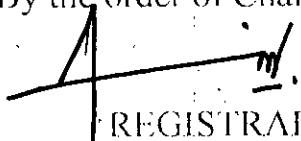


FORM OF ORDER SHEET

Court of _____

Appeal No. 2586/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/12/2023	<p>The appeal of Dr. Asim Saced presented today by Mr. Ahsan Bilal Langraw Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>15-12-2023</u>. Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal NO. _____ /2023

Dr. Asim Saeed VS GOVT OF KPK

APPLICATION FOR FIXATION OF THE ABOVE TITLED Appeal AT
PRINCIPAL SEAT, PESHAWAR

Respectfully Sheweth:

1. That the above mentioned Appeal is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application, the appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Appellant/Applicant

Dated: 13/12/23

Through

Ahsan Billel
ASC

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR, AT CAMP DERA ISMAIL KHAN**

In service Appeal No. 2586/2023

C.M No. _____ 2023

Dr. Asim Saeed Versus Govt. of KPK etc.

SERVICE APPEAL

Subject: **APPLICATION FOR EARLY FIXATION OF HEARING**

Respectfully Sheweth:

The appellent humbly submit as under:-

1. That the above titled service appeal is being filed before this Honourable Service Tribunal.
2. That the matter is of very urgent nature in appeal titled above, if the appeal captioned above is not fixed on urgent basis, then the appellent will face irreparable loss as well as complications will generate in the case, hence, the service appeal titled above may please be fixed at earliest.
3. That, in the titled appeal, rights of the appellent are involved.

It is therefore, humbly requested from this Honourable Service Tribunal that instant urgent application may please be accepted and Service appeal captioned above may please be fixed on urgent basis.

Dated: ___/12/2023

Your humble appellent/applicant

Asim Saeed
Dr. Asim Saeed

Through counsel
Ahsan Bilal
AHSAN BILAL LANGRAW
Advocate supreme Court of Pakistan.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR AT CAMP DERA ISMAIL KHAN.**

Service Appeal No. 21586 /2023

Dr. Asim Saeed
(Appellant)

VERSUS

Govt; of KPK etc
(Respondents)

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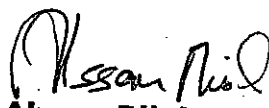
S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit along with C.M	--	1-8
2.	Copy of Appointment order	A	9-11
3.	Copy of notification dated 10/01/2022	B	12
4.	Copy of impugn order dated 27/09/2023	C	13
5.	Copy of Departmental appeal	D	14-16
6.	Copy of impugned order of appellate Authority dated 11/12/2023	E	17
7.	Copies of academic certificates	F	18-19
8.	Vakalatnama	--	20

Dated ___/12/2023

Your humble appellant


Dr. Asim Saeed

Through counsel


Ahsan Bilal
Advocate Supreme Court

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR, AT CAMP DERA ISMAIL KHAN.

Service Appeal No. 2586 /2023

DR. ASIM SAEED son of Muhammad Saeed Resident of Basti Ustrana Shumali, Principal (BPS-18) presently serving under the domain of DEO (male), Dera Ismail Khan.

(Appellant)

VERSUS

1. **Govt; of KPK through Secretary Elementary and Secondary Education Department, Khyber Pakhtunkhwa Peshawar, Block "A" opposite MPA's Hostel Civil Secretariat Peshawar.**
2. **Chief Secretary Govt; of Khyber Pakhtunkhwa Peshawar,**
3. **Director, Elementary and Secondary Education, KPK Peshawar.**
4. **Noor Sultan, SDEO (Sub Divisional Education Officer) (BS-17), Dera Ismail Khan. Presently posted as Deputy DEO (male) office, DIKhan.**

..... **(RESPONDENTS)**

APPEAL UNDER SECTION 4 OF THE KPK SERVICES TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER NO. SO(MC)E&SED/2-3/2022/Promotion/MC/ Asim Saeed /DDEO(M) DATED 27/09/2023 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SSS (ISLAMIYAT) AT GHSS RAMAK, DIKHAN AND APPEAL AGAINST THE ORDER NO. SO(MC)E&SED/4-16/2022/dep. Appeal/Asim Saeed DATED 11/12/2023, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED BY THE APPELLATE AUTHORITY.

Note: Addresses given above shall suffice the object of service.

Respectfully Sheweth;

1. That the appellant is serving in the Education Department since 21/04/1999. The appellant has approximately more than 25 years length of service. Later on the appellant was selected and appointed as Principal (BPS-18) via KP, Public Service Commission. Copy of appointment order is annexed **Annexure "A"**.
2. That, before the issuance of impugn order the appellant was serving as Deputy DEO (male) Dera Ismail Khan since 10/01/2022. During this period the appellant gave meritorious services in computerization and web development in middle section, which is first ever project in KP. During this period the appellant received numerous appreciation certificates from the High-ups. Copy of notification dated 10/01/2022 is annexed as **Annexure "B"**.
3. That, on 27/09/2023, the appellant received impugned notification No. SO(MC)E&SED/2-3/2022/ Promotion/MC/Asim Saeed/DDEO(M) dated 27/09/2023 whereby the appellant has been transferred from the post of Deputy DEO (Male) Dera Ismail Khan to Subject Specialist (Islamiyat BS-18) GHSS Ramak DIKhan and private respondent No. 4 (Junior Office of BS-17) was assigned to hold the look after charge of the post of Deputy DEO (male) DIKhan. Copy of impugn order is annexed as **Annexure "C"**.
4. That feeling aggrieved from the impugn order SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO (M) dated 27/09/2023, the appellant preferred a departmental appeal on 02/10/2023 but the same met the fate of rejection vide impugned order of appellate authority No SO(MC)E&SED/4-16/2022/dep.Appeal/Asim Saeed dated 11/12/2023. Copies of

departmental appeal and rejection order are annexed as **Annexure "D" and "E"** respectively.

5. That the instant service appeal is being filed before this Honourable Tribunal for redressal of grievance as prayed for hereinafter on inter alia on the following grounds,

GROUND S

1. That the impugned transfer order is against service laws, rules and transfer policies and based on political victimization and nepotism, favoritism made against the appellant, hence, liable to be set aside.
2. That basically the appellant was selected via Public Service Commission as a **Principal** on 25/09/2015. The appellant is Masters in **Physics** (M.Sc Physics) and thereafter doctorate (Ph.D) in Education. Astonishingly, the appellant has been posted as Subject Specialist (**Islamiyat BS-18**). The impugned notification clearly reflects the victimization of the appellant. Pertinent to mention here that appellant had not exhausted his normal tenure of service as Deputy DEO (Male). This amount to sheer violation of service rules and laws, hence, the transfer order mentioned above is liable to be cancelled being premature. Copies of academic certificates are annexed as **Annexure "F"**.
3. That the Public servants are always considered to be the back bone of a country and the system, have to be protected against injustices enabling them to deliver to the best of their abilities.
4. That though, transfer/posting is the discretion of the authority but it is the burden duty of authority that while excessing such discretion, the requirement of job, nature of duties,

requisite capabilities and know-how of its performance, qualification of incumbent, seniority position etc must be considered. Thus, such discretion falls within the prerogative domain of Government, but it must not escape unnoticed that such discretion should be exercised in accordance with settled norms of justice, equity and fair play.

5. That the impugned transfer/posting order is sought to be justified in the name of "public interest" without comprehending the implication thereof. Thus, the use of phraseology of "public interest" is basically a cover to justify the unjust transfers.
6. That as per service Laws every Civil Servant is liable to serve anywhere as posted by a competent authority but that does not state that civil servant can be posted or transferred by this regarding other relevant service, nor does it empower the authority to cut short the normal tenure of a posted/transferred Civil Servant, and particularly without assigning any reasons.
7. That when ordinary tenure for posting has been specified in the law or rules made there under, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.

8. That the impugned order of appellate authority was issued without perusing the relevant service record and was issued without assigning any reason, which can safely be term as non-speaking order. Hence, is liable to be set aside.
9. That this honourable Tribunal has ample powers to adjudge the matter under reference per prayer made hereby.
10. That counsel for the appellant may graciously be allowed to add to the grounds, on facts and on law as well, during the course of arguments, if needed be.

In wake of submissions made above, the instant service appeal may kindly be accepted. The impugn order No. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M) dated 27/09/2023 and impugn order No SO(MC)E&SED/4-16/2022/dep. Appeal/Asim Saeed of Appellate Authority may graciously be set aside/canceled/withdrawn in the large interest of justice.

Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Dated ___/12/2023

Your humble appellant

Asim Saeed
Dr. Asim Saeed

Through counsel

Ahsan Bilal
AHSAN BILAL LANGRAW
Advocate Supreme Court of Pakistan.

-b-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR, AT CAMP DERA ISMAIL KHAN**

Service Appeal No. _____/2023

Dr. Asim Saeed Versus **Govt. of KPK etc.**

SERVICE APPEAL

CERTIFICATE

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

Dated ___/12/2023

Appellant

AFFIDAVIT

I, **Dr. Asim Saeed**, appellant herein, do hereby solemnly affirm on oath that all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

___/12/2023

Asim Saeed
DEPONENT

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR, AT CAMP DERA ISMAIL KHAN

In service Appeal No. _____/2023

C.M No. _____ 2023

Dr. Asim Saeed Versus Govt. of KPK etc.

SERVICE APPEAL

AN APPLICATION FOR SUSPENSION OF IMPUGNED ORDER No.
SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M)
DATED 27/09/2023 AND IMPUGN ORDER No. SO(MC)E&SED/4-
16/2022/dep. Appeal/Asim Saeed OF APPELLATE AUTHORITY,
TILL FINAL DISPOSAL OF THE SERVICE APPEAL.

Respectfully Sheweth;

Appellant/applicant humbly submits as under,

1. That the above mentioned service appeal is filing before this Hon'ble Service Tribunal. The instant application may please be consider as integral part of main appeal.
2. That the appellant has a very good prima facia case as primarily he was selected as Principal but vide impugned order he has been posted as ASS (Islamiyat), which is even not the subject field of the appellant.
3. That the appellant (BPS-18) has been replaced by a junior Officer (BPS-17). Thus, the impugned order has no sanctity in the eyes of law.
4. That impugn order has not been acted upon completely and the interim relief is indispensable in the present eventuality.
5. That Hon'able court has ample power to accept the application.

It is therefore requested that application may kindly be allowed.

Dated: ___/12/2023

Your humble appellant/applicant

Asim Saeed
Dr. Asim Saeed

Through counsel

Ahsan Bilal
AHSAN BILAL LANGRAW
Advocate supreme Court of Pakistan.

AFFIDAVIT

I, **Dr. Asim Saeed**, applicant/appellant, do hereby solemnly affirm and declare on oath that contents of above application are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: ___/12/2023

Asim Saeed
DEPONENT



9- Annex "A"
**GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION
 DEPARTMENT**

Dated Peshawar the August 25, 2015

NOTIFICATION

NO.SO(S/ME&SED/3-2/2014/Recruitment of Principal (BS-18) (Male): Consequent upon recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following fifty five (55) candidates of Teaching Cadre as Principals (BS-18) Male (Rs.25940-1950-64940) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:-

Sr. #	Name, Father Name and Address	Domicile/ Zone
1	Mr. Alam Zeb, S/O Jehan Zeb, Yousaf Zai Medical Store Hospital Road Timergara Tehsil Timergara Dir Lower.	Dir/03
2	Mr. Anis-ur-Rehman, S/O Toti Rehman, Moh: Ambar Cham District P.O and Tehsil Dir Upper.	Dir/03
3	Mr. Arif Ullah Khan S/O Ghulam Jan, Village and P.O Shahbaz Khel Tehsil & District Lakkhi Marwat.	Lakki Marwat/04
4	Mr. Awang Zaib S/O Jahan Zen, House No.94 Sector No.4 Mohallah Darband Kalabat Town Ship Tehsil & District Haripur.	Haripur/05
5	Mr. Faisal Khan S/O Missal Khan, C/O Star Hardware and Paint Store, Main Bazar Havelian Tehsil Havelian Distt: Abbottabad.	Abbottabad/05
6	Mr. Ghulam Raziq S/O Fazli Raziq Village Zakhi Miana P.O Akbar Pura Tehsil & District Nowshera.	Nowshera/02
7	Mr. Ghulam Zahir S/O Ghulam Farooq Village & P.O Bishgram Tehsil Lal Qilla District Dir Lower.	Dir/03
8	Hafiz Shams-ur-Rehman S/O Ahmed Ali, C/O Moulvi Ahmad Ali General Store Hospital Road P.O Sarai Naurang Lakki Marwat.	Lakki Marwat/04
9	Mr. Hayat Ullah S/O Shams-ul-Qamar, Mohallah Pinda Khel P.O Charsadda Town Teh & District Charsadda.	Charsadda/02
10	Mr. Hikmatullah S/O An Muhammad C/O Yousaf Medicose Hospital road Sarai Naurang P.O Sarai Naurang Tehsil Sarai Naurang Distt: Lakki Marwat.	Lakki Marwat/04
11	Mr. Imtiaz Ali S/O Allah Dad Regional Institute of Teachers Education (Male) Haripur.	Haripur/05
12	Mr. Inayat-ul-Haq S/O Lutfullah, C/O Doctor Ihsan-ul-Haq Al-Noor Medical Complex near Alhoo-akhor Mosque Saidu Sharif Swat.	Shangla/03
13	Mr. Irfanullah S/O Amin Ullah House # 850, Sadiq Abad Gul Darn Chowk P.O Namak Mandi Kakshal Peshawar.	Dir/03
14	Mr. Ishaq Ali Shah S/O Murtib Ali Shah Village and P.O Unnar Payan Tehsil & District Peshawar.	Peshawar/02
15	Mr. Jamil-ur-Rehman S/O Said Akbar Khan Village & P.O Trabani Tehsil & District Swabi.	Swabi/02
16	Mr. Jehad Muhammad S/O Shamsul Muhammad Mohallah Zakarya Khan Village & P.O Kaddi Tehsil & Distt: Swabi.	Swabi/02
17	Mr. Kamal-ud-Din S/O Khesrow, C/O Qamarudin Chaitil Mohd Dad Nes Masjid Babus Salam Dabari Peshawar.	Chitral/01
18	Mr. Khanul-Haq S/O Mian Habib Jan Village Panam Dheri P.O Mathra Tehsil & Distt: Peshawar.	Peshawar/02
19	Mr. Khan Ahsan S/O Mir Aziz Tanawal Bank Dheri Bazar Bazar Abbottabad.	Abbottabad/05
20	Mr. Khurshid Alam S/O Qamar Zaman Village & P.O Dheri Aikhand Mahal Tehsil Bakhora District Malakand.	Malakand/01
21	Mr. Khurshid Khan S/O Miran Dheri Bazar Bazar Abbottabad.	Abbottabad/05
22	Mr. Muzam Ullah S/O Ghalibullah Village & P.O Dheri Aikhand Mahal Tehsil Bakhora District Malakand.	Malakand/01

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GOVERNMENT OF KHYBER
PAKHTUNKHWA ELEMENTARY &
SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the August 25, 2015

NOTIFICATION

NO.SO(S)MDE&SYED/3-2/2014/Recruitment of Principal (BS-18) (Male) Consequent recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the competent Authority is pleased to appoint the following fifty five (55) candidates of Teaching Cadre as Principals (BS-18) (Rs. 25940-1950-64940) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government with immediate effect on the terms and conditions as given below:

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3	Mr. Arif Ullah Khan S/o Ghulam Jan, Village and P.O Shahbaz Khel Tehsil & District Lakki Marwat	Lakki Marwat/04
4	Mr. Aurang Zaib S/o Jahan Zen, House no.94 Sector No.4 Mohallah Dar Band Kalabat Town Ship Tehsil & District Haripur	Haripur/05
5	Mr. Faisal Khan S/o Missal Khan, C/O Star Hardware and Paint Store Mian Bazar Havelian Tehsil Havelian Distt: Abbottabad.	Abbottabad/05
6	Mr. Ghulam Raziq S/o Fazli Raziq Village Zakhi Miana P.O Akbar Pura Tehsil & District Nowshera	Nowshera/02
7	Mr. Ghulam Zahir S/o Ghulam Farooq Vilalge & P.O Bisham Tehsil Lal Qilla District Lower Dir.	Dir/03
8	Hafiz Shams-Ur-Rehman S/o Ahmed Ali, C/O Mouvi Ahmad Ali General Store Hospital Road P.O Sarai Naurang Lakki Marwat.	Kakki Marwat/04
9	Mr. Hayat Ullah S/o Shams-ul-Qamar, Mohallah Painda Khel P.O Charsadda Town Teh & District Charsadda	Charsadda/02
10	Mr. Hikmatullah S/o Ali Muhammad C/O Yousaf Medicose Hospital Road Sarai Naurangi P.O Sarai Naurang Tehsil Sarai Naurangi Distt: Lakki Marwat.	Lakki Marwat/04
11	Mr. Imtiaz Ali S/o Allah Dad Regional Institute of Teachers Education (Male) Haripur	Haripur/05
12	Mr. Inayat-Ul-Haq S/o Lutifullah C/O Doctor Ihsan-ul-Haq Al-Noor Medical Complex near Allaho-Akbar Mosque Saidu Sharif Swat.	Shangla/03
13	Mr. Irfanullah S/o Amin Ullah House # 850, Sadiq Abad Gul Dara Chowk P.O Namak Mandi Kakshal Peshawar.	Dir/03
14	Mr. Ishaq Ali Shah S/o Muhib Ali shah Village & P.O Umar Payan Tehsil & District Peshawar	Peshawar/02
15	Mr. Jamil-ur-Rehman S/o Said Akbar Khan Village Pabani Tehsil & District Swabi	Swabi/02
16	Mr. Jehad Muhammad S/o Shamsul Muhammad Mohallah Zakarya Khail village & P.O Kaddi Tehsil & Distt: Swabi.	Swabi/02
17	Mr. Kamal-ud-Din S/o Khesrow C/O Qamarudin Chatrali Mohd Dad Near Masjid Babus Salam Dabgari Peshawar.	Chitral/03
18	Mr. Khanus-Ul-Haq S/o Mian Habib Jan Village Panam Dheri P.O Mathra Tehsil & Distt: Peshawar.	Peshawar/02
19	Mr. Khan Afsar S/o Mir Afzal, Tanwal Book Depd: Cantt: Bazar Abbottabad.	Abbottabad/05
20	Mr. Khurshid Alam S/o Qamar Zaman, Village & P.O Dheri Allahdand Moh azikhel Tehsil Batkhel District Malakand.	Malakand/03
21	Mr. Khurshid Khan S/o Mian Jan, Govt, Higher Secondary Shool Takht Bhai District Mardan.	Mardan/03
22	Mr. Majeed Ullah S/o Gul Mula, Village and P.O Hathian The: Takht Bhai District Mardan C/O Rehmanullah Shopkeeper Hashim.	Dir/03

Sr. #	Name, Father Name and Address	House/Zone
23	Mr. Mohabat Shah S/O Arifullah Jan C/O Tajak Bank Deputy Muti Bazar Tirmigan Dir Lower.	Dir/01
24	Mr. Muhammad Ibrahim S/O Daud Khan, Mohallah Walayat, Khaili, Va Shahbaz village & P.O Tardher Tehsil Lahr District Swabi.	Swabi/02
25	Mr. Muhammad Ishaq S/O Syed Daulat Shah, C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency.	Khyber Agy/01
26	Mr. Muhammad Irfan S/O Fozir Gul 159 Durani House C/O Charsadda Medicose Street No.06 Tazabad Town P.O Peshawar University.	Peshawar/02
27	Mr. Muhammad Javid Khan S/O Hukmat Khan, Village & P.O Shabqadar Azim Khan Qilla Tehsil Shabqadar District Charsadda.	Charsadda/02
28	Mr. Muhammad Saddique S/O Alim Shah, C/O Lub Gas Agency, Tehsil Road Karak.	Karak/04
29	Mr. Muhammad Siraj S/O Muhammad Ashraf, House #5261/E Mohi Kandar Kohat Road Bhana Mari Peshawar.	Peshawar/02
30	Mr. Munir Khan S/O Zorif Khan, Rehman General Store Aziz Market Dargai Bazar Malakand.	Malakand/03
31	Mr. Nizar Ali S/O Sardar Ali GHSS Tamab Charsadda.	Charsadda/02
32	Mr. Rizad-Din S/O Mohay-ud-Din, Village Gosam Tehsil Monda District Dir Lower.	Bajaur Agy/01
33	Mr. Safer Ullah Khan S/O Ruck-nu-Din Village Lass Garhi Bosti Khel Dara Adam Khel F.R Kohat.	F.R Kohat/01
34	Mr. Sajid Elahi S/O Imam Din, C/O Waheed Cloth House, Sohrab Market Balakot, District Manshera.	Manshera/05
35	Mr. Sajjad Ahmad S/O Muhammad Ayub Govt. Centennial Model School (GHSS No.3) Manshera.	UDA Manshera/03
36	Mr. Sana-ul-Haq S/O Shams-ul-Haq Village & P.O Srikh Marozai Tehsil Shabqadar District Charsadda.	Charsadda/02
37	Mr. Saqib Tanveer S/O Sakhi Muhammad Tanveer, 10 Civil Lines Jail Road D.I.Khan.	D.I.Khan/04
38	Mr. Sardar Muhammad S/O Mirza Khan Village & P.O Azakhel Payan Tehsil & Distt. Nowshera.	Nowshera/02
39	Sayed Zulfikar Ali S/O Sayed Ali Bahadur Shah Village & P.O Nawagai Tehsil Mandam District Buner.	Buner/03
40	Mr. Sharqai Hussain S/O Muhammad Ashraf, C/O Irshad Shopkeeper Near Makki Masjid Link Road Abbottabad.	Abbottabad/05
41	Mr. Shah Zada S/O Haider Khan, Village & P.O Dehri Alladand Moh. Miras Khel Malakand.	Milakand/03
42	Mr. Sher Mohammad S/O Shamsor Rehman Vill. & P.O Chakesar Tehsil Chakesar District Shangla.	Shangla/03
43	Mr. Sher Yazdan S/O Abdul Dayan, Village Kurvi P.O Toru Jabu Tehsil & Distt. Nowshera.	Nowshera/02
44	Mr. Taj Wali S/O Maq Bali Village Sufaid Sung Moh. Wand Khel P.O Shabgar Bazar Tehsil & District Peshawar.	Peshawar/02
45	Mr. Tanveer ul Haq S/O Abdur Raziq House #F-46 Right Bank Colony Torbela Dam Tehsil Toppi District Swabi.	Swabi/02
46	Mr. Waqar Khan S/O Sifar Ullah Village and P.O Masbo Khel Kandi Fateh Khan Khel Kandi Tehsil and District Peshawar.	Peshawar/02
47	Mr. Zahoor Khan S/O Abdur Qayyum Khan Village Garhi Mali Khel P.O Buzbar Teh & District Peshawar.	Peshawar/02
48	Mr. Amir Zeb S/O Mustafa Kamal Govt. High School Rialam P.O Rhaman District Mardan.	Mardan/02
49	Mr. Asim Saeed S/O Muhammad Saif, Bus Usmana North Near Boys Primary School Dera Ismail Khan.	D.I.Khan/04
50	Mr. Kibryullah S/O Rafiqullah Khan Village & P.O Mayi Moh. Amukhel Tehsil & District Mardan.	Mardan/02
51	Mr. Muhammad Gul S/O Gul Bahar Village & P.O Gauda Tehsil Shabi Khel Tehsil Topi District Swabi.	UDA Swabi/03
52	Mr. Saif ur Rahman S/O Saif ur Rahman Village & P.O Buzbar Tehsil & District Peshawar.	Lakki Marwat/04
53	Mr. Saif ur Rahman S/O Saif ur Rahman Village & P.O Buzbar Tehsil & District Peshawar.	Peshawar/02
54	Mr. Saif ur Rahman S/O Saif ur Rahman Village & P.O Buzbar Tehsil & District Peshawar.	Mardan/02

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Sr.#	Name, Father Name and Address	Domicile/Zone
23	Mr. Mohabbat Shah S/o Arifullah Jan C/o Tajak Book Depoit Main Bazar Timergara Dir Lower.	Dir/03
24	Mr. Muhammad Ibrahim S/o Daud Khan, Mohallah, Walayat Khail via Shahbaz Village P.O.Tordher Tehsil Lahore District Swabi	Swabi/02
25	Mr.Muhammad Ihsan Shah S/O Syed Daulat Shah, C/O Janbad Shah Chemist and Druggist Jamrud Bazar Khyber Agency.	Khyber Agency/01
26	Mr. Muhammad Irfan, S/o Faqir Gul 159 Durani House C/O Charsadda Medicose Street No. 06 Tajabad Town P.O Peshawar University.	Peshawar/02
27	Mr. Muhammad Javid Khan S/o Hukmat Khan, Village & P.O Shabqadar Azim Khan Qilla Tehsil Shabqadar District Chasadda	Charsadda /02
28	Mr. Muhammad Saddiquie S/o Alim Shah, C/O Lub Gas Agency Tehsil road Karak.	Karak/04
29	Mr. Muhammad Siraj S/o Muhammad Ashraf, House # 5261/E Moh: Kandar Kohat Road Bhana Mari Peshawar.	Peshawar/02
30	Mr. Munir Khan S/o Zarif Khan, Rehman General Store Aziz Market Dargai Bazar Malakand.	Malakand /03
31	Mr. Nizar Ali S/o Sardar Ali GHSS Tarnab Charsadda.	Charsadda/02
32	Mr. Riaz-ud-Din S/o Mohay-ud-Din, Village Gosam Tehsil Monda District Dir Lower.	Bajour Agy/01
33	Mr. Safeer Ullah Khan S/o Ruck-nu-Din Village Lass Garhi Bosti Khel Dara Adam Khel F.R Kohat	FR Kohat /01
34	Mr. Sajdi Ealhi S/o Imam Din, C/O Waheed Cloth House, Sohrab Market Balakot, District Mansehra.	Mansehra/02
35	Mr. Sajjad Ahmad S/o Muhammad Ayub Govt Centencial Model School (GHS No.3) Mansehra.	UDA Mansehra/03
36	Mr. Sana-ul-Haq S/o Shams-ul-Haq Village & P.O Srikh Marozai Tehsil Shaqadar District Charsadda.	Charsadda/02
37	Mr. Saqib Taneer s/o Sakhi Muhammad Tanver, 10 Civil Lines Jail Road D.I.Khan	D.I.Khan /04
38	Mr. Sarda Muhammad S/o Mirza Khan Village P.O Azakhel Payan Tehsil & Distt: Nowshera.	Nowshera/02
39	Sayed Zulfiqar Ali S/o Sayed Ali Bahadur Shah Village & P.O Nawagai Tehsil Mandam District Bunir	Bunir/03
40	Mr. Shafqat Hussain S/o Muhamamd Ashraf, C/O Irshad Shopkeer Near Makki Masjid Link Road Abbottabad.	Abbottabad/05
41	Mr. Shah Zada S/o Haider Khan, Village & P.O Dehri Alladand Mo: Miras Khel Malakand.	Malakand/03
42	Mr. Sher Mohammad S/o Shamsoor Rehman Vill: & P.O Chakesar Tehsil Chakesa District Shangla.	Shangla/03
43	Mr. Sher Yazdan S/o Abdul Dayan, Village Kurvi P.O Taru Jaba Tehsil & Distt: Nowshera	Nowshera/02
44	Mr. Taj Wali S/o Maq Bali, Village Sufaid Sung Moh: Wand Khle P.O Shagai Bazar Tehsil & District Peshawar.	Peshawar/02
45	Mr. Taqweem-ul-Haq S/o Abdur Raziq House # F-46 Right Bank Colony Torbela Dam Tehsil Toppi District Swabi.	Swabi/02
46	Mr. Waqar Khan S/o Sifat Ullah, Village and P.O Masho Khel Kandi Fateh Khan Khel Kandi Tehsil and District Peshawar.	Peshawar/02
47	Mr. Zahoor Khan s/o Abdul Qayyum Khan Village Garhi Mali Khel P.O Badaber The& District Peshawar.	Peshawar/02
48	Mr. Amir Zeb S/o Mustafa Kamal, Govt High School Rustam P.O Rustam District Mardan.	Mardan/02
49	Mr. Assim Saeed S/o Muhammad Saeed, Basti Ustana North Near Boys Primary School Dera Ismail Khan.	D.I.Khan/04
50	Mr. Kifayatullah S/o Rafiullah Kahri village & P.O Mayar Moh: Amukhel Tehsil & District Mardan.	Mardan/02
51	Mr. Muhammad Khan S/o Gul Rehman Village & P.O Gandaf Mohallah Shabi Khel Tehsil Topi District Swabi.	UDA Swabi/03
52	Mr. Saif-ur-Rehman S/o Sultan Khan Hashem GHS Mandew Bannu	Lakki Marwat/04
53	Mr. Sarfaraz S/o B-N..... Girls School and College Dabgari Gardan Peshawar.	Peshawar/02
54	Mr. Shakil Ahmad S/o Mehtab Khan Govt. High School No.2 Becket Gunj Mardan.	Mardan/02

-11-

3. Terms & Conditions of Service in r. o. officers from Sr. No. 1 to 55 above are as under:

1. Their services will be considered regular and they will be eligible for pension/deduction of GP fund in terms of Khyber Pakhtunkhwa Civil Servants Act 1973 as amended in 2013.
2. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay/allowances shall be forfeited to the Govt.
3. They would be on probation for period of one year extendable for another one year.
4. They will be governed by such rules and regulations as may be issued from time to time.
5. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 as amended from time to time.
6. Their recruitment shall be School Based and shall not be transferable to any other School.
7. The appointees should join their posts within 30 days of the issuance of this notification. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise, after one month of the issuance of this Notification, failing which their candidature shall expire automatically and no subsequent appeal etc. shall be entertained.
8. Charge report should be submitted to all concerned.
9. Notification can be downloaded from our website: www.kpese.gov.pk
10. No TA/DA will be allowed to the appointees for joining their duty.

SECRETARY

Copy of every No. & Date

Copy forwarded to the

1. Accountant General, Khyber Pakhtunkhwa
2. Director, Ed&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. Director (Recruitment), Khyber Pakhtunkhwa Public Service Commission.
5. District Accounts Officers concerned.
6. PS to Chief Secretary, Khyber Pakhtunkhwa.

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block "A" Opposite MPA's Hostel, Civil Secretariat, Peshawar
 Phone No. 9711-722350

A.W.X. **B**
 -12-

Dated Peshawar the January 10th, 2022

NOTIFICATION

NO. SO/MC/E&SED/4-16/2021/POSTING/TRANSFER/MC: The Competent Authority is pleased to order the posting/transfer of the following Management/ Teaching Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect in the public interest:-

Sr. No.	Name & designation	From	To
1.	Mr. Asim Saeed (TC BS-18)	Principal GHS Himmat Di Khan	Deputy DEO (Male) Di Khan (AVP)
2.	Mr. Abdul Wahab (MC BS-17)	SDEO (Male) Topi Swabi	SDEO (Male) Bankand Kohistan Lower (Vice No-2)
3.	Mr. Sher Zada SST General (BS-16)	SDEO (Male) Bankand Kohistan Lower in OPS	Services placed at the disposal of DEO (Male) Kohistan Lower for further adjustment.
4.	Mr. Moor Islam (TC BS-18)	Principal GHS Dagai Swabi	Deputy DEO (Male) Swabi (Vice No-5)
5.	Mr. Sikandar Hayat (MC BS-17)	Deputy DEO (Male) Swabi OPS	SDEO (Male) Topi Swabi (Vice No-2)
6.	Muhammad Hussain (MC BS-10)	ASDEO (Male) Takhti Nusrat Karak	SDEO (Male) Takhti Nusrat Karak (Vice No-7)
7.	Muhammad Naem (MC BS-17)	SDEO (Male) Takhti Nusrat Karak	SDEO (Male) Miral North Waziristan (AVP)

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Slut of Encl. No. & date.

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officer (Male) Swabi and Di Khan
4. Director E&S, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Swabi and Di Khan
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
7. Officers concerned
8. Master file


IAJAZ ULLAH
 Director (Management Cadre)

Better Copy-12

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar.
Peshawar No. 091-9223588

Dated Peshawar the January 10th, 2022

NOTIFICATION:-

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: the Competent Authority in pleased to order the posting/transfer of the following Management/Teaching Cadre Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

Sr. No.	Name & Designation	From	To
1.	Mr. Asim Saeed (TC BS-18)	Principal GHS Himmat DI Khan	Deputy DEO (Male) Khan (AVP)
2.	Mr. Abdul Wahab (MC BS-17)	SDEO (Male) Topi Swabi	SDEO (Male) Bankand Kohistan Lower (Vice No.3).
3.	Mr. Sher Zada SST General (BS-16)	SDEO (Male) Bankand Kohistan Lower in OPS	Services Placed at the disposal of DEO (Male) Kohistan Lowr for further adjustment.
4.	Mr. Noor Islam (TC BS-18)	Principal GHS Dagai Swabi	Deputy DEO (Male) Swabi (Vice No-5)
5.	Mr. Sikandar Hayat (MC BS-17)	Deputy DEO (Male)	SDEO (Male) Topi Swabi (Vice-02)
6.	Muhammad Hussain (MC-BS16)	ASDEO (Male) Takhti Nusrati Karak	SDEO (Male) Takhti Nusrati Karak (Vice No- 7)
7.	Muhammad Naeem (MC BS17)	SDEO (Male) Takht Nusrati Karak	SDEO (Male) Mirali North Waziristan (AVP).

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA E&SE
DEPARTMENT

Endst: of Even No. & date

Copy forwarded for information:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Swabi and Di.Khan.
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Swabi and Di.Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers Concerned.
8. Master File.

(HAFEEZ-UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9210626

Dated: 27th September, 2023

NOTIFICATION

NO.SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M): Due to administrative exigencies Mr Asim Saeed, (TC BS 18), Deputy DEO (Male) D.I.Khan is hereby transferred posted as Subject Specialist (Islamiyat BS-18) GHSS Ramak D.I.Khan against the vacant post, with immediate effect.

Consequent upon the above, Muhammad Noor Sultan SDEO (M) D.I.Khan is hereby authorized to hold the Look After charge for the post of Deputy DEO (Male) D.I.Khan, in addition to his own duties, as stop gap arrangement, purely on temporary basis, till the arrival of regular officer, in the best public interest.

**SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Ref: of even No.& date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. Section Officer (School Male) E&SE Department.
5. District Education Officer (Male) D.I.Khan.
6. District Accounts Officer D.I.Khan.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

111
(IMRAN ZAMAN)

27.9.23

SECTION OFFICER (Management Cadre)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Annex - 'D'

-14-

No. 18437-1
Dated DIKhan the 04/10/2023

To

The Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

SUBJECT: DEPARTMENTAL APPEAL/REPRESENTATION AGAINST IMPUGNED
NOTIFICATION ORDER NO.SO (MC)E&SED/2-
3/2022/Promotion/MC/Asim Saeed/DDEO (M) DATED 27-09-2023,
WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SS
(ISLAMIYAT) BS-18 GHSS RAMAK DERA ISMAILKHAN.

Memo:


Please find enclosed herewith the original application received from Dr. Asim Saeed
Ex-Deputy District Education Officer (Male) DIKhan is sent for further process.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Endst No 18438 /

Copy of the above is forwarded to the:-

1. PS to Secretary, E&SED Khyber Pakhtunkhwa Peshawar.
2. Master File.


DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

-15-

CG Dirig No.
48/18/10
dt 18/10

BEFORE THE WORTHY CHIEF SECRETARY
KHYBER PAKHTUNKHWA PESHAWAR

Subject: **DEPARTMENTAL APPEAL/REPRESENTATION AGAINST IMPUGNED NOTIFICATION ORDER NO. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed/DDEO(M) DATED 27/09/2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SSS (ISLAMIYAT BS-18) GHSS RAMAK DERA ISMAIL KHAN**

Respected Sir,

Appellant humbly submits as under:

1. That the appellant is serving in the Elementary & Secondary Education Department Khyber Pakhtunkhwa since 21.04.1999. The appellant has approximately more than 25 years length of service.
2. That, at present, the appellant has been serving as Deputy District Education Officer (Male) Dera Ismail Khan vide E&SE Department Notification dated 10.01.2022. During this period appellant gave meritorious services to the department in computerization of record and web development for the Middle Section, which is first ever project in KP. During this period the appellant received numerous appreciation certificates from the High-ups.
3. That, on 27.09.2023, the appellant received impugned Notification No. SO(MC)E&SED/2-3/2022/Promotion/MC/Asim Saeed / DDEO (M) dated 27.09.2023 whereby the appellant had been transferred from the post of Deputy District Education Officer (Male) Dera Ismail Khan to post of Senior Subject Specialist (Islamiyat BS-18) GHSS Ramak DIKhan and a junior officer of BS-17 was allowed to hold the additional charge of the post of Deputy DEO(M)DIKhan. It is clear discrimination with the appellant.
4. That the appellant was selected as **Principal (BS-18)** through Public Service Commission on 25.09.2015. The appellant is highly qualified having **Master Degree in Physics and PhD Degree in Education**. Astonishingly, the appellant had been posted as Subject Specialist **(Islamiyat BS-18)**. The impugned Notification clearly reflects the victimization of the appellant. It is pertinent to mention here that appellant had not exhausted his normal tenure of service as Deputy DEO (Male) DIKhan. This amount to sheer violation of service rules and transfer posting policy of the Government, hence, the transfer order mentioned above is liable to be set aside being premature.
5. That the above-mentioned transfer order is based on political victimization and nepotism, favoritism made against the appellant, hence, liable to be set aside.

ASE / SOMC

CG Dirig No 3146
dt 18/10

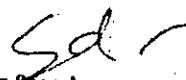
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-16-

6. That the Public servants are always considered to be the back bone of a country and the system, have to be protected against injustices enabling them to deliver to the best of their abilities.
 7. That though, transfer/posting is the discretion of the authority but it is the burden duty of authority that while exercising such discretion, the requirement of job, nature of duties, requisite capabilities and know-how of its performance, qualification of incumbent, seniority position etc must be considered. Thus, such discretion falls within the prerogative domain of Government, but it must not escape unnoticed that such discretion should be exercised in accordance with settled norms of justice, equity and fair play.
 8. That the impugned transfer/posting order is sought to be justified in the name of "public interest" without comprehending the implication thereof. Thus, the use of phraseology of "public interest" is basically a cover to justify such like transfers.
 9. That as per Service Laws every Civil Servant is liable to serve anywhere as posted by a competent authority but that does not state that civil servant can be posted or transferred by this regarding other relevant service, nor does it empower the authority to cut short the normal tenure of a posted/transferred Civil Servant, and particularly without assigning any reasons.
 10. That when ordinary tenure for posting has been specified in the law or rules made there under, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.
- In wake of submissions made above, the Impugned order No. SO(MC)E&SED/2-3/2022/Promotion/MC/ Asim Saeed / DDEO(M) dated 27/09/2023 may graciously be set aside/canceled/withdrawn in the large interest of justice.*

Dated: 02/10/2023

Yours' humble Appellant



Dr. Asim Saeed
Deputy DEO(M) Dera Ismail Khan
Principal BS-18
R/O Basti Ustrana Shumali DIKhan
0300-579-1911, 0344-939-3903



-17-
Annex "E"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

No. SO (MC)E&SED/4-16/2022/dept. Appeal/Asim Saeed
Dated: 11th December 2023

To

Dr. Asim Saeed
Ex- Deputy DEO (Male)
District D.I.Khan

Subject: - **DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST IMPUGNED NOTIFICATION ORDER NO. NO.SO(MC)E&SED/2-3/2022/ PROMOTION /MC/ASIM SAEED/DDEO(M) DATED 27.09.2023, WHEREBY THE APPELLANT HAS BEEN TRANSFERRED AS SSS (ISLMAYAT) GHSS RAMAK D.I. KHAN**

I am directed to refer to your appeal No. 3140 dated 02.10.2023, on the subject noted above and to state that your appeal has been examined and filed, having no legal ground.

11/12/23
11-12-2023
(IMRAN ZAMAN)

SECTION OFFICER (Management Cadre)

Copy for information to the: -

PS to Secretary E&SE Department, Khyber Pakhtunkhwa.

SECTION OFFICER (Management Cadre)

Serial No. GU 2 01705

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Annex - F - 18 -

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.F)

PAKISTAN



(Session 1992-94)

MUHAMMAD SAIED. SON of MUHAMMAD SAIED. and

a student of the DEPARTMENT OF PHYSICS,

having passed the prescribed examination in AUGUST, 1996,

is this day admitted by the Gomal University to the DEGREE of

MASTER OF SCIENCE

in the FIRST Class

The subject of examination being PHYSICS.

The Examination was taken as a whole/in parts

Registered No. 2816-D-90

Roll No. 417

JANUARY 11, 1997

Countersigned

Controller of Examinations

Vice-Chancellor



Qurtuba University
of Science and Information Technology
Dera Ismail Khan, Khyber Pakhtunkhwa, Pakistan

In recognition of
the successful completion of the course of study
this University has conferred on

ASIM SAEED S/O MUHAMMAD SAEED

the degree of -

DOCTOR OF PHILOSOPHY in EDUCATION

Given this thirty first day of December two thousand and twenty-one

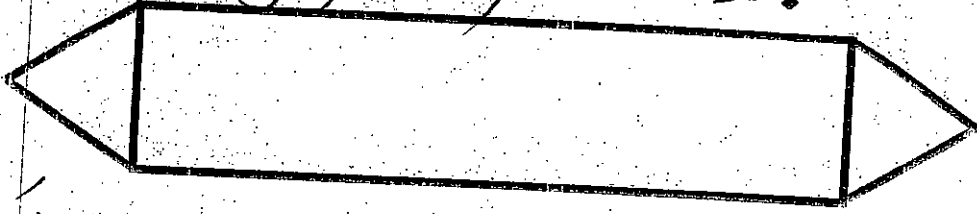
Muhammad Niaz
Controller of Examinations

[Signature]
Registrar

[Signature]
Vice-Chancellor

-19-

بعدالت سروس ٹرن اوور



ڈاکٹر دعا صمد

2 منجانب

ڈاکٹر دعا صمد بنام گورنمنٹ
وینٹور

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
کیلئے صلاہت اسٹن بلال سنگھ راہ الدولہ
آن مقام لپا و

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

Attested & Accepted

Nisar Nisa
ASC

2023ء

ماہ دسمبر

19

الرقوم

العبد العبد

Dr. Arzu Saad
Assam Saad