

**Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare  
Post Box No. 235**

FC Trust Building Sunehri Masjid Road, Peshawar Cantt: Ph: 091-9211536-38  
\*\*\*\*\*

Dated Peshawar the 27.01.2017.

OFFICE ORDER

F.No.1(3)/2015/Admn: **791-98** Mr. Ikram Ullah, Driver (BPS-6), District Population Welfare Office, Torghar is hereby transferred to District Population Welfare Office, Shangla against the vacant post at RHSC-A Shangla, with immediate effect and till further order in the best public interest on his own request.

(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. District Population Welfare Officers, Shangla and Torghar.
2. District Accounts Officers, Shangla and Torghar.
3. Assistant Director (Lit), PWD, KP, Peshawar.
4. PS to Advisor to CM for PWD, KP, Peshawar.
5. PS to Director General, PWD, KP, Peshawar.
6. Assistant HR, Admn: Section, PWD, Peshawar.
7. Official Concerned.
8. Master File.

  
(Hidayat Khan)  
Deputy Director (Admn)

26.12.2016

Appellant in person and Mr. Saghir Musharaf, AD  
alongwith Ziaullah, GP for the respondents respondent.  
Written reply not submitted. Requested for further  
adjournment. Last opportunity granted. To come up for  
written reply/comments on 30.1.2017 before S.B.

  
Chairman

30.01.2017

Appellant with counsel and Mr. Muhammad Arif, Assistant  
alongwith Mr. Muhammad Adeel Butt, Additional AG for respondents  
present. Appellant submitted office order dated 27.01.2017 vide which he  
has been transferred from District Population Welfare Office, Torghar to  
District Population Welfare Office, Shangla against the vacant post and  
thus his grievance has been resolved. So, he does not want to press further  
the instant service appeal. Signature of appellant taken on the side of  
margin sheet as a token of proof. The appeal in hand stands dismissed as  
withdrawn. File be consigned to the record room.

ANNOUNCED  
30.01.2017


  
(ASHFAQUE TAJ)  
MEMBER

155 012-927565-7

28.09.2016

Appellant with counsel present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that the appellant was appointed as Driver on 14.11.2011 as a regular employee in the office District Population Welfare Shangla. He was transferred to District Torghar on 25.11.2013 and was retransferred to Shangla on 29.03.2016. The said order was however cancelled just after one day on 30.03.2016 at the intervention of the Advisor to Chief Minister for Population Welfare Department and argued that the said order was illegal and was not maintainable made due to obvious political influence. He further argued that the departmental representation of the appellant dated 12.04.2016 was not responded in the statutory period, hence the present service appeal on 08.08.2016.

Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents for submission of written reply. To come up for written reply/comments on 29.11.2016 before S.B.

  
Member

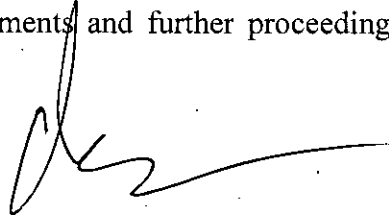
29.11.2016

Clerk to counsel for the appellant and Mr. Sagheer Musharraf, AD (Litigation) alongwith Assistant AG for respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 26.12.2016 before S.B.

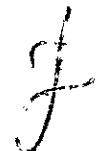
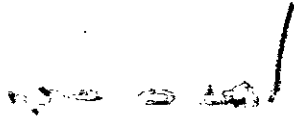
  
MEMBER

23.08.2016

Counsel for the appellant present. Preliminary arguments heard and case file perused. Perusal of the case file reveals that the impugned order dated 30.3.2016 vide which the appellant was transferred from Shangla to Torghar is not available on file. The learned counsel for the appellant requested for time to produce the impugned order dated 30.3.2016. Request accepted. To come up for preliminary arguments and further proceedings on 28.9.2016 before S.B.

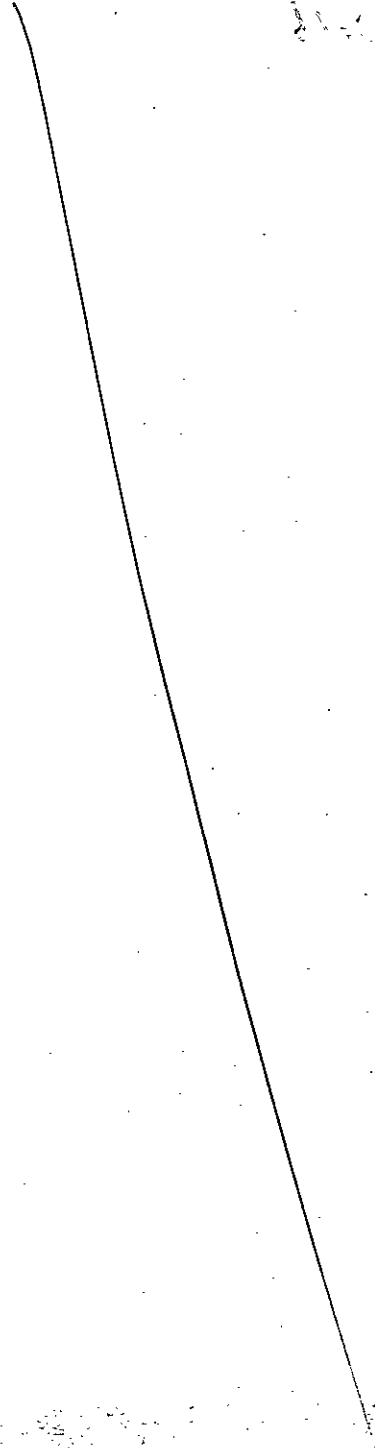


Member



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Handwritten text, possibly a date or reference number



Form- A  
FORM OF ORDER SHEET

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

Case No. 815/2016


S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	11/08/2016	<p>The appeal of Mr. Ikramullah resubmitted today by Mr. Javed Iqbal Gulbela Advocate may be entered in the Institution Register and put up to Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	15-08-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>23-08-2016</u></p> <p style="text-align: right;"> MEMBER</p>

The appeal of Mr. Ikramullah son of Gul Miraj r/o village and post office Alpuri Distt. Shangla received today i.e. on 08.08.2016 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of impugned order dated 30.03.2016 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

No. 1280 /S.T,

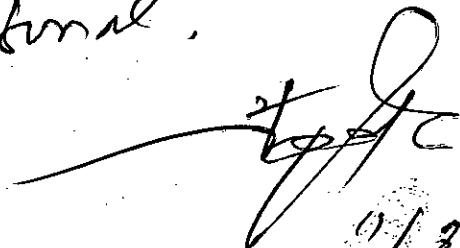
Dt. 09/8 /2016

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Javed Iqbal Gulbela Adv. Pesh.

Respected Sir,

Resubmitted after necessary  
completion, & copy of the  
impugned order dt: 30-03-2016  
has neither been provided to  
Appellant, nor to counsel.  
So the appeal may kindly  
be placed before the Honorable  
Tribunal.



9/8/2016

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

*Appeal No. 815/2016*

Ikram Ullah

VERSUS

Secretary Population Welfare Department and others

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Through

Appellant

  
Javed Iqbal Gulbela

And

**Qaiser Hayat (Khazana)**

Advocates, High Court,  
Peshawar.

①

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

Appeal No. 815/2016

Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 813  
Dated 08/8/2016

Ikram Ullah S/o Gul Miraj R/o Village and post office Alpuri  
District Shangla

.....Appellant

**VERSUS**

1. Secretary Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
3. District Population Welfare Officer, Torghar
4. District Population Welfare Officer, Shangla

.....Respondents

**APPEAL UNDER SECTION 4 OF THE**  
**KHYBER PAKHTUNKHWA, SERVICES**  
**TRIBUNAL ACT 1974, AGAINST THE**  
**IMPUGNED OFFICE ORDER DATED**  
**30/03/2016, OF THE OFFICE OF THE**  
**RESPONDENT NO. 2 WHEREBY THE**  
**APPELLANT WAS TRANSFERRED BACK**  
**TO DISTRICT TORGHAR FROM**  
**DISTRICT SHANGLA, JUST AFTER A**  
**SINGLE DAY OF DUTY AND THE**

Filed to-day

Registrar

8/8/16

Re-submitted to -day  
and filed.

Registrar

11/8/16.



  
**DEPARTMENTAL APPEAL AGAINST THE**  
**SAME ALSO WENT FUTILE.**

**RESPECTFULLY SHEWETH,**

1. That the appellant was initially appointed vide the office order dated 14/11/2011, of the office of Respondent No. 4 as driver in BPS-04, as regular civil servant. (Copy of appointment letter is attached as Annexure A).
2. That inspite of the stark position that the appellant was a regular civil servant, the service of the appellant was terminated on 31/05/2013, by declaring him as an employee of Additional RH Project. (Copy of termination order dated 31/05/2013 is annexed as Annexure B).
3. That the appellant had been appointed as regular basis and not as an employee of Additional RH Project so initially reinstated into service vide the office order dated 02/10/2013. (Copy of the reinstatement order dated 02/10/2013 is annexed as annexure C).
4. That as after being re-instated into service the appellant was transfer etc to out district Torghar, inspite of being just a Class-IV employee, vide the office order dated 25/11/2013, but being an obedient civil servant the appellant made report to DPW office Torghar and gave his arrival report on

(3)

26/11/2013. (Copies of transfer and arrival report are annexed as Annexure D and E respectively).

5. That as the appellant is a poor man and belongs to a poor family and could not afford to live in Torghar for long time, so repeatedly moved applications for his re-transfer to Shangla, but for a long time no head was paid to the badgers of the appellant, but atleast was transferred to District Shangla in his own pay and scale vide the office order dated 29/03/2016, of the office of respondent No. 2. (Copies of the application and office order dated 29/03/2016 are annexed as Annexure F and G).

6. That on the very next date the appellant submitted his arrival report to the worthy District Population Welfare Officer Shangla, but unfortunately the office order dated 29/03/2016 was cancelled vide the impugned office order dated 30/03/2016 and the appellant was re-directed to join back the DPWO Office Torghar, the appellant preferred a departmental appeal against the impugned office order, but inspite of lapse of statutory period, no findings were made upon the same and is simply shelved. (Copy of the departmental appeal is annexed as Annexure H).

7. That now the appellant approaches this Honourable Tribunal to setaside the impugned office order dated 30/03/2016, of the office of Respondent No. 2 upon the following grounds inter alia.

1

4

GROUNDS:-

- A. That the impugned office order is wrong, illegal, incorrect and against the law on subject.
- B. That even otherwise too the appellant is serving in district Torghar, which is an out district for a Class-IV Civil Servant which under the law and natural justice is illegal.
- C. That the impugned order was issued just after a single day of duty and that too without any reason so is illegal.
- D. That otherwise too repeated transfers diminishes the capability and potential of any civil servant and is always discouraged by Superior Courts of the land.
- E. That the appellant is a poor man and cannot afford to live in such a far long area as all his salary is spent upon on traveling to the place of duty.
- F. That from all prospective the impugned office order is illegal, void ab-initio and ineffective upon the rights of the appellant and is liable to be cancelled and set aside.
- G. That any other grounds, not raised here will be argued at the time of arguments, with the prior permission of this Honourable Court.

5

It is therefore, most humbly prayed that on acceptance of the instant appeal, the impugned order dated 30/03/2016, of the Respondent No. 2 may kindly be set aside and cancelled, and the appellant be transferred back to District Shangla.

Any other relief, which is not specifically asked for, may kindly be granted in favour of appellant in the circumstances of the case.

11/1 Jamil  
Appellant

Through

  
Javed Iqbal Gulbela

And

Qaiser Hayat (Khazana)  
Advocates, High Court,  
Peshawar.

(6)

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

Ikram Ullah

VERSUS

Secretary Population Welfare Department and others

**AFFIDAVIT**

I, Ikram Ullah S/o Gul Miraj R/o Village and post office Alpuri District Shangla, do hereby solemnly affirm and declare on oath that all the contents of instant **SERVICE APPEAL** are true and correct to the best of my knowledge and belief and nothing has been concealed or misstated from this Honourable Court.

DEPONENT

IKI Ikram Ullah

ATTESTED  
Zahid Ullah Khan Advocate  
Distt. Courts Peshawar  
05

7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Ikram Ullah

VERSUS

Secretary Population Welfare Department and others

**ADDRESSES OF PARTIES**

**APPELLANT:-**

Ikram Ullah S/o Gul Miraj R/o Village and post office Alpuri  
District Shangla

**RESPONENTS:-**

1. Secretary Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
3. District Population Welfare Officer, Torghar
4. District Population Welfare Officer, Shangla

Appellant  
Through

  
**Javed Iqbal Gulbela**

And

**Qaiser Hayat (Khazana)**  
Advocates, High Court,  
Peshawar.

IA To

137

E

OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER  
SHANGLA AT ALPURI

(8)

Am-A

Dated Peshawar the, 14/11/2011.

Mr. Ikram Ullah S/O Gul Miraj  
Village and P/O, Alpuri, District Shangla

Subject: OFFER OF APPOINTMENT FOR DRIVER (BPS-4)

F.No.1 (4)/Admn/2010-11: Consequent upon the recommendations of the District Selection Committee (DSC), are hereby offer of appointment of Driver (BPS-4) on the following terms and conditions.

TERMS & CONDITIONS:-

1. You shall get pay at the minimum of pay scale BPS-4 (5200-230-12100) including usual allowances as admissible under the rules. You will also be entitled to annual increment as per existing policy.
2. You shall be governed by the NWFP Civil Servants Act, 1973 and all the laws applicable to the Civil Servants and rules made there under.
3. You shall, for all intents and purposes, be civil servant except for purpose of pension or gratuity. In lieu of pension and gratuity, you shall be entitled to receive such amount contributed by you towards Contributory Provident Fund (CPF) alongwith the contribution made by Government to your account in the said fund, in the prescribed manner.
4. Your employment is purely temporary as per Govt: rules / policy. Your services are liable to be terminated without assigning any reason at fourteen (14) days notice or on the payment of 14 days salary in lieu of the notice. In case you wish to resign at any time, 14 days notice will be necessary or in lieu thereof 14 days pay will be forfeited.
5. You shall, initially, be on probation for a period of one year extendable upto two years.
6. You shall produce a medical certificate of fitness from DHQ Hospital, Shangla before reporting yourself for duty as required under the rules.
7. You have to join duty at your own expenses.
8. If you accept the above terms and conditions, you should report for duty to the District Population Welfare Office, Shangla within 15 days of the issuing of this offer failing which your appointment shall be considered as cancelled.

Attested  
District Population Welfare Officer,  
Shangla at Alpuri

Copy forwarded to the:-

1. PS to Minister for Population Welfare, Khyber Pakhtunkhwa, Peshawar.
2. PS to Director General, PWD, Khyber Pakhtunkhwa, PHQ, Peshawar.
3. District Account Officer, Shangla.
4. Accounts Assistant (Local), Shangla.
5. Personal File of the official concerned.

(9)

Am-B  
Regd

GOVERNMENT OF KHYBER PAKHUNJH  
POPULATION WELFARE DEPARTMENT  
POST BOX NO. 235  
FC TRUST BUILDING SUNEHRI MASJID ROAD  
2<sup>ND</sup> FLOOR PESHAWAR CANTT.

F.No.4(35)2012-13/Admn.

Dated Peshawar, The 31/5/2013

To

The District Population Welfare Officer  
Shangla

Subject:- TERMINATION OF SERVICES.

I am directed to enclose herewith specimen letter regarding termination of services of the following Addl: RII employees of your district recruited against the posts of Addl: RII Project to be completed on 30.6.2013.

1	Minhas Begum	FWA(F)	05	Shangla
2	Ikram Ullah	Driver	04	-do-
3	Jehan Bakhta	Sweepress	01	-do-


The same may be signed and served to the concerned employees before 15.06.2013 under intimation to this Directorate.

  
(Kashif Fida)

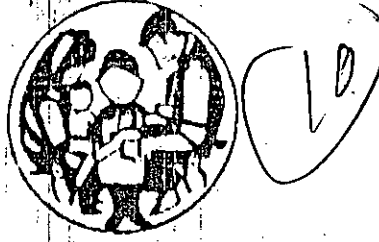
Assistant Director (Admn)

Copy to:-

PS. to Director General, PWD KPK, Peshawar.

  
Assistant Director (Admn)





Ph.No Office-0996-850720  
Fax No. 0996-850720

**OFFICE OF THE DISTRICT POPULATION WELFARE OFFICER  
SHANGLA AT ALPURI.**

F.No.1(4)/Admn-2012-13/a/s/o

Dated, 10-6-2013

**To**

Mr.Miss.Mrs Ikram ullah


**Subject: TERMINATION OF SERVICE**

Reference office letter F.No. 4(35)/2012/Admn dated 31.05.2013 on the above subject.

The Services of Mr.Miss.Mrs Ikram ullah S/O, D/O, W/O Gul meraj

Appointed as Driver under Addl. RH Project shall stand terminated w.i.e. 30.6.2013 on Completion of project.

This may be considered as 15 days prior notice as per project policy of Khyber pakhtunkhwa.

  
District Population Welfare Officer  
SHANGLA

**Copy to:**

1. PS to Secretary Govt:of Khyber Pakhtunkhwa,Population Welfare Department ,Peshawar.
2. PS to Director General Govt:of Khyber Pakhtunkhwa,Population Welfare Department ,Peshawar.

**ATTESTED**

District Population Welfare Officer  
SHANGLA

GOVERNMENT OF KHYBER PAKHTUNKHWA  
POPULATION WELFARE DEPARTMENT

Post Box NO. 235  
FC TRUST BUILDING SUNEHRI MASJID ROAD  
2<sup>ND</sup> FLOOR PESHAWAR CANTT:

F.No 4 (35)/2012/Admn/MSU RHC  
Dated Peshawar, 02/10/2013

To

District Population Welfare Officer,  
Shangla.

Subject: - RE-INSTATEMENT IN SERVICE

I am directed to refer to inquiry report submitted by Mr. Muhammad Aleem Deputy Director (Admn) and representation of Mr. Ikram Ullah Driver and to state that the said Driver may be reinstated into service from the date of termination being appointed on regular basis instead for Additional RH Project under intimation this office please.

(Kashif Fida)  
Assistant Director (Admn)

Copy to:-

- 1) PS to Director General, PWD KPK, Peshawar.

Assistant Director (Admn)

AD / TED

(12)

Am-12

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**DIRECTORATE GENERAL POPULATION WELFARE**  
**POST BOX NO. 235**

FC Trust Bldg Sunehri Masjid Road, Peshawar Cantt. Ph: 091-9211930-38

Dated Peshawar the 25/11/2013.

OFFICE ORDER

F.No.4 (35)/2012/Admn:- Mr. Ikram Ullah, Driver, re-instated into service vide DPW Officer, Shangla office order No. 1(4)/Admn/2013-14/2261 dated 07.11.2013, is hereby posted against the vacant post of Driver at District Population Welfare Office, Torghar with effect from 10.06.2013.

(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. District Population Welfare Officer, Shangla w/r to his letter No. 1(4)/Admn/2013-14/2262 dated 07.11.2013.
2. District Population Welfare Officers, Shangla and Torghar.
3. District Accounts Officers, Shangla & Torghar
4. PS to Director General, Population Welfare Department, Peshawar.
5. Official concerned.
6. Master File.

(Kashif Fida)  
Assistant Director (Admn)

\*Naeem Jan\*

**ATTESTED**

To

The District,  
Population Welfare Officer,  
Torghar.

(13)

Am-E

Subject:-

ARRIVAL REPORT

Dear Sir,

With reference to Assistant Director (Admn), Population Welfare Department, Peshawar Office Order No. 4(35)/2012/Admn dated 25.11.2013, I Mr. Ikram Ullah, Driver is hereby submitted my arrival report for duty on 26.11.2013 as Driver in DPW Office, Torghar.

Yours faithfully

*Ikram Ullah* 26.11.2013  
(Ikram Ullah)  
Driver, DPWO, Torghar

ATTESTED

14

**Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare  
Post Box No. 235**

FC Trust Building Sunehri Masjid Road,  
Peshawar Cantt: Ph: 091-9211536-38  
\*\*\*\*\*

Dated Peshawar the 20-01-2014.

OFFICE ORDER

F.No.4(27)/2012/Admn:- Mr. Ikram Ullah, Driver (BPS-4) re-instated into service with effect from 01.07.2013 and allowed to draw his pay and allowances w.e.f. 01.07.2013 to 30.11.2013 against the vacant post of Driver at DPW Office, Torghar.

(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. DPW Officer, Torghar.
2. Distt: Accounts Officer, Torghar.
3. PS to Director General, PWD, Peshawar.
4. Official concerned.
5. Master File.

  
(Kashif Fida)  
Assistant Director (Admn)

**ATTESTED**

خدمت جناب ڈائریکٹر جنرل، محکمہ بہبود آبادی، خیبر پختونخواہ

Am-151  
75

درخواست برائے تبادلہ ضلع تورغر سے ضلع شانگلہ

Postmarked  
Diary No. 395  
Dated 18/2/14  
S/s

Dec 2 2014

جناب عالی:-

گزارش کی جاتی ہے کہ مسائل ضلع بہبود آبادی دفتر تورغر میں بحیثیت ڈرائیور ڈیوٹی انجام دے رہا ہے۔ چونکہ مسائل ضلع شانگلہ کا مستقل باشندہ ہے اور مسائل کو ضلع تورغر میں ڈیوٹی سرانجام دینا کافی مشکل ہے اور صحیح طریقے سے مسائل کی ڈیوٹی سرانجام نہیں دے پارہا۔ کیونکہ مسائل ایک غریب خاندان سے تعلق رکھتا ہے اور مسائل کو تورغر آنے جانے میں کافی پیسے صرف ہو جاتے ہیں۔

جناب عالی:

اس لئے آپ صاحبان کی خدمت میں دردمندانہ التماس کی جاتی ہے۔ کہ ضلع شانگلہ میں ڈرائیور کی خالی آسامی موجود ہے۔ آپ صاحبان مسائل کو ضلع بہبود آبادی تورغر سے ضلع بہبود آبادی دفتر شانگلہ بحیثیت ڈرائیور تبادلہ کے احکامات صادر فرما کر مشکور فرمائیں۔ مسائل تاحیات آپ کی دراز عمری کیلئے دعا گو رہیگا۔

عین نوازش ہوگی

العارض  
Ramullah  
12-2-2014

اپکا تالبعدار اکرام اللہ، ڈرائیور ضلع بہبود آبادی دفتر تورغر

17/2/14

17/2

18/2/14

18/2/14

ATTACHED

Government of Khyber Pakhtunkhwa  
Directorate General Population Welfare

Post Box No. 235  
admnpwd12@gmail.com  
FC Trust Building Sunehri Masjid Road,  
Peshawar Cantt. Ph: 091-9211536-39

Dated Peshawar the 23/3/2016.

OFFICE ORDER

1196-1201  
F.No.1(C)/2015/Admn: Mr. Ikram Ullah, Driver, District Population Welfare Office, Torghar is hereby transferred to District Population Welfare Office, Shangla against the vacant post at RHSC-A Shangla, with immediate effect and till further order in the best interest of public service.

(Director General)  
Population Welfare Department

Copy forwarded to the:

- District Population Welfare Officers, Shangla and Torghar.
- District Accounts Officers, Shangla and Torghar.
- PS to Advisor to Chief Minister for PWD, KPK w/r to Telephonic conversation with Director General, PWD, KPK on 29.03.2016.
- PS to Director General, PWD, KPK, Peshawar.
- Official Concerned
- Master File.

(Hidayat Khan)  
Deputy Director (Admn)



MISSING

الذم لہم (ذاتی طور پر) ڈیپارٹمنٹ آف ایجوکیشن، لاہور۔  
M. A. Khan

تاریخ: 25-3-2016

محترم سر، لاہور۔

میں نے آپ سے درخواست کی ہے کہ آپ اپنے ڈیپارٹمنٹ میں سے ایک ایجنٹ کو بھیجیں تاکہ وہ

میں آئے اور وہ میرے ساتھ آجائے۔

میں نے ڈیپارٹمنٹ آف ایجوکیشن، لاہور سے درخواست کی ہے کہ وہ میرے ساتھ آجائے۔

میں نے ڈیپارٹمنٹ آف ایجوکیشن، لاہور سے درخواست کی ہے کہ وہ میرے ساتھ آجائے۔

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1



# وکالت نامہ

بعد الترتیب: سردار سید محمد علی صاحب کو نوال  
 الکرام امینہ بنام ایڈووکیٹ سید محمد علی صاحب  
 منجانب امینہ دعویٰ A C A  
 تاریخ

باعث تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و حوالہ کے  
 بمقام ایڈووکیٹ سید محمد علی صاحب کو نوال ایڈووکیٹ ہائی کورٹ کو بدینہ شرح ذیل  
 مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل  
 صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے  
 کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر  
 مقام کچہری کی کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر  
 مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر  
 من مظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی  
 صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کوکل ساختہ پر داخیتہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور  
 صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و  
 تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل  
 کرنے اور ہر قسم کے بیان دینے اور سپروٹاشی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور  
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف  
 کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا  
 اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا پیئر سٹر کو بجائے اپنے یا اپنے ہمراہ  
 مقرر کریں اور ایسے مشیر قانون کے ہر امر دہی اور ویسے ہی اختیارات حاصل ہوں گے جیسے کے صاحب موصوف کو حاصل  
 ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو  
 پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت  
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سند رہے۔  
 مورخہ ----- مضمون مختار نامہ سن لیا ہے اور اسے صحیح سمجھ لیا ہے اور منظور ہے۔

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محمد علی صاحب کو نوال  
 ایڈووکیٹ

Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare

Post Box No. 235  
admpwd12@gmail.com  
FC Trust Building Sunehri Masjid Road,  
Peshawar Cantt. Ph: 091-9211536-38  
\*\*\*\*\*

Dated Peshawar the 30/3/2016.


OFFICE ORDER

1259-64  
F.No.1(3)/2015/Admn. With approval of the competent authority this office order of even number dated 29-03-2016 the transfer order in respect of Mr. Ikram Ullah, Driver, District Population Welfare Office, Torghar to District Population Welfare Office, Shangla is hereby withdrawn with immediate effect till further order.

(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. District Population Welfare Officers, Shangla and Torghar.
2. District Accounts Officers, Shangla and Torghar.
3. PS to Advisor to Chief Minister for PWD, KPK w/r to Telephonic conversation with Director General, PWD, KPK on 30.03.2016.
4. PS to Director General, PWD, KPK, Peshawar.
5. Official Concerned.
6. Master File.

  
(Hidayatullah)  
Deputy Director (Admn)

Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare.

Post Box No. 235

adminpwd12@gmail.com  
FC Trust Building Sunehri Masjid Road,  
Peshawar Cantt. Ph: 091-9211536-38

F.No.1(3)/2015/Admn:-  
Dated Peshawar the 27/6/2016.

To

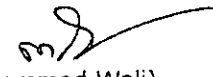
The Section Officer (Establishment),  
Population Welfare Department,  
Peshawar.


Subject: APPEAL

I am directed to refer to letter No. SOE(PWD)4-2/2015/PC/Vol-IV/2453-55 dated 20.04.2016 on the above subject and to state that record reveals that Mr. Ikram Ullah Driver was appointed in District Shangla on regular basis on 14.11.2011. After completion of Additional RH Project he was transferred to DPW Office, Torghar due to non-availability of Driver post in District Shangla. As per his request he was transferred back to DPW Office, Shangla against the vacant post on 29.03.2016 and transfer order was withdrawn on 30.03.2016 in the best public interest as per verbal orders of the honorable advisor to Chief Minister for Population Welfare Department.

Copy forwarded to the:

1. PS to Advisor to CM for PWD, KPK.
2. PS to Director General, PWD, KPK.

  
(Muhammad Wali)  
Director (A&P)

  
Director (A&P)

vide No. - 2303-05  
07/6/16  
