


FORM OF ORDER SHEET

Court of _____

Appeal No. 132 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/01/2024	<p>The appeal of 'Syed Nazar Hussain Shah resubmitted today by Mr. Muhammad Asghar Khan Kundi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Syed Nazar Hussain Shah received today i.e on 15.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Three more copies/sets of the appeal along annexures i.e. complete in all respect may also be submitted with the appeal.

No. 123 /S.T.

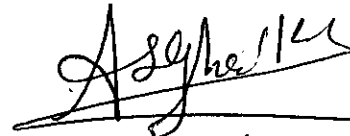
Dt. 16/1 /2024.


16/1/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M. Asghar Khan Kundi Adv.
ASC at Peshawar.

re Submitted Plea
object to Removal Plea
& Submitted
There



16/01/2024

BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 132 /2024

Syed Nazar Hussain Shah. APPLICANT/APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa,
Through Chief Secretary, & others. RESPONDENTS

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal with Affidavit		1-4
2.	Application for Suspension along with Affidavit		5-6
3.	Copy of Seniority List	A	7-8
4.	Copy of Retirement Notification dated 28.12.2022	B	9
5.	Copy of the Notification dated 08.11.2023	C	10
6.	Copy of the Representation dated 07.12.2023	D	11
7.	Copy of Letter dated 11.01.2024	E	12
8.	Wakalatnama		13

Through Appellant


Muhammad Asghar Khan Kundi
Advocate Supreme Court

Dated: 15.01.2024

BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____/2024

Syed Nazar Hussain Shah
S/o Syed Ali Asghar Shah
R/o Secretary Environment,
Forestry & Climate Change,
Civil Secretariat, Peshawar. APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa,
Through Chief Secretary,
Civil Secretariat, Peshawar.
2. Secretary Establishment,
Govt. of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
3. Provincial Selection Board,
Through its Secretary,
Establishment Department,
Civil Secretariat, Peshawar.
4. Section Officer (Estt-I),
Establishment Department,
Civil Secretariat, Peshawar. RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974 AGAINST THE
ORDER DATED 11.01.2024, WHEREBY THE
APPELLANT'S REPRESENTATION FOR HIS
RETROSPECTIVE PROMOTION W.E.F. 04.03.2023
HAS BEEN DECLINED.

Respectfully Sheweth:

1. That the appellant joined the Govt. Service of the province of Khyber Pakhtunkhwa on 14.09.1993 in PCS (Secretariat Group) in BPS-17.
2. That until recently the appellant was at the top of the seniority list for promotion to BPS-21, being the senior most civil servant of Khyber Pakhtunkhwa for promotion to BS-21. (Copy of the Seniority List is annexure "A").
3. That Muhammad Ramzan (PCS SG 21) retired from Govt. Service on 03.03.2023, whereafter a BS-21 vacancy was vacated. (Copy of the Retirement Notification dated 28.12.2022 is annexure "B").
4. That meeting of respondent No.3 was held on 07.09.2023, whereby the appellant was recommended for promotion to BS-21.
5. That the respondent No.1, vide notification dated 08.11.2023, issued promotion of the appellant to BS-21 on regular basis "with immediate effect". (Copy of the Notification is annex "C").
6. That the appellant submitted representation dated 07.12.2023 to respondent No.1 for grant of retrospective promotion w.e.f. 04.03.2023, the date of creation of vacancy; however, the same was declined vide letter/order dated 11.01.2024. (Copies of the Representation dated 07.12.2023 and Letter dated 11.01.2024 are annex "D" & "E" respectively).
7. That aggrieved of the same and finding no other remedy, the appellant approaches this Hon'ble Tribunal on the following amongst other grounds:-

GROUNDS:

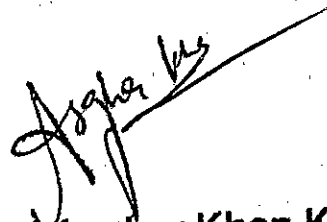
- A. That the impugned order dated 11.01.2024 is against the law and facts on record; hence liable to be set aside.
- B. That the impugned order suffers from misinterpretation of law as section 9 of the Khyber Pakhtunkhwa Civil Servant Act, 1973, fully empowers the Provincial Govt. to grant antedated promotion to a civil servant, provided he was/is eligible earlier. There is no bar in the Khyber Pakhtunkhwa Civil Servant Act, 1973 for grant of retrospective promotion to a civil servant.
- C. That Rule-7 of the Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 also empowers the Provincial Govt. to grant retrospective promotion to the civil servant in case of his eligibility and fitness at the relevant time of promotion. There is no bar in Khyber Pakhtunkhwa (Appointment, Promotion & Transfer) Rules, 1989 to prohibit retrospective promotion.
- D. That law as enunciated by the Supreme Court of Pakistan is settled on the point that a civil servant promotion is to be reckoned from the date of creation of vacancy, if he is otherwise eligible and fit for promotion.
- E. That law favours adjudication of the cases on merits and not to deprive a person/civil servant from his due right of promotion, merely on the grounds of technicalities.

8. That the appellant seeks leave of this Hon'ble Tribunal to raise further points at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this Appeal, the impugned order dated 11.01.2024 of the respondent No.1 may very graciously be set aside and as a consequential relief, the appellant be granted retrospective promotion to BS-21 from 04.03.2023.

Any other remedy which is deemed fit by this Hon'ble Tribunal in the interest of justice, may also be granted in favour of appellant.

Through Appellant

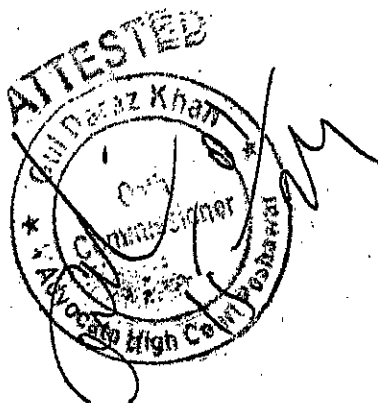


Muhammad Asghar Khan Kundi
Advocate Supreme Court

Dated: 15.01.2024

AFFIDAVIT

I, Syed Nazar Hussain Shah S/o Syed Ali Asghar Shah
~~The Secretary Environment, Forestry & Climate Change,~~
Civil Secretariat, Peshawar, do hereby solemnly affirm
and declare that the contents of the instant **Service
Appeal** are true and correct to the best of my knowledge
and belief and nothing has been concealed from this
Hon'ble Tribunal.



DEPONENT

BEFORE THE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

In Re:

Service Appeal No. /2024

Syed Nazar Hussain Shah. APPLICANT/APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa,
Through Chief Secretary, & others. RESPONDENTS

APPLICATION FOR THE SUSPENSION
OF IMPUGNED ORDER DATED
11.01,2024 AND TEMPORARY GRANT
OF PROMOTION W.E.F 04.03,2023, TILL
THE FINAL DISPOSAL OF TITLED
APPEAL.

Respectfully Sheweth:

1. That the above titled appeal is being filed today, in which no date of hearing has been fixed so far.
2. That the facts and grounds of appeal may kindly be considered as integral part of this application.
3. That the applicant/appellant has got good prima facie case and is sanguine of its success.
4. That the balance of convenience also lies in favor of the applicant/appellant.
5. That if the impugned order is not suspended the applicant/appellant will suffer irreparable loss.

It is therefore prayed that on acceptance of this application, the impugned order dated 11.01.2024 may very graciously be suspended and the applicant/appellant be allowed to BS-21 w.e.f 04.03.2023, till the final disposal of the titled appeal.

Applicant/Appellant
Through

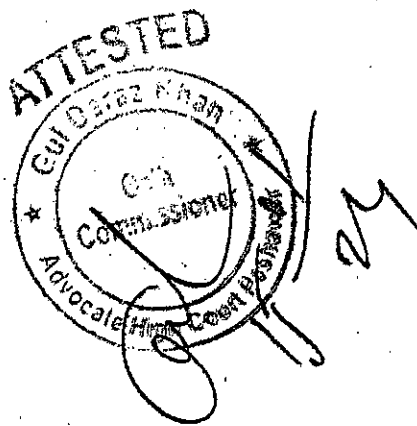


Muhammad Asghar Khan Kundi
Advocate Supreme Court

Dated: 15.01.2024

AFFIDAVIT

I, Syed Nazar Hussain Shah, do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

Date: Peshawar the March 14, 2022

A

NOTIFICATION

In pursuance of Section-8(1) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with

GO. AO(E)-IE&AD/5-1/2022.

Rule-17 of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, final seniority list of officers of (Secretariat Group) BS-20, as stood on 14.03.2022 is notified/circulated:-

Sl. No.	Name of the Officer	Date of birth and Domicile	Date of 1 st entry into Govt Service	Regular appointment/Promotion to present post			Present Posting
				Date	BPS	Method of Recruitment	
1	2	3	4	5	6	7	8
	Mr. Javed Artwar	12.04.1963 DI Khan	20.12.1988	12.04.2017 Regained seniority w.e.f 25.05.2012	20	By Promotion	Director General (Law & Human Rights), Khyber Pakhtunkhwa
	Mr. Muhammad Abid Majeed	23.9.1969 Peshawar	15.09.1993	20.11.2014	20	-do-	Secretary, Forestry, Environment & Wildlife Department
	Mr. Asghar Ali	20.01.1964 Swabi	14.09.1993	08.06.2012	20	-do-	Director, Staff Training Institute, Peshawar
4.	Mr. Muhammad Akbar Khan	05.02.1965 Chitral	15.09.1993	19.10.2012	20	-do-	Director General, Pakistan Forest Institute, Peshawar
5.	Mr. Muhammad Ranzan	04.03.1963 Swabi	14.09.1993	15.07.2016	20	-do-	Managing Director, Merged Areas, Education Foundation
6.	Mr. Masood Ahmad	14.11.1968 Abbottabad	14.09.1993	20.11.2014	20	-do-	Secretary, Law Department
7.	Evad Nazar Hussain Shah	09.04.1966 Abbottabad	14.09.1993	20.11.2014	20	-do-	Secretary, Inter Provincial Coordination Department
8.	Mian Muhammad	10.02.1966 Peshawar	15.02.1992 26.05.1997	19.09.2016	20	-do-	Member, Khyber Pakhtunkhwa Service Tribunal
9.	Mr. Dawood Khan	08.09.1969 Swat	31.05.1995 26.05.1997	12.04.2017	20	-do-	Secretary, Higher Education Department
10.	Mr. Arshad Khan	20.01.1968 Swat	26.05.1997	10.05.2019	20	-do-	Secretary, Information Department
11.	Mr. Mukhtiar Ahmad	20.03.1969 Mardan	26.05.1997	12.04.2017	20	-do-	Director General, Prosecution, Khyber Pakhtunkhwa
12.	Miss, Fareeha Paul	30.03.1967 Abbottabad	26.05.1997	29.05.2017	20	-do-	Awaiting posting in Establishment Department
13.	Mr. Muhammad Imtiaz Ayub	05.01.1967 Swabi	26.05.1997	28.09.2018	20	-do-	Chairman, BISE Mardan
14.	Mr. Manzoor Ahmad	01.03.1968 Charsadda	26.05.1997	26.09.2017	20	-do-	Secretary, Transport & Mass Transit Department

Continued at page-2

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

PAGE-2

Sl. No.	Name of the Officer	Date of birth and Domicile	Date of 1 st entry into Govt Service	Regular appointment/Promotion to present Post			Present Posting
				Date	Age	Method of Recruitment	
16.	Mr. Salehud Din	10.02.1964 Chitral	26.05.1997	28.05.2017	20	By Promotion	Member (General) Provincial Inspection Team, Peshawar
16.	Mr. Muhammad Iqbal	15.04.1967 Charsadda	26.02.1992 26.05.1997	10.10.2018	20	-do-	Secretary, Agriculture Department
17.	Mr. Muhammad Arshad-Il	15.02.1968 Matakand	08.01.1992 26.05.1997	03.10.2019	20	-do-	Awaiting posting in Establishment Department
18.	Mr. Akbar Ali Khan	16.04.1970 Mohmand	26.05.1997	03.10.2019	20	-do-	Special Secretary, Home & Tribal Affairs Department
19.	Mr. Rashid Khan	01.11.1964 Dir	08.12.1988 26.05.1997	03.10.2019	20	-do-	Special Secretary, Higher Education Department
20.	Mr. Muhammad Idrees Khan	15.05.1968 Lakki Marwat	26.05.1997	03.10.2019	20	-do-	Secretary, Public Health Engineering Department
21.	Mr. Janat Gul	01.01.1968 Khyber	01.12.1992 26.05.1997 PCS 83	03.10.2019	20	-do-	Special Secretary, Agriculture Department
22.	Mr. Muhammad Tahir Orakzai	08.12.1969 Orakzal	26.05.1997	03.10.2019	20	-do-	Secretary, Health Department
23.	Mr. Irfanullah	01.04.1968 Peshawar	14.09.1993	03.10.2019	20	-do-	Director General cum Secretary (PERRA), Abbottabad
24.	Mr. Muhammad Fakre Alam	25.03.1968 Bannu	24.10.1992 10.02.2003	04.08.2021	20	-do-	Member (General), Governor's Inspection Team, Peshawar

CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA

Endst: No. & date even

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa/All Divisional Commissioners in Khyber Pakhtunkhwa.
4. PS to Chief Secretary /PS to Secretary Establishment/Officers concerned/Manager, Govt Printing Press Peshawar.

Sulaiman Shah

(ZIA UL HAQ)
SECTION OFFICER (ESTT-I)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Aman B

Dated Peshawar the December 28, 2022

NOTIFICATION

NO. SO(E)/E&AD/5-149/2022 In terms of Rule-20 of the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981, sanction is hereby accorded for encashment of leave preparatory to Retirement in lieu of LPR equal to 365 days, in favour of Mr. Muhammad Ramzan (PCS/SC/BS-21), Managing Director, Merged Areas Education Foundation, Peshawar.

2. In terms of Section 13(1) of the Khyber Pakhtunkhwa Civil Servant Act 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), Mr. Muhammad Ramzan (PCS/SC/BS-21), Managing Director, Merged Areas Education Foundation, Peshawar shall stand retire from Government Service with effect from 03/03/2023 on attaining sixtieth (60th) year of age, as his date of birth is 04/03/1963.

CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA

Encls. No. Or even No. & date.

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Government of Khyber Pakhtunkhwa, E&SE Department.
4. Accountant General, Khyber Pakhtunkhwa.
5. Managing Director, Merged Areas Education Foundation, Peshawar.
6. PS to Secretary Establishment/SS(E)/PA/AS(HRD)/DS(E)/SO(E-II)
7. PS to Secretary (Admin)/D.S(A)/SO(Secret)/Estate Office/ACSO.
8. Cypher by Director (II) and Director Protocol Administration Department.
9. Officer concerned.
10. Manager Govt. Printing Press, Peshawar.

MDAQ/KIA/HR:

(Signature)
Assistant Director
Finance & Administration
Education Foundation

(Signature)
ZIA-UM-HAQ
SECTION OFFICER (EII)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Ann C

Dated Peshawar, the November 8, 2023

NOTIFICATION

NO. SO(E)/E&AD/153/2023 On the recommendations of the Provincial Selection Board in its meeting held on 07.09.2023, Syed Nazar Hussain Shah (PCS/SG/BS-20) is hereby promoted to (PCS/SG/BS-21) on regular basis, with immediate effect.

2. The officer on promotion will remain on probation for a period of one year in terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with Rule 15(1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

3. Consequent upon above, Syed Nazar Hussain Shah (PCS/SG/BS-21) is allowed to actualize his promotion in SS-21 against the already occupied post of Secretary, Climate Change, Forestry, Environment & Wildlife Department.

**CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA**

ENDST. OF EVEN NO. & DATE

Copy forwarded to the:-

1. Senior Member Board of Revenue, Khyber Pakhtunkhwa.
2. Additional Chief Secretary, P&D Department.
3. Additional Chief Secretary, Home & Tribal Affairs Department.
4. Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
7. All Divisional Commissioners in Khyber Pakhtunkhwa.
8. Accountant General, Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. Director General, Information & PRS Department.
11. PS to Chief Secretary, Khyber Pakhtunkhwa.
12. PS to Secretaries, Establishment & Administration Department.
13. PS/SS(E)/SS(Reg)/AS(HRD)/AS(E)/DS(E)/SO(E)/SO(E/V)/E&AD.
14. PA to DS(A)/SO(Secret)/Estate Officer/CSO Cyber/Dy. Director (IT) and Director Protocol Administration Department.
15. Officer concerned.
16. Controller, Govt. Printing Press, Peshawar.

Syed Nazar Hussain Shah

(ZIA) L. HAQ
SECTION OFFICER (E1)
PH. No. 091-9210529
8/11/2023

Annex D

PS/C.S. Khyber Pakhtunkhwa
Office No. 5641-P-W/E
Date: 07-12-2023

To

The Chief Secretary,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: REPRESENTATION / APPEAL UNDER SECTION 4 (a) of KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974.

Dear sir,

It is submitted that the appellant joined the government service Khyber Pakhtunkhwa on 14.09.1993, in PCS (Secretariat Group) in BS-17. That ever since his entry into the government service, the appellant has been serving to the best of his ability and to the satisfaction of the Government of Khyber Pakhtunkhwa.

2. It is to mention here that Muhammad Ramzan (PCS SG BS-21) has been retired from government service on 03.03.2023, where after a BS-21 vacancy was vacated by the Government of Khyber Pakhtunkhwa, Finance Department for the said officer. Copy of the retirement notification dated 28-12-2022 is attached (Annex-A).

3. That the appellant was at the top of Seniority list for promotion to BS-21, being the senior most civil servant of the Khyber Pakhtunkhwa province for promotion to BS-21 (copy of seniority list is (Annex-B)).

4. That the appellant was promoted to BS-21 on the recommendations of Provincial Selection Board (PSB) with the approval of the competent authority on 08-11-2023 (Annex-C). However, the appellant's legitimate right for the promotion to BS-21 from the date of occurrence of vacancy w.e.f 04.03.2023, due to retirement of Muhammad Ramzan (PCS SG BS-21).

5. That, on account of the delayed promotion, the appellant has been subjected to recurring financial loss and mentally anguish.

6. According to Section 9(1) of the Khyber Pakhtunkhwa Civil Servant Act 1973, a civil servant possessing such minimum qualifications as may be prescribed shall be eligible for promotion to higher post for the time being reserved under the rule for departmental promotion in the service or cadre to which he belongs. Moreover, according to promotion policy of the Provincial Government 2009, promotion always made on clear vacancies. In this regard judgments of the Superior Courts also available whereby the remedy of promotion from the date of occurrence of vacancy was granted.

7. It is, therefore, most humbly prayed that on acceptance of this appeal / representation, the appellant may very graciously be granted antedate promotion in BS-21 from the date of occurrence of vacancy i.e. from 04.03.2023. Any other relief deemed appropriate in the circumstances of the case, but not specifically asked for, may also be granted.

Dated: 07.12.2023

Yours faithfully,

(SYED NAZARI HUSSAIN SHAH)
Appellant/Secretary to Govt. of Khyber Pakhtunkhwa
Climate Change, Forestry, Environment
& Wildlife Department



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Amir E

MOST IMMEDIATE

No. SO(E-I)/E&AD/5-150/2024
Dated Peshawar the January 11, 2024

To

Syed Nazar Hussain Shah (PCS SG BS-21),
Secretary to Government of Khyber Pakhtunkhwa,
Climate Change, Forestry, Environment & Wildlife Department.

**SUBJECT: REPRESENTATION APPEAL UNDER SECTION 4(A) OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974.**

Dear Sir, q

I am directed to refer to your appeal/representation dated 07.12.2023 on the subject noted above and inform that promotion of civil servants is regulated under the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the Appointment Promotion & Transfer Rules, 1989. The ibid Act/Rules don't provide any provision regarding retrospective promotion of Civil Servants. Moreover, under Para-VII of the Promotion Policy, 2009, promotion will always be notified with immediate effect. Furthermore, on promotion to higher scale/post, actualization of promotion is involved, which cannot be assumed retrospectively.

2 Since, the instant request is not in line with the Khyber Pakhtunkhwa Civil Servants Act, 1973/Khyber Pakhtunkhwa Appointment Promotion & Transfer Rules, 1989, hence, this Department cannot entertain the same at this belated stage, please.

Yours faithfully,

(ZIA-UL-HAQ)

SECTION OFFICER (ESTT. I)

PH No. 091-9210529

11-1-2024

ایڈویکٹ: محمد اعجاز کھٹک



بار کونسل ایسوسی ایشن نمبر: 0333 9127288

بعد االت جناب: سسر س (زیرو نل فیس) غنٹو خواہ، لیٹاؤ

Appellant	مخائب:	دعویٰ: سسر س (زیرو نل فیس)
سسر س (زیرو نل فیس) بنام		علت نمبر:
حکومت خیبر پختونخواہ		مورخہ:
		جرم:
		تھانہ:

بابت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی کاروائی متعلقہ آن مقام لیٹاؤ سسر س (زیرو نل فیس) محمد اعجاز کھٹک کے اقرار کیا جاتا ہے کہ صاحب موصوف مقدمہ کی کل کاروائی کا کال اعتبار رکھا گیا، نیز وکیل صاحب کو راضی نامہ کرنے و تفویضات و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم بیروی یا بیرون کی سیکرٹری یا ایڈیل کی برائگی اور منسوخی، نیز دائر کرنے اپیل کرنی و نظر ثانی و بیروی کے حق کا مختار ہوگا اور بصورت ضرورت مقدمہ مندرجہ کے کل یا جزوی کاروائی کے واسطے از وکیل یا مختار اپنے ہمراہ یا اپنے نمائندے کے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ کاروائی بالاعتبار حاصل ہوں گے اور اس کا ساتھ بروایت منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب کے مقصد کے سبب سے ہوگا اس کی توثیق پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا نمائندہ ہوں گے کہ بیروی مذکورہ کریں، اور اذکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: /20

بعد االت جناب: سسر س (زیرو نل فیس) غنٹو خواہ، لیٹاؤ

مقام کے لیے منظور ہے۔

Accepted
Apparthy