Form- A

FORM OF ORDER SHEET

Court of	 •	 	 	· · ·	
			•		

	Case No	/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
·		
1-	19/01/2021	The appeal presented today by Mr. Adnan Aman, Advocate
		be entered in the Institution Register and put to the Learned Member
		proper order please:
•		
•		REGISTRAR
		This case is entrusted to S. Bench for preliminary hearing to be
	08-02-21	up there on $\frac{01-03-21}{}$
·· :		up there on 01 03 - 21
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		MEMBER(J)
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01.0	on le	before S.B on 26.07.2021.
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL	NO	•	/2021
ul i rur	710.		<i> </i>

ALIA BIBI

VS.

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	*********	1- 3
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5.	Service Tribunal judgment	E	8- 9
6.	Vakalat nama		10

APPELLANT

THROUGH:

ADNAN AMAN
ADVOCATE HIGH COURT (S)
CELL NO 0321-9853530

Note: Sir,

Spare copies will be submitted After submission of the case.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL. PESHAWAR.

APPEAL NO 1254/2021

Khyber Palchtukhwa Service Tribi

Mrs. ALIA BIBI, SPST (BPS-14).

GGPS, MAYAR SAMARBAGH, LOWER DIR

Personnel Number: 00259724

APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 5- The Director of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS WHO VIDE THE SAME ARE ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE OF THE APPELLANT DURING WINTER & SUMMER VACATIONS AND AGAINST IN ACTION OF THE DEPARTMENTAL APPEALLATE AUTHORITY WHO VIDE THE SAME DID NOT PASS ANY APPROPRIATE ORDER OVER THE DEPARTMENTAL APPEAL OF THE APPEALLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

PRAYER:

That on acceptance of this appeal the respondents may kindly be Filedto-dayduring vacations period (Summer & Winter Vacations) and make the ordered/directed not to make deduction of conveyance allowance payment of all outstanding amount of Conveyance allowance which have been deducted previously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1. That the appellant is serving in the Elementary & Secondary Education Department as SENIOR PRIMARY SCHOOL TEACHER (SPST) BPS-14 quite efficiently and up to the entire satisfaction of their superiors.
- That the Conveyance Allowance is admissible to all the Civil Servants and to this effect a Notification No. FD (PRC)1-1/2011 dated 14.07.2011 was issued. That later on vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS 1 to 15 were enhance/revised while employees from

BPS- 16 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Copy of the Notification dated 20.12.2012 are attached as annexure...... A.

- That appellant was receiving the conveyance allowances as admissible under the law and rules but the respondents without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. Copies of the Salary Slips of working/serving month and vacations (deduction period) are attached as annexure.

 B & C.

 - 64 That the appellant also prayed to be treated alike through the principles of consistency for allowing such relief which was granted in appeal No 1452/2019 titled Maqsad Hayat versus Education Department in Judgment Dated 11.11.2019.
 - 7- That where after the appellant waited for the statutory period of ninety days but no reply has been received from the respondents. That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

GROUNDS:

- A- That the action and inaction of the respondents regarding deduction of conveyance allowance for vacations period/months is illegal, against the law, facts, norms of natural justice.
- B- That the appellant has not been treated by the respondent Department in accordance with law and Rules on the subject noted above and as such the respondents have violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned action of the respondents is without any legal & lawful authority, discriminatory and in clear violation of fundamental rights duly conferred by the Constitution and is liable to be declared as null and void.
- D-That there is clear difference between leave and vacation as leave is applied by the Civil Servant in light Government Servant Revised Leave Rules, 1981 while the vacations are always announced by the Government, therefore under the law and Rules the appellant fully entitled for the grant of conveyance allowance during vacations period.

- E- That the Government Servants Revised Leave Rules, 1981 clearly explain that the civil servants who avail the vacations are allowed only one leave in a month whereas, the other civil servants may avail 04 days leave in a calendar months and the same are credited to his account and in this way he may avail 48 days earned leave with full pay, whereas the Government servants to avail vacation such as appellant is allowed one day leave in a month and twelve (12) days in a year and earned leave for twelve days in a year are credited to his account and there is no question of deduction of conveyance allowance for vacation period, the respondents while making the deduction of conveyance allowance lost sight of this legal aspect and illegally and without any authority started the recovery and deduction of conveyance allowance from appellant.
 - F- That as the act of the respondents is illegal, unconstitutional, without any lawful authority and not only discriminatory but is also the result of malafide on the part of respondents.
 - G- That appellant has the vested right of equal treatment before law and the act of the respondents to deprive the appellant from the conveyance/allowance is unconstitutional and clear violation of fundamental rights.
 - H- That according to Government Servants Revised Leave Rules, 1981 vacations are holidays and not leave of any kind, therefore, the deduction of conveyance allowance in vacations is against the law and rules.
 - I- That according to Article 38 (e) of the Constitution of Islamic Republic of Pakistan, 1973 the state is bound to reduce disparity in the income and earning of individuals including persons in the services of the federation, therefore in light of the said Article the appellant fully entitle for the grant of conveyance allowance during vacations.
 - J- That the appellant seeks permission of this Honorable Tribunal to raise any other grounds available at the time of arguments.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for under the golden principals of consistency.

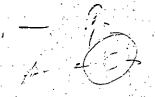
APPELLANT ALIA BIBI

THROUGH:

ADNAN AMAN ADVOCATE HIGH COURT(S)









GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGULATION WING)

NO. FG/SO/SR-IN/8-52/2012 Dated Peshawar the: 20-12-2012

From

The Secretary to Govi, of Khyber Pakhtuskhwa. Finance Department. Penhawar.

To:

All Administrative Secretaries to Govi. of Kinter Pakhtunkhins.

The Sonior Member, Board of Revenue, Khyber Pakhtus and

"The Secretary to General Knyber Paking was

The Sestebay to Chief Minster, Khyber Pakhishkima.

The Secretary, Provincial Ascertary Knyber Pakatorikhika

All Heads of Attached Departments in Knytter Partnur Wave

AF Cishiel Coordination Officers to Khysel Paklisenthus.

As Political Agents / District & Seculops Judges in Khyper Pakingskhwa

The Registral Pashapar Ham Court. Peshapar

The Charman Public Service Corvebsion, Khyber Pakhtunimus The Charman, Sewers Tribenal Kryps: Pakhtunahwa.

Subject:

REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA, PROVINCIAL GOVERNMENT BPS 1-19

Dear Sir.

The Government of Khyter Pakhturahiyo has been pleased to enhance / revise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants Gover of Nayber Pashtunishvia (Working in BPS-1 to BPS-15) w.e.f from 1° September, 2012 at the following rates. However, the conveyance allowance for employees in BFS-15 to BPS-19 will remain ... Wichanged.

S.NO	BP5	EXISTING RATE (PH)	REVISED RATE (PM)
1.	1-4	Rs.1,500/- Rs.1,500/-	RS.1.700/- RS.1.540/-
· <u></u>	5-10	Ps.2,000	Rs.2,720/-
	16-19	Rs,5,000/	Rs.5,000/-

Conveyance Allowance at the above rates per month shall be admissible to those BPS-17, 18 and 19 officers who have not been sanctioned official vehicles.

Yours Faithfully.

(Sahibzada Sacod Ahmad) Secretary Finance

Endate NO. FOSO(SR-10-8-52/2012

. Dated Postiawar the 200 December, 2017

A Copy is forwarded for information to the:-

Associate General, Kingler Hakhturkima, Pesignasi

Secretaries to Government of Ponjab, Goodh & Saboterian निकासक प्रेम्टराधासूनी Au Authorious / Seart Autonomous Socies in Kingber Pakit Lakhina

MITIAZ AYUB Additional Secretary (Row

GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT (REGUALTION WING)

NO.FD/SO(SR-II)/52/2012 Dated Peshawar the: 20.12.2012

From

The Secretary to Govt: of Khyber Pakhtunkhwa. Finance Department, Peshawar.

To:

- 1. All administrative Secretaries to Govt: of Khyber Pakhtunkhwa.
- 2. The Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
- 3. The Secretary to Governor, Khyber Pakhtunkhwa.
- 4. The Secretary to Chief Minister, Khyber Pakhtunkhwa.
- 5. The Secretary, Provincial Assembly, Khyber Pakhtunkhwa.
- 6. All Heads of attached Departments in Khyber Pakhtunkhwa.
- 7. All District Coordination Officers of Khyber Paklitunkhwa.
- 8. All Political Agents/District & Session Judge in Khyber Pakhtunkhwa.
- 9. The Registrar Peshawar High Court, Peshawar.
- 10. The Chairman Public Service Commission, Khyber Pakhtunkhwa.
- 11. The Chairman, Service Tribunal, Khyber Pakhtunkhwa.

Subject:

REVISION IN THE RATE OF CONVEYANCE ALLOWANCE FOR THE CIVIL EMPLOYEES OF THE KHYBER PAKHTUNKHWA, PROVINCIAL GOVERNMENT BPS-1-19

Dear Sir,

The Government of Khyber Pakhtunkhwa has been pleased to enhance/invise the rate of Conveyance Allowance admissible to all the Provincial Civil Servants Govt. of Khyber Pakhtunkhwa (working in BPS-1 to BPS-15) w.e.f from 1st September, 2012 at the following rates. However, the conveyance allowance for employees in BPS-16 to BPS-19 will remain unchanged.

S.No.	BPS	Existing Rate (PM)	Revised Rate (PM)
1	1-4	Rs. 1,500/-	Rs. 1,700/-
2	5-10	Rs. 1,500/-	Rs. 1,840/-
3	11-15	Rs. 2,000/-	Rs. 2,720/-
4	16-19	Rs. 5,000/-	Rs. 5,000/-

Conveyance Allowance at the above rates per month shall be admissible to those BPS-17.
 18 and 19 officers who have not been sanctioned official vehicle.

Your Faithfully

(Sahibzada Saced Alimad) Secretary Finance

Endst No. FD/SO(SR-II)8-52/2012 Dated Peshawar the 20th December, 2012

N

Dist. Govt. KP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (November-2020)





Personal Information of Miss ALIA BIBI d/w/s of BAKHT MUNIR KHAN

Personnel Number: 00259724

CNIC: 10876181603

NTN:

Date of Birth: 06.02.1976

Entry into Govt. Service: 18.06.1995

Length of Service: 25 Years 05 Months 014 Day

Employment Category: Active Permanent

Designation: SENIOR PRIMARY SCHOOL TEA

80001411-DISTRICT GOVERNMENT KHYBE

DDO Code: DA6144-GOVT. PRIMARY SCHOOLS (F) SAMARBAGH

Payroll Section: 001

GPF Section: 001

Cash Center: 04

559,224.00

GPF A/C No: EDUDR010880

Interest Applied: Yes

GPF Balance:

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil

BPS: 14

Pay Stage: 18.

	Wage type	Amount		Wage type	Amount
nnnı	Basic Pay	36,240.00	1000	House Rent Allowance	2,214.00
	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
	UAA-OTHER 20%(1-15)	1,000.00	2148	15% Adhoc Relief All-2013	766.00
	Adhoc Relief Allow @10%	535.00		Adhoc Relief All 2016 10%	2,762.00
	Adhoc Relief All 2017 10%	3,624.00		Adhoc Relief All 2018 10%	3,624.00
	Adhoc Relief All 2019 10%	3,624.00			0.00

Deductions - General

Wage type	Amount	Wage type	Amount	
3014 GPF Subscription	-2,620.00	3501 Benevolent Fund	-600.00	
3609 Income Tax	-328.00	3990 Emp.Edu. Fund KPK	-125.00	
4004 R. Benefits & Death Comp:	-600.00		.0.00	

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
230411	<u></u>			

Deductions - Income Tax

Payable:

5,104.15

Recovered till NOV-2020:

1,533.00

Recoverable:

Gross Pay (Rs.):

Deductions: (Rs.):

-4.273.00

Payee Name: ALIA BIBI

Account Number: 261739394

Bank Details: UNITED BANK LIMITED, 211157 UBL MAYAR UBL MAYAR, MARDAN

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: VILL MAYAR

City: DIR LOWER

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: haroonkhanpk60@gmail.com



Dist. Govt. KP-Provincial District Accounts Office Dir at Timargar Monthly Salary Statement (July-2020)





Personal Information of Miss ALIA BIBI d/w/s of BAKHT MUNIR KHAN

Personnel Number: 00259724 Date of Birth: 06.02.1976.

GPF A/C No: EDUDR010880

CNIC: 10876181603

Entry into Govt. Service: 18.06.1995

NTN: Length of Service: 25 Years 01 Months 015 Days

Employment Category: Active Permanent

Designation: SENIOR PRIMARY SCHOOL TEA

80001411-DISTRICT GOVERNMENT KHYBE

DDO Code: DA6144-GOVT. PRIMARY SCHOOLS (F) SAMARBAGH

Payroll Section: 001

GPF Section: 001

Interest Applied: Yes

Cash Center: 04

GPF Balance:

491,775.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 14

Wage type		Amount Wage type		Amount	
0001	Basic Pay	36,240.00	1000	House Rent Allowance	2,214.00
1300	Medical Allowance	1,500.00	1923	UAA-OTHER 20%(1-15)	1,000.00
	15% Adhoc Relief All-2013	766.00	2199	Adhoc Relief Allow @10%	535.00
	Adhoc Relief All 2016 10%	2,762.00	2224	Adhoc Relief All 2017 10%	3,624.00
	Adhoc Relief All 2018 10%	3,624.00	2264	Adhoc Relief All 2019 10%	3,624.00

Deductions - General

	Wage type	Amount	<u>.</u>	Wage type	Amount
3014	GPF Subscription	-2,620.00	3501	Benevolent Fund	-600.00
	Income Tax	-221.00	3990	Emp.Edu. Fund KPK	-125.00
	R. Benefits & Death Comp:	-600.00			0.00

Deductions - Loans and Advances

				<u> </u>
Loan	Description	Principal amo	unt Deduction	Balance

Deductions - Income Tax

Payable:

3,533.35

Recovered till JUL-2020:

221.00

Exempted: 883.11

Recoverable:

Gross Pay (Rs.):

55.889.00

Deductions: (Rs.): , i ili ili ili laglant -4.166.00

Net Pay: (Rs.):

Pavee Name: ALIA BIBI

Account Number: 261739394

Bank Details: UNITED BANK LIMITED, 211157 UBL MAYAR UBL MAYAR, MARDAN

Leaves:

Opening Balance:

Availed:

Earned:

Balance:

Permanent Address: VILL MAYAR

City: DIR LOWER

* Errors & omissions excepted

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: haroonkhanpk60@gmail.com

70

The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ACTION OF THE CONCERNED AUTHORITY BY ILLEGALLY AND UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE DURING WINTER & SUMMER VACATIONS

Respected Sir,

With due respect it is stated that I am the employee of your good self Department and is serving as SPST (BPS-14) quite efficiency and up to the satisfaction of the superiors. It is stated for kind information that Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. Later ion vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees working in BPS 1 to 15 were enhance/revised while employees from BPS-15 to 19 have been treated under the previous Notification by not enhancing their conveyance allowance. Respected Sir, I was receiving the conveyance allowance as admissible under the law and rules but the concerned authority without any valid and justifiable reasons stopped/deducted the payment of conveyance allowance under the wrong and illegal pretext that the same is not allowed for the leave period. One of the employee of Education Department in Islamabad filed service appeal No.1888 (R) CS/2016 before the Federal Service Tribunal, Islamabad regarding conveyance allowance which was accepted by the Honorable Service Tribunal vide its judgment dated 03.12.2018. That the august K.P.K service tribunal also allowed the restoration of the convence allowance in its judgment dated 11.11.2019 in appeal No 1452/2019 titled Magsad Hayat versus Education Derpartment. Copy attached. That I also the similar employee of Education Department and under the principle of consistency I am also entitled for the same treatment meted out in the above mentioned service appeal but the concerned authority is not willing to issue/grant the same conveyance allowance which is granting to other employees. Copy attached. I am feeling aggrieved from the action of the concerned authority regarding deduction of conveyance allowance in vacations period/months preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the concerned authority may very kindly be directed the conveyance allowance may not be deducted from my monthly salary during the winter & summer vacations.

to pe lune

Dated: 24.09.2020

Your Obediently

ALIA BIBI

TUNKHWA SERVICE TRIBUNA BEFORE THE KHYBER PAKE PESHAWAR APPEAL NO. 1452 /2019 Mr. Magsad Hayat, SCT (BPS-16), APPELLANT GHS Masho Gagar, Peshawar.... **VERSUS** 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar. 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.

3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.

4- The Accountant General, Khyber Pakhtunkhwa, Peshawar.

5- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.RESPONDENTS

APPEAL UDNER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED THE RESPONDENTS BY UNLAWFULLY DEDUCTING THE CONVEYANCE ALLOWANCE SUMMER DURING WINTER VACATIONS AND AGAINST NO ACTION TAKEN APPELLANT ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the respondents may kindly be directed not to make deduction of conveyance allowance during vacations period (Summer & Winter Vacations) and make the payment of all outstanding amount of Conveyance allowance which have been deducted Medic-daypreviously with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in Registrar favor of the appellant.

5-11/18/16 R/SHEWETH: ON FACTS:

1- That the appellant is serving in the elementary and secondary education department as Certified Teacher (BPS-15) quite efficiency. and up to the entire satisfaction of the superiors.

Кнубег

2- That the Conveyance Allowance is admissible to all the civil servants and to this effect a Notification No. FD (PRC) 1-1/2011 dated 14.07.2011 was issued. That later ion vide revised Notification dated 20.12.2012 whereby the conveyance allowance for employees Appeal No. 1452/2019
Maxbad Hayat vs Got 122 (1)

11.11.2019

Counsel for the appellant present.

Learned counsel referred to the judgment passed by learned Federal Service Tribunal in Appeal No. 1888(R)CS/2016 which was handed down on 03:12.2018. Through the said judgment the issue of payment of Conveyance Allowance to a civil servant during summer and winter vacations was held to be within his entitlement and the deduction already made from him was to be reimbursed. Similar reference was made to the judgment by Honourable Peshawar High Court passed on 01.10.2019 in the case of appellant.

Learned counsel, when confronted with the proposition that the issue; in essence, was dilated upon by the Federal Service Tribunal and, more particularly, by the Honourable Peshawar High Court in the case of appellant, stated that in case the respondents are required to execute the judgment of Peshawar High Court, the appellant will have no cavil about disposal of instant appeal.

The record suggests that while handing down judgment in the Writ Petition preferred by the appellant, the Honourable High Court not only expounded the definition of "Pay" as well as "Salary" but also entitlement of a civil servant for the Conveyance Allowance during the period of vacations. It is important to note that the respondents were represented before the High Court during the proceedings.

In view of the above noted facts and circumstances and in order to protect the appellant from a fresh round of litigation which may protract over a formidable period, the appeal in hand is disposed of with observation that the judgment of Honourable Peshawar High Court passed in Writ Petitions including W.P. No. 3162-P/2019 shall be honoured and implemented by the respondents within shortest possible time. The appellant shall, however, be at liberty to seek remedy in accordance with law in case his grievance is not redressed by the respondents within a

াগ্য reasonable time.

File be consigned to the repord.

ANNOUNCED

11.11.2019

. . .

<u>J.</u> St. Chairman (

Wind with

Poshawar

Certified

TAMBARAL COM OFFICERS LINE	CONTROL OF CAMBRIAN DAY MS. THE
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(12/1621 J. C. C. A.	ALIA SIBI
প্রভাগতাল বিষয় (১৯৪০ চন্দ্র ১৯৮৮) প্রভাগতাল বিষয়	IMIE ALIA
	<u>Terrett</u>
TENREPORTENCE (1873)	n engation Department
iso, withdraw or repertor in arrangely, in the arrangely, in the discount of the discount of the arrangely of the repertor is any other with arranged to a constant of the con	We ALLA ST33 on hereby of point and constitute Allfall Fachamer to appear, plead, act, comprom for recount as my/our Counse Malbodore any liability for his delautrand with the st any countr Counsel on my/our resultive act authorow and medive on my/our ceshall deposited on rey/our account in the above
	Lanet

<u>ACCEPTED</u> ADMAN AMAN ABVOCATE

THE TO

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA S	ERVICE TIBUNAL, PESHAWAR
	_ OF 2021
ALIA BIBI	(APPELLANT)
	(PLAINTIFF)
	(PETITIONER)
<u>versus</u>	
Education Department	(RESPONDENT) (DEFENDANT)
•	(DEFENDAIVI)
I/We ALIA BIBI	
Peshawar to appear, plead, act, compromise, for me/us as my/our Counsel/Advocate in any liability for his default and with the authorate Counsel on my/our cost. I/we authorate and receive on my/our behalf all deposited on my/our account in the above not	the above noted matter, without ority to engage/appoint any other orize the said Advocate to deposit, sums and amounts payable or
Dated/2021	ed matter.
Jaicu	4
	CLIENT
	CLIENT
	ACCEPTED ADNAN AMAN

ADVOCATE