


FORM OF ORDER SHEET

Court of _____

Appeal No. 204/2024

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. Nazir Ullah 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</p>  <p>REGISTRAR</p>

The appeal of Mr. Nazir Ullah 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.

- address is given on separate page*
- 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. 51 /S.T.

Dt. 5/1 /2024



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

sir,

Resubmitted after the needful

Suleh Raza

24/1/2024

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

service appeal No. 204 /2024

Nazirullah Versus Government of Khyber Pakhtunkhwa, etc.

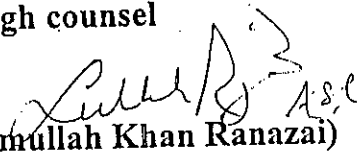
Index

S.NO.	PARTICULARS OF THE CASE.	ANNEXURES.	PAGES.
1.	Memo and grounds of appeal.	—	1-3
2.	Copy of appointment order	"A" —	4-5
3.	Copy of Regularization Order	"B" —	6-7
4.	Copy of Adjusted order	"C" —	8
5.	Copy of order	"D" —	9-10
6.	Copy of Departmental Appeal/Representation	"E" —	11-12
7.	Vakalatnamas.	—	13

**Your Humble appellant:
Nazirullah**

Dated:01.01.2024

Through counsel


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

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal 204 2024

Nazir Ullah **VERSUS** GOVT KPK

(COMPLETE ADDRESS OF APPELLANT)

Nazir Ullah EPI Technician Posted at BHU Barwand Sarwakai South
Waziristan Upper District

Resident of Kotkai Tehsil Sararogha District South Waziristan



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal.

/2024

Nazirullah, 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.**

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.

GROUND:

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.

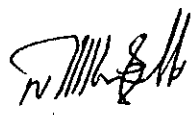
6. That the counsel for the appellant may be allowed to raise additional grounds during the course of arguments.

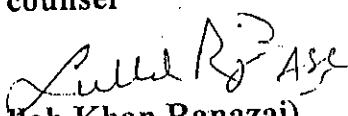
PRAYER:-

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:

Dated:01.01.2024

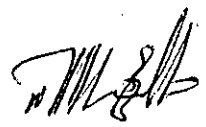
(Nazirullah) 
EPI Technician,
District South Waziristan Upper.
Through counsel

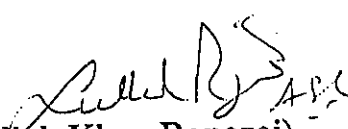

(Saleemullah Khan Ranazai)
Advocate Supreme Court.

AFFIDAVIT

I, Nazirullah 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.

Dated:01.01.2024

Deponent. 
(Identified by)


(Saleemullah Khan Ranazai)
Advocate Supreme Court.

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. Nazirullah S/O Gul Sattar 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 Oss Pass 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) tills 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 contact 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.

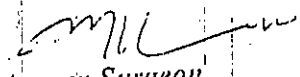
If he accepts the terms and condition he is directed to report for duty at CHC Oss Pass.

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

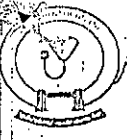
No. 1113-17

Dated Wana the 20/3 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 Oss Pass.


Agency Surgeon
South Waziristan Wana

5



OFFICE OF THE DISTRICT HEALTH OFFICER
DISTRICT SOUTH WAZIRISTAN WANA

OFFICE ORDER.

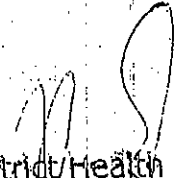
Mr. Nazir ullah EPI technician regularized earlier against the post of Dispenser at SFBM Hospital Sholan vide DHS order No. 23973-82 dated 10-10-2018 and this office order No.49-54 dated 14-03-2019 (Due to no vacant original cadre post), is hereby adjusted on original cadre vacant post of EPI technician with immediate effect.

Sd-----
District Health Officer
District South Waziristan

No. 65-68/1 dated 23/01/2020.

Copy forwarded to the:-

1. Director Health Services Merged areas, Peshawar.
2. District Accounts Officer SW.
3. FSMO EPI Unit SW.
4. Official concerned.


District Health Officer
District South Waziristan

DIRECTOR Health Services,
Tribal Districts, Peshawar

Anex 'B'

⑥

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9210212

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. 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.

S#	Name	Designation	Place of posting
1	Nazeeullah 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 Shahzer 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	Abdul Karim Khan s/o Gulzar Khan	Dispenser	SW Agency
8	Muhammed Shoab 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. 93973-77 /DHS/Liti: 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

DIRECTORATE OF HEALTH SERVICES

Tribal Districts, Peshawar.

Phone: 091-9212112

FAX: 091-9212110

OFFICE ORDER

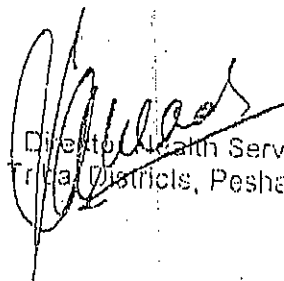
In pursuance of Judgment of Peshawar High Court Peshawar (Dikhan Bench) dated 13.10.2015, in the Writ Petition No. 440-D/2015, titled "Muhammad Farooq s/o Suffer Khan VS Govt. of Khyber Pakhtunkhwa and others" the contract service of Muhammad Farooq s/o Suffer Khan is hereby conditionally regularized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

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

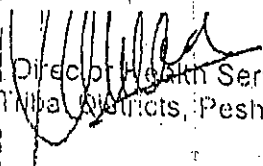
No. 23973-82 /DHS/LIII dated 10 / 10 / 2018

Copy to the:-

1. Registrar (J) Peshawar High Court Peshawar (Dikhan 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.

5. Officials concerned.


Director Health Services,
Tribal Districts, Peshawar.

Annex 'C' 8

**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 drawl 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

Anex 'D' ⑨



Directorate of Health Services
FATA Secretariat, Warsak Road, Peshawar

Phone No: (01-9210212 Fax #: 01-9212110/

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.SOSR-III /FD/12-1/2005 Dated Peshawar,27/02/2013 the services of the following contract 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	Mali Ullah ✓	Zaf Nawaz Khan	C-T Pharmacy	26/01/2007
2	Abdul Nabil 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 Zada ✓	Shah Alam Khan	C-T Pharmacy	26/01/2007
6	All Gohar	Abdul Khalique	C-T Pharmacy	01/08/2003
7	Niaz Dad Shah ✓	Mushat Khan	C-T Pharmacy	07/01/2007
8	Irfan Ullah	Mula Jan	PHC(EPI)	20/07/2004
9	Allawdin	Amir Nawaz	PHC(EPI)	13/04/2004
10	Za 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

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

The Khyber Pakhtunkhwa Civil Servants (Amendment) Bill 2013 Passed by Provincial Assembly on 16th 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.

- 1) 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.

of All deductions/subscription in respect of Contributory Provident Fund made before the commencement of Mysore Panchajanya Civil Service (Amendment) Act 2012 from such Civil Servants, including Government counterparts, shall immediately be transferred to their respective General Provident Fund Accounts. However, such Civil Servants will be entitled to withdraw on as decided GPF Fund deductions/subscription were made.

Director Health Services
Tribal District, Panchajanya

ICHS PATW Paramedico dated 05/11/2018

- 1. Director General Health Service Mysore Panchajanya
- 2. Deputy Director Health Tribal District for Information please
- 3. Regional Engineer Tribal District South West Karnataka
- 4. Regional Engineer Tribal District South West Karnataka
- 5. Regional Engineer Tribal District South West Karnataka

Director Health Services
Tribal District, Panchajanya

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.	Mati 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.	Afi Gohar	Abdul Khaliq	C-T Pharmacy	01/08/2003
7.	Njaz 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



Anex "E" (11)

OFFICE OF THE
District Health Officer
South Waziristan Upper
No: 1521 Dated: 21/05/2023

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.

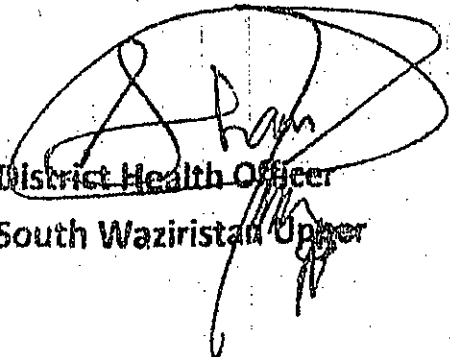
Your kind cooperation is highly essential in this regard.

.....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 اپر

عنوان: درخواست بمراد تصحیح 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۔ (نقول 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 / تصحیح کئے جانے کے احکامات صادر فرمائے جاویں۔ عین نوازش ہوگی

مورخہ 21/09/2023

عرض

نذیر اللہ صاحب
EPI Technician ساوتھ وزیرستان اپر SWTD



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Nazir Ullah

Father Name
Gul Sanar Khan

Gender Country of Stay
M Pakistan

Identity Number Date of Birth
21704-1978789-1 10.03.1986

Date of Issue Date of Expiry
10.10.2023 10.10.2033



Holder's Signature

21704-1978789-1
سرحدیہ ڈاک خانہ سرحدیہ حکومت کی تحصیل سرحدیہ ضلع
ساؤتھ اوزستان

سرحدیہ ڈاک خانہ سرحدیہ حکومت کی تحصیل سرحدیہ ضلع
ساؤتھ اوزستان

101651269391
152-86-285342

Registar General of Pakistan

گشده کارڈ ملنے پر تقریبی لیٹر بکس میں ڈال دیں

PAKISTAN BAR COUNCIL

MR. SALEEM ULLAH KHAN RANA ZAI

Advocate
Supreme Court of Pakistan (ASC)

Date of Issue: 19-4-2016



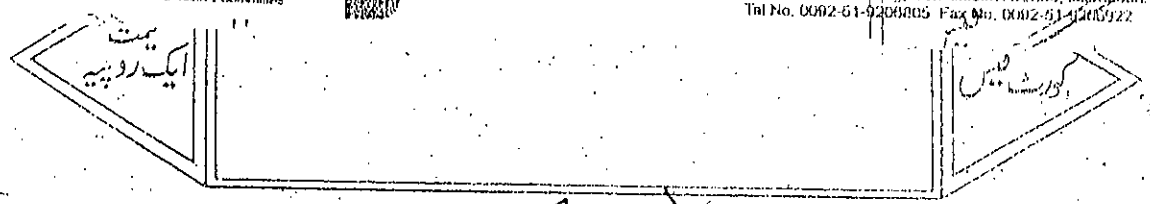
(Abdul Fayaz)
Chairman
Enrollment Committee

(Muhammad Arshad)
Secretary
Pakistan Bar Council

Non Transferable
In the event of joining or carrying on any other profession, business, service or vocation, the holder will not be entitled to use this Card and shall forthwith surrender it to The Pakistan Bar Council

Name: MR. SALEEM ULLAH KHAN RANA ZAI
 Father's Name: HABIB ULLAH KHAN
 Date of Birth: 10-6-1966 CNIC: 121911-0741164515
 Date of Enrollment as Advocate of Supreme Court: 3-6-2005
 Enrollment No: 2053 Ref No: 10/PBC/Kpk.J.D.
 Address: MADINI TOWN, D.T. KHAN
 Tel: Off. 0092-966-714267 Res. 0092-966-713484 Call: 0333-9159809

If found please return to
PAKISTAN BAR COUNCIL
Supreme Court Building, Constitution Avenue, Islamabad
Tel No. 0092-61-9200805 Fax No. 0092-61-9200922



بند اولت جناب
 نذیر اللہ
 نام
 فکرت محمد
 دعوی یا جرم
 تفصیل دعوی یا جرم
 باعث تحریر آنکہ

مقدمہ بتدریج بالاعنوان میں اپنی طرف واسطے تیزی و وجوہ ابدی برائے پیشی یا تصفیہ مقدمہ بمقام سار کیلئے

کو سب ذیل شرائط پر عمل پیرا ہے کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت ہمارے جاملے مقدمہ دیکل صاحب موصول کرالایا دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصول اسکی کسی طرح ذمہ دار نہ ہوں گے، نیز دیکل صاحب موصول مقدمہ مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل میری کرنے کے ذمہ دار نہ ہوں گے۔ نیز دیکل صاحب موصول مقدمہ مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل میری کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ مقدمہ بکھری کے علاوہ اور جگہ سمیت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے ہونے پر منظر کو کوئی افسانہ پیچھے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عائد نہ واپس کرانے کے بھی موصول ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصول میں کردہ ذات خورد منگور و قبول ہوگا۔ اور صاحب موصول کو مرضی دعوی، یا جواب دعوی یا درخواست اجراء کے ذریعہ و نظر ثانی اولیٰ گمانی و ہر قسم درخواست پر دخل و تعبدین کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذریعہ کرانے اور ہر قسم کارروائی وصول کرنے اور رسید دینے اور داخل کرانے اور ہر قسم کے بیان دینے اور اس پر غامی یا راضی نامہ دینے پر حلف کرنے، اقبال دعوی کا بھی اختیار ہوگا۔ اور بسورت مندر ہونے تاریخ پیشی مقدمہ مذکورہ ویران الا بکھری صدر دعوی مقدمہ مذکورہ نظر ثانی و اپیل و گمانی و ویرانگی مقدمہ یا مشورتی ذریعہ بکھری یا درخواست حکم انتہای یا ترقی یا کارزاری میں از فیصلہ اجراء کے ذریعہ بھی صاحب موصول کو بشرط ادائیگی طیفہ عائد میری کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصول میں کردہ ذات خورد منگور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصول کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکی کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اولیٰ یا گمانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے دیکل یا میر منظر کو اپنے جہانے یا اپنے امراء مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں رہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصول کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جائزہ التواہ پر پڑا، وہ صاحب موصول کا حق ہوگا۔ مگر صاحب موصول کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصول کو اپنا اختیار ہوگا کہ وہ مقدمہ کی میری نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی کا صاحب موصول کے برخلاف نہیں ہوگا۔

تاریخ: 2016

مضمون وکالت نامہ میں لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted
 Nuzair
 21704-1978789-1