

FORM OF ORDER SHEET

Court of _____

Appeal No. 223/2024

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1 | 31/01/2024 | The appeal of Mr. Muhammad Ajmal Khan Gandapur received today by registered post through Mr. Ahmad Ali Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ |

By the order of Chairman


REGISTRAR

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, CAMP AT D.I.KHAN.**

Service Appeal No. 223 of 2024

Dr. Muhammad Ajmal Khan Gandapur Vs. Govt. of K.P.K. etc
SERVICE APPEAL

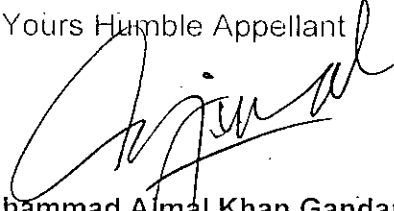
Index: (a-b):-

| S# | DESCRIPTION OF DOCUMENTS | ANNEXURE | PAGE No. |
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| 1. | Service Appeal | --- | 1-9 |
| 2. | Copy of the retirement order of appellant | A ✓ | ✓ 10 |
| 3. | Copy of the application dated 12.02.2021 of appellant | B ✓ | 11-12 |
| 4. | Copy of the service record of the appellant | C ✓ | ✓ 13 |
| 5. | Copy of the mandatory training certificate for promotion in BPS-20 | D | ✓ 14-15 |
| 6. | Copy of the appeal for promotion in BPS-20 to the respondent No.2 | E | 16-17 |
| 7. | Copy of the letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 23 rd June 2023 | F ✓ | 18 |
| 8. | Copy of the letter No.9233/AE.1 dated 08.08.2023 of respondent No.4 | G ✓ | 19 |
| 9. | Copy of the letter dated 21 st August, 2023 of the Health Department Secretariate | H ✓ | 20 |
| 10 | Copy of the letter No.10336/AE-1 dated 31.08.2023 with working papers | I ✓ | 21 |
| 11 | Copy of letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 10 th October, 2023 | J ✓ | 22 |
| 12 | Copy of the letter N.18732/AE-1 dated 08.11.2023 of respondent No.4 | K ✓ | 23 |

b

| | | | |
|----|--|-----|-------|
| 13 | Copy of the impugned letter No.SOH (E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 29th December, 2023 | L ✓ | 24 |
| 14 | Vakalatnama | --- | 25-26 |

Yours Humble Appellant



(Dr. Muhammad Ajmal Khan Gandapur)
Through Counsel



Ahmad Ali
Advocate Supreme Court

Dt. 26 January, 2024



Khalid Mahmood
Advocate High Court, D.I.Khan.

①

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, CAMP AT D.I.KHAN.**

Service Appeal No. 223 of 2024.

Dr. Muhammad Ajmal Khan Gandapur, resident of Mohallah Laghari,
D.I.Khan, Retired Principal Medical Officer (BS-19) , Health
Department/DHO Office, D.I.Khan.

Appellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary, Health Department, Khyber Pakhtunkhwa, Peshawar.
3. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
4. Additional Director General (Admn:), Khyber Pakhtunkhwa, Peshawar.
5. District Health Officer, D.I.Khan.

Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE K.P.K. SERVICE TRIBUNALS ACT, 1974, AGAINST LETTER No.SOH(E-V)/2-2/2023/DR. MUHAMMAD AJMAL KHAN GANDAPUR DATED 29.12.2023 WHEREBY DEPARTMENTAL APPEAL OF APPELLANT FOR PROMOTION IN BPS-20 WAS REGRETTEED ON THE PRETEXT 'NOT COVERED UNDER THE RULES'.

PRAYER:

ON ACCEPTANCE OF PRESENT SERVICE APPEAL, AND BY SETTING ASIDE THE LETTER No.SOH(E-V)/2-2/2023/DR. MUHAMMAD AJMAL KHAN GANDAPUR DATED 29.12.2023, THE APPELLANT MAY PLEASE BE AWARDED PROMOTION IN BPS-20 FROM THE DATE OF

HIS ENTITLEMENT I.E. APRIL-2019 WITH ALL FRINGE BENEFITS COUPLED WITH RECALCULATION OF PENSIONARY BENEFITS; WITH SUCH OTHER RELIEF AS MAY BE DEEMED PROPER AND APPROPRIATE BY THIS HONOURABLE TRIBUNAL IN THE ATTENDING CIRCUMSTANCES OF THE CASE.

NOTE:

The impugned letter dated 29.12.2023 (addressed to DG health and copy of PS to Secretary Health) was neither addressed nor communicated to appellant and he got knowledge of the same on 24.01.2024, hence, from the date of knowledge this appeal is well within time.

Respectfully Sheweth,

1. That the appellant was serving in the Health Department as Principal Medical Officer (B-19) and got superannuation on 14.03.2021 from D.H.O. Office D.I.Khan. Copy of the retirement order of appellant is enclosed as **Annexure A.**
2. That prior to the date of his supernation, the appellant had become entitled to the award of promotion in BPS-20, and in this regard, on 12.02.2021, the appellant submitted an application to the respondent No.2, but the same was neither considered nor replied. Copy of the application dated 12.02.2021 is enclosed as **Annexure B.**
3. That the appellant served in BPS-17 & above for a period of 33^{Years}—06^{Months}, which includes 15^{Years}—24^{Days} service in BPS-17, about 13 years' service in BPS-18 and 06^{Years}—06^{Months} service in BPS-19. Appellant also obtained mandatory training for promotion in BPS-20. A detailed sketch of the service careers of appellant is as under:

| S# | Station/Office | Post Held | Period |
|----|---------------------------------|-------------------------|-----------------------------|
| 1. | SHS Kulachi D.I.Khan (Adhoc) | Medical Officer B-17 | 15.09.1987 to 05.11.1987 |

| | | | |
|----|------------------------------------|--------------------------------------|-----------------------------|
| 2. | SHS Kulachi D.I.Khan (Regular) | Medical Officer B-17 | 06.12.1987 to 15.10.1988 |
| 3. | DHO Office D.I.Khan | FSMO (EPI) B-17 | 16.10.1988 to 31.07.2001 |
| 4. | DHQ Teaching Hospital, D.I.Khan | Medical Officer B-17 | 01.08.2001 to 09.10.2001 |
| 5. | DHQ Teaching Hospital, D.I.Khan | Senior Medical Officer B-18 | 10.10.2001 to 24.09.2014 |
| 6. | DHO Office D.I.Khan | Principal Medical Officer B-19 | 25.09.2014 to 14.03.2021 |

The service record of the appellant is enclosed as **Annexure C** whereas mandatory training certificate for promotion in BPS-20 is enclosed as **Annexure D**.

4. That the appellant then preferred an Appeal for promotion in BPS-20 (**Annexure E**) to the respondent No.2, which was processed and views/comments of respondent No.3 were sought vide letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 23rd June 2023 (**Annexure F**).
5. That in response, the respondent No.4 vide letter No.9233/AE.1 dated 08.08.2023 (**Annexure G**) submitted his views/comments. Thereafter, vide letter dated 21st August, 2023 (**Annexure H**), the Health Department Secretariate directed the respondent No.3 to prepare and sent the working paper for notional promotion to the appellant to the post of BPS-20.
6. That the respondent No.4 vide his letter No.10336/AE-1 dated 31.08.2023 submitted the working papers for promotion of appellant to the Health Department Secretariate. Copy of the letter No.10336/AE-1 dated 31.08.2023 with working papers is enclosed as **Annexure I**.
7. That in response to letter No.10336/AE-1 dated 31.08.2023 the Health Department Secretariate vide letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 10th October, 2023, sought following clarifications from the respondent No.3.

- i. At the time of retirement exact number of his seniority;
- ii. Whether anyone junior to him was promoted; and
- iii. What was the last date of PSB meeting before this retirement.

Copy of letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 10th October, 2023 is enclosed as Annexure J.

8. That accordingly the respondent No.4, vide letter N.18732/AE-1 dated 08.11.2023 (Annexure K) submitted the requisite wise clarifications in the following manner:

- i) The doctor concerned was appointed on adhoc basis as Medical Officer BS-17 on 26.08.1987, and later-on, he was selected as Medical Officer BS-17 through Public Service Commission on 06.12.1987.
- ii) He was promoted to BS-18 on 12.08.2000 and subsequently promoted to BS-19 on 23.09.2014.
- iii) Before his retirement the PSB meeting was held on April 2019 wherein he was at S. No.16 in the working papers while vacant posts of CMO BS-20 were 31, so he was entitled for promotion but he was not considered for promotion due to non-availability of PER for the year 2017. Whereas, his junior doctors were promoted to BS-20. At the time of his retirement, he was at S. No.02 of the Provisional Seniority List of PMOs BS-19 and final Seniority List was submitted to the Government on 27.05.2021 by excluding his name as he was retired from service on 14.03.2021 on attaining the age of superannuation, while, the PSB was arranged on 27.10.2021 i.e. after his retirement.

Hence, entitlement of appellant for promotion in April-2019 and promotion of his junior officer to BS-20 in April-2019, has become an admitted fact, however, appellant was dropped from promotion only because of non-availability of PER for the year 2017.

9. That, thereafter, respondent No.2 instead of processing the case for promotion of appellant, regretted the same on the pretext that same is not covered by the Rules and in this regard issued impugned letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 29th December, 2023 (Annexure L), to the respondent No.3, however, no copy was addressed or officially communicated to the appellant by any of the respondents. The appellant got knowledge of the impugned letter on 24.01.2024, hence, from the date of knowledge this appeal is well within time
10. That aggrieved of the impugned letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 29th December, 2023, the appellant has been left with the only remedy to invoke the jurisdiction of this Honourable Tribunal through the present appeal with the supra prayer on, inter alia, the following grounds:

GROUNDS:

- i. That non award of promotion to the appellant to the post of CMO BPS-20 despite seniority & eligibility, and the impugned letter No.SOH(E-V)/2-2/2023/Dr. Muhammad Ajmal Khan Gandapur dated 29th December, 2023, are highly unjust, illegal, unlawful, and result of misfeasance of respondents.
- ii. That it is evident from the record that the Health Secretariate initially processed the case for promotion of appellant to the post of CMO (BPS-20) and sought working papers from the respondent No.3 and also sought certain clarifications. Working papers and clarifications were submitted, which in a clearcut and clean breast manner prove that the appellant was entitled for promotion w.e.f. April-2019 but he has not been considered due to no fault of appellant. Hence, a great injustice has been done to the appellant.
- iii. That the claim of appellant is an admitted fact as in this regard Para-iii of the letter N.18732/AE-1 dated 08.11.2023 is self-contained and self-explanatory; and relevant excerpt is reproduced hereunder for ready reference:

6

Before his retirement the PSB meeting was held on April 2019 wherein he was at S. No.16 in the working papers while vacant posts of CMO BS-20 were 31, so he was entitled for promotion but he was not considered for promotion due to non-availability of PER for the year 2017. Whereas, his junior doctors were promoted to BS-20.

Hence, the impugned letter is without any justified reason and legal backing.

- iv. That the vested, settled and admitted rights of appellant cannot be sabotaged on the basis of impugned letter. Similarly, an aggrieved person cannot be left without remedy because of any technical reason. It is settled principle of law that technicalities should not be let in the way of dispensation of justice.
- v. That the appellant, after his PER dossier was complete, was deemed to have been cleared for promotion along with the officers junior to him who were considered for Promotion as the appellant was required to give his seniority in BPS-20 in accordance with the proviso of sub-section (4) of Section 8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, particularly when his juniors were promoted to BPS-20 but appellant was deprived from his due promotion because his PER for the year 2017 were wrongly withheld by the concerned Reporting/Countersigning Officer, which is not a fault on the part of appellant. Section 8 of the Act ibid reads as under:

8. Seniority:- (1) For proper administration of a service, cadre or post, the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or post to be prepared, but nothing herein contained shall be construed to confer any vested right to a particular seniority in such service, cadre or post as the case may be.

(2) Subject to the provisions of sub-section (1), the seniority of a civil servant shall be reckoned in

relation to other civil servants belonging to the same service or cadre whether serving the same department or office or not, as may be prescribed.

(3) Seniority on initial appointment to a service, cadre or post shall be determined as may be prescribed.

(4) Seniority in a post, service or cadre to which a civil servant is promoted shall take effect from the date of regular appointment to that post;

Provided that civil servants who are selected for promotion to a higher post in one batch shall, on their promotion to higher post, retain their inter-seniority as in the lower post.

(5) The Seniority lists prepared under sub-section (1), shall be revised and notified in the official Gazette at least once in a calendar year preferably in the month of January.

Thus, non-award of promotion to the appellant as CMO BS-20 is violative of the basic law i.e. Civil Servants Act, 1973.

vi. That similarly, Section 9(2)(b) of the Civil Servants Act, 1973, in unequivocal words states that in case of promotion, the post is to be filled on the basis of seniority cum fitness. The Section 9 runs as under:

9. Promotion:- (1) A civil servant possessing such minimum qualifications as may be prescribed shall be eligible for promotion to a higher post for the time being reserved under the rule for departmental promotion in the service or cadre to which he belongs:

(2) A post referred to in sub-section (1) may either be a selection post or a non-selection post to which promotion shall be made as may be prescribed-

(a) in the case of a selection post, on the basis of selection on merit; and

(b) in the case of a non-selection post, on the basis of seniority-cum-fitness.

On this score too, the impugned letter is squarely unwarranted and ineffective upon rights of the appellant.


- vii. That inordinate delay in awarding promotion to the appellant cannot be perpetuated to sabotage the lawful rights promotion of appellant. Hence, the appellant is entitled to proforma promotion to the post of CMO BPS-20 w.e.f. April 2019 as well as award of all pensionary benefits according to BPS-20.
- viii. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that the present service appeal may please be allowed as prayed for.

Yours Humble Appellant


(Dr. Muhammad Ajmal Khan Gandapur)
Through Counsel

Dt. 26 January, 2024


Ahmad Ali
Advocate Supreme Court


Khalid Mahmood
Advocate High Court, D.I.Khan.

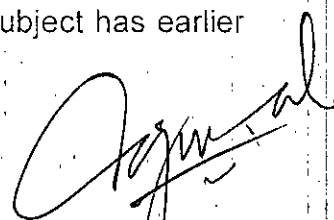
**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, CAMP AT D.I.KHAN.**

Service Appeal No. _____ of 2024

Dr. Muhammad Ajmal Khan Vs. Govt. of K.P.K. etc
SERVICE APPEAL

CERTIFICATE/VERIFICATION

I, *the appellant*, on this day of January-2024 (*herein mentioned above*) at district D.I.Khan do hereby verify and certify that it is the first Service Appeal on behalf of appellant and no appeal on the subject has earlier been filed.

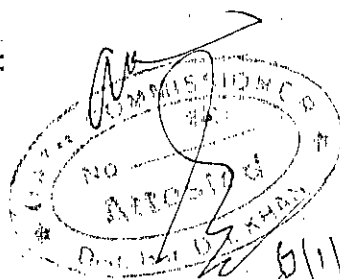

Appellant

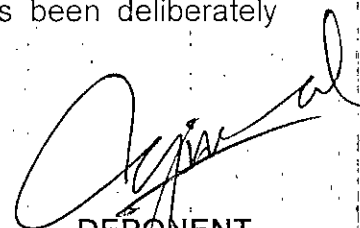
AFFIDAVIT

I, *the Appellant*, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honourable Court.



Identified by counsel:
Ahmad Ali ASC.




DEPONENT



GOVERNMENT OF KHYBER PAKHTUNKHWA

HEALTH DEPARTMENT

Anex (A)

Dated Peshawar the 15th April, 2021

10

1725
4/5/21

NOTIFICATION

NO. SOH(E-V)5-5/2021 In exercise of the powers conferred under Rule-20, Sub Rule (1) of the Khyber Pakhtunkhwa, Civil Servants Revised Leave Rules 1981, Instructions from Govt. of Khyber Pakhtunkhwa, Law, Parliamentary Affairs & Human Rights Department vide letter No.SO(OP-II)/LD/5-3/2012/Vol-IV/6846-48 dated 05.08.2020 and Finance Department, Government of Khyber Pakhtunkhwa letter No. SO(FR)FD/5-92/2019/29191 dated 22.09.2020, sanction is hereby accorded to the grant of Three Hundred & Sixty Five (365) days encashment of leave in lieu of L.P.R w.e.f 14.03.2020 to 14.03.2021 in favour of Dr. Muhammad Ajmal Khan S/O Muhammad Afzal Khan, Principal Medical Officer (BS-19), attached to Civil Dispensary, Moh: Khidmatgara, D.I Khan.

Consequent upon the above, in terms of Section-13 of Khyber Pakhtunkhwa Civil Servant Act, 1973 (amendment Act 2019) Dr. Muhammad Ajmal Khan S/O Muhammad Afzal Khan, Principal Medical Officer (BS-19), attached to Civil Dispensary, Moh: Khidmatgara, D.I Khan shall stand retired from Government Service on 14.03.2021 on attaining age of superannuation, as his date of birth is 15.03.1961.

**SECRETARY HEALTH
GOVT. OF KHYBER PAKHTUNKHWA**

Endst. of even No. dated

Copy to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director General Health Services, Khyber Pakhtunkhwa, Peshawar.
3. District Health Officer, D.I Khan
4. Deputy Director (IT), Health Department, Khyber Pakhtunkhwa for uploading on official website.
5. PS to Secretary Health, Government of Khyber Pakhtunkhwa.
6. PA to Special Secretary Health, Khyber Pakhtunkhwa.
7. Doctor concerned.
8. Personal file of the doctor concerned.

(Latif Ur Rehman)
SECTION OFFICER (E-V)

15/4/21
Attested

District Health Officer
D.I Khan

Scanned with CamScanner

Accountant Selam
D.E.P. Incharge for n/p
3/5/21

3/5/21
MO

To

The Secretary
Government of Khyber Pakhtunkhwa
Health Department Peshawar

Through: Proper Channel

Subject: APPLICATION FOR PROMOTION IN BPS-20
Respected Sir

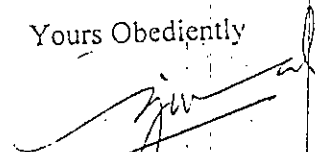
With due respect it is stated that I am working as Principal Medical Officer BPS-19 at CD Mohallah Khidmatgaran Wala under the control of DHO DIKhan, I am going to retire on 14-03-2021 attaining the age of superannuation.

My promotion in BPS-20 is due. I have completed my 04 months mandatory training for promotion and submitted ACR's to Director General Health Services Khyber Pakhtunkhwa Peshawar.

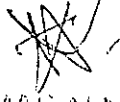
It is therefore, requested kindly promote me in BPS-20. I shall be very thankful to you for this act of kindness.

Dated: 12-02-2021

Yours Obediently


Dr. Muhammad Ajmal Khan S/O
Muhammad Afzal Khan
PMO, BPS-19
CD Khidmatgaran Wala

RECEIVED



MUHAMMAD AJMAL KHAN

Ajmal (B)
343
11

OFFICE OF THE DISTRICT HEALTH OFFICER

DERA ISMAIL KHAN

Phone# 0966-933199

Email: dhodikhan@yahoo.com

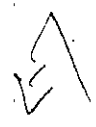
No. 2224-25/PP

Dated: 15/2/2021

25/3

To

The Director General,
Health Services Khyber Pakhtunkhwa
Peshawar



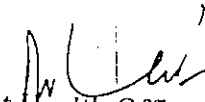
6531

19/2/21

Subject: APPLICATION FOR PROMOTION IN BPS-20.

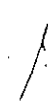
Respected Sir,

I have the honor to submit herewith a self-explanatory application (in original) in respect of Dr. Muhammad Ajmal Khan S/O Muhammad Afzal Khan Principal Medical Officer (BPS-19) attached to Civil Dispensary Moh: Khidmatgara under the control of this office for information and further necessary action please.

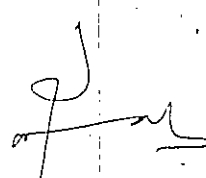

District Health Officer
Dera Ismail Khan

Cc:-

1. Dr, Muhammad Ajmal Khan PMO CD Moh: Khidmatgaran for information w/r to his application dated 12-02-2021.


District Health Officer
Dera Ismail Khan

E-1





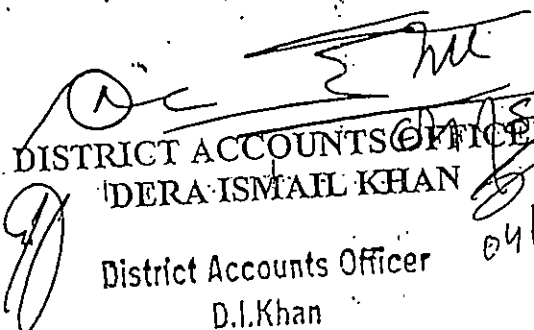
HISTORY OF SERVICE

Ajmal (C)

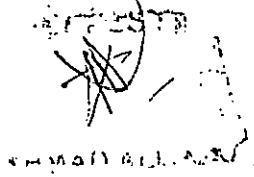
(13)

1 Name: Muhammad Ajmal Khan 2. Father Name: Muhammad Afzal Khan
3 Designation: Principal Medical Officer 4. Domicile: Dera Ismail Khan
5 CNIC No. 12101-7843396-7 6. D.O.B 15/03/1961
7 D.O. Appt: 15/09/1987 8. Personal No. 00193491
9 Address: Mohallah Laghariyan Wala Tehsil & District Dera Ismail Khan
10 Contact No. 03468886633

| NO | Station/Office | Post Held | Period of Service | Remarks |
|----|---|----------------------------------|--------------------------|---------|
| 1. | SHS Kulachi (Adhoc) DIKhan | Medical Officer BPS-17 | 15-09-1987 TO 05-11-1987 | |
| 2. | SHS Kulachi (Regular) DIKhan | Medical Officer BPS-17 | 06-12-1987 TO 15-10-1988 | |
| 3. | DHO Office DIKhan | FSMO (EPI) BPS-17 | 16-10-1988 TO 31-07-2001 | |
| 4. | DHQ Teaching Hospital DIKhan | Medical Officer BPS-17 | 01-08-2001 TO 09-10-2001 | |
| 5. | DHQ Teaching Hospital DIKhan | Senior Medical Officer BPS-18 | 10-10-2001 TO 24-09-2014 | |
| 6. | DHO Office DIKhan | Principal Medical Officer BPS-19 | 25-09-2014 TO 14-03-2021 | |
| 7. | He was retired on 14/03/2021 when he was attached to Civil Dispensary Mohallah Khidmat Gara D.I.Khan as PMO BS-19 | | | |


DISTRICT ACCOUNTS OFFICER
DERA ISMAIL KHAN
District Accounts Officer
D.I.Khan
04/08/21

04/8





**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name E-Mail Address: KJLS@inhs.gov.com
Office # 091-9210269 Exchange # 091-9210177, 9210190 Fax # 091-9210230

Amee

14

OFFICE ORDER

The competent authority is pleased to nominate/relieve the following Principal Medical Officers BS-19 w.e. from 10.09.2020 to join the four months in-service training at Category A/Teaching DHQ Hospitals for their promotion to the post of Chief Medical Officer BS-20 against each their name:-

In case there is any error in place of posting/Training Centre, the same will be corrected on written request:-

| S.NO. | NAME OF DOCTORS/ PLACE OF POSTING | PLACE OF POSTING | NAME OF INSTITUTIONS |
|-------|--|--|-------------------------|
| 1. | Dr. Muneer Begum D/O Wazir Ali, MBBS | PMO DHQH, Kohat | DGHQ Kohat |
| 2. | Dr. Javed Shah, MBBS | KTH, Peshawar | KTH, Peshawar |
| 3. | Dr. Muhammad Ajmal Khan s/o Muhammad Afzal Khan | At the disposal of DHO, DIKhan. | DHQH DIKhan |
| 4. | Dr. Muhammad Khalid Khan s/o Abdul Hamid Khan. | PMO Sarhad Hosp: for Psy. Pesh (Mental) | City Hospital, Peshawar |
| 5. | Dr. Hamid Sheraz, MBBS | PWMO LRII, Peshawar | LRII, Peshawar |
| 6. | Dr. Shamim Afzal s/o Amir Afzal, MBBS | At to DHO, Munsheera | KATH, Munsheera |
| 7. | Dr. Saifur Muhammad s/o Ali Muhammad Khan. | PMO CH Shakardara Kohat | DHQH Kohat |
| 8. | Dr. Sajjad Muhammad s/o Ghulam Muhammad, MBBS | PMO DHQH Kohat | DHQH Kohat |
| 9. | Dr. Nisar Muhammad s/o Mir Zaman, MBBS | PMO BKMC Mardan. | BKMC, Mardan |
| 10. | Dr. Hidayatullah s/o Haliz Mubid Ayub, MBBS | PMOESI, Udadher, Peshawar. | City Hospital, Peshawar |
| 11. | Dr. Zaffar Ali Shah s/o Muhammad Amin Shah. | PMO DHO, Office, DIKhan | DHQH, DIKhan |
| 12. | Dr. Sajjad Ahmad Malik s/o Muhd Ihsan Malik, MBBS | Attached to DHO Peshawar | City Hospital, Peshawar |
| 13. | Dr. Abdur Rashid s/o Karim Khan, MBBS | PMO DHO, Office, DIKhan | DHQH, DIKhan |
| 14. | Dr. Tajul Haq s/o Shah Rasool, MBBS | PMO DHO, Office, Peshawar | City Hospital, Peshawar |
| 15. | Dr. Durre Afshan, MBBS | PMO ATH, Abbottabad | ATH Abbottabad |
| 16. | Dr. Shabir Ahmad s/o Abdul Sattar, MBBS | PMO ID Children Hosp: Peshawar. | City Hospital, Peshawar |
| 17. | Dr. Inayatullah s/o Daulat Khan, MBBS | PMO DHO, Office, Kohistan | SGTH, Swat |
| 18. | Dr. Nasim Akhtar, MBBS | PWPMO DHQH, Charsadda | DHQH Charsadda |
| 19. | Dr. Fauzia Shahdaza, D/O Shahzade, MBBS | PMO DHQH Bakhela | DHQH Timergara. |
| 20. | Dr. Bibi Hajira, MBBS | SGTH Swat | SGTH, Swat |
| 21. | Dr. Muhammad Faza Khan s/o Shah Afzal, MBBS | PMO DHQH, Bakhela | DHQH, Timergara |
| 22. | Dr. Jehanzeb s/o Shah Baroz Khan, MBBS | PMO DHQH, Miranshah | DHQH Barro |
| 23. | Dr. Mir Alam Khan Afridi s/o Akbar Hussain Afridi, MBBS | PMOSGTH, Swat | SGTH Swat |

| | | | |
|-----|--|--------------------------------------|-------------------------------------|
| 363 | Dr. Saadullah Khan S/O Ayub Khan I | PMODHQH, Bannu | DHQH Bannu |
| 364 | Dr. Rabia Mehar (Waheed) D O Mehar Dil Khan | PMOESH, Gara Tajik Peshawar | City Hospital, Kohat Road, Peshawar |
| 365 | Dr. Haroon Nusir Khattak S/O Rab Nawaz MBBS | RHC, Karak. | DHQH Karak |
| 366 | Dr. Fazal Rehman S/O Muhammad Amir Khan MBBS MPH | Attached to DHO Charsadda | DHQH Charsadda |
| 367 | Dr. Yousaf Khan S/O Said Rehman MBBS | ESH, Pabji Nowshera. | DHQH Nowshera |
| 368 | Dr. Hamidullah S/O Muhammad Salim | PMO DHO Nowshera. | DHQH Nowshera |
| 369 | Dr. Mustafa S/O Behramand, MD | At the disposal of EDO (H) Swat | SGTH Swat |
| 370 | Dr. Rizwanullah s/o Amanullah Khan, MBBS | ADG, DGHS, Office, Peshawar | City Hospital, Kohat Road, Peshawar |
| 371 | Dr. Zafar Iqbal S/O Muhammad Amin | SMO LRH Peshawar | LRH, Peshawar |
| 372 | Dr. Rafiullah S/O Haji Khan Zada | PMO, ESH, Nahaqi, Peshawar. | City Hospital, Kohat Road, Peshawar |
| 373 | Dr. Ali Shah S/O Fazli Ghafoor | At the disposal of EDO (H) Charsadda | DHQH Charsadda |

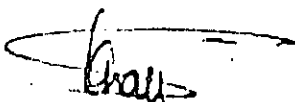
SI *****
DIRECTOR GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

No 15017-110 (A.E.) Dated Peshawar the 04 / 09 / 2020

Copy forwarded to the:-

- 1 Secretary to Govt. of Khyber Pakhtunkhwa Health Department Peshawar.
- 2 Director General, PHSA, Peshawar.
- 3 Director Health Services Merge Area, Peshawar.
- 4 All Principals Medical Colleges in Khyber Pakhtunkhwa
- 5 All Hospitals Director MHI in Khyber Pakhtunkhwa.
- 6 All Medical Superintendents DHQ Hospital in Khyber Pakhtunkhwa.
- 7 All District Health Officers in Khyber Pakhtunkhwa.

For information and necessary action.


ADDITIONAL DIRECTOR GENERAL (HRM)
DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

13/9/20

ACTED



ADDITIONAL DIRECTOR GENERAL (HRM)

Amef

E

16

To: The Worthy Secretary,
Government of Khyber Pakhtunkhwa,
Health Department, Peshawar.

Through Proper Channel

Subject: APPEAL FOR PROMOTION IN BPS-20

Most Respected Sir,

With due regards, it is most respectfully submitted that I was serving in the Health Department as Principal Medical Officer (B-19) and got superannuation on 14.03.2021, however, before my retirement, I had become entitled to the award of promotion in BPS-20, and in this regard, I before my retirement, on 12.02.2021, submitted an application, but the same was neither considered nor replied. My service history is tabulated hereunder:

| S# | Station/Office | Post Held | Period |
|----|------------------------------------|--------------------------------------|-----------------------------|
| 1. | SHS Kulachi D.I.Khan (Adhoc) | Medical Officer B-17 | 15.09.1987 to 05.11.1987 |
| 2. | SHS Kulachi D.I.Khan (Regular) | Medical Officer B-17 | 06.12.1987 to 15.10.1988 |
| 3. | DHO Office D.I.Khan | FSMO (EPI) B-17 | 16.10.1988 to 31.07.2001 |
| 4. | DHQ Teaching Hospital, D.I.Khan | Medical Officer B-17 | 01.08.2001 to 09.10.2001 |
| 5. | DHQ Teaching Hospital, D.I.Khan | Senior Medical Officer B-18 | 10.10.2001 to 24.09.2014 |
| 6. | DHO Office D.I.Khan | Principal Medical Officer B-19 | 25.09.2014 to 14.03.2021 |

2. Sir, from the abovementioned figures it is clear that I had 15 Years—24 Days service in BPS-17, about 13 years' service in BPS-18 and 06 Years—06 Months service in BPS-19 with mandatory training for promotion in BPS-20; and as such, my total service in BPS-17 and above was about 34 years. According to Khyber Pakhtunkhwa Civil Servants Promotion

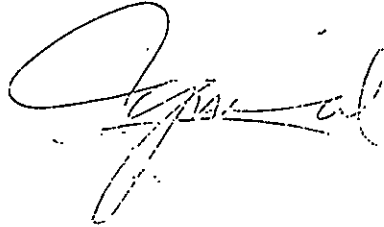
Atkins

Policy, the required length of service for promotion in BPS-20 is 17 years' service in BPS-17 & above, whereas, I served double of the required length in BPS-17 in the Health Department.

3. Moreover, according to the 'Provisional Seniority list of Principal medical Officers BPS-19, as held on 01.01.2019' Officers, most junior than me, had been awarded promotion in BPS-20 on acting Charge basis whereas, I despite being entitled for regular promotion in BPS-20, because of my length of service as well as mandatory training course, kept waiting for such promotion till the date of my retirement.

4. In view of the foregoing humble submissions, I beseech your kind honour to please consider my case for the purpose of my promotion in BPS-20 from the date of my entitlement and, accordingly, I may please be awarded all fringe benefits with retrospective effect.

Yours Sincerely,



Dt. 31 May, 2023.

Dr. Muhammad Ajjal Khan Gandapur
(Retired Principal Medical Officer)
Now r/o Mohallah Laghari, D.I.Khan

Cell No. _____

Attested
(Signature)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

ANEF (F)
12

NO. SOH(E-V)2-2/2023/Dr. Muhammad Ajmal Khan Gandapur
Dated Peshawar the 23rd June, 2023

To
The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

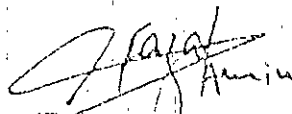
Subject APPEAL FOR PROMOTION IN BPS-20

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith an application in respect of Dr. Muhammad Ajmal Khan Gandapur, retired as Principal Medical Officer (BS-19) from DHO Office, D.I.Khan, wherein he is requesting for promotion to the post of Chief Medical Officer (BS-20) on notional basis, which is self explanatory

I am therefore, directed to request that details views/ comments alongwith factual position of his seniority at the time of retirement as to whether he was eligible for promotin or otherwise.

Yours faithfully


(FAZAL AMIN)
SECTION OFFICER (E-V)

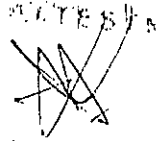
Encl: As above.

Endst. No. & Date Even

Copy to the:-

- 1 DS (Lit) Health Department, Khyber Pakhtunkhwa.
- 2 SO (Lit-II) Health Department, Khyber Pakhtunkhwa.
- 3 PS to Secretary Health Department, Khyber Pakhtunkhwa.
- 4 Personal file of the doctor concerned.

SECTION OFFICER (E-V)


SECTION OFFICER (E-V)



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

Amr 9
19

NO. 2

ADD

Dated 17/07/2023

To:

The Secretary to Govt. of
Khyber Pakhtunkhwa Health
Department Peshawar

SUBJECT:- APPEAL FOR PROMOTION IN BPS-20.

Sr.

With reference to your letter No.SOIR(E-V)2-2/2023.

Dr.Muhammad Ajeel Khan Gandapur dated 23/06/2023; on the subject noted
above. I have the honour to state that:-

- i) The doctor concerned was appointed on adhoc basis as Medical Officer BS-17 on 26.08.1987 and later on he was selected as Medical Officer BS-17 through Public Service Commission on 06.12.1987.
- ii) He was promoted to BS-18 on 12.08.2009 and subsequently promoted to BS-19 on 23.09.2014.
- iii) At the time of retirement, he was at S.No.02 in the Provisional Seniority List of PMO BS-19 for the year 01.01.2021 and final Seniority List was submitted to the Government on 27.5.2021 by excluding his name, as he was retired from service on 14.03.2021 on attaining the age of superannuation, while the PSB was arranged on 27.10.2021 i.e after his retirement.

ADDL; DIRECTOR GENERAL (ADMN:)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

AMR 9/19

ADDL; DIRECTOR GENERAL (ADMN:)



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Amef (H)

No. SOH(E-V)/2-2/2023/ Dr. Muhammad Ajmal Khan Gandapur
Dated Peshawar the 21st August, 2023

To

The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

29

Subject: APPEAL FOR PROMOTION IN BPS-20

Dear Sir,

I am directed to refer to your letter No. 9233/AE.I dated 08.08.2023 on the above captioned subject and to state that a working paper for notional promotion to the post of CMO (BS-20) in respect of Dr. Muhammad Ajmal Khan Gandapur, Principal Medical Officer (BS-19) may be prepared and sent to this office for further necessary action please.

Yours faithfully,

Section Officer (E-V)

Endst. No. & Date Even

Copies to the:-

- PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer (E-V)

DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHW A PESHAWAR

ANEP (I)
(2)

E-Mail Address: mgp@ghs.gov.pk office Ph# 091 921023
Exchange# 091 9210177, 9211196 Fax # 091 9210236

No. 10336 / ANEP Dated 31/08/2023

To:
The Secretary to Govt. of Khyber Pakhtunkhwa
Health Department Peshawar

SUBJECT: - APPEAL FOR PROMOTION IN BPS-20

With reference your letter No.SOH(E-V),2-2/2023/ Dr.Muhammad
Ajmal Khan Gandapur dated 21.08.2023 on the subject noted above, I have the honour
to submit herewith the notional promotion case in respect of Dr. Muhammad Ajmal Khan
Principal Medical Officer (BS-19) to the post of Chief Medical Officer (BS-20) for
consideration as desired please.

ADDL; DIRECTOR GENERAL (ADMN);
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

RECEIVED
31/08/2023
MADALI



GOVERNMENT OF KHYBER PAKHTUNKHWA
HEALTH DEPARTMENT

Aney (S)

No. SOH(E-V)/2-2/2023/ Dr. Muhammad Ajmal Khan Gandapur
Dated Peshawar the 10th October, 2023

To
The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

(22)

Subject: APPEAL FOR PROMOTION IN BPS-20

Dear Sir,

I am directed to refer to your letter No. 10336/AE.I dated 31.08.2023 on the above captioned subject and to state that the following clarification may be furnished to this department in respect of Dr. Muhammad Ajmal Khan Gandapur, Principal Medical Officer (BS-19) for his promotion on notional basis to the post of CMO (BS-20) for further necessary action, please:-

- i. At the time of retirement exact number of his seniority;
- ii. Whether anyone junior to him was promoted; and
- iii. What was the last date of PSB meeting before his retirement.

Yours faithfully,

Section Officer (E-V)

Endst. No. & Date Even

Copies to the:-

- PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer (E-V)

Section Officer (E-V)



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name E-Mail Address K.P.Kdghs@yahoo.com
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

Amey (14)
23

NO. 18732 /A.E.I

Dated 08/11/2023

To,

The Secretary to Govt: of
Khyber Pakhtunkhwa Health
Department, Peshawar.

SUBJECT:- APPEAL FOR PROMOTION IN BPS-20.

Sr,

Reference your office letter No.SOH (E-V) 2- 2/2023 / Dr.Muhammad

Ajmal Khan Gandapur dated 10.10.2023, on the subject noted above and to inform that:-

- i) The doctor concerned was appointed on adhoc basis as Medical Officer BS-17 on 26.08.1987 and Later on he was selected as Medical Officer BS-17 through Public Service Commission on 06.12.1987.
- ii) He was promoted to BS-18 on 12.08.2000 and subsequently promoted to BS-19 on 23.09.2014.
- iii) Before his retirement the PSB meeting was held on April 2019 wherein he was at S.No.16 in the working paper while vacant posts of CMO BS-20 were 31, so he was entitled for promotion but he was not considered for promotion due to non availability of PER for the year 2017. Whereas his junior doctors were promoted to BS-20. At the time of retirement he was at S.No.02 of the Provisional Seniority List of PMGS BS-19 and final Seniority List was submitted to the Government on 27.5. 2021 (by excluding his name, as he was retired from service on 14.03.2021 on attaining the age of superannuation, while the PSB was arranged on 27.10.2021 i.e after his retirement.

F. Q. Khan
ADDL; DIRECTOR GENERAL (ADMN:)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar

8/11/23

[Signature]
SECRETARY

HEALTH DEPARTMENT

No. SOH(E-V)2-2/2023/ Dr. Muhammad Ajmal Khan Gandapur
Dated Peshawar the 29th December, 2023

To


The Director General Health Services,
Khyber Pakhtunkhwa,
Peshawar

Subject: APPEAL FOR PROMOTION IN BPS-20

Dear Sir,

I am directed to refer to your letter No. 10336/AE.I dated 01.08.2023 and 9233/AE.I dated 08.08.2023 on the above captioned subject and to state that the case in respect of Dr. Muhammad Ajmal Khan Gandapur, Principal Medical Officer (BS-19) for his promotion on notional basis to the post of CMO (BS-20) is not covered under the rules, please.

Yours faithfully,

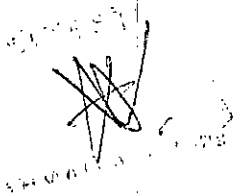

Section Officer (E-V)

Encl. No. & Date Even

Copies to the:-

- PS to Secretary Health, Khyber Pakhtunkhwa.

Section Officer (E-V)





KHAI ID MEHMOOD

Advoc

bc-15-1415

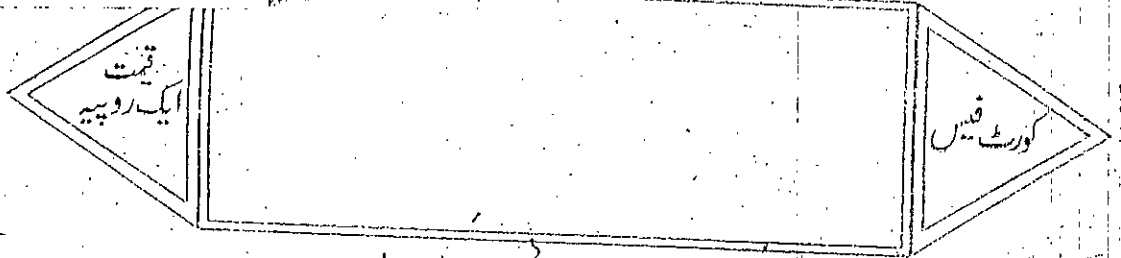
Date of issue: November 2022

Valid upto: November 2025



وکالت نامہ

Secretary
KP Bar Council



بعدالت جناب خیر محمد کونو اور سرور کی پوجا کے طور پر

منجانب اسپرلارٹ

ڈاکٹر محمد اہمل گلز اور دیگر بنام گورنمنٹ

ضلع پشاور

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ متدریجہ بالا

توان میں اپنی طرف واسطے بیرونی اور غیر ذمہ داری کے لئے پیشگی یا تفریقہ مقدمہ بمقام

حکومت گلز اور دیگر بنام گورنمنٹ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشگی پر خود بذریعہ اختیار خاص رو برو بعدالت حاضر ہوتا رہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا۔ اگر پیشگی پر مبالغہ حاضر نہ ہوگا۔ اور مقدمہ بیرونی غیر عاجزی کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف ایک کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشاور کے علاوہ کسی جگہ یا پشاور کے اوقات سے پہلے یا پشور یا بروز تفتیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشاور کے علاوہ کسی جگہ یا پشاور کے اوقات سے پہلے یا پشور یا بروز تفتیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پشاور کے علاوہ اور جگہ سماعت ہونے یا بروز تفتیل یا پشاور کے اوقات کے آگے پیچھے پیش ہونے پر عالم کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جمانہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر اخطار صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو ہر قسم کی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذمہ داری اور نظر ثانی اور اپیل مگرانی اور ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذمہ داری کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید لینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر حاشی یا راجسی نامہ و فیصلہ بر خلاف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقررہ ہونے تاریخ پیشگی مقدمہ مذکورہ بیرون از پشاور یا بیرون از مقدمہ مذکورہ نظر ثانی و اپیل مگرانی و برآمدگی مقدمہ یا منسوخی ذمہ داری یا طرف یا درخواست حکم انتہائی یا قرتی یا گرفتاری یا نقل از فیصلہ اجراء کے ذمہ داری صاحب موصوف کو بشرط ادائیگی علیحدہ علیحدہ پوری کا اختیار ہوگا اور تمام ساختہ پر ذمہ داری صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت مقررہ ذات صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا مگرانی یا دیگر مطالبہ مقدمہ مذکورہ کسی دوسرے وکیل یا غیر ملوک اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التزام پر پکا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشگی سے پہلے ادا کرنے کی ضرورت ہوگی۔ اور صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ گنجد یا ہے تاکہ مقدمہ

مورثہ 26 (2) (ب) (ب) 2018

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

اس پر عمل
 03364330001
 (Signature)

20

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. AHMAD ALI**
Father's Name **RAHIM GUL**
Date of Birth **06-04-1967** CNIC **12110375114312719**
Date of Enrolment as Advocate of Supreme Court **11-08-2013**
Enrolment No. **3092** Ref No. **69/PBC/KPK/J/12**
Address **GULSHAN COLONY, D. I. KHAN,**

MR. AHMAD ALI
Advocate
Supreme Court of Pakistan (ASC)



(Mian Abbas Ahmad)
Chairman
Executive Committee

Date of Issue **13-06-2013** Valid Up to: **31-12-2015**

(Muhammad Arif)
Secretary
Pakistan Bar Council

Tel: Off **0092-965-710005** Res: **0092-965-710005** Cell: **0305-3240000**

If found please return to:
PAKISTAN BAR COUNCIL
Supreme Court Building, Constitution Avenue, Islamabad
Tel No. 0092-51-9206865 Fax No. 0092-51-9206992

بابت حشر و محرم گواہ سروس ٹریڈنگ اور
مجاہد احمد
ڈاکٹر محمد اظہار خان
نام گورنمنٹ کالج ڈکنز
دوبئی یا جرم
تفصیل دوبئی یا جرم

باعث تحریر آنکہ
مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی اور جناب دی برائے پیشی با تفسیر مقدمہ بنام
المرسلہ خان الاصولیہ سولیم کوریا
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا بلحاظ بزرگیہ رو برد عدالت حاضر ہوتا رہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر متاثر حاضر نہ ہو اور مقدمہ تیسری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
موصوف میں کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
بیرون کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے
پر مشغول نہیں ہونے چاہئے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے نہ
توقیف ساختہ پر داخستہ صاحب موصوف عمل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض ذہنی یا جناب دی یا درخواست اجراء امانت و ذمہ
تفویضی پیشی گمرانی ہر قسم درخواست ہر قسم کے بیان دینے اور پر عیالی یا راشنی نامہ و فیصلہ بر حلف کرنے اقبال دی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر بیرونی مقدمہ مذکور نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوخ و ذمہ ایک طرفہ یا درخواست حکم امتناعی یا ترقی
یا گرفتاری قبل از ایصال اجراء کے ذمہ دی بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مقررہ دی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف عمل کردہ
از ذمہ منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست اظہار
اپیل گمرانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنا نبھائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور وکیل
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ بر جائہ التواء چاہے وہ صاحب موصوف کا حق ہو گا مگر
صاحب موصوف کو پوری نہیں پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پروا نہ کریں اور ایسی صورت
میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا ذمہ داری نامہ لکھ دیا ہے تاکہ سند رہے
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ڈاکٹر محمد اظہار خان - ایڈووکیٹ
[Signature]