

Copy forwarded to the:

1. PSO to Chief Minister Khyber Pakhtunkhwa Peshawar.
2. Section Officer-III Government of Khyber Pakhtunkhwa Health Department Khyber Pakhtunkhwa Peshawar w/r to his letter No.SOIII/HD/2-1/2016/Manzoor Hussain dated 25.02.2016.
3. DHO Dikhan.
4. DAO Dikhan.
5. MS MMM Teaching Hospital Dikhan.
6. Superintendent Promotion Cell, DGHS Office Peshawar.
7. PA to DGHS, Khyber Pakhtunkhwa.
8. DHIS Cell. DGHS Office Peshawar.
9. Officials concerned.

For information and necessary action.

For

DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

Alleged  
3/3/

To

The Honourable Secretary (Appellate authority)  
Government of Khyber Pakhtunkhwa  
Health Department

Subject: **Appeal against letter No.787/Personnel dated 18/2/2016  
regarding my Premature Transfer**

Respected Sir,

Most respectfully it is submitted that:

1. I am working as Office Assistant at office of the DHO DIKhan since February 2015 with the entire satisfaction of my superior.
2. Mr. Manzoor Hussain approached for transfer in my place from MMM Teaching Hospital DIKhan with political pressure on the DO letter of Mr. Ehtasham Akbar Khan MPA alongwith remarks of Chief Minister on DO letter "May be Transfer" (copy of DO letter enclosed **Annexure-A**)
3. The DHO DIKhan and DGHS KPK Peshawar has already been submitted a letter against Mr. Manzoor Hussain Office Assistant that he is un-reliable & using the name of different officers to black mails the staff in the Health Facilities. Further that he may not be transferred to office of DHO DIKhan vide letter No.11799 dated 23/12/2014 and letter No.1332/Personnel dated 29/1/2015. (Both photocopies enclosed as **Annexure B&C**)
4. The DG Health KPK has already mentioned in his letter No.787/Personnel dated 18/2/2016 that the tenure of both Office Assistant are not completed as well as ban imposed on posting/transfer by the Government of KPK Health Department

Therefore it is requested to kindly allow me to complete my normal tenure at DHO Office DIKhan and file the letter dated 18/2/2016 of DG Health KPK Peshawar regarding my transfer on political ground.

Dated 19/2/2016

Yours Obediently

*Abdul Qadus*  
(Abdul Qadus)  
Office Assistant  
DHO Office DIKhan

Allow 3/3/

Annex (K) 18  
Recd No. 92  
19-2-16

Anep (L) 19

**DIRECTORATE GENERAL HEALTH SERVICES**  
**KHYBER PAKHTUN KHWA PESHAWAR**



E-Mail Address: [nwfdghs@yahoo.com](mailto:nwfdghs@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230

**OFFICE ORDER**

As approved by the competent authority, the posting/ transfer order in respect of Mr. Manzoor Hussain office Assistant from MMM Teaching Hospital D.I Khan to DHO office D.I Khan and Mr. Abdul Qadus office Assistant from DHO Office D.I Khan to MMM Teaching Hospital D.I Khan, issued vide this Directorate office order bearing Endst: No. 849-57/Personnel/Manzoor Asst: dated 29.02.2016, is hereby cancelled.

Sd/xxxxxxx

DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

Dated 01 /03/2016

No 858-67 /Personnel/Manzoor Asst:

Copy forwarded to the:-

1. PSO to Chief Minister Khyber Pakhtunkhwa.
2. Section Officer-III Govt: of Khyber Pakhtunkhwa Health Department Peshawar w/r to his letter No. SO-III/HD/2-1/2016/Manzoor Hussain dated 01.03.2016.
3. DHO D.I Khan.
4. DAO D.I Khan
5. M.S MMM Teaching Hospital D.I Khan.
6. Superintendent Promotion Cell DGHS office KPK Peshawar.
7. PA to DGHS, Khyber Pakhtunkhwa.
8. DHIS Cell DGHS, KPK Peshawar.
9. Officials concerned.

For information and necessary action.

01/3/16  
ASSISTANT DIRECTOR (P-II)  
DIRECTORATE GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

01/3/2016

Hafiz S.M Ali Shah

Ali Shah  
3/3



GOVT. OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. SOH-III/HD/2-1/2016(Manzoor Hussain)  
Dated the Peshawar 11<sup>th</sup> March, 2016

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: CANCELLATION OF TRANSFER.

I am directed to refer to the subject noted above and to state that the competent authority has approved to cancel office order No. 859-67/Personnel/Manzoor Asstt: dated: 01-03-2016 and restore office order No. 849-57/Personnel/Manzoor Asstt: Dated: 29-02-2016 (copies attached) immediately under intimation to this department at the earliest.

Encl: As above.

(Muhammad Farid)  
Section Officer-II

Endst: of even no & date.

Copy forwarded to:-

1. The District Health Officer, D.I Khan.
2. PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III

Manzoor

~~Manzoor Hussain~~



**DIRECTORATE GENERAL HEALTH SERVICES,  
KHYBERR PAKHTUNKHWA, PESHAWAR**

*All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.*  
Exchange # 091-9210187, ☎ Tele # 9210196 Fax # 091-9210230

ANEX N 21

**OFFICE ORDER.**

As directed by the Competent Authority, the posting/transfer order issued vide this Directorate letter No.859-67/Personnel/Manzoor/Asstt: dated 01-03-2016 is hereby cancelled and office order issued vide this Directorate order No.849-57/Personnel/Manzoor Asstt: dated 29-02-2016 is hereby restored.

Sd/xxxxxx  
DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR

No. 1771-79 /Personnel/Manzoor Asst

Dated 11 /03/2016

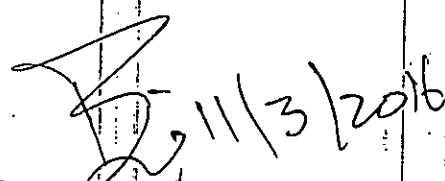
Copy forwarded to the:

1. PSO to Chief Minister Khyber Pakhtunkhwa;
2. Section Officer-III Government of Khyber Pakhtunkhwa Health Department Peshawar with reference to his letter No.SOH-II/HD/2-1/2016 (Manzoor Hussain) dated 11-03-2016.
3. DHO D.I.Khan.
4. DAO D.I.Khan.
5. MS MMM Teaching Hospital D.I.Khan.
6. Superintendent Promotion Cell DGHS Office KPK Peshawar.
7. PA to DGHS, Khyber Pakhtunkhwa.
8. DHIS Cell DGHS KPK, Peshawar.
9. Official concerned.

For information and necessary action.

Attended  
57

For

  
DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

Attenu  
[Handwritten scribble]

Dated 11/03/2016

Therefore it is requested to kindly allow me to complete my normal tenure at DHO Office Dikhan and with draw letter dated 11/03/2016 regarding my premature transfer on political ground.

6. Now a letter issued by your office vide No.SO-III/HD/2-1/2016 (Manzoor Hussain) dated 11/03/2016 regarding my premature transfer.

5. The DG Health KPK has already mentioned in his letter No.787/Personnel dated 18/2/2016 that the tenure of both Office Assistant are not completed as well as ban imposed on posting/transfer by the Government of KPK Health Department.

4. The DHO Dikhan and DGHS KPK Peshawar has already been submitted a letter against Mr. Manzoor Hussain Office Assistant that he is unreliable & using the name of different officers to black mails the staff in the Health Facilities. Further that he may not be transferred to office of DHO Dikhan vide letter No.11799 dated 23/12/2014 and letter No.1322/Personnel dated 29/1/2015. (Both photocopies enclosed as **Annexure B&C**)

3. The transfer issued by DG Health after approval of your honour on 29/2/2016, subsequently cancel on 01/3/2016

2. Mr. Manzoor Hussain approached for transfer in my place from MMM Teaching Hospital Dikhan with political pressure on the DO letter of Mr. Phtasham Akbar Khan MPA alongwith remarks of Chief Minister on DO letter "May be Transfer" (copy of DO letter enclosed **Annexure-A**)

1. I am working as Office Assistant at office of the DHO Dikhan since February 2015 with the entire satisfaction of my superior.

Most respectfully it is submitted that:

Respected Sir,

regarding my Premature Transfer  
Appeal/Review against letter dated 11/3/2016

Subject:

The Honourable Secretary  
Government of Khyber Pakhtunkhwa  
Health Department  
(Appellate authority)

RECEIVED  
14/3/16

1568  
14/3/16

Amx. @ (22)

Yours Obediently  
[Signature]  
(Abdul Qadus)  
Office Assistant  
DHO Office Dikhan



Aug. (P) (23)  
GOVT. OF KHYBER PAKHTUNKHWA  
HEALTH DEPARTMENT

No. SOH-III/HD/2-1/2016(Manzoor Hussain)  
Dated the Peshawar 16<sup>th</sup> March, 2016

To

The Director General Health Services,  
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: CANCELLATION OF TRANSFER.

I am directed to refer to the subject noted above and to state that the competent authority has approved to cancel office order No. 849-57/Personnel/Manzoor Asstt: dated: 29-02-2016 and restore office order No. 859-67/Personnel/Manzoor Asstt: dated: 01-03-2016 immediately and Mr. Abdul Qadus Office Assistant BS-16 be retained at office of the District Health Officer, D.I Khan as he has not completed his normal tenure under intimation to this department at the earliest.

(Muhammad Farid)  
Section Officer-III

Endst: of even no & date.

Copy forwarded to:-

1. The District Health Officer, D.I Khan.
2. PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer-III

Manzoor  
3/



Alex (A)

P-24

# DIRECTORATE GENERAL HEALTH SERVICES KHYBER PAKHTUN KHWA PESHAWAR

E-Mail Address: [nwfdghs@yahoo.com](mailto:nwfdghs@yahoo.com) office Ph# 091-9210269 Exchange# 091-9210187, 9210196 Fax # 091-9210230



## OFFICE ORDER

As approved by the competent authority, this Directorate office order bearing Endst: No. 849-57/Personnel/Manzoor Asstt: dated 29.02.2016 and Endst: No. 1771-79/Personnel/Manzoor Asst: dated 11.03.2016 are hereby cancelled.

Subsequently this Directorate office order bearing Endst: No. 859-67/ Personnel /Manzoor Asstt: dated 01.03.2016 is hereby restored.

Sd/xxxxxxx

DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.  
Dated 16 /03/2016

No. 1876-84 /Personnel

Copy forwarded to the:-

1. PSO to Chief Minister Khyber Pakhtunkhwa.
2. P.S to Minister for Health Khyber Pakhtunkhwa.
3. Section Officer-III Govt: of Khyber Pakhtunkhwa Health Department Peshawar w/r to his letter No. SO-III/HD/2-1/2016/Manzoor Hussain dated 16.03.2016.
4. DHO D.I Khan.
5. DAO D.I Khan
6. M.S MMM Teaching Hospital D.I khan.
7. Superintendent Promotion Cell DGHS office KPK Peshawar.
8. PA to DGHS, Khyber Pakhtunkhwa.
9. DHIS Cell DGHS, KPK Peshawar.
10. Officials concerned.

For information and necessary action.

For DIRECTOR GENERAL HEALTH  
SERVICES, K.P.K PESHAWAR.

16/3/2016

Allo...  
P  
3/

Alex (R)

D.No 371

17/3/2016

حکومت پنجاب ڈیوٹی ماف ڈیپارٹمنٹ اکرام علی خان

(28)

جواب عالی

گزارشی ہے کہ میرے لئے سفر آرڈر کینسل ہو گئے ہیں اور مجھے ڈیوٹی ماف ڈیپارٹمنٹ میں

Retain کر دیا گیا ہے۔ مطابق جی ڈی پیکو پیغام

آرڈر نمبر 1876-84 / مورخہ 16/8/2016 (کاپی لف ہے)

لینڈا میرے آرڈر Endorse کیے جائیں اور

مجھ سے حاضرگالی جائے اور میری تنخواہ سزورہ کر دیں

مورخہ 17/3/16

ڈیپارٹمنٹ

ڈیوٹی ماف ڈیپارٹمنٹ

سید

# وکالت نامہ

قیثی ایک روپیہ		کورٹ فیس
-------------------	--	-------------

سروس سرفور جیٹو کوٹہ اور  
 پنجاب مدنی  
 مہم القدری خان نام گورنمنٹ ہسپتال ملتان  
 دعویٰ یا جرم سروس اپیل  
 تفصیل دعویٰ یا جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات کے پیش یا تفسیر مقدمہ نام  
 کے لیے  
 شہادت کے لیے  
 کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب  
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب  
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر پچہری کے علاوہ یا پچہری کے اوقات سے پہلے یا پچہری یا بروز تعطیل  
 بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پچہری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پچہری کے اوقات کے آگے یا پچہری پیش ہونے  
 پر منظر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ  
 کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسائے ڈگری  
 نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر ثانی یا راضی نامہ و فیصلہ برحلاف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے  
 تاریخ پیشی مقدمہ مقرر بیرون از پچہری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوقی ڈگری یک طرفہ یا درخواست حکم انتہائی یا قرتی  
 یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ہنگی علیحدہ مختام بیرونی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مثل کردہ  
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی  
 اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے  
 اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر چاہنے التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر  
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروی نہ کریں اور ایسی صورت  
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے  
 مورخہ 21/2/2016ء 21/2/2016ء ماہ مارچ 2016ء  
 مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted  
 Kham  
 Adv. H. C.  
 مہم القدری خان  
 جس کا بیرسٹر اندر مان ہیں زر مارکیٹ بالقابل جائز ہوں ڈیرہ اسماعیل خان