

FORM OF ORDER SHEET

Court of .....

Appeal No. 314/2024

S.R. No.	Order No.	Order or other proceedings with signature of judge
1	2	3

1 25/02/2024

The appeal of Mr. Shakil Akbar presented today by Mr. Mafi ur Rehman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 27.02.2024. Parcha Peshi is given to counsel for the appellant.

By the order of Chairman



REGISTRAR

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Shakil Akbar

Versus

Director General Local Government of KP and others

**APPLICATION FOR THE FIXATION OF THE INSTANT**  
**APPEAL BEFORE THE PRINCIPAL SEAT AT PESHAWAR**

Respectfully Sheweth:

- That the appeal titled above is pending before this Hon'ble Court which is fixed for today.
- That in the instant appeal there is an urgency and a matter of stay is also attached with the instant appeal.
- That the respondents as well as application/council is also residing at Peshawar.
- That if the case is not early fixed the appellant shall suffer irreparable loss.

**PRAYERS:**

It is, therefore, most humbly submitted that on acceptance of instant Application, the instant appeal may kindly be fixed before the principal seat at Peshawar for the best interest of justice.

Through

Appellant

**Muti Ur Rehman**

**&**

**Hidayat Ur Rehman**

Advocates High Court Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**

**PESHAWAR**

3/4/2024

Shakil Akbar

Versus

Director General Local Government of KP and others

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•	Copy of seniority list dated: 25/11/2022	"B"	10-11
•	Seniority list dated 06/09/2021 is attached	"C"	12-15
•	Copy of the Departmental Appeal, withdrawal order and Dismissal Order dated 02-02-2024 is attached	"D" "E" & "F"	15-22
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Appellant

Through

**Muti Ur Rehman**

&

**Hidayat Ur Rehman**

Advocates High Court Peshawar

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Service Appeal No. 314 /2024

Shakil Akbar S/o Badeel ul zaman R/o Shishikuh Drosh Tehsil  
and District Chitral

..... Appellant

Versus

1 Director General Local Government Khyber Pakhtunkhwa,  
Peshawar,

2 Assistant Director Local Government and Rural Development  
Department Lower Chitral.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL  
ACT, 1974 AGAINST THE ORDER DATED 02.02.2024 VIDE  
WHICH THE RESPONDENT NO. 2 HAS REGRETTED TO  
CORRECT THE SENIORITY LIST DATED 25-11-2022 OF  
THE APPELLANT.**

Respectfully Sheweth:

- That the appellant was appointed as Village Secretary on 29/09/2015 in Local Government department and is performing his duty faithfully.
- That after appointment, all other employees of the said department being same qualifications promoted to BPS-11, according to the seniority list initially prepared by the Respondents which was according to the Rules and Law. ( Copy of list of promoted candidate is Annexed as 'A')
- That on dated 25/11/2022 the Respondents issued another self-made seniority list while modifying the original/ initial seniority list for promoting their blue eyed employees, which is illegal, unlawful, against the law and judgment of this Hon'ble court.

(2)

(Copy of seniority list dated: 25/11/2022 is attached herewith "B")

- That according to the original/initial seniority list, which was revised on yearly basis, the Appellant was at serial No: 15 and then the respondents had issued the self-made seniority list where the appellant has been placed at serial No: 30, which is against the right of the Appellant and against the prevailing Rules and Regulations. (Seniority list dated 06/09/2021 is attached as Annexure "C")
- That the appellant preferred Departmental Appeal dated 28-11-2022 against the seniority list Dated 25/11/2022 to worthy Assistant Director Local Government District Lower Chitral (Respondent No: 2) and thereafter filed a civil suit for seeking remedy against the unlawful act of Respondents, later on the civil suit was withdrawn on the ground of jurisdiction of civil court and in the meanwhile the Respondent No 2 through order dated 02-02-2024 regretted the Appeal of the Appellant.

Copy of the Departmental Appeal and Dismissal Order of the Appeal is attached as Annexure "D" "E" & "F".

- That the appellant feeling aggrieved from the above impugned order dated 02-02-2024 filed the instant service appeal before this Hon'ble Tribunal, on the following grounds:

**GROUND:**

- That the act of respondents is illegal and unconstitutional and liable to struck down.
- The initial seniority list, upon which the previous promotions have been given to the other candidates, the appellant was placed at the 15th position, which was in accordance with the procedures and regulations governing the department.

(3)

- The recent changes in the department's procedure for preparing the seniority list have resulted in unjust placement of junior employees above the present appellant, which is discriminatory and violates of the fundamental rights of the Appellant.
- The seniority list which has been now issued is against the Rules and Regulations as well as against the Judgments of this Hon'ble Court and superior courts. (Copy of Notification is attached as Annexure "G" and "H" Seniority Rules).
- Correction of the seniority list to reflect the initial placement, in accordance with the regulations at the time of appointment, is crucial to uphold fairness, justice, and the principles of meritocracy within the department.
- That the impugned order dated 02.02.2024 is totally based on surmise and conjecture, hence liable to be set aside and recalled.
- That the impugned order is against the basic norms of justice which required to be set aside.
- That the order dated 02.02.2024 is illogical and based on surmises.
- That any other ground in respect of the instant appeal will be raised at the time of arguments with permission of the worthy Tribunal.

(4)

**PRAYERS:**

It is, therefore, most humbly submitted that on acceptance of instant Service Appeal, the impugned order dated 02.02.2024 may kindly be set aside and recalled and the concern department may also be directed to prepare the seniority list according to the previous seniority list dated 06-09-2021.

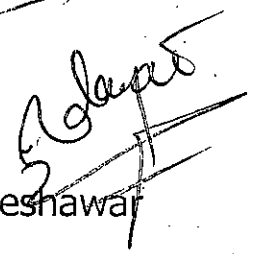
Through

Appellant

  
**Muti Ur Rehman**

&

**Hidayat Ur Rehman**

Advocates High Court Peshawar  


(5)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

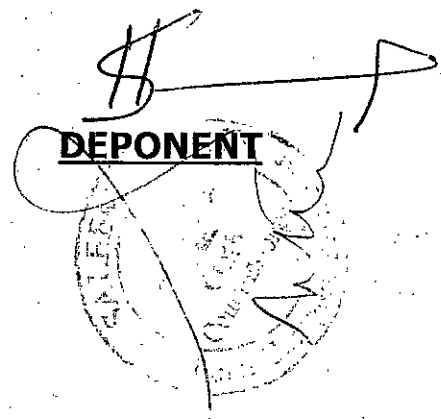
Shakil Akbar

Versus

Director General Local Government of KP and others

**VERIFICATION**

It is verified that no such like Appeal has earlier been filed before this Hon'ble Tribunal on the subject matter.

A handwritten signature in black ink is written over a circular stamp. The stamp contains some illegible text and a central emblem. The word "DEPONENT" is printed in bold, black, uppercase letters across the middle of the stamp.

**DEPONENT**



(8)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Shakil Akbar

Versus

Director General Local Government of KP and others

**APPLICATION FOR SUSPENSION OF IMPUGNED ORDER**  
**DATED 02.02.2024 AND UPHOALD THE SENIORITY LIST**  
**DATED 06-09-2021 TILL FINAL DECISION THE THE**  
**INSTANT APPEAL.**

Respectfully Sheweth:

- That the appeal titled above is pending before this Hon'ble Court which is fixed for today.
- That the appellant /petitioner has a good prima facie case and arguable case and is sanguine about his success.
- That the balance of convenience is also lies in favour of the appellant/petitioner.
- That the ground taken in the main appeal, may please be considered as an integral part of the instant appeal.

**PRAYERS:**

It is, therefore, most humbly submitted that on acceptance of instant Application, the impugned Order dated 02.02.2024 and uphoald the seniority list dated 06-09-2021 till final decision the instant appeal.

Through

Appellant

**Muti Ur Rehman**

**&**

**Hidayat Ur Rehman**

Advocates High Court Peshawar

(7)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Shakil Akbar

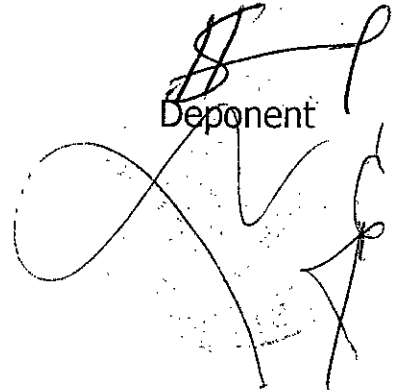
Versus

Director General Local Government of KP and others

**AFFIDAVIT**

I, Shakil Akbar S/o Badeel ul zaman, do hereby solemnly affirm and declare on Oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent



(8)

Annexure

A



OFFICE OF THE ASSISTANT DIRECTOR,  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT, LOWER CHITRAL

No. 1031 /AD/LC

Dated 21/09/2020

MINUTES OF THE MEETING OF DEPARTMENTAL PROMOTION COMMITTEE (DPC) FROM THE PROMOTION OF JUNIOR VILLAGE SECRETARIES (BPS-9) TO THE POST OF SENIOR VILLAGE SECRETARIES (BPS-11) IN LOCAL GOVERNMENT RURAL DEVELOPMENT CHITRAL.

1. A meeting of Departmental promotion committee was held on 10/09/2020 at 11:00am in the office of Assistant Director Local Government & Rural Development Department Chitral in order consider the promotion of junior village secretaries (BPS-9) to the post of senior village secretaries (BPS-11), lying vacant under promotion Quota in District Chitral. The following officers attended the meeting.

- i. Assistant Director LG&RDD Chitral. Chairman
- ii. Assistant Director LG&RDD Dir Upper (Representative of Provincial Govt.) Member
- iii. Assistant Engineer LG&RDD Chitral Member

2. The meeting was started with the recitation of Holy Quran. The Chair welcomed the participants and briefed the meeting that there are Nineteen (19) sanction posts of senior village secretaries in LG&RDD Chitral, out of which Eight (8) posts of senior village secretaries have become vacant due to retirement, deaths etc. of the incumbents and goes to the promotion Quota. The chair informed that Administrative Department of LG&RDD vide notification No.SD(E) LG/2-133/SSRC/2019 Dated:16-10-2019 have notified that the post of senior Village secretaries (BPS-11) shall be filled Under the promotion quota i.e. on the basis of seniority cum-fitness with at least five-year service as such, from amongst the junior village secretaries VCNC's.

3. The Chair informed that, According to the final undisputed seniority list of the junior village secretaries circulated vide letter No.7436-7537/AD/CTL dated 20-05-2020, a Panel of the following officials (Junior Village Secretaries) is placed before the District Departmental Promotion Committee for considering the promotion of junior village secretaries (BPS-09) to the post of senior village secretaries (BPS-11) lying vacant under promotion Quota.

S.no	Name of Junior Village Secretary	Date of Birth	Domile	Date of appointment
01	Shahab Ud Din	13-02-1985	Chitral	29-09-2015
02	Zabullah	12-03-1986	Chitral	29-09-2015
03	Muhammad Azam	01-04-1986	Chitral	29-09-2015
04	Muhammad Asif	20-04-1986	Chitral	29-09-2015

Attended  
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(9)

05	Muhammad Iqbal	02-01-1987	Chitral	29-09-2015
06	Suhrab Hussain	05-02-1987	Chitral	29-09-2015
07	Sayed Wali	08-03-1987	Chitral	29-09-2015
08	Piyar Ali	08-03-1987	Chitral	29-09-2015

4. The Chair informed the participants that the officials included in the panel for the promotion to the post of senior village secretaries (Bps-11) have not completed the required length of service i.e. five years as per Service Rules while smooth functioning of village/Neighborhood councils is adversely effected, therefore, attention of the Committee was invited to Rule-9 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotor. and Transfer) Rules 1989, which envisaged that "where the appointing authority considers it to be in the public interests to fill up posts reserved under the rules for departmental promotion and the most senior Civil Servant belonging to the cadre or service concerned, who is otherwise eligible for promotion does not possess the specified length of service the authority may appoint him to that post on acting charge basis;

*Provided that no such appointment shall be made, in the prescribed length of the service is short by more than three years."*

5. The Committee after perusal of the working paper, ACRs/synopsis thereof, length of service and certificate to the effect that the officials included in the panel for promotion are not required to NAB/Ehtisab Commission/Anti-Corruption Establishment and no Judicial or Departmental Inquires are pending against them, recommended the following officials for promotion from Junior Village Council Secretaries (BPS-09), to the post of Senior Village Secretaries (BPS-11), under Rule-09 of APT, 1989, with immediate effect in the best public interest.

S#	NAME OF JUNIOR VILLAGE SECRETARY	DATE OF BIRTH	DOMICILE	DATE OF APPOINTMENT	RECOMMENDATION OF DPC
01	Shahab Ud Din	13-02-1985	Chitral	29-09-2015	Recommended on promotion to the post of senior Village Secretary (BPS-11) Against vacant post on acting charge basis as per Rule-9 of the APT Rules 1989 with immediate effect.
02	Zabiullah	12-03-1986	Chitral	29-09-2015	Recommended on promotion to the post of senior Village Secretary (BPS-11) Against vacant post on acting charge basis as per Rule-9 of the APT Rules 1989 with immediate effect.
03	Muhammad Azam	31-04-1986	Chitral	29-09-2015	Recommended on promotion to the post of senior Village Secretary (BPS-11) Against vacant post on acting charge basis as per Rule-9 of the APT Rules 1989 with immediate effect.
04	Muhammad Asif	20-04-1986	Chitral	29-09-2015	Recommended on promotion to the post

*Approved to be done*  
*[Signature]*

(10)

Annex 'B'

Annex = B



OFFICE OF THE ASSISTANT DIRECTOR,  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT, LOWER CHITRAL

41

NO: 3594-3657AD/LC  
DATED: 25/11/2022

To,  
All VCs/NCs Secretaries  
District Lower Chitral

Subject: TENTATIVE SENIORITY LIST OF ALL JUNIOR VILLAGE/NEIGHBOURHOOD  
COUNCILS SECRETARIES OF DISTRICT LOWER CHITRAL

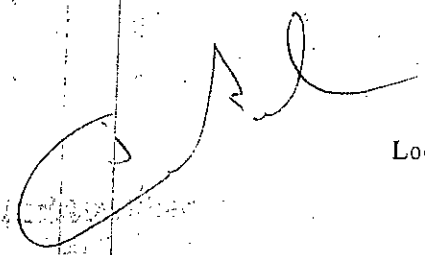
In compliance of Director General Local Government and Rural Development Khyber Pakhtunkhwa letter No. Director (LG) 3-1 Establishment/2022/2343-49 dated 24<sup>th</sup> October, 2022 a tentative seniority list of all Junior Village/Neighborhood Councils Secretary is prepared and enclosed for your information.

In this connection you are hereby informed to submit your complaint if any on the seniority list in written to the undersigned office within 20 days for correction, please.

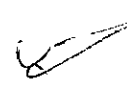
  
Assistant Director  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

Endst of Even No. and Date above:  
Copy forwarded for information to the:

1. Assistant Director (Admin/HR) LG &RDD, Khyber Pakhtunkhwa, Peshawar.
2. PA to Director General, LG &RDD, Khyber Pakhtunkhwa, Peshawar.
3. Progress officer LG &RDD, Lower Chitral.
4. Supervisor LG &RDD, Lower Chitral.



  
Assistant Director  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

Accessed TO  
Date  


(11)

6/2

S.N	Name	Father Name	Merit marks	Date of birth	Date of appointment	Qualification	VC/NC
1	Asad ur Rahman	Hamid Ur Rahman	86	02/01/1990	29/09/2015	BS(Hons)	
2	Sohail Ali Khan	Sher Ali Khan	85	09/08/1988	29/09/2015	MBA	
3	Wasi Ur Rahman	Abdur Rauf Khan	85	02/06/1989	29/09/2015	MA	
4	Anees Ahmed	Riaz Ahmad	85	03/01/1991	29/09/2015	BBA(Hons)	
5	Fazel Arif	Fazal Dayan	84	03/02/1988	29/09/2015	MSc	
6	Shakeel Ahmad	Shah Zareen	84	25/03/1990	29/09/2015	MA	
7	Saif Uddin	Sartaj Uddin	83	31/12/1988	29/09/2015	MA	
8	Yaqoob Zareen	ayub zareen	83	02/10/1990	29/09/2015	MA	
9	Zia Ul Haq	Hidayat Ullah	83	15/12/1991	29/09/2015	Mcom	
10	Yahya Khan	hatyaz Uddin	83	02/05/1992	29/09/2015	Bcom	
11	Sayed Intiaz Ur Rahman	Sayed Zia uddin	83	02/10/1993	29/09/2015	Msc	
12	M. Taj Alam	maqsood Alam Khan	83	04/03/1994	29/09/2015	BS(Hons)	
13	Ayaz Ali	Faqeer Khan	83	04/12/1994	29/09/2015	Bcom	
14	M. Hanif	M. Ayub	83	15/12/1995	29/09/2015	BA	
15	Shah Nawaz	Sardar nawaz khan	82	18/04/1990	29/09/2015	BBA(Hons)	
16	Ismail Shah	Sher Jahan	82	06/03/1990	29/09/2015	MCom	
17	Shuja Ur Rahman	Hafiz Ur Rahman	82	15/10/1992	29/09/2015	MA	
18	M Ilyas	Abdul Wazir khan	80	01/02/1993	29/09/2015	MA	
19	Hamdul Bari	Abdul bari	78	04/07/1988	29/09/2015	Msc	
20	Amar Zaib Jeghar	jahangir jeghar	78	03/01/1992	29/09/2015	BS(Hons)	
21	Nazir uddin	Mir Sawat	77	26/03/1989	29/09/2015	Mcom	
22	Sultan ghani	Sultan Muhammad	76	03/01/1995	29/09/2015	BA	
23	Shamsul Haq	Abdul Hai	75	16/08/1988	29/09/2015	MSc	
24	Hamid Uddin	Husam Uddin	75	17/10/1988	29/09/2015	MSc	
25	Asghar Ali Faqeer	Ghulam faqeer	75	10/12/1994	29/09/2015	BA	
26	Shaiq Ul Islam	Sardar Wali	75	01/01/1996	29/09/2015	BA	
27	Riaz Ahmad	alidat khan	74	09/09/1990	29/09/2015	BSc	
28	Karam Ali Shah	Mastana shah	73	02/06/1991	29/09/2015	Bsc	
29	Hayat Ud Din	Muhammad Hayat	73	01/02/1992	29/09/2015	B.Com	
30	Shakil Akbar	Badeel Ul Zaman	72	15/02/1988	29/09/2015	MA	
31	Rehmat Elahi	m.fazal elahi	69	03/01/1994	29/09/2015	MA	
32	asif raza	pacha mir khan	66	04/01/1989	29/09/2015	bcom	
33	abdul akber	gul akber	65	04/01/1988	29/09/2015	MA	
34	riaz Ahmad	TAJ MOHMMAD	65	20/12/1992	29/09/2015	Msc	
35	ibrahim khan	nadir khan	on promotion	01/05/1990	25/08/2016	FA	
36	nawaz sharif	unat baik	53	13/11/1992	12/01/2016	FA	
37	Akmal khan	ziarat Gul Shah	on promotion	04/12/1987	30/09/2006	BA	
38	Zia ud din	muhammad yusuf khah	on promotion	12/01/1976	18/8/2011	FA	
39	shamsu ul Arfeen	aziz Uddin	on promotion	04/01/1992	12/01/2016	FA	
40	M.anwar shah	mia gul shah	on promotion	05/01/1971	21/11/2013	FA	
41	Sharif Ur Rahman	qaziazfal	on promotion	03/02/1976	21/11/2013	BA	
42	M.Anwer Uddin	m. siraj uddin	on promotion	03/10/1979	09/01/2015	MA	
43	Zia Ur Rahman	sharif ur rhaman	on promotion	05/01/1995	09/01/2015	FA	
44	Adina Baig	Raheem Baig	61	02/02/1990	15/4/2019	MSc	
45	Atta Ur Rahman	saiif ur rahaman	basis of court	06/02/1995	22/06/2019	Ma	
46	Jamshid Khan	qadim khan	on promotion	21/3/1994	04/11/2013	FA	
47	Muhammad Hashim Jaffar	m. jaffar shah	Son Quota	03/07/2004	03/06/2022	FA	

12-07-2023

(11)

Assistant Director  
 LG & ADD  
 Lower District

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Annexure (C)

33

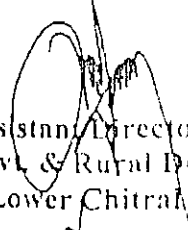


OFFICE OF THE ASSISTANT DIRECTOR,  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT, LOWER CHITRAL  
No. 2528 LG & RDD  
Dated 06/09/2021

To: All Secretaries, VCs/NCs,  
Lower Chitral.

Subject: TENTATIVE SENIORITY LIST OF VILLAGE SECRETARIES IN DISTRICT  
LOWER CHITRAL


Refer to the subject cited above, the tentative seniority list of Village Secretaries VCs/NCs, LG & RDD in District Lower Chitral is attached herewith for your information and direction to check your data in seniority list and inform this office the error/omission(s) if any, within three days, positively.


  
Assistant Director,  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

Endst: Even No. & date as above:

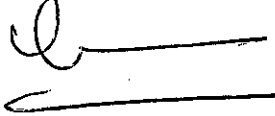
Copy forwarded for information & necessary action to the:

1. Assistant Director (Admin/HR), LG & DD Khyber Pakhtunkhwa, Peshawar
2. PA to Director General, LG & DD Khyber Pakhtunkhwa, Peshawar

  
INCHARGE  
INSTITUTION BRANCH  
DISTRICT GOVT. LOWER CHITRAL  
2/1/21

  
Assistant Director,  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

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Tentative SENIORITY LIST OF VILLAGE/NEIGHBORHOOD COUNCIL SECRETARIES BPS-11 & BPS 09 IN DISTRICT LOWER CHITRAL						
S No	Name	BPS	Date of Appointment	Date of Birth	Qualification	Remarks
1	Shah Sikandar s/o Sarwar Khan	11	18/5/1988	20/2/1965	BA	
2	Hidayat Ullah s/o Kifayat Ullah	11	19/10/1988	15/11/1969	FA	11/9/2019 Adjusted as Secretary
3	Iamshid Ahmad s/o Sher Agha	11	11/10/1991	30/03/1967	BA	25/9/2012 Adjusted as Secretary
4	Alah Alam s/o Makhdoob Alam Khan	11	20/7/1997	15/3/1963	FA	11/9/2012 Adjusted as Secretary
5	Namwar Shah s/o Zartanat Shah	11	7/9/1995	1/7/1966	BA	11/9/2012 Adjusted as Secretary
6	Ajaz Ahmad s/o Anwar Bate	11	25/5/2004	25/1/1979	BA	
7	Shahab Uddin s/o Zar Khan	11	29/09/2015	13/2/1995	B Com	11/9/2020 Promoted to BPS 11
8	Zahid Ali s/o Sher Asghar	11	29/09/2015	17/3/1995	MA	10/9/2020 Promoted to BPS 11
9	Mulhammad Asif s/o Muhammad Wali	11	29/09/2015	20/4/1986	MSc	10/9/2020 Promoted to BPS 11
10	Muhammad Iqbal s/o Gul Feroz Khan	11	29/09/2015	2/1/1987	MSc	10/9/2020 Promoted to BPS 11
11	Sahar Hassan s/o Mehrez Hassan	11	29/09/2015	5/2/1987	M.A	10/9/2020 Promoted to BPS 11
12	Syed Wahid s/o Mir Ahmad	11	29/09/2015	8.3.1987	MSc	10/9/2020 Promoted to BPS 11
13	Imran Hussain s/o Hussain Wali	11	29/09/2015	5.1.1988	MSc	10/9/2020 Promoted to BPS 11
14	Azhar Ali Shah s/o Zahir Ali Shah	9	29/09/2015	15.1.1988	MSc	
15	Shahid Akbar s/o Raheel Ali Zaman	9	29/09/2015	15/2/1988	M.Phil	
16	Fazal Asif s/o Fazal Dusan	9	29/09/2015	2/3/1988	MSc	
17	Asad Akbar s/o Gul Akbar	9	29/09/2015	1/4/1988	M.A	
18	Hamdul Bari s/o Abdul Bari	9	29/09/2015	7/4/1988	MSc	
19	Enams U Haq s/o Asad Haq	9	29/09/2015	16/8/1988	MSc	
20	Sahid Ali Khan s/o Sher Ali Khan	9	29/09/2015	8/9/1988	MBA	
21	Hamid Ud Din s/o Husam Ud Din	9	29/09/2015	17/10/1988	M.Sc	

Base of Age/Seniority

Accepted to be true copy  
*[Signature]*

*[Signature]*  
INCHARGE

INSTITUTION BRANCH  
DISTRICT COURTS LOWER CHITRAL

*[Signature]*



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23	Qasim Ud Din Wazir Rehman vs. Abdul Rauf Khan	9	29/09/2015	31/12/1988	MA
24	Naseer Uddin vs Mir Syed	9	29/09/2015	6/7/1989	MA
25	Asif Raza vs Pacha Mir Khan	9	29/09/2015	20/3/1989	M.Com
26	Azad Ur Rehman vs Hamid U Rahman	9	29/09/2015	1/4/1987	B.Com
27	Faqeer Zarin vs Ayub Zarin	9	29/09/2015	1/2/1990	BS (Hons)
28	Shahid Ahmad vs Shah Zareen	9	29/09/2015	10/2/1990	MA
29	Shah Nawaz Khan vs Syed Nawaz Khan	9	29/09/2015	25/3/1990	MA BBA(Hons)
30	Faraz Shah vs Sher Rahman	9	29/09/2015	18/4/1990	M.Com
31	Raza Ahmad Khan vs Ali Iqbal	9	29/09/2015	13/6/1990	M.Com
32	Naveed Ahmad vs Raza Ahmad	9	29/09/2015	9.9.1990	B.Sc
33	Zahara Ali Shah vs Maqana Shah	9	29/09/2015	1.3.1991	BBA(Hons)
34	Zaid Haq vs Hidayat Dilah	9	29/09/2015	6.5.1991	B.Sc
35	Hayat Ud Din vs Muhammad Hayat	9	29/09/2015	15.12.1991	M.Com
36	Yalqin Khan vs Hayat Ud Din	9	29/09/2015	1/2/1992	MA
37	Naveed Zare vs Jahangir Jigar	9	29/09/2015	5/2/1992	B.com
38	Munir U Rehman vs Hafiz Ur Rehman	9	29/09/2015	1/3/1992	B.CS(hon)
39	Raza Ahmad vs Taj Muhammad	9	29/09/2015	15/10/1992	MA
40	Muhammad Hyar vs Abdul Warh Rahar	9	29/09/2015	20/12/1992	M.Sc
41	Syed Imtiaz ur Rehman vs Syed Zaid Ud Din	9	29/09/2015	2/1/1993	MA
42	Rehman Fiaz vs Muhammad Fazel Elahi	9	29/09/2015	10/2/1993	M.Sc
43	Muhammad Taj Ali vs Magsood Ali Khan	9	29/09/2015	1/3/1994	MA
			29/09/2015	3/4/1994	B.Sc (Hons)

MAJ  
INCHARGE  
INSTITUTION BRANCH  
CAMPUS OFFICE - LOWER CAMPUS

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44	Ali s/o Faqir Khan	9	29/09/2015	12/4/1994	B.Com	
45	Asghar Faqeer s/o Ghulam Faqir	9	29/09/2015	2/10/1994	B.A	
46	Sultan Ghani s/o Sultan Muhammad	9	29/09/2015	1/3/1995	B.A	
47	Muhammad Hanif s/o Muhammad Ayub	9	29/09/2015	15/12/1995	B.A	
48	Shahid ul Islam s/o Sardar Wali	9	29/09/2015	1/1/1996	MA	
49	Ibrahim Khan s/o Nasir Khan	9	25/8/2016	5/1/1990	FA	
50	Nawaz Shariq s/o Farid Hussain	9	1/12/2016	13/11/1992	FA	
51	Almas Khan s/o Zarat Gul Shah	9	30/9/2005	12/4/1987	BA	Promoted to BPS 09
52	Zar Ud Din s/o Muhammad Yousuf Khan	9	18/03/2011	1/12/1976	FA	Promoted to BPS 09
53	Shams Ul Arifeen s/o Aziz Ud Din	9	16/04/2013	1/4/1992	FA	Promoted to BPS 09
54	Shah s/o Mian Gul	9	21/11/2013	1/5/1971	FA	Promoted to BPS 09
55	Sharif Ur Rahman s/o Qazi Afzal	9	21/11/2013	2/3/1976	BA	Promoted to BPS 09
56	Muhammad Anwar Ud Din s/o Muhammad Siraj Ud Din	9	1/9/2015	10/3/1979	MA	Promoted to BPS 09
57	Zoi Rehman s/o Shafig Ur Rahman	9	1/9/2015	1/5/1995	FA	Promoted to BPS 09
58	Adina Baig s/o Rahim Baig	9	15/04/2019	2/2/1990	MSc	
59	Ara Ur Rahman s/o Saif Ur Rahman	9	6/2/2019	2/6/1995	MA	
60	Jamshid Khan s/o Qadir Khan	9	1/4/2013	21/03/1994	FA	Promoted to BPS 09
61	Muhammad Hasnain Jaffar s/o Muhammad Jaffar Shah	9	7/3/2022	7/3/2004	FSc	

*Abdul*  
INCHARGE  
INSTITUTION BRANCH  
DISTRICT COURT LOWER CHITRAL  
*Soley*

*A. J. J. J.*  
Assistant Director,  
LG&RDD Lower Chitral  
*h*

Attested to be True  
Copy  
*[Signature]*

(16)

Annex 'D'

26

The

Assistant Director Local Government District Chitral Lower.

Subject: departmental promotion order on seniority basis

Sir!

With due respect it is stated that I have been working in Local Government as a Secretary BPS 09 since 2015. I am a most senior scale 9 employee of the department in terms of seniority.

It is therefore requested to your honor kindly take necessary action and issue an order to my promotion from scale 9 to scale 11 due to the following reasons and realities.

1: Dear Sir! It is brought to your notice that during the last seven years, a total number of 10 secretaries have been promoted from scale 9 to scale 11 on the basis of seniority.

2: Mr. Muhammad Iqbal, on serial number 11 of the seniority list, was promoted on the basis of seniority from scale 9 to 11, later he resigned from his position and joined education department and recently Mr. Azhar Ali Shah son of Zafar Ali Shah Date of Birth 05/01/1988 Serial No. 14 of Seniority List was promoted from Scale 9 to Scale 11 on seniority basis.

3: Respected through notification dated on 14th November 2022, Mr. Naeem Uddin has been promoted from supervisor to progress officer, due to this departmental promotion now the employee on serial No. 1 of seniority list will be promoted to the post of supervisor and accordingly one staff will be promoted from scale 9 to scale 11.

Respected Sir, as mentioned above that Mr. Azhar Ali Shah bearing serial No. 14 of seniority list has already been promoted from scale 9 to scale 11 a few months ago and on the basis of seniority list I am in serial No. 15 and my date of birth is

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*Solman*

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15/02/1988.now as per seniority list it my legal right to be promoted from scale 9 to scale 11.

Respected it is requested to your honor that kindly thoroughly consider on my request and issue my promotion order on immediate basis.

I will be grateful to you

Your truly

Mr. Shakil Akbar

S/o Badi Zaman

Designation: Secretary

Date: 18/11/2022

IN CHARGE  
INSTITUTION BRANCH  
DISTRICT COURT LOWER CHITRAL  
20/11/22

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Annexure (E)

2718  
2023

LI. NO 2

(E)

**IN THE COURT OF ZEESHAN YOUNAS, CIVIL JUDGE-IV,  
LOWER CHITRAL**

Case No: 241/1 Year: 2023 Title: Shakeel Akbar Vs Govt Kpk Etc

Serial No. of Order and Date of proceedings Order or others Proceedings with signature of Civil Judge and that of parties or counsel where necessary.

Order No.13  
19/07/2023

Plaintiff through counsel present. Defendants no. 1 to 32 through representative along with District Attorney present.

Through this order the court intends to decide the maintainability and jurisdiction of the suit.

The facts in brevity are that the plaintiff is serving as secretary village council in local government and being aggrieved of seniority list merit list dated 25-11-2022 brought a suit for declaration and cancellation seeking therein that the merit list issued by the defendants no. 1 to 4 are illegal and against the law and is issued with malafide and ill will with intent to promote defendants no. 4 to 32 to the post of senior secretary. hence, the merit list seniority list dated 25-11-2022 is liable to be cancelled.

Defendants were summoned as per law and procedure. Defendants no. 01 to 32 appeared through representative and contested the stance of the plaintiff by submitting written statement wherein they raised many factual as well as legal objections.

After the submission of the written statement, the file was fixed for arguments on maintainability of the instant suit on the point that whether this court has jurisdiction to entertain the suit in hand?

19/7/23

**Attested**  
**Copy Clerk**  
Session Court  
Chitral  
13-12-2023

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IN THE COURT OF ZEESHAN YOUNAS, CIVIL JUDGE-IV,  
LOWER CHITRAL

Case No: 241/F Year: 2023 Title: Shakeel Akbar Vs Govt Kpk Etc

Order No.13  
19/07/2023  
Continue.....

Arguments heard, ~~and~~ record deciphered and perused with valuable assistance of the counsels.

Perusal of the record shows that the plaintiff is civil servant and currently serving in local government department as secretary village council and his terms and conditions of service are governed by KP Civil Servants Act 1973. Section 08 and 09 of the ibid Act pertains to the seniority and promotion of civil servants. The plaintiff being aggrieved by the merit list brought this instant suit for declaration that defendants no.01 to 03 misinterpreted the rules and regulations and issued a merit list with ill will, malafide and intent to illegally promote the defendants. The plaintiff has challenged the merit list seniority list and placement of his name in the said merit list. The issue of a civil servant's seniority is outside the jurisdiction of this court even if the seniority list is made with ill will and malafide. Article 212 of the Constitution bars the jurisdiction of this court. Article 212 is reproduced as below:

*Article 212: Administrative Courts and Tribunals*

*(1). Notwithstanding anything hereinbefore contained, the appropriate Legislature may by Act provide for the establishment of one or more Administrative Courts or Tribunals to exercise exclusive jurisdiction in respect of*

- a. matters relating to the terms and conditions of persons who are or have been in the service of Pakistan, including disciplinary matters*
- b. matters relating to claims arising from tortious acts of Government, or any person in the service of Pakistan, or of any local or other authority*

19/7/23

Attested  
Copy Clerk  
Session Court  
Chitral

13.12.2023

IN THE COURT OF ZEESHAN YOUNAS, CIVIL JUDGE-IV,  
LOWER CHITRAL

Case No: 241/1      Year: 2023      Title: Shakeel Akbar Vs Govt Kpk Etc

**Order No.13**

19/07/2023

Continue.....

*empowered by law to levy any tax or cess and any servant of such authority acting in the discharge of his duties as such servant or*

*c. matters relating to the acquisition, administration and disposal of any property which is deemed to be enemy property under any law*

*(2) Notwithstanding anything hereinbefore contained where any Administrative Court or Tribunal is established under clause (1) no other court shall grant an injunction, make any order or entertain any proceedings in respect of any matter to which the jurisdiction of such Administrative Court or Tribunal extends and all proceedings in respect of any such matter which may be pending before such other court immediately before the establishment of the Administrative Court or Tribunal other than an appeal pending before the Supreme Court, shall abate on such establishment*

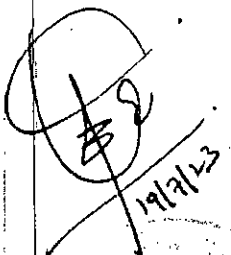
*Provided that the provisions of this clause shall not apply to an Administrative Court or Tribunal established under an Act of a Provincial Assembly unless, at the request of that Assembly made in the form of a resolution, Majlis-e-Shoora (Parliament) by law extends the provisions to such a Court or Tribunal*

*(3) An appeal to the Supreme Court from a judgment, decree, order or sentence of an Administrative Court or Tribunal shall lie only if the Supreme Court, being satisfied that the case involves a substantial question of law of public importance, grants leave to appeal*

As the plaintiff is a civil servant and seniority merit list of a civil servant necessarily entails terms and conditions of service of civil employees and the question of seniority falls within the exclusive jurisdiction of KP Service Tribunal. Furthermore, the jurisdiction of this court is also barred by KP Service Tribunal Act of 1974. The plaintiff has two remedies against such act of the department, firstly, he could file an appeal or representation before the departmental hierarchy (if provided) and, secondly, appeal before the service tribunal. Since,

**Attested**  
**Copy Clerk**  
**Session Court**  
**Chitral**

13-12-2023



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**IN THE COURT OF ZEESHAN YOUNAS, CIVIL JUDGE-IV,  
LOWER CHITRAL**

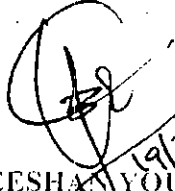
Case No: 241/1 Year: 2023 Title: Shakeel Akbar Vs Govt Kpk Etc

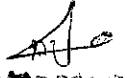
**Order No.13**  
19/07/2023  
Continue

equally efficacious remedy and forum is provided by the Constitution and KP Service Tribunal Act of 1974. hence, the instant suit is not maintainable and the suit in hand is returned to the plaintiff with direction to approach the proper forum. Muharrir of the court is directed to do the needful. File be consigned to record room after its necessary completion and compilation.

Date of Institution	20-12-2022
Date of return	19-07-2023
Name of the Plaintiff	Shakeel Akbar
Reason for Return	Lack of Jurisdiction

**Announced**  
19.07.2023

  
(ZEESHAN YOUNAS)  
Civil Judge-IV Lower Chitral

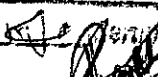

  
**Attested**  
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Session Court  
Chitral

U.No. 1381  
26.07.2023

13-12-2023

**Court Fee Stamp**

1. Sr.No. Of Application 6636
  2. Date of Presentation of Application 13-11-2023
  3. Date of Commencement 19-07-2023
  4. Date of Filing 13-12-2023
  5. No. of Pages 04 (pages)
  6. Court Fee 08
  7. Urgent 4
  8. Name of Copier MIRAZULLAH 5921
- Date of Delivery 13-12-2023

Session Court Examiner   
Superintendent of Session Court  
Chitral  


Consignment  
Date 26.07.2023





OFFICE OF THE ASSISTANT DIRECTOR SENIOR-HQ,  
LOCAL GOVERNMENT & RURAL DEVELOPMENT  
DEPARTMENT, LOWER CHITRAL

No: 263-70 /AD/LC

DATED: 02 / 02 /2024

To,

1. Mr. Shakil Akbar, Junior Village Secretary
2. Mr. Abdul Akbar, Junior Village Secretary
3. Mr. Hamdul Bari, Junior Village Secretary
4. Mr. Shams Ul Haq, Junior Village Secretary
5. Mr. Nazir Ud Din, Junior Village Secretary
6. Mr. Asif Raza, Junior Village Secretary

Subject: APPLICATION/ OBJECTION REGARDING TENTATIVE SENIORITY LIST

Reference to your application on the subject cited above, it is stated that as per the notification issued by Worthy Director General, LG&RDD Khyber Pakhtunkhwa (copy enclosed) and (Appointment, Promotion and Transfer) Rules 1989, Part-VI (17) (1) (a) (copy enclosed), your objections raised against the tentative seniority list are hereby regretted.

Assistant Director (Sr-HQ)  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

Endst: Even No. & date as above:

Copy forwarded for information & necessary action to the:

1. Assistant Director (Admin/HR), LG&RDD, Khyber Pakhtunkhwa, Peshawar.
2. PA to Director General, LG&RDD, Khyber Pakhtunkhwa, Peshawar.

Assistant Director (Sr-HQ)  
Local Govt. & Rural Dev. Deptt:  
Lower Chitral

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(23)

Annexure 'G'

## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

### NOTIFICATION

1. Whereas, the appellant Mr. Jan Baz Khan was appointed as Arabic Teacher (BPS-15) in District Bannu on adhoc/contract basis through NTS on 22-05-2014 and regularized vide Notification dated 21-03-2018. Thereafter, the DEO (M) Bannu notified seniority (merit-wise) of AT cadre on 15-10-2019 in terms of Section-8 of Civil Servant Act, 1973 read with Rules-17 of (Appointment, Promotion & Transfer) Rules 1989, wherein, the name of the appellant was shown at S.No. 84 among his other colleagues.
2. And whereas, aggrieved of the seniority (ibid), the appellant invoked the constitutional jurisdiction under Article-212 of the Islamic Republic of Pakistan, 1973 through filing Service Appeal No. 687/2020 before the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar, whereby the appellant impugned the seniority list stood on 26-10-2019 of ATs (BPS-15) in District Bannu with the prayer, that the same may be prepared age-wise in accordance with the Sub-Section-2 of Section-4 (Appointment & Regularization of Services) Act of 2017.
3. And whereas, the case of the appellant was decided vide judgment dated 31-05-2023 by the Honorable Tribunal in favor of the appellant with the direction to the Department, reproduced in verbatim as under: -

*"inter-se-seniority of the appellant shall be determined age-wise on the basis of Notification dated 21-03-2018 as well as Sub-Section-2 of Section-4 of KP E&SE Department (Appointment & Regularization of Services) Act, 2017 by placing the name of the appellant at correct position in the seniority list of the concerned Arabic Teacher with all consequential benefits".*

4. And whereas, the case was declared as UNFIT for filing CPLA before the apex Court by the law Department, whereafter, the DEO (M) Bannu implemented the Judgment ibid to the extent of seniority (age-wise) and submitted working papers to this Directorate for promotion of the appellant to the post of SST(BPS-16) in compliance of the judgment supra, whereafter, the case was referred to the meeting of Departmental promotion committee held on 13-12-2023 and the committee has recommended that, the promotion Notification No. 8565-70 dated 07-02-2020 be withdrawn to the extent of Mr. Safdar All Shah SST (B/C) (BPS-16) only and Mr. Janbaz Khan - AT (BPS-15) be promoted to the post of SST (BPS-16) with immediate effect.

Now therefore, in compliance of the Judgment dated 31-05-2023 of the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar & recommendations of Departmental Promotion Committee, the competent authority (Director E&SE Khyber Pakhtunkhwa) is pleased to withdraw the promotion Notification No. 8565-70 dated 07-02-2020 to the extent of Mr. Safdar All Shah SST (B/C)(BPS-16) and the appellant Mr. Jan Baz Khan AT (BPS-15) is hereby promoted to the post of SST(BPS-16) in terms of Rule-7 of the (Appointment, Promotion & Transfer) Rules, 1989 with immediate effect in the interest of public service. Moreover, their services are placed at the disposal of DEO (M) Bannu for further adjustment.

#### Terms and Conditions:-

1. He shall be on probation for a period as specified in Rules (15) substituted vide No.SO(Policies)/E&AD/1-3/2017 Dated, 07-12-2017 in Appointment, Promotion and Transfer Rules, 1989.
2. He will be governed by such rules and regulations as may be issued from time to time by the government
3. His services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.

- 5 His Inter-Se- seniority on lower post will remain intact as per Rules (17)(4) of Appointment, Promotion and Transfer Rules, 1989.
- 6 No TADA is allowed for joining the duty.
- 7 He will give an undertaking to be recorded in his service book to the effect that if any over payment is made to them in light this order, will be recovered and if he is wrongly promoted, he will be reversed.
- 8 Before handing over charge, his documents may be checked. If he does not possess the required relevant qualification as per rules, he may not be handed over the charge of the post.

(Samina Altaf)

Director

Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

No: 4/72-76 /F.No. (AD/LR-II)/SA No. 887/2020/Jan Baz/2023. Dated Peshawar the: 23/2/2024

**Copy forwarded for information & n/action to the:-**

- 1 Learned Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 2 Learned AAG Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 3 District Education Officer (Male) Bannu.
- 4 District Accounts Officer District Bannu.
- 5 Deputy Director (Legal) E&SE Khyber Pakhtunkhwa
- 6 Section Officer (Lit-II) E&SE Department Khyber Pakhtunkhwa.
- 7 PA to Additional Secretary (General) E&SE Department Khyber Pakhtunkhwa.
- 8 PA to Director E&SE Khyber Pakhtunkhwa.
- 9 Official concerned
- 10 Master File.

*[Signature]*  
Assistant Director (Estab-M-1)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Amended = A

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PART-VI

SENIORITY

17. **Seniority** :- (1) the seniority inter se of civil servants <sup>47</sup>(appointed to a service, cadre or post) shall be determined:-

- (a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission <sup>48</sup>[or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection: and
- (b) in the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

**Explanation-I:-** If a junior person in a lower post is promoted to a higher post temporarily in the public interest, even though continuing later permanently in the higher post, it would not adversely effect the interest of his seniors in fixation of his seniority in the higher post.

**Explanation-II:-** If a junior person in a lower post is promoted to a higher post by superseding a senior person and subsequently that senior person is also promoted the person promoted first shall rank senior to the person promoted subsequently; provided that junior person shall not be deemed to have superseded a senior person if the case of the senior person is deferred for the time being for want of certain information or for incomplete record or for any other reason not attributing to his fault or demerit.

**Explanation-III:-** A junior person shall be deemed to have superseded a senior person only if both the junior and the senior persons were considered for the higher post and the junior person was appointed in preference to the senior person.

(2) Seniority in various cadres of civil servants appointed by initial recruitment vis-à-vis those appointed otherwise shall be determined with reference to the dates of their regular appointment to a post in that cadre; provided that if two dates are the same, the person appointed otherwise shall rank senior to the person appointed by initial recruitment.

<sup>49</sup>(3) In the event of merger/restructuring of the Departments, Attached Departments or Subordinate Offices, the inter se seniority of civil servants affected by the merger/restructuring as aforesaid shall be determined in accordance with the date of their regular appointment to a cadre or post.

<sup>50</sup>(4) The inter-se-seniority of civil servants in a certain cadre to which promotion is made from different lower posts, carrying the same pay scale shall be determined from the date of regular appointment/promotion of the civil servants in the lower post.

Provided that if the date of regular appointment of two or more civil servants in the

<sup>47</sup> Substituted for the words appointment to a post in the same basic pay scale in a cadre by Notification No. SOR-I(S&GAD)4-1/80, dated 17-05-1989.

<sup>48</sup> The words inserted by Notification No. SOR-I(S&GAD)4-1/80/II, dated 04-02-1996.

<sup>49</sup> Sub-rule (3) of Rule 17 added vide Notification No. SOR-I(E&AD)4-1/80/IV, dated 28-5-2002.

<sup>50</sup> Sub-rule (4) of Rule 17, added vide Notification No. SOR-VI (E&AD) 1-3/2008 dated 19-11-2009.

Accepted  
T. V. S. S. S.

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lower post is the same; the civil servant older in age, shall be treated senior.

18. **General Rules:** - In all matters not expressly provided for in these rules, civil servants shall be governed by such rules as have been or may hereafter be prescribed by Government and made applicable to them.

19. **Repeal:-** The <sup>51</sup>[Khyber Pakhtunkhwa] Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, are hereby repealed.

(Authority; No. SORI(S&GAD)4-1/80, dated 13<sup>th</sup> May, 1989)

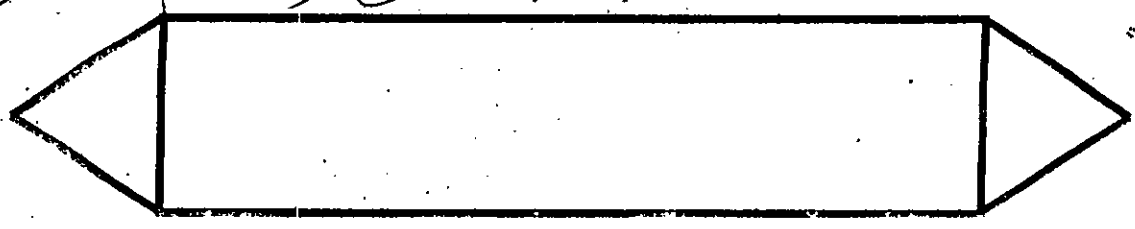
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Handwritten signature and official stamp: "Assistant Secretary to Government" and "Lower Grades".

<sup>51</sup> Sub. by the Khyber Pakhtunkhwa Act No: IV of 2011.

Handwritten signature: "A. F. Esvel" and "18/08/2023".

بعدالت حساب ضمیمہ کی توجہ سے سروس ٹرنس فونل شمار



Appellate

2 منجانب

شکل المسر بنام ڈاکٹر عبدال  
فصل نور منصف ٹرنس فونل

مورخہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکے

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

آن مقام شمار کیلئے بدلت اور فونل اور صلوع و انوار علی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث و فیصلہ پر خلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق و زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ ہوں گے سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

2024

ماہ 02

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المرقوم

Accepted  
واہ العبد  
Adopted

العبد  
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At Saleel Akbar