FORM OF ORDER SHEET.

Court of__

2441 /2023

		App	eal No. 2441 /2023
' · ,	S.No.	Date of order proceedings	Order or other proceedings with signature of judge
	1	2	3
x	1-	21/11/2023	The appeal of Syed Alam Shah received today by
		d'	registered post through Sardar Muhammad Azeem Advocate.
			It is fixed for preliminary hearing before touring Single Bench
	- -	• •	at A.Abad on
			By the order of Chairman
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BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 2441 12023

Syed Alam Shah

...APPELLANT

RESPONDENTS

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs Departmental Peshawar another

SERVICE APPEAL

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7.	Vakalat Nama	· _	287-

...APPELLANT

Through Counsel:

Dated:- 10/11 /2023

(SARDAR MÚHAMMAD AZEEM) Advocate High Court Abbottabad

03129832024

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 244/ 12023

Syed Alam Shah S/o Sikandar Shah Assistant Office of District Public prosecutor Mansehra.

...APPELLANT

VERSUS

- 1. Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs Departmental Peshawar.
- 2. Director General Prosecution Khyber Pakhtunkhwa Peshawar.

...RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER NO. DP/F&A08A08/10063-70 DATED 02/08/2023 AND FINAL SENIORITY LIST OF ASSISTANT YEARS 2023 IN WHICH REGULAR SERVICE OF THE APPELLANT AGAINST THE POST OF ASSISTANT B.P.S 16 HAS BEEN ILLIEGALLY CONVERTED TO ACTING CHARGE BASES.

PRAYER:-

ON ACCEPTING OF THIS APPEAL IMPUGNED ORDER NO. DP/F&A08/10063-20 DATED 08/08/2023 KINDLY BE SET ASIDE AND THE RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO RESTORE THE REGULAR SERVICE OF THE APPELLANT AS AN ASSISTANT WITH ALL BACK BENEFITS IN THE INTEREST OF JUSTICE.

Respectfully Sheweth,

2.

That the appellant was appointed as a Junior Clerk in C&W department on 12/03/1995 as and continued on his post and performed his duties honestly and devotedly.

That thereafter appellant was adjusted in BPS-7 in K.P.K Law, parliamentary affair and human rights department vide order No. SLT(LD-15(1(:96, dated 21.07.2003. That during the year 2016 the respondents promoted the appellant's junior from the post of junior clerk BPS-9 to post of senior clerk BPS-14 and appellant was not given the promotion only on the basis of a baseless inquiry and after concluding of inquires, appellant was granted promotion with immediate effect instead of from the date when his colleagues were promoted.

That the appellant filed appeal No. 924/18 Before This Honourable Tribunal regarding granting of promotion w.e.f8-1-16 which was accepted by this Hon'ble Tribunal vide judgment dated 17.02.2021 and on acceptance of appeal respondent granted promotion to appellant w.e.f 8-01-16. (Copy of judgment and order are annexed as Annexure "A" & "B")

That subsequently the respondent after approval of DPC having of prescribed qualification eligibility and fitness granted the promotion to appellate against existing vacant post of

3

4.

5.

assistant on regular bases vide order No.952-75 dated 11-02-2019. Copy of order Annexed as Annexure (C)

That the appellant after promotion against the post of Assistant B.P.S 16 continuously performed his duty against the said post to the satisfaction of his superior officer and no any complaint against the appellant.

6.

7.

8.

That the respondent issued final seniority list of assistant B.P.S 16 in years 2021-22 in which the name of appellant mentioned at serial No.20 & 22 as a regular employee. (Copy of seniority list is annexed as Annexure "D" & "E")

That respondents No.1 & 2 issue impugned order on -08-2023 and final seniority list of Assistant in years 2023 under which regular service of the appellant converted to acting charge bases, which is illegal against the law discriminatory thus not sustainable under the law. (Copy of impugned order dated 3.08.2023 and final seniority list years 2023

are annexed as Annexure "F" & "S")

That the appellant has filed a departmental appeal against impugned order dated 0\$.08.2023 and the final seniority list year 2023 but no response has been given by the respondents, hence this appeal inter-alia on the following grounds amongst others. (Copy of Departmental appeal is annexed as Annexure "\\")

<u>GROUNDS:-</u>

a.

That after the appellant was regularly promoted in B.P.S 16 he performed his duty according to the satisfaction of his superior officer, therefore promotion order has been implemented and the appellant has acquired vested rights based on the order, now the respondent have no power under the law to change / convert the regular service of the appellant's to acting charge base thus the impugned order is void illegal contrary to law, rules and natural justice, hence not sustainable:

b. That the impugned order dated 08.08.2023 and final seniority list year 2023 issued by the respondent on the bases of malafide and in violation of Article 4 and 25 of the Constitution, hence not sustainable.

c. That the persons who was promoted alongwith the appellant in the post of assistant B.P.S 16 on 11.02.2019 and his qualification is matric the respondent not only kept its regular service, but also proposal for promotion in B.P.S 17 was also given. And the regular service of the appellate converted into acting charge bases thus the action of respondents based on discrimination.

d. That the instant Service appeal is well within

time.

e. That the other points shall be urged at the time of arguments.

PRAYER

It is therefore humbly prayed that on acceptance of this appeal the impugned order kindly be set aside and respondents No. 1 & 2 may graciously be directed to restore regular service of the appellant with all back benefit in the interest of justice. Any other relief which deem fit and proper may also be granted.

...APPELLANT

APPELLANT

Through Counsel:

Dated:- 10 - 11 /2023

(SARDAR MUHAMMAD AZEEM) Advocate High Court Abbottabad

VERIFICATION:-

Verified that the contents of the instant **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal and no such like service appeal has earlier been filed before this Hon'ble tribunal or any other Court of Law.

Dated: - 10 - 1/2023

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. /2023

Syed Alam Shah

...APPELLANT

VERSUS

Secretary to Govt. of Khyber Pakhtunkhwa Home and Tribal Affairs Departmental Peshawar another

.. RESPONDENTS

DEPONENT

SERVICE APPEAL

AFFIDAVIT

I, Syed Alam Shah S/o Sikandar Shah Assistant office of District Public prosecutor Mansehra, Appellant, do hereby solemnly affirm and declare on Oath that the contents of instant *Service Appeal*, are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

Dated:- 10 - 11 /2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT, ABBOTTABAD

Service Appeal No.924/2018

Date of Institution Date of Decision ... 23.07.2018 17.02.2021

Syed Alam Shah son of Sikandar Shah Senior Clerk resident of Post Office Lassan Nawab Tehsil & District Mansehra.

(Appellant)

(Respondents)

Azeem Advocate

High Court Abbottabae

Pech3

<u>VERSUS</u>

Круо vice Tribunal. peshawar Secretary of Government of Khyber Pakhtunkhwa Home & Tribal Affairs Department Peshawar and Six others.

> Sardar Muhammad Azeem, Advocate

STT

 ΓR ukhwa

17/2/21

Riaz Khan Paindakheil, Assistant Advocate General

ROZINA REHMAN ATIQ-UR-REHMAN WAZIR

For appellant.

For respondents.

MEMBER (J) MEMBER (E)

JUDGMENT

ROZINA REHMAN, MEMBER : Brief facts of the case are that appellant was appointed Junior Clerk in BPS-05 in C&W Department on 12.03.1995. He was adjusted in BPS-07 in the Khyber Pakhtunkhwa Law, Parliamentary



Affairs & Human Rights Department on 21.07.2013. Those Junior Clerks who were junior to the appellant were promoted from BPS-11 to BPS-14 during the year 2016 but appellant was not promoted on the pretext that an inquiry was pending against him whereas the said inquiry was decided in his favor. Respondents No.3 to 7 who were junior to appellant were promoted as Senior Clerk in the year 2016 whereas appellant was promoted on 03.01.2018 but with immediate effect. He then filed a departmental appeal but the same was not responded to, hence; the instant service appeal.

2. Learned counsel for appellant argued that the promotion order of the appellant issued with immediate effect is discriminatory and that justice demands that the appellant may be treated in accordance with law from the date when his juniors were promoted.

3. Conversely, learned A.A.G submitted that a meeting of Departmental Promotion Committee was convened on 29.01.2016 for the purpose of promotion of Junior Clerks to the posts of Senior Clerks and that the name of appellant was also included in the working paper however, he was deferred due to pending inquiry against him and after exoneration from the inquiry, appellant was promoted and that question of superseding the appellant by the junior colleagues does not arise and lastly, he submitted that no discrimination to the appellant was committed rather he was promoted in accordance with law and rules. He, therefore, requested for dismissal of the instant appeal.

4. Record reveals that meeting of departmental selection committee was convened for the purpose of promotion of Junior Clerks (BPS-11) to the post of Senior Clerk (BPS-14) and the name of the appellant was also

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included in the working paper, the committee however deferred his case due to a pending inquiry against him. The appellant after exoneration from the charges, was promoted to the post of Senior Clerk(BPS-14), but with immediate effect and his name was also placed in his due place in the seniority list, whereas the appellant is seeking relief to the effect that his promotion shall be made effective from the date, when his juniors were promoted, as he was deferred and not superseded. The learned attorney when confronted with the proposition conceded to the fact that he was deferred for an inquiry pending against him and after his exoneration, respondents were required to effect his promotion from the date i.e. 08-01-AZOPETE AJVOC316 Meters Abbertabae Sardarn 2016 when his other colleagues were promoted.

In the light of foregoing reasons, the appeal in hand is accepted as 5. prayed for. No orders as to costs. File be consigned to record room

Date of Presentation of Application

Date of Complete Day of Comp. Date of Delivery of Copy

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None of Clark

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ANNOUNCED. 17.02.2021

> (Attiq ur Rehman Wazir) Member (E) Camp Court, Abbottabad

(Rozina Rehman) /ember()) Camp Court, Abbottabad

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Khore http://linwa Service Tribunal, Peshawar

UB

IN THE SUPREME COURT OF PAKISTAN

(Appellate Jurisdiction)

Present: MR. JUSTICE GULZAR AHMED, HCJ MR. JUSTICE MAZHAR ALAM KHAN MIANKHEL

(Civil Petition No.252-P/2021 (Against the judgment dated 17.02.2021 passed by the Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeal No.924/18)

Secretary to Govt. of KP. Home and Tribal Affairs Department, Peshawar and another

Versus

Syed Alam Shah and others

..Respondents

...Petitioners

For the petitioners: Mian Shafaqat Jan, Addl.A.G. Mr. Saced Naeem, Dir. Legal

In person

14.10.021

Respondent No.1:

Date of hearing:

ORDER

GUIZAR AHMED. CJ. The counsel for the petitioners himself has conceded before the Khyber Pakhtunkhwa Service Tribunal, Peshawar (the 'Tribunal') to the proposition that on exoneration of the respondent from the inquiry and the deferment of his promotion, the promotion is to be effected from the date he was deferred i.e. 08.01.2016 when his other colleagues were promoted. Where the stance of the respondent has been conceded by the counsel for the petitioners before the Tribunal, we see no reason as to why we should

te interfere with the impugned judgment. In the peculiar facts and an circumstances of the case, on account of making a conceding



Senier Court Associate Suprome Court of Pakistan



statement by the counsel for the petitioners, we find no merit in this

petition. The same is dismissed and leave refused.

Sd/-HCJ Sd/-J

NPS Islamabad. 14th October, 202 Nasir Khan /-'Not approved for reporting' . . · · · · 15

C.P.252-P/21

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Annex

DIRECTORATE OF PROSECUTION KHYBER PAKHTUNKHWA

No. OPL | Service <u>APPeal</u> No. 924/2018 Dated Peshawar 24 / 11 / 2021/15982-8 Office Phone # 91-9212559 Fax # 091-9212559 E-mail kpprosecution@yahoo.com

ORDER:

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AKHTUNKI

No.DP/E&A/ : In pursuance of judgment/order of the Supreme Court of Pakistan in Civil Petition No. 252-P/2021, Dated: 14-10-2021, and Khyber Pakhtunkhwa Service Tribunal decision in Service Appeal No. 924/2018 dated: 17/02/2021, the Competent Authority is pleased to amend the promotion notification dated: 03-01-2018, to the extent of Syed Alam Shah. Senior Clerk/Assistant, by considering his promotion from the 08-01-2016, instead of 03-01-2018, with all back benefits by placing his name at his rightful position in the seniority list.

> -Sd-Director General Prosecution Khyber Pakhtunkhwa.

Endst : of even No. dated: Copy forwarded for information to the:

- District Public Prosecutor, Mansehra.
- District Account Office, Mansehra.
- PA to Director General Prosecution. Directorate of Prosecution.
- Official concerned.

Deputy Director Administration



Mr. Ting (Supert.) to inform the Official Concerned.



Annez $\langle C$ DIRECTORATE OF PROSECUTION KHYBER PAKHTUNKHWA No. ______ Dated Peshawar 11 1021 2019 / Office Phone # 091-9212559 Fax # 091-9212559 E-mail koprosecution@vahoo.com On the recommendation of the Departmental No. DP/ESA/1(100)/ 952 Promotion Committee (D.P.C), the following Senior Clerks (BPS-14) of this Directorate are .75. hereby promoted to the post of Assistant (BS-16), on regular basis with immediate effect:-Present Posting Office of the District Public Prosecutor, Abbotmbad. Name S.No Shakeel Akhtar Office of the District Public Prosecutor, Torghar. Syed Ibrar Shah Office of the District Public Prosecutor. Buner Officerofathe District Public Prosecutor Addatabad My odda 21 Sakhawat Shah ٦ Office of the District Public Prosecutor, Peshawar. A Muhammad'Arshadigi - 4 Office of the District Public Prosecutor, Karak. Malik Rohmat Al Yaqoob Khan Directorate of Prosecution Khairullah Jan Directorate of Prosecution Office of the District Public Prosecutor, Bannu Fida Muhammar Office of the District Public Prosecutor, Dir Loine Muhammad Youraf Office of the District Public Prosecutor, Swabi Aurangzeb 10 Office of the District Public Prosecutor, Swabl Ajnul Khan 11 Office of the District Public Prosecutor, Malakand, Sahibzada 12 Office of the District Public Prosecutor, Swat 13 C.Said Rehman Office of the District Public Prosecutor, Mansehra. 1 Tariq Ahmad 14 Office of the District Public Prosecutor, Malakand Syed Alam Shah 15 Office of the District Public Prosecutor, Shangla Hazrat Muhammad .16 The above officials will be on probation for a period of one year in terms of section-6(2) Johan Alam _17 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rules-15(1) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. --sd/--(Director General Prosecution) Directorate of Prosecution, Khyber Pakhtunkirwa Copy Forwarded for Information to the: -Accountant General Office, Khyber Pakhtunkhwa, Peshawar Concerned District Public Prosecutor Offices. ۱., 2 3. Concerned District Accounts Offices. 5. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar. "PA to Director General Prosecution, Khyber Pakhtunkhwa. Establishment Section of this Directorate. いたの回辺で Pasting Director Administration ATTESTED District Public Prosecutor Mansehra Acessi Advocata incharr Migh Court Abbat these

BETTER COPY



AKHTUNKHWA '

Dated Peshawar 11/02/2019 Office Phone# 091-9212559 Fax# 091-9212559 E-Mail: Kpprosecution@yahoo.com

ORDER:

<u>No. DP/F&A/1(100)/952.75</u> on the recommendation of the departmental promotion committee (P.P.C), the following Senior Clerks (Bps-14 of this Directorate are hereby promoted to the post of Assistant (BPS-16) regular basis with immediate effect:-

S.No	Name	Present Posting
1.	Shakeel Akhtar	Office of the District Public prosecutor, Abbottabad
2.	Syed ibrar Shah	Office of the District Public prosecutor, Torghar.
3.	Sakhawat Shah	Office of the District Public prosecutor, Buner.
4.	Muhammad Arshad	Office of the District Public prosecutor, Abbottabad ManSel
5.	Malik Rehmat Ali	Office of the District Public prosecutor, Peshawar.
6.	Yaqoob Khan	Office of the District Public prosecutor, Karak.
7.	Khairullah jan	Directorate prosecution.
8.	Fida Muhammad	Directorate prosecution.
9.	Muhmmad Yousaf	Office of the District Public prosecutor, Bannu
10.	Auranzeb	Office of the District Public prosecutor, Dir Lower.
11.	Ajmal Khan	Office of the District Public prosecutor, Swabi.
12.	Sahibzada	Office of the District Public prosecutor, Swabi.
13.	Said Rehman	Office of the District Public prosecutor, Malakand.
14.	Tariq Ahmad	Office of the District Public prosecutor, Swat.
15.	Syed Alam Shah	Office of the District Public prosecutor, Mansehra.
16.	Hazrat Muhammad	Office of the District Public prosecutor, Malakand.
17.	Jan Alam	Office of the District Public prosecutor, Shangla

The above officials will be on probation for a period of one year in terms of section 6(2) of the Khyber Pakhtunkhwa civil servant Act, 1973 read with rules 15(1) of the Khyber Pakhtunkhwa Civil servants (Appointment, Promotion and Transfer) Rules 1989.

Sd/-(Director General Prosecution) Directorate of prosecution, Khyber Pakhtunkhwa

By forwarded for information to the:-

- 1. Accountant General Office, Khyber Pakhtunkhwa, Peshawar. +
- 2. Concerned District Public Prosecutor offices.
- 3. Concerned District Accounts offices.
- 4. Officials concerned.
- 5. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department, Peshawar.
- 6. PA to Director General Prosecution, Khyber Pakhtunkhwa.
- 2 7. Establishment Section of this Directorate.

nmere «D

DIRECTORATE OF PROSECUTION KHYBER PAKHTUNKHWA

NO. DP/E2 A/1(66) 14049-89 Dated Peshawar 20 /10 /2021 Office Phone # 091-9212559 Fax # 091-9212559 E-mail <u>kpprosecution@yahoo.com</u>

All District Public Prosecutors, Khyber Pakhtunkhwa.

All Assistants (BS-16) and Junior Clerk, (BS-11). FINAL SENIORITY LIST OF ASSISTANTS (BPS-16) AND JUNIOR CLERKS

Dear Sir.

ition:

ubject: -

(BPS-11).

I am directed to refer to the subject noted above and to enclose herewith a copy of "Final Seniority List" of the Assistants (BS-16) and Junior Clerks(BS-11) working at the strength of Directorate of Prosecution. The same may be handed over to all the officials concerned working under your kind control for information and further necessary

action, please.



Enci: (as above) Copy forwarded for information to the:

1. All Regional Director Prosecution Khyber Pakhtunkhwa. 2. PA to Director General Prosecution, Khyber Pakhtunkhwa.

Mr. Tarig (Segurt.) to inform The

- Ça Ð Deputy Director Administration Stated.

Yours sincerely,

A Sayto Deputy Director Administration

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FINAL SENIORITY LIST OF OFFICE ASSISTANT BPS-16. IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber Pakhtunkhwa, 2021

			DOB & Domicile	Date of First Entry to Service	Regular App	ointuren resent P	UPromotion to ost	
	Name	Qualification		with designation & BPS	Date	BS	Method of Recruitment	Present Posting
	Muhammād Hamayoon	B.A.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, orakzai
	Qamar Zaman	B.A	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Office of the District Public Prosecutor, south Waziristan
	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matrie	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	17/11/2017	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5.	Mubarik Ahmad	F.A.	04/12/1961 Charsadda	29-11-1987 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basis Directorate of prosecution, Charsadda
6.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (SS-17) On Acting Charge Base Office of the District Public F-osecutor, Bannu
7.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Kurram.
8.	Mumraiz Khan	Matric	04/04/1970 Peshawar	19-09-2000 Naib Qasid BS-01	17/11/2017	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss Directorate of Prosecution, Khyber
. 9.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	11/02/2019	15	Promotion	Appointed as Superintendent (BS-17) On Acting Charge Basiss DPP Mohammad
16.	Syed Ibrar Shah	Matric	1976 Mansehra	10-03-2003 Naib Qasid BS-01	05/04/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Torghur
11.	Syed Hakeem Shah	Matric	05/02/1962 Buner	30-06-1996 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, buner

تناجيه الجهور مورج < C

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				DOB & Domicile	Date of First Entry to Service	Regular Apj	ofntmen Present P	t/T'romotion to	
	S.NO	Name	Qualification		with designation & BPS	Date	BS	Method of Recruitment	Present Posting
- <u>-</u>	12.	Abdul Wahid	Matric	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	17/11/2017	16	Promotion	Assistant (BS-16) at Office of the District Public
	13.	Sakhawat Shah	B.A	10/04/1975 Buner	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat
•	14.	Muhammad Arshad	Matric	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, batagram
	15.	Malik Rehmat Ali	Matric	04/04/1981 Peshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Khyber
	16.	Muhammad Yousaf	BIA	24/04/1964 ອັນແກນ	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor , Bannu
	17.	Aurangzeb	Matric	01/03/1963 Dir Lower	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor .DIR LOWER
	18.	Ajmal Khan	Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (IS-16) at District Public Prosecutor SWABI
	19.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Juniar Clerk BS-05	11/02/2019	16	Promotion	Assistant (BSy16) at District Public Prosecutor .Swabi
	20.	Said Rehman	F.A	20/03/1974 Swat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT
	21.	Tariq Ahmad	Matric ·	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT
•	22.	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Fublic Prosecutor 🖉
•	23.	Hazrat Muhammad	B.A.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	10	Promotion	Assistant (BS-16) at District Public Prosecutor Malakand
	24.	Jehan Alam	B.A.	07/03/1984 Shangla	12-04-2007 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor Shangla
	25.	Ismail Khan	B.A	10-01-1982 MALAKAND	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda
	26.	Raisul Ahrar Bacha	B.S (Zoology)	05-07-1994 • SWAT	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION
	27.	Saba Gul	B.S(BOT ANY)	16-01-1995 MARDAN	24-06-2019 Assistant BS-16	24-06-2019	16	Appointed through KPPSC	Assistant (BS-16) at Nowshera
	28.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant BS-16	03-09-2019	16	Appointed through KPPSC	Assistant (BS-16) at District Public Prosecutor Abbottabad
	29.	Hanif-ur-	MA(Polit ical	01.03.1980 ** Bajaur	01.12.2004 Assistant BS-16	01.07.2019	16	Adjustment surplus pool	On deputation(education deptt)
.			ical Listerto	miller	Stretted Jungton	nr đ.			- -
• : !	١	l Khan.		/	Sarciar Muhamm Az Jem Advoca Nich Court Abbrid	1933 1933			

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	(D) Annex (E)	
-	DIRECTORATE OF PROSECUTION	E(02.2
Staninest of Staninest of	No. <u>DPLE - ALI (66) (673 - 672)</u> Dated Peshawar 25 / 64 / 2022 Office Phone # 91-9212559	od c itmc .
-	Fax # 091-9212559 E-mail kpprosecution@yahoo.com	noti
- To I.	All Regional Director Prosecution In Khyber Pakhtunkhwa	mol
2.	All District Public Prosecutors, In Khyber Fakhtunkhwa.	mĸ
Attention:	All Assistant (BS-16) & Senior Clerk (BPS-14).	əm
Subject: -	FINAL SENIORITY LIST OF ASSISTANT (BS-16) & SENIOR CLERK (BPS-14).	tor
Dear Sir,	I am directed to refer to the subject noted above and to enclose herewith a copy	'ro
of"Final Se	eniority List" of the Assistant (BS-16) and Senior Clerk (BPS-14) working at the	·r.
	Directorate: of Prosecution. The same may be handed over to all the officials working under your kind control for information and further necessary action,	
Encl: (as a	Delity Not 12 12 12 12 12 12 12 12 12 12 12 12 12	-
1. PA.to	Director General Prosecution, Khyber Pakhtunkhwa. 9 (Cupert.) to inform Deputy Director Administration WWW	- Larra
un - 0	29/14/2022 DET Not Ateste Asstude Asstude	人 ~



FINAL SENIORITY LIST OF OFFICE ASSISTANT BES-16, IN DIRECTORATE OF PROSECUTION PESHAWAR Khyber Pakhtunkhya, 2022

			DOB & Domicile	Date of First Entry to Service	Regular Appoi	iațment/P Post	ramotion to Present	
0	Name	Qualification		with designation & BPS	Date	BS	Method of Recruitment	Present Posting
1.	Muhanimad Hamayoon	В.А.	28/10/1967 Lakki Marwat	12-05-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Charg Basis Office of the District Public Prosecutor, orakzai
2.	Qamar Zaman	B.A.	20/01/1970 Tank	12-05-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Char Basis Office of the District Public Prosecutor, south Waziris
3.	Muslim Khan	Matric	07/01/1966 Charsadda	26-07-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Char Basis Directorate of Prosecution, Peshawar
4.	Sikandar Hayat	Matrie	15/11/1964 Dir Lower	15-08-1994 Junior Clerk BS-05	14-02-2020	16	Promotion	appointed as superintendent (bs-17) on acting charge basis office of the district public prosecutor, upper dir
5.	Muhammad Iqbal	B.Com	05/05/1970 Lakki Marwat	13-09-1989 Junior Clerk BS-05	14-02-2020	16	Promotion	Appointed as Superintendent (BS-17) On Acting Chai Basis Office of the District Public Presecutor, Bannu
6.	Mumraiz Khan	Matric	01/04/1970 Peshawar	08-06-1988 Naib Qasid BS-01	14-02-2020	16	Promotion	Appointed as Superintendent (#S-17) On Acting Cha Basis Directorate of Prosecution, Khyber
7.	Shahid Gul	Matric	05/05/1963 Kohat	19-09-2000 Junior Clerk BS-05	27-05-2021	16	Promotion	Appointed as Superintendent (BS-17) On Acting Cha Basis DPP Kurram.
8.	Shakeel Akhtar	Matric	15/03/1977 Nowshera	17-04-1994 Assistant BS-16	27-05-2021	16	Promotion	Appointed as Superintendent (BS-17) On Acting Cha Basis DPP Mohammad
					11/02/2019	16	Promotion	
9.	Syed Ibrar Shah	Matric	1976 Mansehra	- 10-03-2003 Naib Qasid BS-01				Assistant (BS-16) at Office of the District Public Prosecutor, Torghar
		Jeros L	e el					

Advinden L Advinden L

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\mathcal{T}	• •	۰ ۱	N	Qualificatio	DOB & Domicile	Date of First Entry to Service with designation & BPS	Regular Ar Present	Post Pres	at/Promotion to sent Posting	Present post	
•		S.NO	Name	n		whit designation & 515	Date	FPS	Method of recruitment		1
		10.	Abdul Wahid	Matrie	16/03/1972 Tank	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (DS-16) at Office of the District Pub, tank	
	•		Sakhawat Shah	B.A	10/04/1975 Buner	10=03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, swat	
		12.	Muhammad	Matrie	01/06/1977 Mansehra	10-03-2003 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Proscentor, batagram	
		13.	Arshad Malik Rehmat	Latrie	04/04/1981 Poshawar	10-03-2003 Naib Qasid BS-01	11/02/2019	16	Promotion	Assistant (BS-16) at Office of the District Public Prosecutor, Uhyber	
		14.	Ali Muhammad	B.A	24/:)4/1964 Bannu	24-04-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor, Bannu	1997 - 1997 -
		15.	Yousaf	Matric	01/03/1963	17-08-1988 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,DIR LOWER	Las Jacuantasa
		16.	Aurangzeb Ajmal Khan	Matric	Dir Lower 24/11/1967 Swabi	03-12-1989 Junior Clerk BS-05	11/02/2019	16	Pronotion	Assistant (DS-16) at District Public Prosecutor ,SWABI	urtechi
		17.	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Swabi	
		18.	Said Rehman	F.A	20/03/1974 Syvat	26-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT	
		19.	Tariq Ahmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,SWAT	
	_	r20.	Syed Alam Shah	Matric	13/02/1974 Manschra	15-03-1995 Junior Clerk BS-05	11/02/2019	ló	Promotion	Assistant (BS-16) at Distri at Public Prosecutor "Manschra	
		21.	Hazrat	В.А.	01/01/1970 Malakand	23-07-1995 Junior Clerk BS-05	11/02/2019	16	Promotion	Assistant (BS-16) at District Public Prosecutor ,Malakand	
a 1	.,			B,A.	07/03/1984	12-04-2007 Junior Clerk BS-05	11/02/2019	16	. Promotion	Assistant (BS-16) at District Public Prosecutor ,Shangla	
		23.	Ismail Khan		Sbangla 101-1982 MALAKANE	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at Office of the District Public Prosecutor, Charsadda	
		24.	Raisul Ahra		05-(17-1994	15-03-2019 Assistant BS-16	15-03-2019	16	Appointed through KPPSC	Assistant (BS-16) at DIRECTORATE OF PROSECUTION	
	۰. ۱	25.	Bacha Saba Gul	B.S(BOTAN	1 16-01-1995		24-06-2019	10	Appointed through KPPSC	Assistant (BS-16) at DPP OFFICE Nowshera	
Sister of the second		(1) ¹¹ (1) ¹ (2)6	Muhammad Ali Shah	LLB (Hons)	MARDAN 26-11-1989 Abhoilabad		03-09-2019	16	Appointed throug KPPSC	Assistant (BS-16) at District Public Prosecutor Abbottabad	

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Ja. Jar Mulia.a.. Alaan Advocate Jaan Gourt Alborato

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DIRECTORATE OF PROSECUTION GOVERNMENT OF KHYBER PAKHTUNKHWA HOME & TRIBAL AFFAIRS DEPARTMENT No. DP/

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Dated Peshawar the 080 Office Landline#091-9212559 hurs/bés

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<u>ORDER</u>

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recommendation . of the the On NO.DP/E&A/ 168 1006 Departmental Promotion Committee (DPC) in its meeting held on 25-07-2023 and DP/EA/1(100)952-75 order No. Directorate in supersession of this duted: 11-02-2019, the Competent Authority has been pleased to promote/ appoint the following Senior Clerks (BPS-14) to the post of Assistant (BPS-16) on regular/ acting charge basis as per details given below:

	Mr. Shakeel A khtar	On regular basis	11-02-2019
••			Muhmand
	Mr. Syed Ibrar Shah	On regular basis	-do- Tursh
· . :	Mr. Sakhawat Shah	On acting charge basis	-do- Swat [+1] :
	Mr. Muhammad Arshad	-do+	-do-
5.	Mr. Malik Re unat Ali	-do-	-do- Khyber
b .	Mr. Yaqoob Ehan	-do-	-do-
7.	Mr. Khairullah Jan	-do-	-do-
8.	Mr. Fida Mul ammad	-do-	-do-
9. [.]	Mr. Muhamm ad Yousaf	-do-	-do- Qumn
· 10.	Mr. Murangzeb	-do-	-do- Dir lavel

attested Junitan Sardar Muhammar Azeen Advoration Azeem Advocate High Court Abboriateac

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DIRECTORATE OF PROSECUTION GOVERNMENT OF KHYBER PAKHTUNKHWA HOME & TRIBAL AFFAIRS DEPARTMENT No. DP/____ 1 11.

Dated Peshawar the _____ Office Landline#091-9212559 . Sume the way of the

	•		
·		SEREGE	Millie Teastrant Millie
مر العامة الم مناطقة الم	Neine aufonie En		11-02-2019
11.	Mr. Ajmal Khan	On acting charge basis	Swalor
l,2.	Mr. Sahibzada	-do-	-do- Swabi
<u> </u> - B ~	Mri, Said Rehman	i -do- ,	-do- Swal
':' 14.	Mr. Tariq Ahmad	-do-	-do- Chursadola
15.	Mr. Syed Alam Shah	-do:	-do-
16.	Mr. Hazrat Wuhammad	-do-	-do-
17.	Mr. Jehan Alam	-do-	
۱ [.]			· · · ·

-Sd-Director General Prosecution (Directorate of Prosecution) Khyber Pakhtunkhwa

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Endst : of even No. dated:

Copy forwarded for information to the:

F. Accountant General office, Khyber Pakhtunkhwa Pashawar.

2. District Public Prosecutor offices concerned. 111

3. District Account offices concerned.

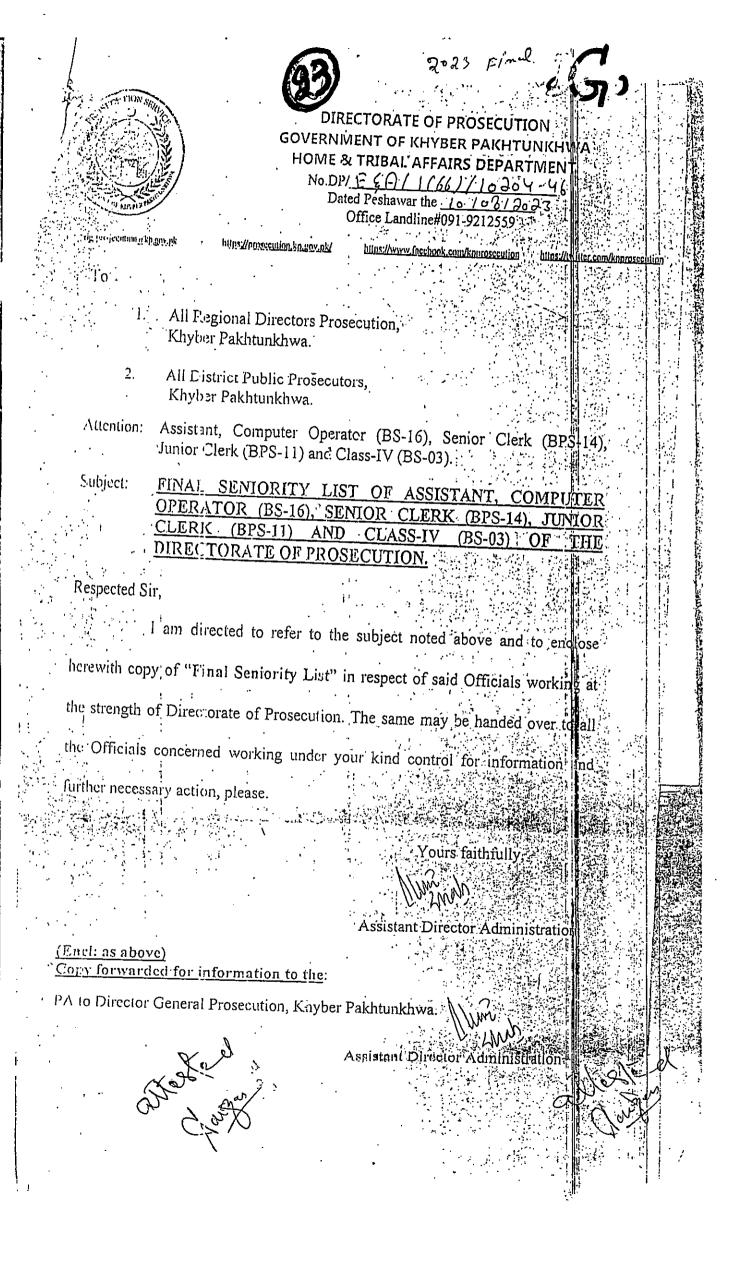
4 .PS to Secretary to Government of Khyber Pakhtunkhwa, Home & Iribal Affairs . • • •

ⁱDepartment, Peshawar.

.5. Officials concerned.

6. PA to Director General, Khyber Pakhtunkhwa.

7 Establishment Section of this Directorate.



			PESHAWAR KH	FIGE ASSISTANT (BI IYBER PAKHTUNKHY	WA'AS STO	<u>00'00</u>	N 09-08-2023.	
<u>\$.NO</u>	Name	Ounlification	DOB & Domicile	Date of First Entry to Service with designation	Regular A	pointn Preser		PressensPosting
	and the state of the second second			& BPS	Date	BPS	Method of Recruitment	
	Shakeel Akhtar	Matric	15-03-1977 Novshera	17-04-1994 Assistant	27-05-2021	16	Promotion	Appointed as Superitendent (BPS-17) On Acting Charge Basis office of District Public IPresentor, Mohammad
2	Syed Ibrar Shah	Matric	01-07-1976 Mansehra	10-03-2003 Naib Qasid	11-02-2019	16	Promotion	Office of Distric! Public Prosecutor. Torghar
3.	Abdul Wahid	Matric	16-03-1972 Tank	10-03-2003 Junior Clerk	11-02-2019	16	Promotion	Office of Districat Public Prosecutor. Tank
4.	Ismail Khan	B. A	10-01-1982 Bajaur	15-03-2019 Assistant	15-03-2019	16	Initial, Appointed through KPPSC	Office of Distric : t Public Prosecutor, Charsadda
5	Raisul Ahrar Bacha	B.Š (Zoology)	05-07-1994 Swat	15-03-2019 <u>Assistant</u>	15-03-2019	16-	Initial, Appointed through KPPSC	Directorate of Pirosœution
6, [.]	Saba Gul	B.S (Botany)	16-01-1995 Mardan	24-06-2019 Assistant	24-06-2019	, 16	Initial, Appointed through KPPSC	Office of District Public Prosecutor Mardan and is on Es-Pakistan Leave
7.	Muhammad Ali Shah	LLB (Hons)	26-11-1989 Abbottabad	03-09-2019 Assistant	03-09-2019	16	Initial, Appointed through KPPSC	Office of Districat Pablic Prosecutor Abbottabad
s.	Sadar Ayub	F.A	06-01-1985 Upper Kohistan	i2-04-2007 Junior Clerk	20-01-2020	16	Promotion	Office of District Public Prosecutor Upper Kohistan
9.	Waheed Akhtar	D.COM	28-02-1987 Kohat	12-04-2007 Junior Clerk	20-01-2020	16	Promotion	Office of Distric:t Public Prosecutor, Kohat
10.	Fazle Rábi	Matric	10-01-1970 Peshawar	01-01-1992 Naib Qasid	20-01-2020	16	Promotion	Office of Distric:: Public Prosecutor, Peshawar
		ster	and and a second	- Aler	en l		<u> </u>	

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	S. No	Name		Date of Birth &	NKIIWA AS STOOD ON 09-08	· · · · · · · · · · · · · · · · · · ·
	<u>.</u>		Qualification	Donricile	Date of first entry into service with designation & BPS	Present Posting
	1.	Sakhawat Shah	В.Л	10/04/1975 _Buner	10-03-2003 Naib Qasid BPS-01	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, swat
	2.	Muhammad Arshad	Matric	01/06/1977 Manschra	10-03-2003 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Battagram
	3.	Malik Rehmat Ali	Matric	04/04/1981 . Pcshawar	10-03-2003 Naib Qasid BPS-01	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Khyber
	4.	Muhammad Yousaf	B.A	24/04/1964 Bannu	24-04-1988 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Bannu
•	5.	Ajmal Khan	· Matric	24/11/1967 Swabi	03-12-1989 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swabi
-	6. 	Sahibzada	Matric	25/03/1970 Swabi	10-09-1990 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swabi
.	7.	Said Rehman	F.A	20/03/1974 . Swat	26-02 1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swat
	8.	Tariq Abmad	Matric	03/04/1975 Swat	27-02-1995 Junior Clerk BPS-05	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Swat
	9. ···	Syed Alam Shah	Matric	13/02/1974 Mansehra	15-03-1995	Assistant (BPS-16) on acting charge basis at Office of the District Public Prosecutor, Mansehra
		Larachionannad	BA	01/01/1970 Malakand	23=07=1993	Assistant (BPS-16) on onthe anti-
	· .	Ruth		and a state	Junior Clerk BPS-05	Office of the District Public Prosecutor, Malakand

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cff) جَرَمِنُ مَ المَ المُحْرَى تُوَدَفُقْ دَفَى فَرْقُولَ قَدْهِ وَلَنَ وَمَامَ المور 2023 - Lang 10063- 5- 6 100 101 - 101 - 101 - 101 En the mode of prosecution in the state Acting علا نے فیت ایم پنٹ کا تیکو مرسول قد م the charge base - in in it is the in (1) مرتر اسمار ف ورف القروري و و مع القروري و المع 16 WI- 3- 0 - 5 - 1 = 5 & S UND N- 14. pc تولود بر لور از در ای ای مر اورای د توم بندا در در ای - 202 ى قاسل سنياد فى كسك جارى كى كى حل مسرا بدان انى ماد ويكو السين موج رسا - 1 2013 Up / De Vormotion (2) 2, 2 Edys (5) 13, تَ مَا فَامِنْكَ طِيرِ السَّنَاعَ فَالَجْ سَتَحَ رَ فِي فَرْاطِعَلَ سَرِانَجَامِ رَ وَمِلْعِ " Meste d under solution 2 de git and a long and a long and and a long and a solution and a 127 Promotion -1, of cu 20 10 vested night " Blins - 4 QUE 203 63 GIL 6 0 W W E, & Acting - 500 E mad on site Deut all Educed 8 low 2023 in le site in b Estore le in D'Eure cours 25 100 al co e cours Estore le in D'Eure cours 25 100 al co e cours lic Droseentor (x' h 2 2 in 101" Alen- Chill

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بعدالت مرول مريوم م of plen عنوان: منجا

مرول إمد نوعية يتقد معر باعث تحريراً نك مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام The wow and states کود کیل مقرر کرے اقر الزکرتا ہوں کُہصاحب موصوف کومقد مہ کی کل کا روائی کا کامل اختیار ہوگا نیز دکیل صاحب موصوف کوکرنے راضی نامہ دتقر رثالث و فیصلہ برحلف ودینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء دصولی چیک روپیہ دعرضی دعویٰ کی تصدیق اوراس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل پاکسی جزوئ کا روائی کے لئے کسی اوروکیل یا مختارصا حب قانونی کواپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا درصا حب مقرر شدہ کوبھی دہی اور دیسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخر چہ وہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایارقم وصول کرنے کابھی اختیار ہوگا۔اگرکوئی پیشی مقام دورہ پر ہویا ے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اورا گرمختار مقرر کر دہ میں حد کوئی جز وبقایا ہوتو دکیل صاحب موصوف مقدمہ کی پیروی کے یابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصيغه مفلس کے دائر کرنے اوراس کی پیروی کا بھی صاحب موصوف کواختیار ہوگا۔) ہذاوکالت نامت^ح سرکیا تا کہ سندر ہے۔

