

24.11.2021

None for the appellant present.

Fresh notices be issued to the appellant and his counsel.
Adjourned. To come up for preliminary hearing on 27.01.2022
before S.B.



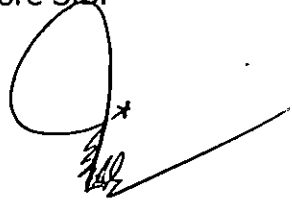
(MIAN MUHAMMAD)
MEMBER (E)

Wakil
of
Syl & Sons
14/12/2021

27.01.2022

None for the appellant present.

The instant service appeal ~~has~~ been adjourned since
24.09.2019 and preliminary hearing could not be ~~addressed~~ till
date. Learned counsel for the appellant is therefore, afforded last
opportunity to argue the case in preliminary hearing. Adjourned.
To come up for preliminary hearing on 29.03.2022 before S.B.



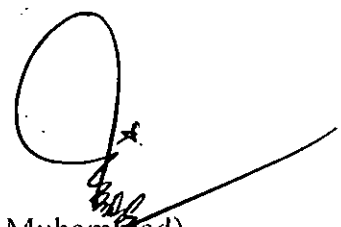
(Mian Muhammad)
Member(E)

29.03.2022

None for the appellant present.

Despite having given notice for preliminary hearing
and last opportunity granted on 27.01.2022, neither appellant
nor his counsel appeared for preliminary hearing. As such the
instant service appeal is hereby dismissed for non-
prosecution. File be consigned to the record room.

Announced:
29.03.2022



(Mian Muhammad)
Member (E)

18.02.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 30.06.2021.


Reader

30.06.2021

Junior to counsel for appellant present.

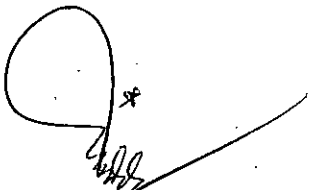
He made a request for adjournment as senior counsel is not available today. Adjourned. To come up for preliminary hearing on 28.09.2021 before S.B.


(Rozina Rehman)
Member(J)

28.09.2021

None for the appellant present.

Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing before the S.B on 24.11.2021.


(MIAN MUHAMMAD)
MEMBER (E)

01.07.2020

Counsel for appellant present and seeks adjournment. Adjourned to 23.09.2020 before S.B in order to avail the outcome of cases pending before the Larger Bench of this Tribunal, regarding retrospective punishment.



Member (J)

23.09.2020

Counsel for the appellant present.

On the last date of hearing instant matter was adjourned to avail the outcome of cases pending before the Larger Bench and having similar nature. The Larger Bench has not yet concluded the proceedings before it, therefore, instant matter is adjourned to 03.12.2020 before S.B.



Chairman

03.12.2020

Counsel for the appellant present.

The proposition regarding retrospectivity of penalty has not been decided by the Larger Bench as yet. Instant case is, therefore, adjourned to 18.02.2021 before S.B.



Chairman

04.12.2019

Counsel for the appellant present.

Instant matter is adjourned to 22.01.2020 in order to avail the outcome of pending appeals before a larger bench of this Tribunal in respect of award of penalty with retrospective effect.


Chairman

22.01.2020

Junior to counsel for the appellant present.

Requests for adjournment due to general strike of the Bar. Adjourned to 21.02.2020 in order to avail the outcome of case(s) pending before the Larger Bench regarding retrospective punishment.


Chairman

21.02.2020

Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 07.04.2020 before S.B.


Member

07.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 01.07.2020 for the same. To come up for the same as before S.B.

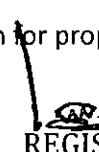



Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1178/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2019	<p>The appeal of Mr. Shah Jehan resubmitted today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 24/9/19</p>
2-	26/09/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/10/19.</u></p> <p> CHAIRMAN</p>
	25.10.2019	<p>Counsel for the appellant present.</p> <p>Learned counsel requests for adjournment as the date of hearing in the instant case was not noted in his dairy for today.</p> <p>Adjourned to 04.12.2019 for preliminary hearing before S.B.</p> <p> Chairman</p>

The appeal of Mr. Shah Jehan Ex-PST GPS Faras Killi Lund Khwar Mrdan received today i.e. on 19.08.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Annexures of the appeal may be attested.
- 4- Annexures of the appeal may be flagged.
- 5- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1454 /S.T,

Dt. 21-8- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Taimur Ali Khan Adv. Pesh.

Respected Sir,

1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies are not attached ~~was~~ shown as annexure with the appeal.

2- Removed

3- Removed

3- Removed

4- Removed

5- Removed

Resubmitted after compliance-



23/9/19.

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1178 /2019

Shah Jehan

VS


Education Deptt:

INDEX

S.No.	Documents	Annexure	P. No.
1.	Memo of Appeal	-----	01-03
2.	Application of Condonation of delay	-----	04-05
3.	Copy of appointment order	A	06-07
4.	Copy of order dated 30.04.2014	B	08
5.	Copy of departmental appeal and rejection order	C&D	09-10
6.	Vakalat Nama	-----	11

APPELLANT

THROUGH:



**M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT,**


**TAIMUR ALI KHAN
ADVOCATE HIGH COURT,**


**S. NOMAN ALI BUKHRI
ADVOCATE HIGH COURT**

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1178 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1171

Dated 19-8-2019

Shah Jehan, Ex-PST, GPS Faras Killi,
Lund Khwar, Mardan.

(APPELLANT)

VERSUS

1. The Secretary (E&SE), Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE), Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) Mardan.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 23.07.2019, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT OF THE APPELLANT HAS BEEN REJECTED AGAINST THE ORDER DATED 30.04.2014, WHEREIN MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED UPON THE APPELLANT, FOR NO GOOD GROUNDS.

Filed to-day

Registrar

19/8/19

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 23.07.2019 AND 30.04.2014 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS.

OR

THE ORDER DATED 23.07.2019 MAY KINDLY BE SET ASIDE AND THE ORDER DATED 30.04.2014 MAY BE MODIFIED INTO COMPULSORY RETIREMENT AS THE APPELLANT HAS HAS MORE THAN 10 YEARS OF

Re-submitted to -day
and filed.

Registrar

24/9/19

SERVICE. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed in Education Department on the post of PST in the year 1992 and has performed his duty with devotion and honesty till retirement and no complaint has been filed against him during his service carrier. **(Copy of appointment order is attached as annexure-A)**
2. That the appellant has applied for leave without pay for 2 years w.e.from 01.09.2007 to 10.01.2008, which was sanctioned and on the expiry of leave the appellant again applied for leave.
3. That as the appellant presumed that his leave might be sanctioned by the competent authority, but he did not inform about the fate of that application and on absence he was removed from service vide order dated 30.04.2014 w.e from 16.11.2009. **(Copy of order dated 30.04.2014 is attached as Annexure-B)**
4. That the appellant filed departmental appeal against the removal order, which was also rejected on 23.07.2019 for no good grounds. **(Copies of departmental appeal and rejection order are attached as Annexure-C&D)**
5. That the appellant come to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned orders dated 23.07.2019 and 30.04.2014 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside or the order dated 23.07.2019 liable to be set aside and the order dated 30.04.2014 liable to be modified to compulsory retirement as the appellant has more than 10 years of service.

3

- B) That after the expiry of leave the appellant again applied for leave, and he presumed that his leave might be sanctioned by the competent authority, but the respondent department did not inform that whether his application for leave was allowed or not and removed him from service on the basis of absence.
- C) That one sided inquiry has been conducted against the appellant before passing the impugned order, which is not permissible under the law.
- D) That no charge sheet was issued to the appellant before passing the impugned order which is violation of law and rules.
- E) That no show cause notice was issued to the appellant which is violation of law and rules.
- F) That penalty of removal from service was imposed upon the appellant for just two days absence, which is too harsh, and such is not permissible under the law and rules and therefore liable to be set aside or modified to compulsory retirement as the appellant has more than 10 years of service.
- G) That the appellant has been condemned unheard and has not been treated according to law and rules.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT

Shah Jehan

THROUGH:


M. ASIF YOUSAFZAI

ADVOCATE SUPREME COURT,


TAIMUR ALI KHAN

ADVOCATE HIGH COURT,

& 
S. NOMAN ALI BUKHRI

ADVOCATE HIGH COURT

4

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____ /2019

Shah Jehan

VS

Education Deptt:

**APPLICATION OF CONDONATION OF DELAY IN THE
INSTANT APPEAL**

RESPECTFULL SHEWETH:

1. That the instant appeal is pending before this august Service tribunal in which no date has been fixed so for.
2. That the appellant was removed from service vide order dated 30.04.2014 w.e from 16.11.2009, which is retrospective order and such like orders are void order and limitation does not run against the void order.
3. That as per Supreme Court Judgment reported as PLD 2003 (SC) 724, cases should be decide on merit rather than technical including limitation as the appellant has filed this appeal with prayer for modification of his removal order to compulsory retirement, therefore the instant appeal may kindly be decided on merit.
4. That the appellant has good prime facie case and kindly be decided on merit.

It is therefore most humbly prayed that on the acceptance of this application, the instant appeal may kindly be condoned on the basis of above submission.

b-476
APPELLANT

THROUGH:

Amir
**M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT,**

Taimur
**TAIMUR ALI KHAN
ADVOCATE HIGH COURT.**

5

AFFIDAVIT

It is solemnly affirmed that the contents of this application is true and correct and nothing has been concealed from this august Tribunal.

DEPONENT

Annex A

6

OFFICE OF THE DISTRICT EDUCATION OFFICER, (MALE) PRIMARY MARDAN.

APPOINTMENT.

OFFICE ORDER.

~~DATE: 02/03/1992~~

Consequent upon the NEW RECRUITMENT POLICY of the Govt: of NWFP Education Department No.S0(PE)6-1/91 dated Peshawar the 2/3/1992.

The appointment of the following trained PTC Candidates session 1990-91 are hereby made with immediate effect in BPS-7(Rs:1095-60-1995) plus usual allowances in the interest of public service.

Appointment are made according to the Govt:Policy para No.1, Recruitment of PTO teachers under the new Recruitment policy shall be strictly on the basis of merit and only PTC trained persons will be recruited for vacancies with in a provincial constituency from among candidates belonging to that constituency"

S.No.	Name/Father's name Home address/Qualification.	PTC Marks.	Name of school where posted.	Remarks.
<u>P.F 13 Mardan-1.</u>				
1.	Mr.Sajjad Ahmed S/O Nisar Muhammad R/O Muhammad Khel House Mardan.SSC.	686	CMPS,Kashmir Abad	Against A.N.C post.
2.	Irtikharud Din S/O Imadud Din Moh:Wazir Abad Mardan SSC.	685	,, Khat Killi(Hoti)	-do-
3.	Ijaz Khan S/O Khyber Khan R/O Shshdandh Baba Mardan.SSC	667	,, Waris Khan Kuroona Hoti.	-do-
4.	Muhammad Ali S/O Jalil Ahmed R/O Muslim Abad Mardan SSC.	584	,, Bako Dheri (Bakhsali Road)	-do-
<u>P.F-20-MARDAN-3.</u>				
5.	Alam Zeb S/O Ghafoor Shah R/O Seri Garyala FA.	671	,, Saeed Abad Hussai.	-do-
<u>P.F-21-Mardan-4.</u>				
6.	Sajjad Ahmed S/O Zarin Gul R/O Babuzai Mardan FA.	639	,, Miangan Aba Khel (Babuzai)	-do-
7.	Khan Bacha S/O Lal Bacha B.Sc. R/O Jamra Mardan.	688	,, Sawal Dher.	-do-
8.	Muhammad Ibrahim S/O Said Ghani R/O Chail Benda Katlang. SSC.	688	,, Haji Sarfaraz Banda. Katlang.	-do-
9.	Safdar Shah S/O Fazal Shah SSC R/O Babuzai Mardan.	681	,, Kamal Din Baba Shamozai(Ghundo).	-do-
10.	Ghulam Muhammad S/O Gul Muhammad R/O Katlang Mardan SSC	678	,, Haji Fazli Karim Katti Garhi.	-do-
11.	Azizur Rehman S/O Fazal Rehman R/O Redawan Baizo Kharki. SEC	678	,, Khan Sharif Banda Qasmi.	-do-
12.	Khan Sher S/O Ikram Khan R/O Katlang BA.	671	,, Masjid Habibullah Likpani.	-do-
13.	Janat Gul S/O Badshah Gul R/O Jamal Marhi Mardan.FA	669	,, Ihsanul Haq(Shalgazi)	-do-
14.	Abdur Rehman S/O Sarbali Khan R/O Baizo Kharki Mardan.BA.	662	,, Alo Benda.	-do-
15.	Sadullah S/O Nadir Khan R/O Jabar Mardan.BA.	661	,, Musanif Shah Kotki.	-do-
16.	Attullah Khan S/O Habibullah Khan R/O Babuzai SSC.	657	,, Salak (Ghundo)	-do-
<u>P.F-23- MARDAN-6.</u>				
17.	Fakhri Alam S/O Zamir Gul FA, R/O Umer Abad T.Bhai.	682	,, Takker.	-do-
18.	Muhammad Ismail S/O Abdul Majeed R/O Dundia L.Khwer. F.Sc	673	,, Dobian.	-do-
19.	Israrud Din S/O Rehmanud Din R/O Sher Garh T.Bhai. F.Sc	665	GPS,Sokai.	-do-

Attested

- PAGE NO.2.
- 20. Ifzal Anwar S/O Umara Khan 661 GMP3, Spelano Dheri. A.N.C Post.
 - R/O Jewar Hethian. BA,
 - 21. Said Bacha S/O Khan Bahadar 660 ,, Zarghoon Shah Banda -do-
R/O Kotki Mardan, FA. Salak,
 - 22. Aurang Zeb S/O Shah Nazar 640 ,, Pul Killi. -do-
Khan R/O Moti Banda BA,
 - 23. Shah Jehan S/O Sarfaraz Khan 632 ,, Gharib Abad -do-
R/O Dundia L.Khwar.FA. Lund Khwar.
 - 24. Raj Muhammad S/O Adil Muhammad 624 ,, Ahmed Gul Killi. -do-
R/O Ghano Dheri,
 - 25. Fazal Mabood S/O Fazal Rabbi 613 ,, Ambar Shah Kuroona. -do-
R/O Dargiwal T.Bhai.
 - 26. Zakrai Khen S/O Gul Muhammad 606 ,, Senai Lund Khwar. -do-
R/O Dewan Khel L.Khwar.
 - 27. Muhammad Saleem S/O Pazir Gul 602 ,, Janga L.Khwar. -do-
R/O Dagai L.Khwar.
 - 28. Wajid Ali Shah S/O Habib Shah 598 ,, Fazli Abad. -do-
R/O Dewan Khel L.Khwar.

PAR NO. II COMBAINED MERIT OF DISTRICT.

If no trained teacher are available with in the constituency for certain vacancies then trained PTC candidates from the rest of the said District will be accomodated.

- 29. Muhammad Riaz S/O Zar Bahadar 652 GMP3, Damamo (S.Behlol). A.N.Post.
R/O Gundo Mardan SSC.
- 30. Fazal Mehmood S/O Muhammed- 649 ,, Aslam Killi Ward No.4 T.Bhai. -do-
Nabi R/O Janga T.Bhai. FA
- 31. Mukaram Shah S/O Fazli Qadoos 625 ,, Sreekh Bonda (Gaddar) -do-
R/O Gaddar (Mardan). BA.
- 32. Amir Zaman S/O Redad Khen 624 ,, Shah Zaman Killi (S.Shah). -do-
R/O Bazzo Kharki FA.
- 33. Muhammad Iqbal Khan S/O 617 ,, Nadeem Abad (S.Shah). -do-
Noor Muhammad Khan R/O Katlang.

NOTE:-

All the appointees are hereby informed that their posting have been on the newly sanctioned Mosque schools and they are directed to start the same on proper places with the help of ASDEO (illaqa) immediately.

TERMS & CONDITIONS.

1. Their service are liable to termination/reveration at any time with out any reason being assigned.
2. In case of resignation they will have to submit one month's prior notice to the Deptt; or forefiet one month pay in lieu thereof to the Govt;
3. They should not be allowed to take over charge if their ages are less than 18 years and above than 25 years.
4. They are required to produce Health and Age certifiactae from M/S DHQ Hospital Mardan before handing over charge.
5. Charge report should be submitted to all concerned,
6. If they fail to take over charge of the post with in 14 days after the issue of this order their apptt; shall stand cancelled.
7. Original Documents/Certificate should be checked before handing over charge.

(JAMANDOS KHAN)
DISTRICT EDUCATION OFFICER,
(MALE) PRIMARY MARDAN.

Endst: No. 26C9-General/F.No.25/Apptt: of PTC/ I-EE dated Mdn: the 30/4/1992.

Copy forwarded to the:-

1. Director Primary Education NWFP Hayat Abad Peshawar.
2. P/S to Minister for Education and Sports NWFP Peshawar.
- 3-4. Sub Divl: Education Officer, (M) Mardan & Takht Bhai.
- 5-38. All Candidates concerned.

IHSAN ULLAH/
KHELJEE.

DISTRICT EDUCATION OFFICER,
(MALE) PRIMARY MARDAN.

30/4/92

8
B 15

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN
OFFICE ORDER

In exercise of Khyber Pakhtunkhwa removal from service revised in 2011 conferred upon as competent authority ordered the initiation of disciplinary proceedings against Mr. Shah Jehan PST GPS, Faras Killi (L/Khwar) Takht Bhai and constituted enquiry committee to scrutinize the charges of absenceism leveled against you.

You, Mr. Shah Jehan PST GPS, Faras Killi (L/Khwar) Takht Bhai remained will full absent from duty w.e.f 16/11/2009 till date and through a reliable sources you are reported to be abroad without permission of the competent authority.

And whereas a departmental inquiry was constituted against you to find out the facts and figures.

And whereas you did not appear before the inquiry committee and failed to produce any defence in your support, and therefore the inquiry committee recommended you for removal from service.

And whereas a final show cause was sent to you on your home address vide letter 11734 Dated 06.12.2013 but you did not respond in the stipulated period.

And whereas show cause notice was published in 2 (two) leading newspapers, which also you did not respond.

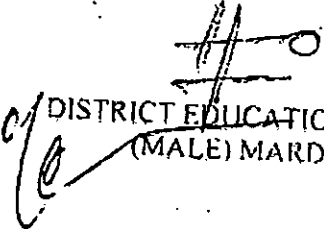
Now, the undersigned as competent authority is satisfied that the charges against you are proved and therefore order your removal from service w.e.f 16/11/2009.

(NOOR ZADA KHALOZAI)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Endst: No. 304749

Date: 30/11/2014

- Copies forwarded to the:-
1. Sub-Divisional Education Officer (M) Piry: Takht Bhai
 2. District Accounts Office Mardan.
 3. Official Concerned.


DISTRICT EDUCATION OFFICER
(MALE) MARDAN

Attested

Annex 9

مکتبہ شائعہ ڈاکٹر شاہ جہان پوری

The Director E&SE
Khyber Pakhtunkhwa
Peshawar.

Subject: REINSTATEMENT AGAINST OST POST

Respected Sir,

It is stated that I have been appointed against PST post on 9th of May 1992 at GPS Gharib Abad Lund Khwar, Tehsil Takht Bhai, District Mardan. I worked on the same post for 17 years but unfortunately due to some unavoidable domestic problems I was unable to continue my service regularly.

I submitted an application for without pay leaves but was rejected. Afterwards, in the same year I was declared absent from duties w.e.f 16.11.2009 to 30.04.2014 than DEO (M) Mardan imposed a penalty of my removal from service vide No. 3047-49 dated 30.04.2014 (Copy Attached at Annex -1).

Now my domestic problems have been solved and I want to join my services again as I have profound interest in teaching learning process. I submitted an application for Reinstatement to DEO (M) Mardan, They Replied to approach the competent forum i.e. Director E&SED Peshawar (Copy Attached at Annex-II).

It is therefore requested that penalty of my removal from service be kindly withdrawn and I may kindly be reinstated on humanitarian basis. I shall be Thankful to you for the rest of my life.

Yours Obediently

320/13/12
Shah Jehan

Shah Jehan PST,
Lund Khwar, Mardan.

ADDED
13/12

P.O. DUB NWPT,
By: No 202 Z
Dated: 13/12/14

DD(M)
1151
13.12.14

Attested

(5) ڈپٹی کمشنر ضلع شانگلہ بھام پوری
(4) ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ضلع شانگلہ پوری



**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA,
PESHAWAR**


No. _____ /F.No. :A-10/Vol-I/ Appeal PST(M) General.
Dated: 23/7/2019

To

The District Education Officer
(Male) Mardan.

Subject: - DEPARTMENTAL APPEAL

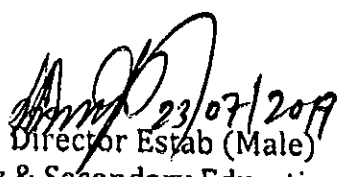
I am directed to refer to your letter No. 730 dated 29/01/2019 on the subject cited above and to ask you that the case/appeal in respect of Mr. Shah Jehan EX:- PST GPS Faras Killi District Mardan, has been examined/analyzed by this office. Hence inform the appellant concerned that his appeal has been rejected by the Appellate Authority.


Assistant Director Estab (Male)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 501 5107

Copy of the above is forwarded to: -

1. Mr. Shah Jehan EX:- PST GPS Faras Killi District Mardan.
2. PA to Director E&SE local Office.
3. Master File.


Assistant Director Estab (Male)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Attested

(11)

VAKALAT NAMA

NO. _____/20

IN THE COURT OF KP Service Tribunal Peshawar

Shah Jehan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt

(Respondent)
(Defendant)

I/We, Shah Jehan

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

Shah Jehan
(CLIENT)

ACCEPTED

Taimur Ali Khan
Advocate

M. Asif Yousafzai
M. ASIF YOUSAFZAI
Advocate Supreme Court
Peshawar.
B.C NO# 10-7327
CNIC # 17301-5106574-3

OFFICE:

Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)