

18.12.2019

Appellant alongwith counsel, Addl. AG alongwith Akhtar Hussain, Assistant for official respondents and counsel for respondent No. 5 present.

The appellant requests for withdrawal of appeal in view of order dated 12.12.2019 issued by Chief Engineer (South)/respondent No. 3.

Learned counsel for respondent No. 5 states that the order referred to by the appellant has been passed during pendency of instant appeal and is based on political consideration while malafide of official respondent No. 3 is yet to be ruled out in passing the order.

Be that as it may, the appellant has categorically requested for withdrawal of his appeal which cannot be brushed aside in view of objection on behalf of respondent No. 5. The appeal is resultantly dismissed as withdrawn. Withdrawal of instant appeal shall, however, not affect the rights of respondent No. 5 if otherwise available to him under the law.

File be consigned to record room.


Chairman

Announced:
18.12.2019

Service Appeal No. 997/2019

22.10.2019 Appellant in person, Mr. Kabirullah Khattak, Additional AG alongwith M/S Akhtar Hussain, Assistant and Muhammad Irfan, Assistant on behalf of official respondents No. 1 to 4 and private respondent No. 5 in person present.

Representatives of official respondents as well as private respondent No.5 request for further time to submit the requisite reply. Adjourned to 05.11.2019 before S.B.


CHAIRMAN

05.11.2019 Appellant in person, Addl. AG alongwith Akhtar Hussain, Assistant for official respondents present. Learned counsel for private respondent No. 5 also present and furnished Wakalatnama in his favour which is placed on record.

Respondents need further time for submission of requisite reply. Adjourned to 03.12.2019 on which date the requisite reply/comments shall positively be submitted.


Chairman

03.12.2019 Appellant in person, Akhtar Hussain Assistant alongwith Addl. AG for respondents No. 1 to 4 and private respondent No. 5 in person present.

Respondents need further time to furnish the requisite reply/comments. Last opportunity is granted. To come up for written reply/comments on 18.12.2019 before S.B.


Chairman


08.10.2019

Counsel for the appellant present.

Additional documents have been submitted by the appellant which are made of the record.

Learned counsel contends that on 08.04.2019 the appellant was transferred from PHE Division Kohat and was posted at PHE Division Karak. Consequently, the appellant took over charge at the place of his posting on 10.04.2019. However, after lapse of nine days another office order dated 17.04.2019 was issued whereby the transfer of appellant was cancelled and he was again posted at Kohat. The impugned order dated 17.04.2019 was in violation of transfer/posting policy of the Provincial Government and in utter disregard to the tenure of a civil servant.

In view of the record and arguments of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 22.10.2019 before S.B.


Appellant Deposited
Security & Process Fee

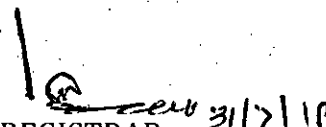
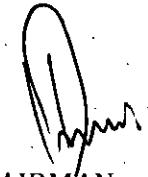

17/10


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 997/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/07/2019	<p>The appeal of Mr. Lal Nawaz presented today by Mr. Adnan Khattak 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 31/7/19</p>
2-	23.08.2019	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23-8-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the appellant present.</p> <p>Learned counsel requests for time to further document the appeal.</p> <p>He may do so before next date of hearing. Adjourned to 08.10.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p>

P-7

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 997 /2019

Lal Nawaz..... Appellant

Versus

Government of KP and others..... Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Grounds of appeal.		1-4
3	Addresses of the parties.		5
4	Copy of notification No. 07/E-9/PHE dated 08.04.2019.	A	6
5	Copy of impugned order dated 17.04.2019	B	7
6	Copy of representation	C	8-9
12	Wakalatnama.		10

Appellant

Dated: _____

Through



Adnan Khattak
Advocate High Court
Peshawar.

(11)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 997 /2019

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 1106

Dated 31/07/2019

Lal Nawaz S/o Zoro Din

Divisional Head Draftsman PHE Division Kohat..... Appellant

Versus

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary
- 2) Secretary, Public Health Engineering Department, Peshawar.
- 3) Chief Engineer South, Public Health Engineering Peshawar.
- 4) Superintending Engineer Public Health Engineering Circle, Kohat.
- 5) Sadiq ur Rahman Draftsman Public Health Engineering Division
Karak..... Respondents

Subject: APPEAL U/S 04 OF THE SERVICES
TRIBUNAL ACT, 1974 AGAINST THE
NOTIFICATION NO. 03/E-9/PHE DATED
17.4.2019 WHEREBY THE APPELLANT
TRANSFER ORDER WAS MODIFIED
FROM PHE DIVISION KARAK BACK TO
PHE DIVISION KOHAT AND THE
REPRESENTATION OF APPELLANT
WAS NOT DECIDED WITHIN
STATUTORY PERIOD OF 90 DAYS.

Filed to-day
[Signature]
Registrar
31/7/19

Respectfully Sheweth;

- 1) That the appellant was initially appointed as tracer then promoted to Draftsman in Public Health Engineering Department Khyber Pakhtunkhwa Peshawar.

- 2) That inquiry regarding some matter was conducted in Public Health Engineering Division, Karak which proposed and transfer all technical and non technical staff of Public Health Engineering Division, Karak.
- 3) That acted on proposal of inquiry committee the respondent No.3 issued notification NO. 07/E-9/PHE dated 08.04.2019 by transferring all technical and non technical staff of Public Health Engineering Division, Karak to different Division. (Copy of notification No. 07/E-9/PHE dated 08.04.2019. is attached as Annexure A).
- 4) That later on respondent No.3 issued another impugned notification No. 03/E-9/PHE dated 17.04.2019 by modifying the office order No. 07/E-9/PHE dated 08.04.2019 by transferring back appellant back to Kohat who was under transfer to PHE Division Karak. (Copy of impugned order dated 17.04.2019 is annexure B).
- 5) That the appellant feeling aggrieved from the impugned notification No. 03/E-9/PHE dated 17.04.2019 filed the representation on 25.04.2019 which was not decided within the stipulated period. (Copy of representation is attached as Annexure C).

Hence this service appeal on the following amongst other grounds.

GROUNDS

- A. That impugned notification No. 03/E-9/PHE Dt 17.04.2019 passed by respondent No.3 is illegal, void ab-initio, against law, rules and policy.
- B. That comparing tenure/ time period of posting of appellant at PHE Division Kohat is 05 years and 06 months with that of respondent No.05 i.e. 07.02.2014 was date of transfer of



OFFICE OF THE CHIEF ENGINEER (SOUTH)
PUBLIC HEALTH ENGINEERING DEPARTMENT, PESHAWAR
P.O. Box 227, Peshawar, Pakistan. Phone: 031-3510000, 3510001, 3510002, 3510003, 3510004, 3510005, 3510006, 3510007, 3510008, 3510009, 3510010, 3510011, 3510012, 3510013, 3510014, 3510015, 3510016, 3510017, 3510018, 3510019, 3510020, 3510021, 3510022, 3510023, 3510024, 3510025, 3510026, 3510027, 3510028, 3510029, 3510030, 3510031, 3510032, 3510033, 3510034, 3510035, 3510036, 3510037, 3510038, 3510039, 3510040, 3510041, 3510042, 3510043, 3510044, 3510045, 3510046, 3510047, 3510048, 3510049, 3510050, 3510051, 3510052, 3510053, 3510054, 3510055, 3510056, 3510057, 3510058, 3510059, 3510060, 3510061, 3510062, 3510063, 3510064, 3510065, 3510066, 3510067, 3510068, 3510069, 3510070, 3510071, 3510072, 3510073, 3510074, 3510075, 3510076, 3510077, 3510078, 3510079, 3510080, 3510081, 3510082, 3510083, 3510084, 3510085, 3510086, 3510087, 3510088, 3510089, 3510090, 3510091, 3510092, 3510093, 3510094, 3510095, 3510096, 3510097, 3510098, 3510099, 3510100.

No 081 E-9 /PHD.

Dated Peshawar, the 12/12/2019

OFFICE ORDER

On recommendations of the Placement Committee in its meeting held on 11.12.2019, at 1600 hours under the Chairmanship of Chief Engineer (South) PHED, the following transfers/postings of the officials of Public Health Engg Department are hereby ordered with immediate effect, in the best interest of public:-

S.#	Name	From	To	Remarks
1.	Muhammad Ashraf Sub Engineer	PHD Division Peshawar	PHD Division Southern Tribal District Peshawar	Vice S # 2
2.	Mr Iqbal Khan Sub Engineer	PHD Division Southern Tribal District Peshawar	PHD Division Peshawar	Vice S # 1
3.	Mr Karim Nawaz Sub Engineer	PHD Division Peshawar	PHD Division Charsadda	Vice S # 5
4.	Mr Zubad-ur-Rehman Sub Engineer	PHD Division Nowshera	PHD Division Charsadda	Vice S # 6
5.	Mr. Hamid Ali Sub Engineer	PHD Division Charsadda	PHD Division Peshawar	Vice S # 3
6.	Mr. Shoaib Ullah Sub Engineer	PHD Division Charsadda	PHD Division Nowshera	Vice S # 4
7.	Mr. Farman Ullah Sub Engineer	PHD Division Karak	PHD Division Bannu	Vice S # 8
8.	Mr. Mohammad Ilyas, Sub Engineer	PHD Division Bannu	PHD Division Karak	Vice S # 7
9.	Mr. Saleem Khan Sub Engineer	PHD Division Hangu	PHD Division Southern Tribal District Kohat	Vice S # 10
10.	Mr. Arshad Husain Sub Engineer	PHD Division Southern Tribal District Kohat	PHD Division Hangu	Vice S # 9
11.	Mr. Intizar Muhammad Sub Engineer	PHD Division Swabi	PHD Division Buner	Against the vacant post
12.	Mr. Javid Ansar Sub Engineer	PHD Division Dir Upper	PHD Division Dir Lower	Vice S # 13
13.	Mr. Mstahudin Sub Engineer	PHD Division Dir Lower	PHD Division Dir Upper	Vice S # 12
14.	Mr. Hukhar Ahmad Sub Engineer	PHD Division Abbottabad	PHD Division Manshera	Vice S # 16
15.	Mr. Navir Nawaz Sub Engineer	PHD Division Abbottabad	Gravity Flow Abbottabad	Against the vacant post
16.	Mr. Imdad Hussain Shah, Sub Engineer	PHD Division Manshera	PHD Division Abbottabad	Vice S # 14
17.	Mr. Amjad Husain Sub Engineer	PHD Division Manshera	PHD Division Abbottabad	Vice S # 15
18. ✓	Mr. Lal Nawaz Head Draftsman	PHD Division Kohat	PHD Division Karak	Vice S # 10
19.	Mr. Saddiq-Ur-Rehman Head Draftsman	PHD Division Karak	PHD Division Kohat	Vice S # 18

P.T.O

Chief Engineer (South)

Endstr: No. Q8/E-26/PHI2

Dated 12/12/2019

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Chief Engineer (North) PHED Peshawar.
3. Superintending Engineers PHED Circle concerned.
4. Executive Engineers PHED Division concerned.
5. Deputy Secretary (Admin) PHED, Peshawar.
6. P.S to Secretary PHED, Peshawar.
7. Section Officer (Estt) PHED, Peshawar.
8. District Accounts Officer concerned.
9. Officials concerned.


Chief Engineer (South)

appellant, now law, rules and policy demands the transfer of person who has spent more than five years at the same station.

- C. That the respondent No.5 has also completed his tenure at PHE Division Karak and law demands to be transfer as he was rightly transferred to PHE Division Kohat in first notification NO. 07/E-6/PHE dated 08.04.2019.
- D. That appellant has completed his tenure as per law at PHE Division, Kohat from 07.02.2014 & 08.04.2019, thus the impugned notification is not made in public interest.
- E. That the family of the appellant is settled in Karak and no one is there to look after his family as his wife is suffering from Hepatitis thus the appellant is facing problem since 2014.
- F. That the impugned notification was issued specifically for the respondent No.5 to adjust him as blue eye person and also the impugned notification is the out come of the political interference.
- G. That in impugned notification of respondent No.3 have not given any legal justification for transferring the appellant back to the said post.
- H. That appellant seeks permission of the honorable court to advance any other grounds/ points of the arguments.

It is therefore, humbly prayed that on acceptance of this appeal, notification No.03/E-9/PHE dated 17.04.2019 issued by respondent No.3 may please be cancelled/ set aside and appellant may please be permitted to continue his duration at PHE division Karak as per notification No. 07/E-p/PHE dated 18.04.2019.

Any other relief which deems fit in the circumstances of the case and not specifically asked for may kindly be granted to the appellant.

Lal Nawaz
Appellant

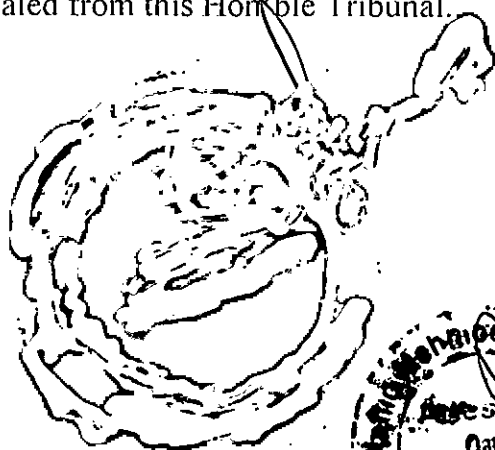
Dated: _____

Through

Adnan Khattak
Adnan Khattak
Advocate High Court
Peshawar.

AFFIDAVIT

I, Lal Nawaz, do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.



Lal Nawaz
DEPONENT



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. _____/2019

Lal Nawaz..... Appellant
Versus

Government of KP and others..... Respondents

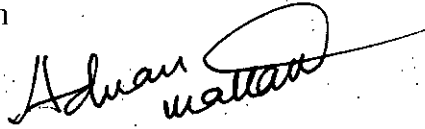
ADDRESSES OF THE PARTIESAPPELLANT:**Lal Nawaz** S/o Zoro Din
Divisional Head Draftsman PHE Division KohatRESPONDENTS:

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary
- 2) Secretary, Public Health Engineering Department, Peshawar.
- 3) Chief Engineer South, Public Health Engineering Peshawar.
- 4) Superintending Engineer Public Health Engineering Circle, Kohat.
- 5) Sadiq ur Rahman Draftsman Public Health Engineering Division
Karak

Appellant

Dated: _____

Through



Adnan Khattak
Advocate High Court
Peshawar.



OFFICE OF THE CHIEF ENGINEER (SOUTH)
PUBLIC HEALTH ENGG. DEPTT. KHYBER PAKHTUNKHWA, PESHAWAR

Ph# 091-9217288, Fax# 091-9217396, E-mail: Ce.s.phed@pshd.com, Ph# 10, Sector-B-II, Phase-V, Hazrat Nizamuddin, Peshawar

No. 071 E-9 /PHE.

Dated Peshawar, the 08/04/2019.

OFFICE ORDER

The following posting/transfer of Drawing Establishments are hereby ordered with immediate effect, in the public interest.

#	Name	From	To	Remarks
1.	Mr. Muhammad Sajid Circle II. Draftsman	PHE Circle Kohat	PHE Circle Peshawar	Against the existing vacancy
2.	Mr. Lal Nawaz Divisional II. Draftsman	PHE Division Kohat	PHE Division Karak	Vice S.No. 3
3.	Mr. Sadiq-ur-Rehman Divisional II. Draftsman	PHE Division Karak	PHE Division Bannu	Vice S.No. 5
4.	Mr. Khurshid Nawaz Circle II. Draftsman	PHE Circle Bannu	PHE Circle Kohat	Vice S.No. 1 He is also authorized to look after the additional charge of the post of Divisional II. Draftsman PHE Division Kohat in addition to his own duty.
5.	Mr. Khalid Javid Divisional II. Draftsman	PHE Division Bannu	Circle Head Draftsman (OPS) PHE Circle Bannu	Vice S.No. 4

Chief Engineer (South)

Endsit: No. 071E-25/PHE,

Dated 08/04/2019.

Copy forwarded to.

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Superintending Engineers PHE Circle Peshawar/Kohat/Bannu.
3. The Executive Engineer PHE Division Kohat/Karak/Bannu.
4. The District Account Officer Kohat/Bannu/Karak.
5. The official concerned.

Accepted
Adnan
Khattak

Chief Engineer (South)

OFFICE OF THE CHIEF ENGINEER (SOUTH)

Public Health Engg: Deptt: Khyber Pakhtunkhwa, Peshawar
Ph# 091-9217788 Fax # 091-9217396 E-mail: CC.s.phed pr5419@gmail.com. Plot No.40 Sector B-II,
Phase-V Hayatabad Peshawar

No. 07/E-9/PHE

Dated Peshawar the 08.04.2019.

OFFICE ORDER

The following posting/ transfer of Drawing Establishments are hereby ordered with immediate effect, in the public interest.

#	Name	From	To	Remarks
1.	Mr. Muhammad Sajid Circle H Draftsman	PHE Circle Kohat	PHE Circle Peshawar	Against the existing vacancy
2.	Mr. Lal Nawaz Divisional H Draftsman	PHE Division Kohat	PHE Division Karak	Vice S No.3
3	Mr. Sadiq ur Rahman Divisional H Draftsman	PHE Division Karak	PHE Division Bannu	Vice S No.5
4.	Mr. Khurshid Nawaz Circle H Draftsman	PHE Circle Bannu	PHE Circle Kohat	Vice S No.1 he is also authorized to look after the additional charge of the post of Divisional H Draftsman PHE Division Kohat in addition to his own duty
5.	Mr. Khalid Javid Divisional H Draftsman	PHE Division Bannu	Circle Head Draftsman (OPS) PHE Circle Bannu	Vice S No.4

Chief Engineer (South)

Endst No. 07/E-25/PHE

Dated 08.04.2019.

Copy forwarded to:

1. The Accountant General Khyber Pakhtunkhwa Peshawar.
2. The Superintending Engineers PHE Circle Peshawar/ Kohat/ Bannu.
3. The Executive Engineer PHE Division Kohat/ Karak Bannu.
4. The District Account Officer Kohat/ Bannu/ Karak.
5. The official concerned.

Chief Engineer (South)

Shahid
Shahid
Khattar

B / 9

OFFICE OF THE CHIEF ENGINEER (SOUTH)
PUBLIC HEALTH ENGINEERING DEPTT. KHYBER PAKHTUNKHWA, PESHAWAR
The 091-9217288 Fax/091-9217390 E-mail: Cee@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk, Phed@phed.org.pk

No. 031 E-9 /PHE,

Dated Peshawar, the 17/04/2019.

OFFICE ORDER

Partial modification in this office order No.0711-9/PHE, dated 08.3.2019 the following posting/transfer of Divisional Head Draftsman are hereby ordered with immediate effect, in the public interest.

#	Name	From	To	Remarks
1.	Mr. Lal Nawaz	Under transfer to PHE Division Karak	PHE Division Kohat	Against the existing vacancy
2.	Mr. Saadq-ur-Rehman	Under transfer to PHE Division Bannu	PHE Division Karak	Vice S.No.1

Chief Engineer (South)

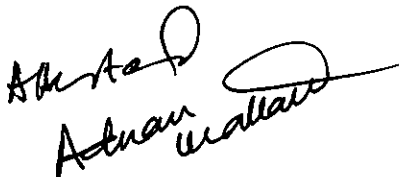
Endstt: No. 031 E-25 /PHE.

Dated 17/04/2019

Copy forwarded to:

1. The Superintending Engineers PHE Circle Kohat-Bannu.
2. The Executive Engineer PHE Division Kohat/Karak/Bannu.
3. The District Accounts Officer Kohat/Karak/Bannu.
4. The official concerned.


Chief Engineer (South)


Asst. Engineer
Asst. Engineer

OFFICE OF THE CHIEF ENGINEER (SOUTH)

Public Health Engg: Deptt: Khyber Pakhtunkhwa, Peshawar
 Ph# 091-9217788 Fax # 091-9217396 E-mail: CC.s.phed pr5419@gmail.com. Plot No.40 Sector B-II,
 Phase-V Hayatabad Peshawar

No. 03/E-9/PHE
 Dated Peshawar the 17.04.2019.

OFFICE ORDER

Partial modification in this office order No.07/E-9/PHE dated 08.04.2019 the following posting/ transfer of Divisional Head Draftsman are hereby ordered with immediate effect in the public interest. .

#	Name	From	To	Remarks
1	Mr. Lal Nawaz	Under transfer to PHE Division Karak	PHE Division Kohat	Against the existing vacancy
3	Mr. Sadiq ur Rahman	Under transfer to PHE Division Bannu	PHE Division Karak	Vice S No.4

Chief Engineer (South)

Endst No. 03/E-25/PHE

Dated 17.04.2019.

Copy forwarded to:

1. The Superintending Engineers PHE Circle / Kohat/ Bannu.
2. The Executive Engineer PHE Division Kohat/ Karak Bannu.
3. The District Account Officer Kohat/ Bannu/ Karak.
4. The official concerned.

Adnan
Adnan
Mattar

Chief Engineer (South)

To

(8) C
The Secretary to Govt: of Khyber Pakhtunkhwa,
Public Health Engineering Department,
Peshawar.

Date: 25/04/19
D.No: 918

~~25.04.19~~

Subject: DEPARTMENTAL APPEAL AGAINST CANCELLATION OF
TRANSFER ORDERS.

R/Sir,

It is humbly submitted that after completion of my long stay / tenure with effect from 07.02.2014 as Divisional Head Draftsman at PHE Division Kohat, I was transferred from PHE Division Kohat to PHE Division Karak vide Chief Engineer (South) PHE Department Peshawar No.07/E-9/PHE, dated 08.04.2019 (copy enclosed).

It is pertinent to mention here that I have very serious problem at my home and my wife is seriously ill and under treatment. There is no other responsible person to look after my illing wife. In such circumstances my above mentioned transfer order has been cancelled in very un justice manner and on political grounds by the Chief Engineer (South) PHE Department No.03/E-9/PHE, dated 17.04.2019 (copy enclosed).

Keeping in view my long stay / tenure out of my home station and domestic problem as above cancellation of transfer orders may kindly be re-viewed and transfer from PHE Division Kohat to PHE Division Karak may be retained as a justice of which I will be thankful for ever please.

Dated: 22 /04/2019.

Yours Obediently,

Lal Nawaz

(LAL NAWAZ)

ac Divisional Head Draftsman
PHE Division Kohat.



OFFICE OF THE SUPERINTENDING ENGINEER PUBLIC HEALTH ENGG:

CIRCLE KOHAT.

No. 02 / SE/PHE/5 Dated Kohat the 24 /04/2019.

9

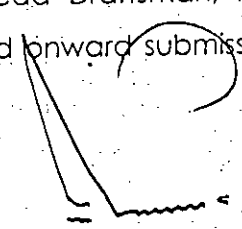
To,

The Chief Engineer (South)
Public Health Engg: Deptt:
Khyber Pakhtunkhwa Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST CANCELLATION OF TRANSFER ORDERS:

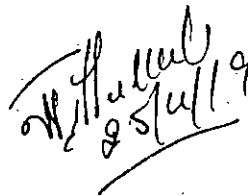
Reference:- Executive Engineer PHE Division Kohat letter No. 03/E-4 dated 23/04/2019.

Enclosed find herewith Departmental appeal through proper channel as per subject cited above, in respect of Mr Lal Nawaz Head Draftsman, received from Executive Engineer PHE Division Kohat, for consideration and onward submission to quarter concerned please.


Superintending Engineer
Public Health Engg: Circle
Kohat

Copy to the Executive Engineer PHE Division Kohat for information w/r to above.

D.No. 1694
DT: 6/5/19.


25/4/19


Superintending Engineer
Public Health Engg: Circle
Kohat

50 روپے	22630	PESHAWAR BAR ASSOCIATION PBA		
ایڈویکٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: Be-10-8066				
رابطہ نمبر: 03005930703				

بعدالت جناب: سروس ٹریسٹوئل صورت ضمیمہ کتبوں خواہ لے نہ

منجانب: لعل نواز	دعویٰ:
لعل نواز	علت نمبر:
بنام	مورخہ:
گورنمنٹ	جرم:
	تھانہ:

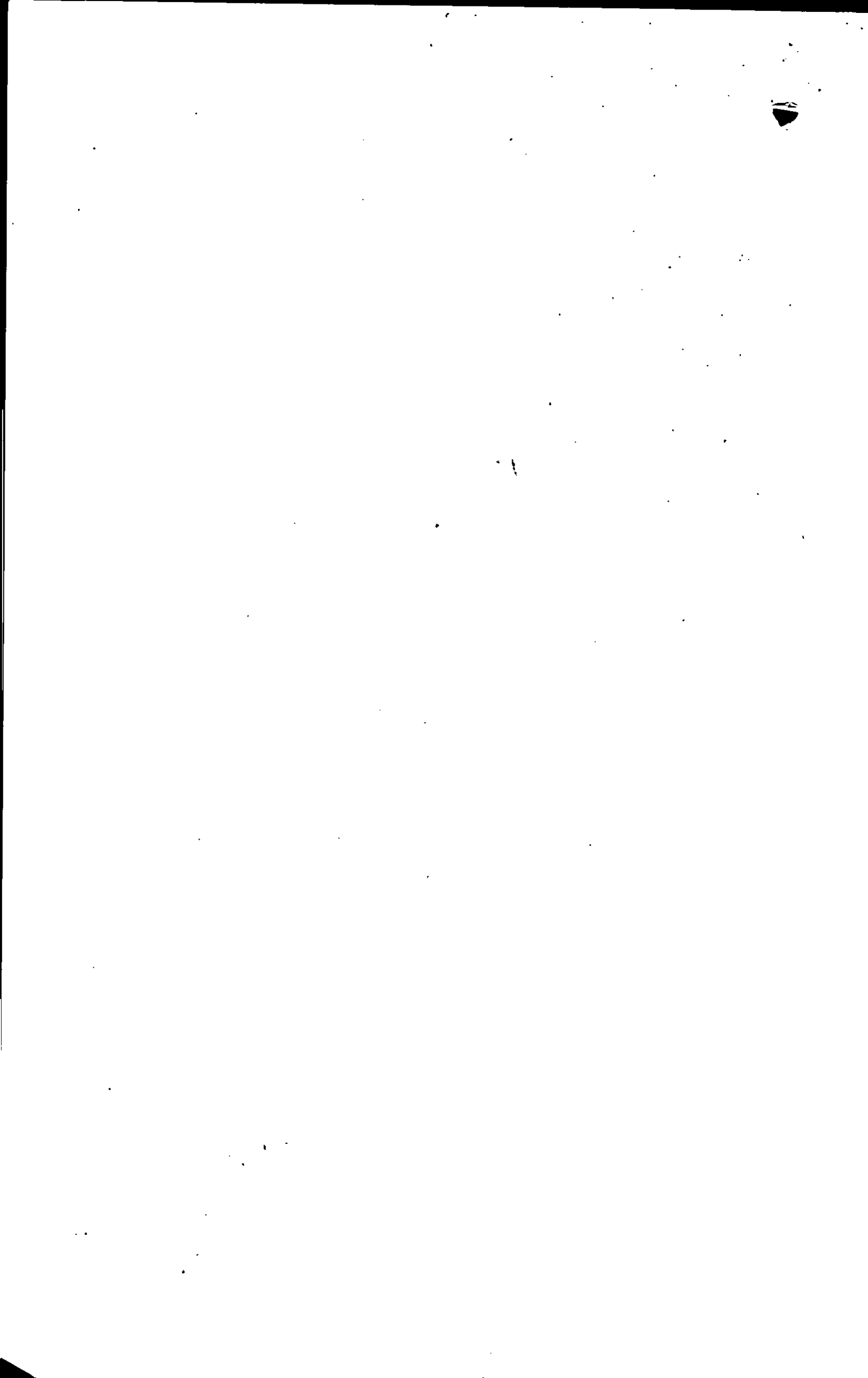
باعث تحریر آنکہ





مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام لے لے کے **محمد بان صاحب** اور **دستک لے لے** کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث 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 پیروی یا ڈگری یک طرفہ 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
 کارروائی 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 سند رہے

Attended
 &
 Accepted
 Adv.

المقوم: **گواہ شد**

مقام کے لیے منظور ہے۔



50	30669			
ایڈویکیٹ: 		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: bc-10-9170				
رابطہ نمبر: 0346-9083579				

بعدالت جناب: صیبر منیر سروسز لیمیٹڈ

منجانب: <u>صادق الرحمن</u>	دعویٰ: <u>سلسلہ نمبر 997/2019</u>
<u>لعل نواز</u>	علت نمبر: <u>7</u>
<u>بنام</u>	مورخہ:
<u>صادق الرحمن</u>	جرم:
	تھانہ:

باعت تحریر آگے

محمد علی

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

آن مقام لنہا کیلئے ظہور اسلام کھل ایڈووکیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی 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 کارروائی 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 با اختیارات 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 سند رہے

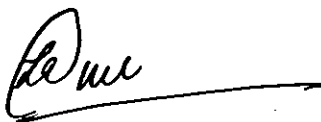
المرقوم: کرم سومر 2019

العبد گواہ شد العبد

مقام لنہا کے لیے منظور ہے۔

Accepted
and Attested

نوٹ: اس وکالت نامہ کی فوٹوکاپی ناقابل قبول ہوگی۔

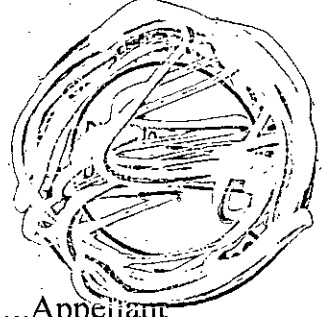


صادق الرحمن ولد سید منیر خان کونڈلک میں شہیدہ لعل نواز کی وکیل

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL.

PESHAWAR

S.A.No. _____/2019



Lal Nawaz.....Appellant

Versus

Govt. of K.P and others Respondents

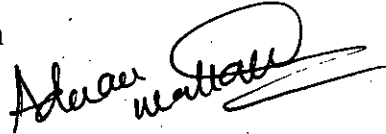
I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Application for additional documents.		1
2	Affidavit.		2
3	Copy of arrival report dt.10.04.2019	-	3
4	Copy of departure report dt.09.04.2019		4

P4

Appellant

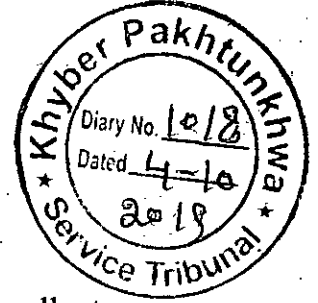
Through


Adnan Khattak
Advocate, High Court.

Dated: 03.10.2019

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR



S.A.No. _____/2019

Lal Nawaz.....Appellant

Versus

Govt. of K.P and others Respondents

APPLICATION FOR PERMISSION TO PLACE
ON FILE ADDITIONAL DOCUMENTS IN THE
TITLED APPEAL.

Respectfully Sheweth;

- 1) That the titled noted case is pending adjudication before this hon'ble Tribunal and fixed for 08.10.2019.
- 2) That the documents herein under mentioned in the index were not available at the time of filing instant appeal, which are necessary for the just/ proper decision of the case, and the appellant to place on original court file.

Therefore, it is requested that permission may kindly be granted for placing the attached documents on original court file.

Appellant

Through

Adnan Khattak
Advocate, High Court.

put up to the court with
relevant appeal.

Reader

4/10/19

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

S.A.No. _____/2019

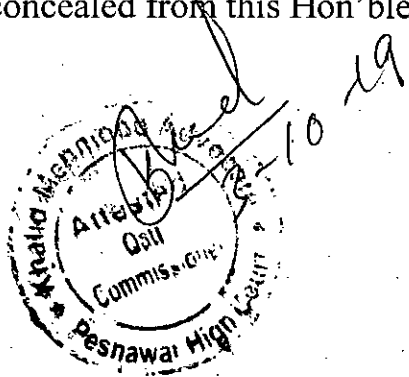
Lal Nawaz.....Appellant

Versus

Govt. of K.P and others Respondents

AFFIDAVIT

I, Adnan Khattak Advocate (counsel for appellant), do hereby affirm and declare as per information furnished by my client that the contents of the accompanying **Application** are true and correct and nothing has been concealed from this Hon'ble Tribunal.



Adnan Khattak
Deponent

(3)

The Executive Engineer
Public Health Engg: Division
Karak.

(7) E-4
10/4/19

SUBJECT:- ARRIVAL REPORT

In compliance of Chief Engineer (South) Public Health Engg: Dapil
Hyber Pakhtunkhwa Peshawar office order No.07/E-9/PE dated 08-04-2019, I beg
to submit my Arrival Report today on 10-04-2019 (EN)

Thanks.

HC/DAA/127
Per objection

Yours Obediently

Lai Nawaz
Division Head Draftman
PHE Division Karak

Arrival

HC
Per objection

10/4/19

Attended
etc

Adnan
Mallat

To

4

The Executive Engineer
Public Health Engg: Division
Kohat

SUBJECT:- DEPARTURE REPORT.

In Compliance of Chief Engineer (South) Public Health Engg: Deptt:
Kyber Pakhtunkhwa Peshawar office order No.07/E-9/PHE dated 08-04-2019
I beg to submit my Departure Report today on 09-04-2019 (F.N)

Yours Obediently

Lal Nawaz

(Lal Nawaz)
Divisional Head Draftsman (BPS-14)

HE
For information
& Record

[Signature]

9/4/2019

E-4

R/keeper
Please file.
[Signature]

Attested
eye
[Signature]
Adnan
Adnan