

Before Khyber Pakhtunkhwa Service Tribunal

Service Appeal No.415/2019

Date of Institution: 26.03.2019

Date of Decision: 09.04.2019

Mrs. Nahid Akhtar (LHV) Health Department Kishwara, Swat.
(Appellant)

Versus

1. Director General Health Services DGHS Khyber Pakhtunkhwa at Civil Secretariat Peshawar and 2 others.
(Respondent)

Present:

Mr. Arbab Nasrumminallah, Advocate .. For appellant

Judgment/Order:

HAMID FAROOQ DURRANI, CHAIRMAN:

The appellant is aggrieved of order dated 06.12.201 passed by District Health Officer Swat at Gul Kada whereby she was transferred from BHU Charbagh to BHU Kishwara.

2. Arguments heard.

3. It was contended by learned counsel for the appellant that the impugned transfer order was in violation of transfer/posting policy of Provincial Government as the appellant was previously transferred from BHU Kishwara to BHU Charbagh on 16.05.2018.

4. The material available on file shows that on 16.05.2018, the transfer of appellant and one Mst. Taskeen Anwar was made on the recommendations by the District Nazim, Swat. The said order appears to be politically motivated and when learned counsel was confronted with this fact he could not controvert the proposition. On the other hand, the impugned order dated



06.12.2018 reversed the transfer effectuated through the previous order and the appellant was once again posted at BHU Kishwara. Practically, the impugned order had set at naught the prior transfer order made due to political reasons. Needless to note that through the impugned order, both the female officials were posted again at the place of their respective posting before the passing of order dated 16.05.2018.

5. In view of above, the appeal in hand is devoid of merits warranting its admission for regular hearing. The same is therefore, dismissed in limine alongwith application for suspension of the impugned order. File be consigned to the record room.



(Hamid Farooq Durrani)

Chairman

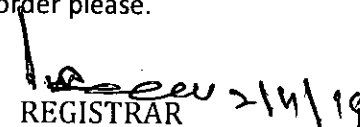

ANNOUNCED

09.04.2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 415/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/04/2019	<p>The appeal of Mst. Naheed Akhtar resubmitted today by Arbab Nasruminallah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 2/14/19</p>
2-	03/04/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/04/19</u>.</p> <p> CHAIRMAN</p>

The appeal of Mrs. Nahid Akhtar LHV Health Department Kishwara Swat received today i.e. on 26.03.2019 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days:

- 1- Memorandum of appeal may be got signed by the appellatant.
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal may be attested.
- 4- Affidavit may be got attested by the Oath Commissioner.
- 5- The law under which appeal is filed is not mentioned.
- 6- The authority to whom the departmental appeal was preferred/made has not been arrayed a party.
- 7- Annexure-F of the appeal is illegible which may be replaced by legible/better one.
- 8- Address of respondent no. 3 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 9- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 521 /S.T,

Dt. 27-3- /2019


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Arbab Nasruminallah adv. Pesh.

Re Submitted after complainance
on dated 2-4-2019

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 415 / 2019

Nahid Akhtar

VERSUS


~~Deputy~~ Director Health (**Paramedics**) DGHS Khyber
Pakhtunkhwa Peshawar and Others

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4.	Application for suspension		9-10
5.	Copy of appointment order		
6.	Copy of order dated 05/04/2011	Annex A	11
7.	Copy of transfer order dated 16/05/2018	Annex B	12
8.	Copy of order no.7181-88/PF dated 06/12/2018	Annex C	13
9.	Copy of departmental appeal	Annex D	14-16
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APPELLANT

Through


Arbab Nasrumminallah
Advocate, High Court
Peshawar.

Dated: 18/03/2019

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 415/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 390

Dated 26/3/2019

Mrs. Nahid Akhtar (LHV) Health Department
Kishwara, Swat.

Appellant

VERSUS

1. Director General Health Services DGHS Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. District Health Officer, District Swat Gul Kada.
3. Mrs. Taskeen Anwar W/o Arshad D/o Anwar Shah (LHV) R/o Mohallah Mira Salam Town, Charbagh, Tehsil Charbagh, District Swat.

Respondents

Filed to-day

Registrar
26/3/19.

Re-submitted to-day
and filed.

Registrar
2/4/19

APPEAL U/S 4 OF SERVICE TRIBUNAL
ACT 1973 AGAINST THE ORDER DATED
06/12/2018 WHEREBY THE
RESPONDENTS DISTRICT HEALTH
OFFICER (DHO SWAT) ILLEGALLY
AGAINST THE SERVICE LAW RULES
TRANSFERRED THE APPELLANT
WITHOUT COMPLETING THE
STATUTORY PERIOD PRESCRIBED BY
THE LAW AND RULES.

Prayer:-

ON ACCEPTANCE OF THIS APPEAL AGAINST THE DEPARTMENT THE ORDER DATED 06/12/2018 OF THE RESPONDENT DISTRICT HEALTH OFFICER (D.H.O) SWAT MAY KINDLY BE SET ASIDE/ CANCELLED AND APPELLANT MAY KINDLY BE TRANSFERRED/POSTED AS LHV AT B.H.U CHARBAGH.

Respectfully Sheweth,

1. That the Appellant was initially appointed and posted as LHV on 28, April, 1993 and since then the appellant is performing her duties to the entire satisfaction at her superiors and served the department for considerable time.
2. That the appellant was transferred and posted as L.H.V at B.H.U kishawara vide order dated 05/04/2011. (Copy of order dated 05/04/2011 is annexed as annexure "A").
3. That the appellant was serving as L.H.V at B.H.U Kishwara and was transferred from B.H.U Kishwara to B,H.U Charbagh vide order dated 16/05/2018. (Copy of transfer

order dated 16/05/2018 is annexed as annexure "B")

4. That after the passage of short interval of less than 6 months the appellant was once again transferred on political whims, malafidely from B.H.U Charbagh to B.H.U Kishwara vide order No.7181-88/P.F dated 06/12/2018 which is hereby referred as impugned order. **(Copy of order dated 06/12/2018 is annexed as annexure "C")**
5. That the appellant submit the departmental appeal on dated 24/12/2018 against the order of District Health officer District Swat Gulkada to Director General Health Services (DGHS) Khyber Pakhtunkhwa at Civil Secretariat Peshawar. **(Copy of departmental appeal is annexed as annexure "D")**
6. That the DGHS Khyber Pakhtunkhwa Peshawar asked comments from the concern Department letter no. 527 dated 23/01/2019 and one reminder letter which was send to them on dated 03/02/2019 but they turn deaf ear from it and does not given any replay. **(Copy of both Letters are annexed as annexure "E")**

7. Now the appellant approaches this Hon'ble Court against the order dated 06/12/2018 is illegal against the law, Civil service appointment transfer and promotion rules, therefore of no value in the eyes of law, therefore the impugned order is liable to be set aside/ cancelled on the following grounds amongst others.

GROUND:-

- A. That the impugned order of the Respondent is illegal, against the service law, rules and Government policy on the subject.
- B. That the impugned order is illegal as the relevant law and rules provided a procedure for transfer of Government servant but in the case of the appellant transfer the law and rules were ignored therefore the appellant was transferred on political whims and wishes.
- C. That it is very much clear that the appellant was transferred to B.H.U Charbagh on 16/05/2018 but once against transferred to Basic Health Unit (B.H.U) Kishwara after a short span at time vide impugned order dated 06/12/2018 which shows the illegality at the impugned order,

further more the law and distums of superior court discourage such like premature transfer.

D. That the impugned transfer is unreasonable therefore untenable in the eyes of law and liable to be set aside.

E. That the impugned act of the Respondent is the clear violation of the law, rules, poicy while the authority vested with any powers are to be exercised just fair and reasonable but the same was not followed in the case of the appellant.

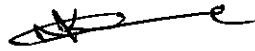
F. That the appellant served at B.H.U Kishwara which is a Hilly Areas for about seven years and was transferred to B.H.U Charbagh where the appellant served for less then six months but was once again transferred to the same B.H..U Kishwara (Hilly area) which is against the law natural justice and fair play therefore the impugned order liable to be set aside on this sole ground only.

G. That any other ground may be raise at the time of arguments with the prior permission of this Hon'ble Court.

(6)

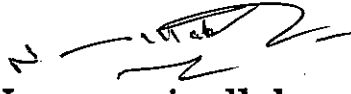
It is therefore, most humbly prayed that on acceptance of this appeal against the department the order dated 06/12/2018 of the respondent D.H.O swat may kindly be set aside/cancelled and appellant may kindly be transferred/posted as LHV at B.H.U Charbagh

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



Arbab Nasrumminallah
Advocate, High Court
Peshawar.

Dated: 18/03/2019

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.

7

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Nahid Akhtar

VERSUS

~~Deputy~~ Director Health (Paramedics) DGHS Khyber
Pakhtunkhwa Peshawar and Others

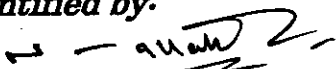
AFFIDAVIT

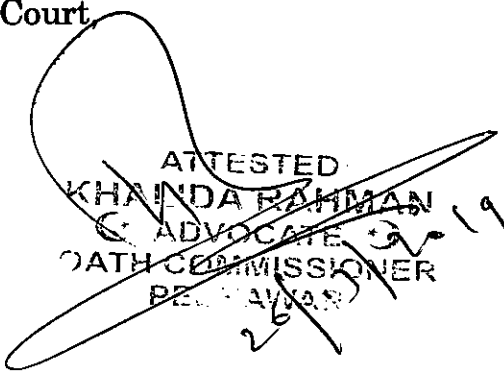
I, Mrs. Nahid Akhtar (LHV) Health Department
Kishwara, Swat, do hereby solemnly affirm and declare that all
the contents of the instant appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed or
withheld from this Hon'ble Court.


DEPONENT

NIC No 15602-0389672-9

Identified by:


Arbab Nasrumminallah
Advocate, High Court,
Peshawar.


ATTESTED
KHANDA RAHMAN
ADVOCATE
OATH COMMISSIONER
PESHAWAR
26/5/19

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Nahid Akhtar

VERSUS

~~Deputy~~ Director Health (**Paramedics**) DGHS Khyber
Pakhtunkhwa Peshawar and Others

ADDRESSES OF PARTIES

PETITIONER.

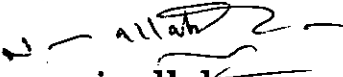
Mrs. Nahid Akhtar (LHV) Health Department
Kishwara, Swat.

ADDRESSES OF RESPONDENTS

1. Director General Health Services DGHS Khyber
Pakhtunkhwa at Civil Secretariat Peshawar.
2. District Health Officer, District Swat Gul Kada.
3. Mrs. Taskeen Anwar W/o Arshad D/o Anwar Shah
(LHV) R/o Mohallah Mira Sàlam Town, Charbagh,
Tehsil Charbagh, District Swat


APPELLANT

Through


Arbab Nasrumminallah
Advocate, High Court
Peshawar.

Dated: 18/03/2019

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2019

Nahid Akhtar

VERSUS

~~Deputy~~ Director Health (**Paramedics**) DGHS Khyber
Pakhtunkhwa Peshawar and Others

APPLICATION FOR SUSPENSION OF THE
IMPUGNED ORDERS DATED 06-12-2018 TILL
THE FINAL DECISION OF THE APPEAL

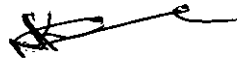
RESPECTFULLY SHEWETH:-

Appellant/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.
2. That the appellant has got a good prima facie case.
3. That the balance of convenience also in favour of the appellant and if suspension order against the impugned order dated 06/12/2018 has not been issued the appellant will suffer irreparable loss.

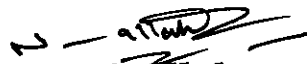
4. That the grounds mentioned in the main appeal may be considered as part of this application.

It is therefore requested that the impugned orders dated 01/02/2018 may kindly be suspended till the final decision of the appeal.



APPELLANT

Through



Arbab Nasrumminallah
Advocate, High Court
Peshawar

Dated: 18/03/2019

Annexed (A)

(14)

Provincial Primary Healthcare Initiative (PPHI),
District Swat


PPHI

No: PPHI/DSU-Sw M&E-05- /
Dated: 5th April 2011

OFFICE ORDER


The following postings / transfers are hereby ordered with immediate effect in public interest.

S. No	Name	Designation	From	To
1.	Dr. Samarát Khan	Medical Officer	BHU Charbagh	BHU Mashkomai
2.	Mst. Naheed Akhtar	LHV	BHU Charbagh	BHU Kishawra


District Support Manager,
PPHI Swat

Copy forwarded to:

1. Executive District Officer (Health) Swat for information please
2. Incharge BHU Charbagh for information and record please
3. Incharge BHU Kishawra for information and record please
4. Incharge BHU Mashkomai for information and record please
- ✓ 5. Officials Concerned


District Support Manager,
PPHI Swat

Attached to Cabinet Division, Prime Minister Secretariat, Govt. of Pakistan
Mohallah Gul Rangzai, Gumbad Maira, Mingora, District Swat.

Phone No: 0946-721241-40 Fax No: 0946-721240

Email: pphiswat@gmail.com

Annexed B



**OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT**

Phone No: 0946-9240139, Fax No: 0946-9240215

Email: gulkada@swat.gov.pk

No. /

Dated: 16 /5/2018

OFFICE ORDER

As approved by the District Nazim Swat the following posting /transfer of PHC Tech: (MCH) LHVs are hereby ordered with immediate effect in the best interest of public services .

Arrival/Departure Reports should be submitted to this office accordingly.

S.N	Name	Designation	From	To	Remarks
1	Mrs.Taskeen Anwar	PHC Tech (MCH) LHV	BHU:Charbagh	BHU:Kishwara	V.S.No.2
2	Mrs.Nahid Akhtar	----do----	BHU:Kishwara	BHU:Charbagh	V.S.NO.1

SD/XXXX


District Health Officer
District Swat at Gulkada.

NO 7181-88 /PF

Copy forwarded to the :-

- 01- District Nazim Swat for information with reference to his No.1628/DG/Swat dated 5/4/2018
- 02- Medical Officer I/C BHU:Kishwara Swat.
- 03- Medical Officer I/C BHU:Charbagh Swat.
- 04- Divisional Monitoring Officer MKD Division swat.
- 05- The above named officials .
- 06- DHIS cell of this office .
- 07- Account Section of this office
- 08- P/File of the officials

For information.


District Health Officer
District Swat at Gulkada

Annexed 63

13



**OFFICE OF THE DISTRICT HEALTH OFFICER
GULKADA DISTRICT SWAT**

Phone No: 0946-9240139, Fax No: 0946-9240215
Email: edohswat@yahoo.com

No. /

Dated: 6/12/2018

OFFICE ORDER

As directed by the competent authority the following posting / Transfer of PHC Tech: (MCH) LHVs are hereby made with immediate effect.

S/No	Name	Designation	From	To	Remarks
1	Mrs. Taskeen Anwar	PHC Tech (MCH) LHV	BHU:Kishwara	BHU:Charbagh	Vice S.No.2
2	Mrs. Naheed Akhtar	PHC Tech (MCH) LHV	BHU:Charbagh	BHU:Kishwara	Vice S.No.1

Arrival /Departure reports should be submitted to this office accordingly.

Sd/xxxx
District Health Officer
District Swat at Gulkada.

NO 17597-99

- Copy forwarded to the :
- 01- Medical Officer I/C BHU:Charbagh Swat.
 - 02- Medical Officer I/C BHU:Kishwara Swat.
 - 03- Account Section of this office.
 - 04- Divisional Monitoring Officer MKD Division Swat.
 - 05- The above named officials
 - 06- DHIS Section of this office.
- For information.

District Health Officer
District Swat at Gulkada

Rahman ali 1242018

Annexed D

(14)

**BEFORE THE DIRECTOR GENERAL HEALTH SERVICES MEMBER
PUKHTOONKHTWA AT CIVIL SECRETARIATE PESHAWAR**

Mrs Nahid Akhtar (LHV) Health Department, BHU Kishawra Appellant

Versus

District Health Officer District Swat..... Respondent

Through proper channel

Departmental Appeal against the Order no 7181-88/PF Dated 6/12/2018 whereby the Respondent (DHO Swat) illegally, against the service law rules transferred the Appellant without completing the Statutory Period prescribed by the Law and rules.

Prayers in Appeal:

On acceptance of this Departmental Appeal the order no 7181-88/PF dated 06/12/2018 of the Respondent (DHO Swat) may kindly be set aside/Cancelled and the appellant may kindly be transferred/posted as LHV at BHU Charbagh.

Respected Sir,

1) That, the appellant was initially appointed and posted as LHV on 28-Apr-1993 and since then the appellant is performing her duties to the entire satisfaction of her superiors and served the department for considerable time.

(The copy of appointment order attached)

2) That, the appellant was transferred and posted as LHV at BHU Kishawara vide order dated 05/04/2011.

(Copy of order dated 05/04/2011 is attached)

ATTESTED
[Signature]
18/3/19

3) That the appellant was serving as LHV at BHU kishawra and was transferred from BHUKishawara to BHU charbagh vide order dated 16/05/2018.

(Copy of transferorder dated 16/05/2018 is annexed)

4) That, after the passage of very short interval of less then six months, the appellant was once again transferred on political whims, Malafidely from BHU charbagh to BHU Kishawra, vide order ^{NO} ~~NO~~ 7181-88/PF dated 06/12/2018 which is hereby referred as Impugned order.

(Copy of order ^{NO} ~~NO~~ 7181-88/PF dated 06/12/2018 is annexed)

5) That, the Impugned order dated 06/12/2018 is illegal, against the law, Civil service appointment transfer and promotion rules, therefore of no value in the eyes of law, therefore the impugned order is liable to be set aside/cancelled on the following grounds amongst others

Grounds:

- i) That, the impugned order of the respondent is illegal ,against the service law, rules and Govt. policy on the subject.
- ii) That, the impugned order is illegal as the relevant law and rules provided a procedure for transfer of Govt. servant but in the case of the appellant's transfer the law and rules were ignored therefore the appellant was transferred on political whims and wishes.
- iii) That, It is very much clear that the appellant was transferred to BHU charbagh on 16/05/2018 but was once again transferred to BHU Kishawra after a short span of time vide impugned order Dated 06/12/2018 which shows the illegality of the impugned order, Furthermore the law and Dictums of superior courts discourage such like pre- Mature transfer.
- iv) That, The Impugned transfer is unreasonable therefore untenable in the eyes of law and liable to be set aside.

ATTESTED.

[Signature]
12/3/19

- v) That, the impugned act of the respondent is the clear violation of the of the law, rules, policy while the authority vested with any powers are to be exercised just, fair and reasonably but the same was not followed in the case of the appellant.
- vi) That, the appellant served at BHU Kishawra which is a Hilly Area for about seven years and was transferred to BHU charbagh where the appellant served for less than six months but was once again transferred to the same BHU kishwara (Hilly area) which is against the law, natural justice and fair play, therefore the impugned order liable to be set aside on this sole ground only.

It is therefore very humbly prayed that on acceptance of the instant Departmental appeal the impugned order i.e 17597-99 Dated 05/12/2018 may kindly be set aside/ Cancelled and the appellant may kindly be posted/ transferred to BHU Charbagh.

ATTESTED

5- attested
[Signature]
 18/12/2018

[Signature]
 Mrs. Nahid Akhtar
 LHV BHU Kishawra.

Date: 19/12/2018

DEPUTY DIRECTOR (PARAMEDICAL)
DGMS KHARBER PAKHTUNKHA
PESHAWAR

[Handwritten signature]

I am directed to refer to the subject matter above and to enclose
herewith a copy of the report submitted in regard to the said matter. The
report is dated 12/12/2018 and is enclosed in the envelope dated 12/12/2018
for your reference.

DEPARTMENTAL OFFICE

The Deputy Director (Paramedical)
DGMS

[Faint, mostly illegible text and stamps at the bottom of the page]

BETTER COPY

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Office Ph#: 091- 9210269 Exchange # 091-9210187, 091-9210196 Fax # 091- 9210230
All communications should be addressed to the Director General Health Services Peshawar and not to
any official by name.

No 527/AE-VI,
Dated: 23/10/2019

To

The District Health Officer,
Swat.

Subject:- DEPARTMENTAL APPEAL

I am directed to refer to the subject noted above and to enclose herewith a copy of departmental appeal in respect of Mrs. Nahid Akhtar, PHC Technician (MCH) BPS-12, against office order No. 17597-99/ dated 05/12/2018, for furnishing comments in the matter.

DEPUTY DIRECTOR (PARAMEDICS)
DGHS KHYBER PAKHTUNKHWA
PESHAWAR

BETTER COPY

DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR

Office Ph#: 091- 9210269

Exchange # 091-9210187, 091-9210196

Fax # 091- 9210230

All communications should be addressed to the Director General Health Services Peshawar and not to any official by name.

No 2170/AE-VI,

Dated: 13/02/2019

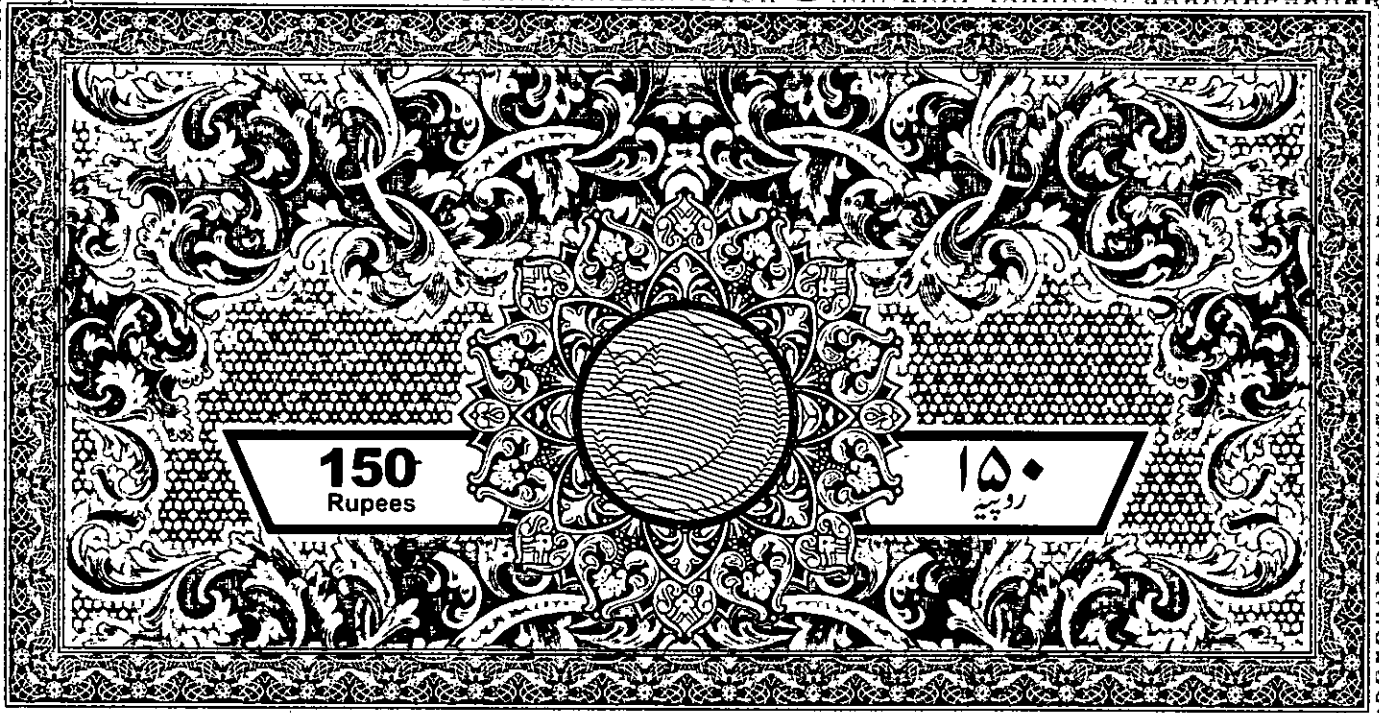
To

The District Health Officer,
Swat.

Subject:- DEPARTMENTAL APPEAL

I am directed to refer to this Directorate letter No. 527/AE-VI, dated 23/01/2019, on the subject noted above and to request to expedite the case so as to proceed further.

DEPUTY DIRECTOR (PARAMEDICS)
DGHS KHYBER PAKHTUNKHWA
PESHAWAR



﴿مختار نامہ خاص﴾

منکہ اختیار دہندہ مسماۃ ناہید اختر دختر عزیز الرحمن زوجہ امیر زیب ساکن چارباغ تحصیل چارباغ ضلع سوات کی ہوں۔ اندر میں وقت بچانگی عقل ہوش و حواس خمسہ برضا مندی خود اقرار کر کے لکھ دیتی ہوں، کہ من مقررہ ایک سروس اپیل، بعنوان مسماۃ ناہید اختر بنام گورنمنٹ آف خیبر پختونخوا ایدز ریو سیکرٹری وغیرہ بعدالت جناب سروس ٹریبونل خیبر پختونخوا ایشادور میں دائر کرنا چاہتی ہے۔ چونکہ من مقررہ پردہ نشین خاتون ہونے کی وجہ سے مقدمہ ہذا کی پیروی و جواب دہی سے اصالتاً قاصر ہوں۔ لہذا من مقررہ اپنی چانپ سے مسماۃ ناہید اختر (1) امیر زیب (شناختی کارڈ نمبر 1-0466121-15602) (2) انور زیب پسران بخت روان (3) رفیق احمد ولد میر محمود ساکنان چارباغ تحصیل چارباغ ضلع سوات کو مختاران خاص مقرر کر کے اختیار دیتی ہوں کہ مختاران خاص منفرد یا مشترکاً مذکورہ مقدمہ ہذا کی پیروی و جواب دہی کیلئے وکیل یا بیریسٹر مقرر کریں۔ وکیل کا محتنانہ ادا کریں۔ عدالت موصوف کے علاوہ عدالت عالیہ ہائی کورٹ پشاور/ دارالقضاء و عدالت عظمیٰ سپریم کورٹ آف پاکستان میں مقدمہ ہذا کی پیروی کریں اور کرائیں۔ عدالت ہائے میں پیش ہو کر تحریری، حلفی، زبانی بیان دیدیں۔ فہرست گواہان و شہادت پیش کریں۔ درخواست سرسبزی، اپیل، نگرانی، نظر ثانی، رٹ پیشین دائر کریں۔ فریق مخالف کے ساتھ شریعت قانون و راضی نامہ کریں۔ بعد از ڈگری اجراء ڈگری دائر کریں۔ ضروری دستاویزات پیش و طلب کریں۔ عرائض، ضروری دستاویزات، وکالت نامہ کی تصدیق کریں۔ ریماٹڈ ہونے کی صورت میں پیروی مقدمہ کریں۔ غرض یہ کہ مختاران خاص کی جملہ ساختہ پرداختہ کاروائی قانونی و شرعی از ابتدائی تا ہر عدالت مآذات خود کو قابل قبول و منظور ہوگی۔ لہذا مختار نامہ خاص ہذا بحضور گواہان ذیل سنداً تحریر ہے۔

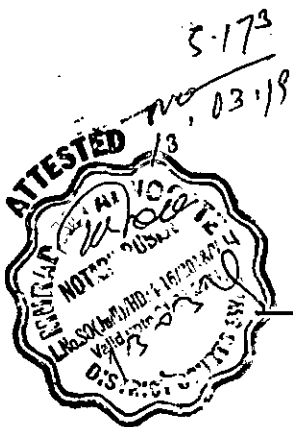
۱۵۰

مسماۃ ناہید اختر دختر عزیز الرحمن زوجہ امیر زیب (اختیار دہندہ)

کارڈ نمبر 9-0389672-15602

گواہ ش
احشام الحق ولد عبد الوہاب سکند بلوگرام ضلع سوات

گواہ ش
قاضی انعام اللہ ولد قاضی ثناء اللہ سکند پانز سوات



20

قیمت 50 روپے	7938	  
ایڈوکیٹ: لدیابج، لفر صین، اللہ		
بار کونسل/ ایسوسی ایشن نمبر: bc-1632		
رابطہ نمبر: 0321-9726408		پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: Service Tribunal Peshawar

مناجب: Appellant	دعوی: Appeal
Mrs. Nahid Akhtar	علت نمبر: —
بنام Deputy Director Health D.G.H.S K.P.K and Others	مورخہ: —
	جرم: —
	تھانہ: —

باعث تحریر آنکہ

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

آن مقام پشاور کیلئے لدیابج، لفر صین، اللہ وینڈو سیدے پشاور کو وکیل 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 و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے 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 اور بصورت ضرورت مقدمہ مذکورہ 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 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 یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

الرقوم: 26-03-2019

العبد _____ گواہ شد _____ العبد
مقام _____ نے اور _____ کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Handwritten signature and text

مسماة نایید اختر دستم خط میرا لھمن زو جب ایمر زریب کلمتہ عیار بانہ کیسل چار بانہ فیصلہ سوارت