

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 583/2019

Date of Institution ... 06.05.2019

Date of Decision ... 30.07.2019

Muhammad Aman Ullah, Accountant (BPS-16), District Population Welfare Office,
Swat. ... (Appellant).

VERSUS

Directorate General Population Welfare Department and six others.
... (Respondents)

Present.

Miss. Roeda Khan,
Advocate. ... For appellant

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of notification dated 08.11.2017, whereby the private respondents in the appeal were promoted to BPS-17. It is the claim of appellant that the said respondents were juniors to him and that he was unlawfully ignored for the purpose of promotion.
2. Learned counsel for the appellant heard and available record gone through.
3. It transpires from the record that the impugned notification was passed on 08.11.2017 where-against purportedly departmental appeal was preferred by the appellant on 21.12.2018. It is, however, duly noted in the



departmental appeal that the same was fifth in number while copy of any of the previous appeals was not provided with the brief.

4. It is no where provided in the law that a civil servant could file successive departmental appeals. Rather, the appellant was obligated to have preferred a service appeal before the Tribunal upon rejection of his departmental appeal or in case it was not responded to within period provided for the purpose.

5. There is yet another aspect of the case in hand. The departmental appeal, as per the appellant, was preferred on 21.12.2018 while the appeal in hand was filed on 06.05.2019. In the said manner, instant appeal is clearly barred by time allowed for the purpose. Learned counsel, in the context of limitation, referred to judgment reported as 2002 PLC (C.S) 1388 and judgment of this Tribunal in service appeal No. 760/2011. The two cited judgment do not seem to be relevant for the purpose as the service appeals decided thereby were not beyond the period of limitation.

6. In view of the above, the appeal in hand is found meritless, warranting its admission for regular hearing. The same is, therefore, dismissed in limine. File be consigned to the record room.

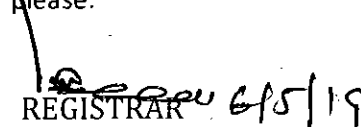




(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
30.07.2019

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 583/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|------------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 06/05/2019 | <p>The appeal of Mr. Muhammad Amnaullah presented today by Roeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 06/05/19</p> |
| 2- | 09/05/19 | <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/06/19</u></p> <p style="text-align: right;"> CHAIRMAN</p> |
| 20.06.2019 | | <p>Counsel for the appellant present and requested for adjournment. Adjourned to 30.07.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member</p> |

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 583 /2019

Muhammad Aman Ullah

VERSUS

Directorate General Population Welfare Department and
Others

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APPELLANT

Through


Roeda Khan

Advocate, High Court
Peshawar.

Dated: 30/04/2019

(11)

BEFORE THE HON'BLE SERVICE TRIBUNAL

PESHAWAR

**Khyber Pakhtunkhwa
Service Tribunal**

In Re S.A No. 583 /2019

Diary No. 710

Dated 06/5/2019

Muhammad Aman Ullah Accountant BPS-16, District
Population Welfare Officer, Swat.

Appellant

VERSUS

1. Directorate General Population Welfare Department .
2. District Population Welfare Office Mardan.
3. Secretary Government of Khyber Pakhtunkhwa Population Welfare Department.
4. Mohammad Kashif Khan Account BPS 17 Director General Population Welfare Office Peshawar
5. Amin Khan S/o Saif-ur-Rehman, Assistant Director BPS 17 Director General Population Welfare Office Peshawar
6. Abdul Salam S/O Mohammad Ishaque Assistant Director BPS 17 Director General Population Welfare Office Peshawar
7. Shahid Murad S/O Murad Khan Deputy Demographer BPS 17 District Population Welfare Office Peshawar.

Respondents

Filed to-day

Registrar

B/S/15

APPEAL U/S-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE NOTIFICATION DATED 08/11/2017 WHEREBY THE PRIVATE RESPONDENT WERE PROMOTED TO BPS-17 DESPITE BEING JUNIORS AND THE APPELLANT WAS IGNORED AGAINST WHICH THE APPELLANT FILED A DEPARTMENTAL APPEAL WHICH WAS NOT RESPONDED WITHIN STATUTORY PERIOD.

2

Prayer:-

ON ACCEPTANCE OF THIS SERVICE APPEAL THE IMPUGNED ORDER DATED 08/11/2017 MAY VERY KINDLY BE SET ASIDE AND THE RESPONDENT DEPARTMENT MAY KINDLY BE DIRECTED TO PROMOTE THE APPELLANT BEING ELIGIBLE AND THE RESPONDENT DEPARTMENT MAY FURTHER BE DIRECTED TO MAINTAIN PROPER SENIORITY LIST AS PER RULES 17 OF APT RULES ALONG WITH ALL BACK BENEFITS.

Respectfully Sheweth,

1. That the appellant is initially appointed as Account Assistants BPS-11 on 31/08/2000. (Copy of appointment order is annexed as annexure "A")
2. That the appellant according to merit list was placed at serial No.5 and had obtained 70 marks. (Copy of merit list is attached as annexure "B")
3. That after appointment the appellant performed his duty with hard work and full devotion and no complaint whatsoever has been made against the appellant.
4. That due to hard work and unblemished service record the appellant has been promoted to BPS-16.

5. That the Respondent department issued a notification dated 08/11/2017 whereby the private Respondent has been illegally promoted to BPS 17 while the appellant has been ignored being senior and eligible **(Copy of a promotion orders is annexed as annexure "C")**
6. That the appellant filed a departmental appeal within 30 days of the communication of the impuned promotim order dated 08/11/2017 which has not been decided by the Respondent department within the statutory period. **(Copy of a departmental appeal is annexed as annexure "E")**
7. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

- A. That the appellant has not been treated in accordance with law and hence his rights secured and guaranteed under the Constitution of 1973 were badly violated.
- B. That in accordance with law the Respondents were required to have

processed the case of promotion etc of the appellant also, however it was refused, thus the appellant has been deprived of his vested right of consideration for seniority.

C. That according to Rules 17 of APT, the Respondent department is required to maintain the seniority list on the basis of merit list instead of arrival.

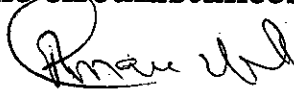
D. That the promotion of the private Respondent is against the rule and law and ignorance of the appellant is a clear cut violation of rules and law.

E. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of this service appeal the impugned order dated 08/11/2017 may very kindly be set aside and the respondent department may kindly be directed to promote the appellant being eligible and the respondent department may further be directed to maintain proper seniority list as per rules 17 of APT rules along with all back benefits.


(5)

*Any other relief not specifically asked for
may also graciously be extended in favour of
the Appellant in the circumstances of the case.*



APPELLANT

Through


Roeeda Khan
Advocate, High Court
Peshawar.

Dated: 30/04/2019

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.



Advocate.

6

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

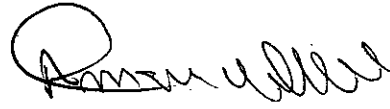
Muhammad Aman Ullah

VERSUS

Directorate General Population Welfare Department and Others

AFFIDAVIT

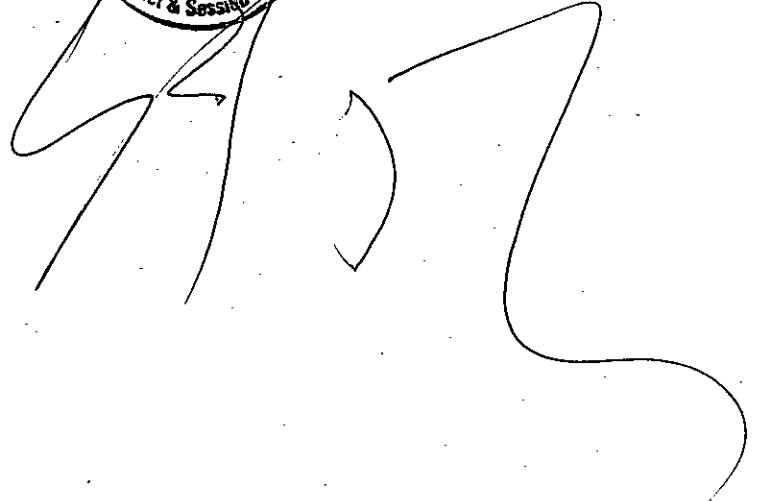
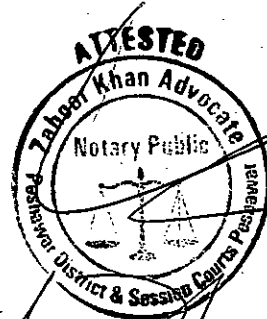
I, **Muhammad Aman Ullah Accountant BPS-16, District Population Welfare Officer, Swat**, do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.



DEPONENT

Identified by:

Roeeda Khan
Advocate High Court
Peshawar.



BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Muhammad Aman Ullah

VERSUS

Directorate General Population Welfare Department and
Others

ADDRESSES OF PARTIES

PETITIONER.

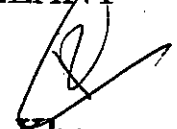
Muhammad Aman Ullah, Accountant BPS-16,
District Population Welfare Officer, Swat.

ADDRESSES OF RESPONDENTS

1. Directorate General Population Welfare
Department.
2. District Population Welfare Office Mardan.
3. Secretary Government of Khyber Pakhtunkhwa
Population Welfare Department.


APPELLANT

Through


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 30/04/2019

(8)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Muhammad Aman Ullah

VERSUS

Directorate General Population Welfare Department and

APPLICATION FOR CONDONATION OF DELAY
{IF ANAY}

RESPECTFULLY SHEWETH.

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the appellant submitted departmental appeal within 30 days of the communication of the promotion order dated 08/11/2017.
3. That it is a well settled principle of law and according to the judgment of Supreme Court as well as judgment of this Hon'ble Tribunal rely upon 2002 PLS (CS) Page 1388 and

(9)

judgment passed in service appeal No:
760/2011 Sanaullah Khan Versus Police
Department decided on 15/03/2019 but in
matter of promotion seniority pay pension no
limitation run against that.

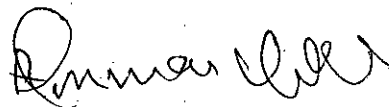
Grounds:

- A. That the impugned orders are void order and
no limitation run against the void orders.

- B. That there are number of precedents of the
Supreme Court of Pakistan which provides
that the cases shall be decided on merits
rather than technicalities.

*It is, therefore, requested that the
limitation period (if any) may kindly be
condone in the interest of justice.*

Dated: 30/04/2019



APPELLANT

Through



Roeeda Khan
Advocate, High Court
Peshawar.

Directorate General
Population Welfare Department
Post Box.No.235

F.No.4(35)/95-2000/Admn.Vol-IV

Peshawar, the 31st August, 2000.

Subject: APPOINTMENT AS ACCOUNT ASSISTANT (BPS-11)

Reference their applications on the subject noted above.
The following candidates are hereby offered appointment on temporary basis, as Account Assistant (BPS-11), in NWFP, Population Welfare Department on the following terms and conditions.

| S/No. | Name of Candidates | District of Domicile | Place of Posting |
|-------|---|----------------------|--|
| 1. | Waqar Khan S/O Mohammad Afzal | Peshawar | Directorate General, Population Welfare Office, Peshawar. |
| 2. | Abdul Sami S/O Abdul Qayyum | Chitral | Reproductive Health Services Centre-A Chitral. |
| 3. | Mohammad Kashif Khan S/O Mohammad Hashim Khan | Peshawar. | Reproductive Health Services Centre-A, Nowshehra. |
| 4. | Jehanzeb Pervaiz S/O Mohammad Pervaiz | Peshawar | Reproductive Health Services Centre-A, Swat. |
| 5. | Mohammad Aman Ullah S/O Jar Ullah | FATA | Divisional Directorate Population Welfare, Kohat. |
| 6. | Mohammad Khalid Usman S/O Sakhawat Shah | Mardan | Reproductive Health Services Centre-A Mardan. |
| 7. | Waheed Khan S/O Mureed Abbass | Bannu | Reproductive Health Services Centre-A, Bannu. |
| 8. | Azmat Ullah S/O Taseer Ghulam | Bannu | Reproductive Health Services Centre-A, Abbottabad. |
| 9. | Shuja-ul-Mulk S/O Mohammad Shafiq | FR-Kohat | Reproductive Health Services Centre-A, Kohat. |
| 10. | Amin Khan S/O Saif-ur-Rehman | Peshawar. | Divisional Directorate Population Welfare Deptt: Peshawar. |
| 11. | Wazir Mohammad S/O Mohammad Ali | Mardan | Reproductive Health Services Centre-A, Swabi. |
| 12. | Zahir-ud-Din S/O Mohammad Shafi | Peshawar. | Reproductive Health Services Centre-A, Haripur. |
| 13. | Mohammad Tauseef Khan S/O Haq Nawaz. | Mansehra | Divisional Directorate Population Welfare Deptt: A.Abad. |
| 14. | Naeem Khan S/O Gul Qadar Khan. | Karak | Reproductive Health Services Centre-A, DIKhan. |
| 15. | Abdul Salam S/O Mohammad Ishaque. | Peshawar | Reproductive Health Services Centre-A, Hayatabad Medical Complex Peshawar. |
| 16. | Shahid Murad S/O Murad Khan | Peshawar. | Reproductive Health Services Centre-A, Khyber Teaching Hospital Peshawar. |

by Sir (A.S.)
please refer.
4/9/2000

7073
4/9/2000

R
A.S.

- i) They will be paid the salary of BPS-11, i.e. pays scale Rs. 1725-116-3465 plus other allowance as sanctioned by the Government from time to time.
- ii) They can be posted any where in Pakistan as the competent authority may decide.
- iii) In case of resignation from service they will be bound to give one month notice to the Government prior to the date of relinquishing charge. In case one month's notice is not served an amount equivalent to one month salary will be deposited by the concerned.
- iv) He/She will not be entitled to any TA/DA to join duty.
- v) He/She will be on probation for a period of one year. If no order is issued on the expiry of the first year of probation period, it shall be deemed to have been extended for a further period of one year.
- vi) Their appointment will be subject to Medical Certificate of fitness. Government/ Competent Authority will be competent to vary or add conditions without any notice. The decision of the competent authority will be final and not challengeable before any court of law. Similarly the interpretation of these conditions by the competent authority will be final.

In case they accept the offer of appointment on these terms and conditions they should report for duty to the District Population Welfare Officer mentioned against their name and produce original certificate in connection with their age, qualification, domicile etc.

The offer is valid for 15 days from the date of its receipt and will automatically lapse if no reply is received within due date or you fail to report for duty by this date i.e. 15 days after issue of the offer.

The appointment is subject to verification of your character and antecedents by police authorities.

Sd/-
Director General

Mr./Miss./Mrs. Mohammad Amanullah s/o Janallah
Bilal Farid s/o Mr. E. Khan s/o Mr. Bazar
Hangal

Copy forwarded to:-

1. Addl: Accountant General, P.R. Sub Office Peshawar.
2. PS to Secretary, PW & WDD, Govt. of NWFP, Peshawar.
3. All Divisional Directors, PWD, in NWFP.
4. All DPWOs, in NWFP for information & necessary action.
5. All District Accounts Officer/Agency Account officer, in NWFP.
6. Section Officer(Admn-V), Ministry of Population Welfare, Islamabad, for information w/r to his letter No.5(4)/2000/Admn-V dated 30.8.2000.

(Amir Jan Khan)
Director(A&C)
31/8/2000

*** A.W ***

LIST FOR THE POST OF ACCOUNTS ASSISTANT (BPS-11) HELD ON 07-08-2000
 MERIT LIST OF THIRTY EIGHT SUCCESSFUL CANDIDATES SELECTED FOR APPOINTMENT (PRINCIPAL & ALTERNATE)
 OBTAINING FIFTY TO SEVENTY SIX MARKS OUT OF HUNDRED MARKS

| Sl. No. | Name of Candidate | Qualif. | Date of Birth | Domestic | Cal. No. | Marks Obtained | Merit Position | Remarks |
|---------|-----------------------------------|-------------|---------------|-------------|----------|----------------|----------------|---------|
| 341 | Mr. Waqar Khan X | B.Com | 15-12-1973 | Reserve | 20 | 76 | 1 | |
| 275 | Mr. Abdul Sami | B.Com | 20-5-1977 | Chitral | 8 | 74 | 2 | |
| 400 | Mr. M. Kasim Khan | M.A | 21-7-1977 | Nowshera | 1 | 72 | 3 | |
| 370 | Mr. Johanzab Farooq X | B.Com | 26-11-1976 | Parbhakar | 210 | 71 | 4 | |
| 199 | Mr. Amanullah | B.E & B.Sc. | 14-1-1968 | Kohat A.T.A | 17 | 70 | 5 | |
| 342 | Mr. Muhammad Khalid Usman | M.Sc. | 13-4-1974 | Mardan | 43 | 69 | 6 | |
| 101 | Mr. Waheed Khan (Merit by former) | B.Com | 20-8-1972 | Bannu | 47 | 68 | 7 | |
| 102 | Mr. Armatullah Khan | B.A IIB | 18-4-1974 | Bannu | 64 | 67 | 8 | |
| 103 | Mr. Shuja-ud-Din Ahmad | B.Com | 10-4-1976 | Kohat | 10 | 66 | 9 | |
| 271 | Mr. Anam Khan | B.Com | 07-02-1976 | Peshawar | 105 | 65 | 10 | |
| 317 | Mr. Waqar Muhammad | B.Com | 22-02-1977 | Mardan | 54 | 64 | 11 | |
| 337 | Mr. Zaher-ud-Din | M.Sc. | 08-06-1977 | Peshawar | 107 | 63 | 12 | |
| 273 | Mr. Muhammad Tausif Khan | B.Com | 10-02-1978 | Marsyiah | 2 | 62 | 13 | |
| 105 | Mr. Nazeem Khan | B.Com | 03-02-1971 | Karak | 16 | 61.5 | 14 | |
| 343 | Mr. Abdul Salam | M.Com | 02-09-1973 | Peshawar | 97 | 61 | 15 | |
| 106 | Mr. Shafiq Khurd | B.Com | 04-01-1972 | Peshawar | 114 | 60.5 | 16 | |
| 107 | Mr. Imdad Ali | B.Com | 08-03-1978 | Feroz | 15 | 60 | 17 | |
| 398 | Mr. Salim Raza | B.A | 02-04-1971 | Mardan | 59 | 59 | 18 | |
| 399 | Mr. Khairullah | B.Com | 01-05-1972 | D.I Khan | 28/24 | 58.6 | 19 | |
| 401 | Mr. Akbar Ahmad | B.A | 18-05-1978 | Peshawar | 58 | 58 | 20 | |
| 402 | Mr. Iqbal Ahmad | M.Sc. | 17-05-1972 | Bannu | 50 | 57 | 21 | |
| 408 | Mr. Saadat Ali | M.A | 07-03-1972 | Swabi | 5 | 56.5 | 22 | |
| 396 | Mr. Khawaja Abdul Rehman | B.Com | 13-04-1978 | Peshawar | 180 | 56 | 23 | |
| 56 | Mr. Aslam Durr Yousef | B.Com | 01-08-1977 | Mardan | 30 | 55.5 | 24 | |
| 242 | Mr. Muhammad Yousef Khan | B.A | 05-01-1974 | D.I Khan | 7 | 55 | 25 | |

Annexure-A

Annexure-B

Amir's



GOVERNMENT OF KHYBER PAKHTUNKHWA,
POPULATION WELFARE DEPARTMENT
02nd Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

Dated Peshawar the 08th November, 2017

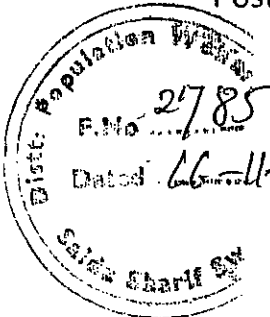
NOTIFICATION

No. SOE (PWD) 4-42/2015-16/DPC:- On the recommendations of the Departmental Promotion Committee and with approval of the Competent Authority, the following ADPWOs, Statistical Investigator & M&E Officers and Accountant (BS-16) are promoted against the posts of Assistant Directors / TPWO / DDPWOs (Non-Tech) / Instructors (Non-Tech) / Accounts Officer / Deputy Demographers (BS-17) on regular basis, whereas Mr. Adnan Saeed, ADPWO at S. No. 11 on acting charge basis, with immediate effect:-

| S. No. | Name | Promoted to the post |
|--------|--|---|
| 1 | Shah Zeb, ADPWO (BS-16) | AD / TPWO / DDPWO / Instructor (Non-Tech) / Accounts Officer / Dy. Demographer (BS-17) on regular basis. |
| 2 | Shahab Ahmad, ADPWO (BS-16) | -do- |
| 3 | Zia-ul-Haq, ADPWO (BS-16) | -do- |
| 4 | Afsar Khan, Statistical Investigator (BS-16) | -do- |
| 5 | Muhammad Tariq, M&E Officer (BS-16) | -do- |
| 6 | Abdul Salam, Accountant (BS-16) | -do- |
| 7 | Amin Khan, Accountant (BS-16) | -do- |
| 8 | Muhammad Kashif Khan, Accountant (BS-16) | -do- |
| 9 | Shahid Murad, Accountant (BS-16) | -do- |
| 10 | Saleem Ullah Khan, Accountant (BS-16) | -do- |
| 11 | Adnan Saeed, ADPWO (BS-16) | AD / TPWO / DDPWO / Instructor (Non-Tech) / Accounts Officer / Dy. Demographer (BS-17) on acting charge basis |

The officers at S. No. 1 to 10 above will remain on probation for a period of one year in terms of Rule-15 of Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 extendable for another year.

Posting / transfer orders will be issued later on.



MAA
PWA wishes to
Acu


5/11/17

SECRETARY
GOVT. OF KHYBER PAKHTUNKHWA
POPULATION WELFARE DEPARTMENT

Endst: No. SOE(PWD)4-42/2015-16/DPC/2314-2323 Dated Peshawar the 08th Nov: 2017

Copy for information & necessary action to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Population Welfare Department, Peshawar.
3. All District Population Welfare Officers in Khyber Pakhtunkhwa.
4. All District Accounts Officers in Khyber Pakhtunkhwa.
5. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
6. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa, Peshawar.
7. PS to Secretary, Population Welfare Department, Khyber Pakhtunkhwa, Peshawar.
8. PA to Advisor to the CM for PWD, Khyber Pakhtunkhwa, Peshawar.
9. Officers concerned.
10. Master file.


SECTION OFFICER (ESTT)
Phone No. 091-9223623

To,

AMID 33
141
The Director General,
Population Welfare Department,
Khyber Pakhtunkhwa, Peshawar.

Through Proper Channel:

Subject: - REQUEST FOR RECTIFICATION OF VIOLATED SENIORITY.

Dear Sir,

Your Kind attention is invited to the above noted subject with the following submissions:

1. That I was appointed in the year 2000 by the then DSC as per appointment orders enclosed at (Flag-A). According to merit list I was placed at serial No. 5 amongst 16 Nos. Selected Account Assistants with 70 marks and at serial No. 5 of the merit list (Flag-B).
2. That according to worn-out and obsolete tradition our seniority was determined even in the existence of the merit list, which is altogether a gross violation of APT Rules, the Rule 17 under title of seniority may be read as under:
 - a. In the case of persons appointment by initial recruitment, in accordance with the order of merit assigned by the Commission (or as the case may be, the Departmental Selection Committee) provided that persons selected for appointment to post in an earliest selection shall rank senior to the persons selected in a later selection: and
 - b. In the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointments in the post: provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

The above miss-calculation of the department inflicted me long lasting future and mental loss to me and my family, which cannot be comprised upon, however before knocking at the door of the Court, I humbly request before your good self to observe that "I MUHAMMAD AMAN ULLAH (BPS-16) HAS NOW BECOME JUNIOR OF MY JUNIOR MEANING THEIR BY THAT AS PER ATTACHED MERIT LIST.

THE FOLLOWING JUNIOR OF MY CADERS/SAME BATCH HAVE BEEN PROMOTED TO (BPS-17) OUT OF TURN".

1. Mr. Waheed Khan (BPS-17)
2. Mr. Abdul Salam (BPS-17)

AMID 33
141

AMAN ULLAH
BPS-16

18

3. Mr. Ameen Khan (BPS-17)

4. Mr. Shahid Murad (BPS-17)

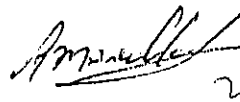
Now whereas, the correction of seniority on the mode of merit is the burning process in Director General Population Welfare, therefore I file this 5th No appeal once for all, before adopting legal proceedings to receive my right through this appeal and if not entertained the court of law.

Yours Faithfully,

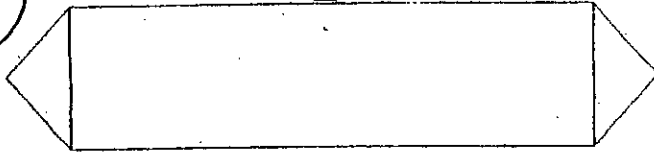
(Muhammad Aman Ullah)
Accountant
District Population Welfare Office
Kohat

Copy to:-

1. Deputy Director (Admn), Population Welfare Department, Peshawar w/r to his office order No. 4(15)/2016/Admn dated 26/12/2018.
2. District Population Welfare Officer, Kohat.


21/12/18
Accountant
District Population Welfare Office
Kohat

بعد از کتاب حج و عمرہ



2019 پنجاب

محمد امین اللہ بنام

مورث

مقدمہ

دعویٰ

جرم

Population
wednesday
Departed

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ

آن مقام کے لئے رسید کیے گئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز

دیکل صاحب کو راضی نامہ کرنے و تقریر 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 بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کارروائی 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 مذکورہ باختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے

سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں

گے۔ کہ پیروی مذکور کریں۔ لہذا داکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted
By

(Signature)

Muhammad Amanullah

(Signature)

2019

(Signature)

ماہ

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المرقوم

العبد محمد امین اللہ

کے لئے منظور ہے۔

(Signature)

مقام