


FORM OF ORDER SHEET

Court of _____

Appeal No. 209/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/01/2024	<p>The appeal of Mr. Taj Alam resubmitted today by registered post through Mr. Saleemullah Khan Ranazai Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Taj Alam received today i.e on 04.01.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure D of the appeal is illegible be replaced by legible/better one.
- 2- Address of appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 49 /S.T.

Dt 5/1 /2024.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Salemullah Khan Ranazai Adv.
High Court at D.I.Khan.

ser,

Re submitted after the need feel.

Salemullah Khan

24/1/24

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. 209 2024

TAJ ALAM

VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Taj Alam EPI Technician. Posted at Civil Hospital Sararogha South
Waziristan Upper District

Resident of Sararogha Tehsil Sararogha District South Waziristan



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

service appeal No. 209 /2024

Taj Alam Versus Government of Khyber Pakhtunkhwa, etc.

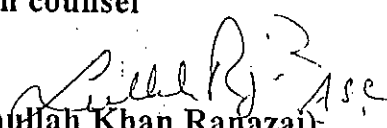
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**Your Humble appellant:
Taj Alam**

Dated:01.01.2024

Through counsel


**(Saleemullah Khan Ranazai)
Advocate Supreme Court.**

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No: 209 2024

TAJ ALAM

VERSUS

GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Taj Alam EPI Technician Posted at Civil Hospital Sararogha South
Waziristan Upper District

Resident of Sararogha Tehsil Sararogha District South Waziristan



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal *No 209* /2024

Taj Alam, EPI Technician South Waziristan Upper District.

(Appellant)

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Health Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services Merged Area Peshawar.
3. Regional Director (Southern Region), Health Services Khyber Pakhtunkhwa, Peshawar.
4. District Health Officer, District South Waziristan Upper.

(Respondents)

SERVICE APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT AGAINST THE NON-REPLY OF THE DEPARTMENTAL APPEAL SUBMITTED BY THE APPELLANT ON 21.09.2023 AND BY ACCEPTANCE OF APPEAL, THE RESPONDENTS MAY BE DIRECTED TO REGULARIZED THE SERVICES OF APPELLANT FROM HIS DATE OF APPOINTMENT i.e 30.03.2007 AND TO RELEASE THE MONETARY BENEFITS IN SHAPE OF ARREARS TO THAT ALLOWANCE.

Respectfully Sheweth,

The appellant prefers the instant petition on the grounds hereinafter submitted along with others.

(Note:- The addresses of respondents as given above are sufficient for the purpose of service.)

BRIEF FACTS

1. That the appellant was appointed as EPI Technician vide order dated 30.03.2007 on contract basis, after fulfilling all the codal formalities. Copy of appointment order is enclosed herewith as Annexure-A.
2. That the appellant was then regularized in service vide order dated 10.10.2018. Copy of regularization order is enclosed herewith as Annexure-B.
3. That the appellant was subsequently adjusted vide order dated 14.03.2019. Copy of adjusted order is enclosed herewith as Annexure-C.
4. That the appellant came to know about his colleagues, who were appointed on contract basis with the appellant but there services were regularized from the date of their contract appointment vide order dated 06.11.2018. Copy of order is enclosed herewith as Annexure-D.

- 5. That being aggrieved, the appellant preferred departmental representation / appeal on 21.09.2023, which was forwarded by the DHO concern vide covering letter dated 21.09.2023. Copy of the Departmental Appeal/representation is enclosed herewith as Annexure-E.
- 6. That no order was passed with regards to the departmental appeal/representation of the appellant hence after expiry of 90 days the appellant approaches this Honourable Tribunal for the redressal of his grievances on inter-alia the following grounds.

GROUNDS:

- 1. That admittedly the appellant along with others were appointed on contract basis and the services of certain employees were regularized through a separate order from the date of their appointment, whereas the services of the appellant were regularized through another order but not specifying to be from the date of his initial appointment, therefore, the appellant has been discriminated, therefore, the indulgence of this Honourable Tribunal is warranted in the circumstances.
- 2. That no doubt the appellant belongs to the then tribal area which was subsequently merged in the province of Khyber Pakhtunkhwa and in the meantime certain Acts were passed by the province, wherein the services of contract employees were regularized but the appellant and some others were refused the regularization by the department by saying that the Act of Khyber Pakhtunkhwa does not cover the tribal area, therefore the contract services of the appellant and others could not be regularized and this matter started from the year 2005, when the regularization Act was passed and subsequently in the year 2009, 2011, 2015, 2017 Acts of similar nature were passed.
- 3. That it is for the astonishment for the appellant when he lay hands over an order, wherein the services of his colleagues were regularized in 2018 but from the date of their initial contract employment i.e 2007 but why the same benefit was not extended to the appellant, it is a mystery and the respondents are in better position to explain the same, if they have any solid legal ground.
- 4. That the non-response on the appeal of the appellant by the Director General Health, clearly smell malafide and the appellant is justified by saying that the

respondents cannot justify the discrimination, therefore, they failed to decide the departmental appeal of the appellant.

- 5. That as the appellant has been discriminated; therefore, he requested for his regularization from the date of his initial appointment and also asks for the arrears of that period along with other monetary benefits.
- 6. That the counsel for the appellant may be allowed to raise additional grounds during the course of arguments.

PRAYER:-

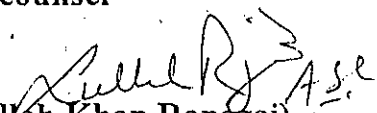
It is therefore, humbly prayed that on acceptance of instant service appeal, the respondents may be directed to regularized the services of the appellant from the year 2007, the date on which the appellant was inducted in service on contract basis and he may also be given the arrears and other monetary benefits acknowledged by the law by keeping the appellant at par with his colleagues.

Your Humble appellant:



(Taj Alam)
EPI Technician,
District South Waziristan Upper.
Through counsel

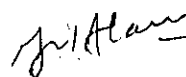
Dated:01.01.2024



(Saleemullah Khan Ranazai)
Advocate Supreme Court.

AFFIDAVIT

I, Taj Alam EPI Technician, District South Waziristan Upper, the appellant, do hereby solemnly affirm on Oath that the contents of the petition are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.



Deponent.
(Identified by)

Dated:01.01.2024



(Saleemullah Khan Ranazai)
Advocate Supreme Court.

Annex A (4)

**AGENCY SURGEON OFFICE
SOUTH WAZIRISTAN AGENCY WANA**

APPOINTMENT ORDER

As recommended by the Departmental Selection Committee in the interview held on dated 20/03/2007, Mr. Taj Alam S/O Said Rehman is hereby appointed as a **Junior EPI Technician in BPS-05** plus usual allowances as admissible under the rules against the vacant post at CHC Spina Mela in South Waziristan Agency, on contract basis on the terms and condition lay down below:

- 1- His appointment shall be for a period of 2 years from the date of her joining in services and shall be extended on his satisfactory performance.
- 2- He is declared medical fit for this job.
- 3- His appointment is purely on contract basis (prescribed under Government of NWFP Contract Policy 2002) till the availability of post and he shall be bound to serve for at least 5 year in FATA.
- 4- His appointment is non-transferable. Moreover spouse policy and district cadre policy shall not be applicable to her.
- 5- Either party can terminate this contract with 60 days notice of pay in lieu thereof.
- 6- He shall be dealt in accordance with rules and regulation applicable to contract employees under contract policy 2002.
- 7- He shall not indulge in any trade, business and any other activity what so ever which has been declared prohibited for the Government servants in elaboration of civil servants Act 1973.
- 8- He will not be entitled for any TA/DA for joining service and the offer shall be automatically held cancelled if he fails to join in 15 days of receipt of this offer.

If he accepts the terms and condition he is directed to report for duty at CHC Spina Mela.


Sd/- Dr. Mohammad Nazir
Agency Surgeon
South Waziristan Wana

No. 1123-27

Dated Wana the 30 / 3 2007.

Copy for information and necessary action to the:-

- 1- Director Health Services FATA, NWFP, Peshawar.
- 2- Agency Account Officer at Tank
- 3- Official Concerned.
- 4- Head Clerk of this office
- 5- Incharge CHC Spina Mela.


Agency Surgeon
South Waziristan Wana

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9210212

FAX: 091-9212110

(5)
"Annex B"

OFFICE ORDER

In pursuance of Judgment of Peshawar High Court Peshawar (DI Khan Bench) dated 13.10.2015, in the Writ Petition No. 439-D/2015, titled "Nazeerullah and others VS Govt. of Khyber Pakhtunkhwa and others" the contract services of the following officials working in South Waziristan Agency are hereby conditionally regularized subject to the final decision on CPLA filed in the Supreme Court of Pakistan with CP No. 45-P/2017:

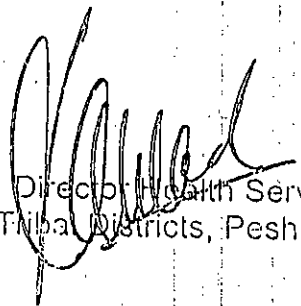
Sl#	Name	Designation	Place of posting
1	Nazeerullah s/o Gul Sanar Khan	Junior EPI Tech.	CHC Oss Pass SWA
2	Taj Alam s/o Said Rehman	--do--	CHC Speena Meela, SWA
3	Niaz Wali s/o Niaz Bat Khan	--do--	CHC Akhtar Gul Kot, SWA
4	Basheer Ahmad s/o Shahzad Khan	--do--	CHC Shakha Khel, SWA
5	Badshah Deen s/o Wareshan Khan	--do--	CHC Haji Shareef Seen Kot, Shah Kotai, SWA
6	Inamullah s/o Dost Wali	--do--	CHC Tangi Budinzai Badshah Khan SWA
7	Abdurkhan Khan s/o Gulzar Khan	Dispenser	SW Agency
8	Muhammed Shoaib s/o Muhammad Qareeb	--do--	--do--
9	Matiullah s/o Zar Nawaz Khan	--do--	--do--
10	Muhammad Eesa s/o Roh Khan	Pharmacy Tech.	--do--
11	Niaz Badshah s/o Mushat Khan	Dispenser	--do--
12	Peer Zada Khan s/o Shah Alam Khan	--do--	NW Agency

Sd/xxxxxxxxxxxxxx
Director Health Services,
Tribal Districts, Peshawar.

No. 23973-77 /DHS/Lili: dated 10/10/2018

Copy to the:-

1. Registrar (J) Peshawar High Court Peshawar (DI Khan Bench) w/r to the above cited writ and order.
2. Agency Surgeon, SW Agency.
3. Additional Agency Surgeon SWA at Tank.
4. Agency Accounts Officer SW at Tank.
5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar.

6

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9219212

FAX: 091-9212110

OFFICE ORDER

In pursuance of Judgment of Peshawar High Court Peshawar (DI Khan Bench) dated 13.10.2015, in the Writ Petition No. 440-D/2015, titled "Muhammad Farooq s/o Suffer Khan VS Govt. of Khyber Pakhtunkhwa and others" the contract service of Muhammad Farooq s/o Suffer Khan is hereby conditionally regularized subject to the final decision on CPLA filed in the Supreme Court of Pakistan with CP No. 46-P/2017.

Sd/xxxxxxxxxxxxx
Director Health Services,
Tribal Districts, Peshawar.

No. 23973-82/DHS/LIII dated 10/10/2018

Copy to the:-

- 1. Registrar (J) Peshawar High Court, Peshawar (DI Khan Bench) w/r to the above cited writ and order.
- 2. Agency Surgeon, SW Agency.
- 3. Additional Agency Surgeon SWA at Tank.
- 4. Agency Accounts Officer SW at Tank.
- 5. Officials concerned.

[Signature]
Director Health Services,
Tribal Districts, Peshawar.

5. Officials concerned.

[Signature]
Director Health Services,
Tribal Districts, Peshawar.

(7)
"Annex-C"

**OFFICE OF THE DISTRICT SURGEON,
TRIBAL DISTRICT SOUTH WAZIRISTAN.**

OFFICE ORDER:

With the reference of the Director Health Services, Merged Areas, Peshawar No: 23973-77/DHS/Liti dated: 10/10/2018 and 23973-82/DHS/Liti: dated: 10/10/2018 and in pursuance of judgment of Peshawar High Court Peshawar (DIKhan Bench) dated: 13/10/2015 in the writ petition No:439-D/2015, the contract Services of the following officials working under this office are hereby conditionally regularized subject to the final decision on CPLA filed in the supreme Court of Pakistan with CP No:45-P/2017.

The Services of the following contract employees/EPI Technicians are hereby adjusted/posted against the vacant positions/posts mentioned against each for the purpose of draw of pay till the availability of their original posts on regular basis in the interest of public.

S.NO	NAME	FATHER NAME	DESIGNATION	ADJUSTED AGAINST
1	Mr. Nazir Ullah	Gul Sanar Khan	EPI Technician	Clinical Technician Pharmacy
2	Mr. Taj Alam	Said Rehman	EPI Technician	Clinical Technician Pharmacy
3	Mr. Niaz Wali	Yar Bat Khan	EPI Technician	Clinical Technician Pharmacy
4	Mr. Bashir Ahmad	Shahzar Khan	EPI Technician	Clinical Technician Pharmacy
5	Mr. Badshah Din	Waresham Khan	EPI Technician	Clinical Technician Pharmacy
6	Mr. Inam Ullah	Dost Wali	EPI Technician	Dialysis Technician
7	Mr. Muhammad Farooq	Safar Khan	EPI Technician	Dialysis Technician

Sd-----
District Surgeon,
Tribal District, South Waziristan

No: 49-55 Dated Wana the: 14 /03/2019

Copy to the:

1. Director Health Services Merged Areas, Peshawar.
2. Deputy Commissioner, Tribal District, South Waziristan.
3. District Account Officer, Tribal District, South Waziristan at Tank.
4. Additional District Surgeon, Tribal District, South Waziristan at Tank.
5. Registrar (J) Peshawar High Court (DIKhan Bench).
6. Account Clerk of this Office.
7. Officials concerned. ✓


District Surgeon,
Tribal District, South Waziristan

⑧
"Amer-D"

Directorate of Health Services
FATA Secretariat, Warsak Road, Peshawar

Phone #: 091-9210211 Fax #: 091-9212110/

OFFICE ORDER

Pursuant to Government of KPK, Civil servants (Amendment) Act, 2005, read with Govt. of KPK, Establishment & administration Department (regulation wing) notification No. SO (Regulation-VI) (E & AD) 1-13-2005, dated 10/08/2005, Government of Pakistan Cabinet Secretary Establishment Division Notification No.AC/30/2008-R.11 dated: 29th August, 2008, KPK Civil Servants(Amendment) ACT-2013 Notification No:OSR-III /FD/12-1/2005 Dated Peshawar,27/02/2013 the services of the following cant and paramedics attached to the Agency Surgeon Tribal District South Waziristan are hereby regularized from the date of their appointment as mentioned against each.

S.No	Name	Father Name	Designation	Date of Appointment
2	Matt Ullah ✓	Zar Nawar Khan	C-T Pharmacy	26/01/2007
2	Abdur Rahim Khan ✓	Gul Zar Khan	C-T Pharmacy	26/01/2007
3	Muhammad Tufail	Shamshir Khan	C-T Pharmacy	27/01/2007
4	Abdul Rahim Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
5	Pir Zahir ✓	Shah Alam Khan	C-T Pharmacy	26/01/2007
6	All Gohar	Abdul Khalig	C-T Pharmacy	01/08/2003
7	Maz Dad Shah ✓	Muxhat Khan	C-T Pharmacy	07/01/2007
8	Irfan Ullah	Musa Jan	PHC(EPI)	20/07/2004
9	Alaudin	Amir Nawaz	PHC(EPI)	13/04/2004
10	Zaj Muhammad	Musa Jan	PHC(EPI)	13/07/2004
11	Shamshair Ahmad	Noor Muhammad	PHC(EPI)	29/09/2004
12	Ambrin Habib	Habib Ahmad	PHC(MCH)	07/04/2007

Their appointment will be subject to the following terms and conditions:-

The Khyber Pakhtunkhwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 10th January 2013 and assented to by the Government Khyber Pakhtunkhwa on 17th January 2013, has been published as an Act of the Provincial Assembly of Khyber Pakhtunkhwa. Under the said Act all Civil Servants appointed to a service or post on or after 1st July 2001 shall be deemed to have been appointed on regular basis and will be eligible for pension/deduction of G.P. Fund. Accordingly the following instructions/guidelines are issued for compliance of all concerned Departments/Organizations.

- a) Deduction on account of General Provident Fund at prescribed rates from all the Civil Servants, who have become eligible for pension under the Khyber Pakhtunkhwa Civil Servants (Amendment) Act 2013 should be started forthwith.

All deductions/subscription in respect of Contributory Provident Fund made before the commencement of Khyber Pakhtunkhwa Civil Services (Amendment) Act, 2013 from such Civil Servants, excluding Government employees shall immediately be transferred to their respective General Provident Fund Accounts. However, such Civil Servants will be entitled to make an ad declared G.P. Fund deductions/subscription from now.

Director Health Services
Tribal District, Peshawar

DHS PATW Peshawar Dated 06/11/2018

Copy

- 1- Director General Health Service Khyber Pakhtunkhwa
- 2- Deputy Director Admin Tribal District for information please
- 3- Agency Surgeon Tribal District South Waziristan
- 4- Agency Account Officer Tribal District South Waziristan
- 5- Official Correspondent

Director Health Services
Tribal District, Peshawar



Directorate of Health Services
Fata Secretariat Warsak, Road, Peshawar

Phone # 091-9210212 Fax# 091-9212110/

OFFICE ORDER

Pursuant to Government of KPK, Civil servant (Amendment) Act, 2005, (and with Govt of KPK, Establishment & Administration Department Regulation wing) Notifications No. SO(Regulation-VI) (E & AD) 1-13-20012, dated 10/08/2005, Government of Pakistan Cabinet Secretary Establishment Division Notification No. AC/30/2008-R.11 dated 29th August, 2008, KPK Civil Servant (Amendment) ACT-2013 Notification No. SOSR-III /FD/12-1/2002 Dated Peshawar, 27/02/2013 the Services of the following content paramedics attached to the Agency Surgeon Tribal District South Waziristan are hereby regularized from the date of their appointment as mentioned against each.

S.No	Name	Father Name	Designation	Date of Appointment
1.	Muti Ullah	Zar Nawaz Khan	C-T Pharmacy	26/01/2007
2.	Abdur Rehman Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
3.	Muhammad Tufial	Shamshir Khan	C-T Pharmacy	27/01/2007
4.	Abdul Rehman Khan	Gul Zar Khan	C-T Pharmacy	26/01/2007
5.	Pir zada	Shah ALam Khan	C-T Pharmacy	26/01/2007
6.	Ali Gohar	Abdul Khalig	C-T Pharmacy	01/08/2003
7.	Niaz Badsha	Mushat Khan	C-T Pharmacy	07/01/2007
8.	Irfan Ullah	Mula Jan	PHC(EPI)	20/07/2004
9.	Allaudin	Amir Nawaz	PHC(EPI)	13/04/2004
10.	Taj Muhammad	Musa Jan	PHC(EPI)	13/07/2004
11.	Shamshair Khan	Noor Muhammad	PHC(EPI)	29/09/2004
12.	Ambrin Habib	Habib Ahmad	PHC(MCH)	07/04/2007

Their appointment will be subject to the following terms and conditions:

The Khyber Pakhtunkwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 15th January 2013 assented to by the Government Khyber Pakhtunkhwa on 17th January 2013 has been publish as an Act of the Provincial Assembly of Khyber Pakhtunkhwa, Under the said Act all Civil Servants appointed to a service or post on or after 1st July 2001 shall be deemed to have been appointed on regular basis and will be eligible for pension/deduction of G.P Fund Accordingly the following instructions/guidelines are issued for compliance of all concerned Departments/ Organizations.

- Deduction on account of General Provident Fund at prescribed rates from all the Civil Servants, who have become eligible for pension under the Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 should started forthwith.
- As deduction/instructions in respect of Contributory Provident Fund made before the Government of Khyber Pakhtunkhwa Civil Servants (Amendment) Act, 2013 from such Civil Servants, including Government Competent Authority shall immediately be transferred to their respective General Provident Fund Accounts. However such Civil Servants will be entitled to markup on so decided G.P Fund deduction/instruction were made.

Director Health Services
Tribal District Peshawar

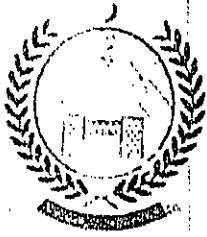
No. _____ DSH/FATA Paramedics

Dated 06/11/2018

Copy to the

- Director health Services, Khyber Pakhtunkhwa
- Deputy Director Admin DHS Tribal District for information please.
- Agency Surgeon Tribal District South Waziristan.
- Agency Account Officer Tribal District South Waziristan.
- Official Concerned.

Sd
Director Health Services
Tribal District Peshawar



OFFICE OF THE

District Health Officer

South Waziristan Upper

No: 1520 Dated: 27/05/2023

10
"Annex-E"

To,

The Director General Health services
Khyber Pakhtunkhwa, Peshawar.

Subject: Request of Employees for regularization from the Date of Appointment as per Application Submitted

R/Sir,

Enclosed please find herewith an application by EPI Techs/Dispenser who are working under the control of this Office since 2007/2008. Therefore it is requested that kindly regularization of said EPI Techs may be considered/issued from their date of appointments, i.e 30/03/2007, so that these officials may claim their outstanding arrear of pay & allowances.

Your kind cooperation is highly essential in this regard.

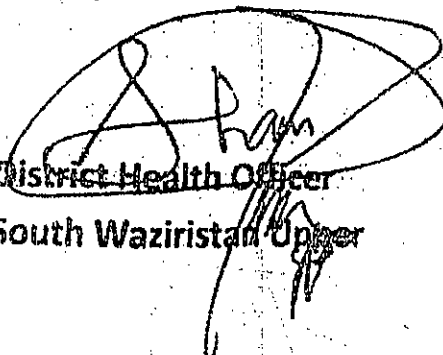
.....sd.....

District Health Officer
South Waziristan Upper

Even date & No.

Copy to.

1. The Regional Director (Southern region) KP, Peshawar
2. The District Account Officer, Tank.
3. Accountant of this Office.
4. Concerned Officials.
5. Record.


District Health Officer
South Waziristan Upper

بھنور جناب ڈسٹرکٹ ہیلتھ آفیسر صاحب ساوتھ وزیرستان SWTD پر

عنوان: درخواست بمراد تصیح فرمائے جانے تاریخ تعیناتی۔

جناب عالی! سائل حسب ذیل عرض رساں ہے۔

1. یہ کہ سائل آپ کے محکمہ میں بطور EPI Technician مورخہ 30/03/2007 کو بھرتی ہوا۔

2. یہ کہ سائل اولاً کنٹریکٹ پر بھرتی ہوا بعد میں حکومت خیبر پختونخواہ نے سابقہ فائنا محکمہ جات کو ریگولر اور اسی طرح تمام ملازمین کو بھی ریگولر کر دیا ہے۔

3. یہ کہ سائل کے ہمراہ دیگر ملازمین کے ریگولر یزیشن احکامات بھی جاری ہوئے جن کی تاریخ تعیناتی 2007 سے جاری ہوئی اس لئے سائل کی تعیناتی کے احکامات بھی سال 2007 سے جاری فرمائے جائیں۔ (لفول احکامات لف ہیں)

4. یہ کہ سائل کی تعیناتی کے احکامات جاری فرمائے جاویں۔

5. یہ کہ درخواست ہذا کو منظور فرمانے کے جناب کے پاس وسیع تر اختیارات حاصل ہیں۔

لہذا استدعا ہے کہ سائل کی تاریخ تعیناتی درست / تصیح کئے جانے کے احکامات صادر فرمائے جاویں۔ عین نوازش ہوگی

مورخہ 21/09/2023

عرضے

تاج عام SWTD EPI Technician ساوتھ وزیرستان پر SWTD

PAKISTAN National Identity Card

Name
Taj Alam

Holder's Name
Taj Said Ullahman

Gender
M

Country of Stay
Pakistan

Identity Number
21704-1262842-9

Date of Birth
01.04.1980

Date of Issue
26.01.2023

Date of Expiry
26.01.2033



Holder's Signature

پروفیسر: طاہرہ طاہرہ، ڈاکٹر: طاہرہ، ڈاکٹر: طاہرہ

پروفیسر: طاہرہ طاہرہ، ڈاکٹر: طاہرہ طاہرہ، ڈاکٹر: طاہرہ طاہرہ

پروفیسر: طاہرہ طاہرہ، ڈاکٹر: طاہرہ طاہرہ

Secretary General of Pakistan

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گمشدہ کارڈ ملنے پر تقریبی لیٹر بکس میں ڈال دیں

PAKISTAN BAR COUNCIL

PROFESSIONAL CARD

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Name MR. SALEEM ULLAH KHAN RANA ZAI
Father's Name HABIB ULLAH KHAN
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MR. SALEEM ULLAH KHAN RANA ZAI

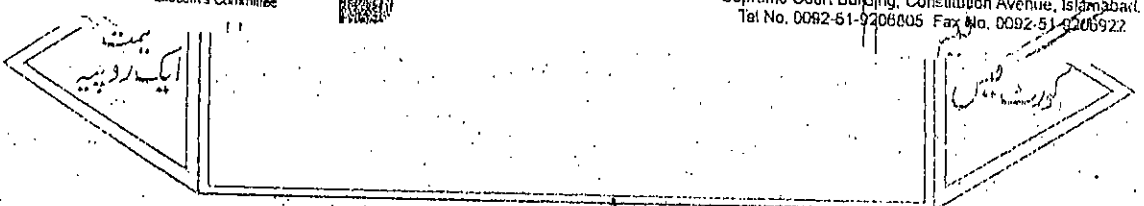
Advocate
Supreme Court of Pakistan (ASC)

Date of Issue: 19-4-2016



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Secretary
Pakistan Bar Council



بند التماس جناب
محترم صاحب
نام حکومت پاکستان
تاج عالم
دعویٰ یا جرم
تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا العنوان میں اپنی طرف واسطے بیرونی وجوہات ہی برائے پیشگی یا تصفیہ مقدمہ بمقام سٹار کیلئے
پر درخواست

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشگی پر خود بڑا ذمہ داری اختیار فرمائیں اور ہر عدالت، حاضر و ناہر میں گاہ اور ہر وقت ہمارے جانے مقدمہ وکیل صاحب
موسوف کو اطلاع دینے اور ہر عدالت میں ہر وقت ہمارے جانے مقدمہ وکیل صاحب موسوف کو اطلاع دینے اور ہر عدالت میں ہر وقت ہمارے جانے مقدمہ وکیل صاحب
اس کے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موسوف مقدمہ مندرجہ بالا کے علاوہ کسی جگہ یا جگہ پر ہر وقت ہمارے جانے مقدمہ وکیل صاحب موسوف
ذمہ دار نہ ہوں گے، نیز وکیل صاحب موسوف مقدمہ مندرجہ بالا کے علاوہ کسی جگہ یا جگہ پر ہر وقت ہمارے جانے مقدمہ وکیل صاحب موسوف
ہوں گے۔ اور مقدمہ مندرجہ بالا کے علاوہ اور جگہ سماعت، اولے یا بروز تسمین یا کچھری کے اوقات سے پہلے یا کچھری یا بروز تسمین ہر وقت ہمارے جانے مقدمہ وکیل صاحب
دار یا اس کے واسطے کسی معاون کے ادا کرنے یا عملانہ واپس کرنے کے بھی موسوف ذمہ دار نہ ہوں گے۔ چھ کوکل ساختہ پر داخلہ صاحب موسوف مثل کردہ
ذات خود منظور و قبول ہوگا۔ اور صاحب موسوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذریعہ نظر ثانی اپنی گمانی اور ہر قسم درخواست پر دستخط و تصدیق کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ذریعہ کے لئے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان و سپرد اور اس پر پابندی یا راضی نامہ فیصلہ پر
حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیش مقدمہ مذکورہ ویران لا کچھری صدر بیرونی مقدمہ مذکورہ نظر ثانی واپس دیکھائی و گمانی و برآمدگی
مقدمہ یا مندرجہ ذریعہ یا طرف یا درخواست حکم امتحان یا ترقی یا کرناری میں از فیصلہ اجراء کے ذریعہ بھی صاحب موسوف کو بشرط ادائیگی ملحدہ ملانہ بیرونی کا اختیار ہوگا
اور تمام ساختہ پر داخلہ صاحب موسوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موسوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کارروائی یا بصورت درخواست نظر ثانی اپنی یا گمانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا ہیر مشرک اپنے جہانے یا اپنے امراء مقرر کریں۔ اور ایسے مشیر قانون کو
بھی ہر امر میں دیکھ اور ویسے امتیازات حاصل ہوں گے، جیسے صاحب موسوف کو حاصل ہیں، اور دوران مقدمہ میں جو کہ ہر جائیداد انوار پر ہوگا، وہ صاحب
موسوف کا حق ہوگا۔ مگر صاحب موسوف کو پوری نہیں تاریخ پیش سے پہلے ادا نہ کروں گا۔ تو صاحب موسوف کو اپنا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی
سورت میں ہر کوئی مطالبہ کسی صاحب موسوف کے برخلاف نہیں ہوگا۔

موسوف

مقدموں وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted
Taj Alam
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