

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal No. 325/2024

S No.	Date of order or proceedings	Order or other proceedings with signature of judge
	2	3

1      27/02/2024

The appeal of Mst. Basmeena Bibi re-submitted today by registered post through Malik Ishfaq Ahmad Jilani Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on

By the order of Chairman

  
REGISTRAR

The appeal of Mst. Rasmeeena Bibi received today i.e on 09.02.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

According to sub-rule-4 of rule 6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondents no.1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent be deleted/struck out from the list of respondents.

NO. 301 /S.P.

DT. 14/02 /2024.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Malik Ashfaq Ahmad Jilani Adv.  
High Court, Marsehra.

Objection is removed.

The name of respondent No. 1  
is delete.

Thanks

Malik Ashfaq Ahmad  
Advocat High Court  
Marsehra.

Ashfaq  
26-02-2024

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11077

SERVICE APPEAL NO: 325/2024

Dated 09-2-2024

Mst. Basmeen Bibi, Ex-Primary School  
Teacher At Government Centinal Model  
Primary School Shalkhan Abbad, Tehsil  
Palas District Kp Kohistan.....**Appellant**


**Versus**

1. The Government of KPK through  
Secretary Elementary and  
Secondary Education, Peshawar.
2. The Director Elementary and  
Secondary Education, Peshawar.
3. The District Education Officer  
(Female) District KP Kohistan at  
Pallas.....**Respondents**

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974**  
**AGAINST THE IMPUGNED ORDERS**  
**DATED 13.08.2015 AND 08.01.2024**  
**ISSUED BY RESPONDENTS NO. 2 & 3.**

**Prayer:**

On acceptance of instant service  
appeal, the impugned orders dated  
13.08.2015 and 08.01.2024 issued by  
respondents No. 2 & 3 respectively may  
kindly be set-aside declaring them  
illegal, void and against the law on the  
subject and appellant be re-instated into  
service in BPS 04 to BPS-12 with all back  
benefits.

~~Filed to day~~  
  
Registrar  
9/2/24

**BBEFORE THE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA**  
**PESHAWAR**

SERVICE APPEAL NO: 325 /2024

Mst. Basmeen Bibi.....Appellant

**Versus**

Govt. of KPK etc.....Respondents

**SERVICE APPEAL**

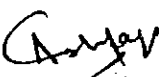
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**Dated: 03.02.2024**

**Mst. Basmeen Bibi**  
(Appellant)

Through: -

  
**Malik Ishfaq Ahmed Jillani**  
Advocate High Court,  
District Courts (Mansehra)

P-1

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

SERVICE APPEAL NO: 325/2024

Mst. Basmeen Bibi, Ex-Primary School  
Teacher At Government Centinal  
Model Primary School Shalkhan  
Abbad, Tehsil Palas District Kp  
Kohistan.....**Appellant**

**Versus**

1. The Director Elementary and  
Secondary Education, Peshawar.
2. The District Education Officer  
(Female) District KP Kohistan at  
Pallas.....**Respondents**

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974**  
**AGAINST THE IMPUGNED ORDERS**  
**DATED 13.08.2015 AND 08.01.2024**  
**ISSUED BY RESPONDENTS NO. 2 & 3.**

**Prayer:**

On acceptance of instant service  
appeal, the impugned orders dated  
13.08.2015 and 08.01.2024 issued by  
respondents No. 2 & 3 respectively  
may kindly be set-aside declaring  
them illegal, void and against the law  
on the subject and appellant be re-  
instated into service in BPS 04 to BPS-  
12 with all back benefits.

**Respectfully Sheweth!**

1) That, appellant was appointed in prescribed manner by competent authority against the post of Primary School Teacher (BPS-4) vide appointment order dated 01.12.2006. She had been performing her duty regularly and with punctuality.

2) That, all of a sudden, respondent No 03 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon the appellant on the ground of alleged unspecified absence from duty, vide impugned order dated 13.08.2015.

(Copy of impugned order dated 13.08.2015 is annexed as Annexure "A").

3) That, appellant filed a Departmental appeal before respondent No 02 against the impugned order.

(Copy of Departmental appeal annexed Annexure "B").

4) That, respondent No. 02 sought comments from respondent No. 03 in respect of the Departmental appeal of the appellant which were furnished on 12.05.2022,

recommending the instatement of the appellant.

(Copy of order of respondent No. 2 dated 22.10.2021 and reply dated 12.05.2022 annexed as annexure "C & D").

- 5) That, the appellant submitted an application to the respondent No. 2 through RTI-13 the appellant visited the office of respondent No. 2 within stipulated time and respondent No. 2 handedover the impugned order dated 08.01.2024.

(Copy of impugned order dated 08.01.2024 is annexed as Annexure "E")

- 6) That, respondent No. 02 vide impugned notification/order dated 02.07.2022 rejected the Departmental Appeal of the appellant by mentioning no reason of rejection, while disregarding the comments/reply submitted by respondent No. 03 whereby, it was recommended to reinstate the appellant into service.

(Copy of impugned order dated 02.07.2022 annexure "F").

- 7) That, the impugned order dated 02.07.2022 was never ever communicated to the appellant. Appellant got the said impugned

order of her own from the office of respondent No. 02 on 08.01.2024.

- 8) That, respondent No. 03 was directed by respondent No. 02 to inform the appellant about the fate of her Departmental Appeal but the appellant was never ever informed by respondent No. 03 as directed by respondent No. 02.
- 9) That, being aggrieved from the impugned orders, appellant having no other remedy is filing the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

**GROUND:-**

- A. That, appellant never remained absent as alleged, that is why, respondent No. 03 submitted comments/reply in favour of the appellant recommending her reinstatement to respondent No. 02.
- B. That, before imposing the impugned penalty, no publication as required under Rule 9 of E&D, Rules, 2011, was ever made in the newspapers.



C. That, no show cause notice was ever issued to the appellant nor she was heard in person before imposing major penalty upon her.

D. That, as per written statement of the concerned Head Teacher dated 28.09.2015, she remained absent. Appellant never performed her duty regularly, that is why, respondents No. 03 recommended re-instatement of the appellant to respondent No. 02 while submitting comments in respect of the Departmental appeal of the appellant.

(Copy of statement dated 28.09.2015 annexed as annexure "G").

E. That, no inquiry into the alleged allegation was ever conducted. The impugned penalty was imposed without any reason and lawful justification.

F. That, appellant was never confronted with the alleged allegation at any point of time so, she has been condemned unheard, violating all the norms of service law, justice and fair play.

G. That, before passing the impugned orders, appellant was not put on notice to present her view point/explanation under the Doctrine of AUDI AULTEMI PARTEM, hence, the impugned orders are not sustainable and maintainable under the law. Respondent No. 03 while realizing her mistake, recommended re-instatement of the appellant into service.

H. That, respondent No. 02 should have re-instated the appellant into service with all back benefits in the light of the comments/reply dated 12.05.2022, furnished by respondent No. 03 but instead, he rejected the Department appeal of the appellant without assigning any reason without hearing the appellant.

I. That, appellant had a long unblemished service record at her credit and she has been removed from service with a single stroke of pen without observing due process of law.

J. That, no complaint was ever filed by any one against the appellant for

her being absent from duty as alleged on any working day with any authority.

K. That, the impugned orders are illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect, hence, liable to be set aside.

**Prayer: -**

It is, therefore, very humbly prayed that on acceptance of instant service appeal, the impugned orders dated 13.08.2015 and 08.01.2024 issued by respondents No. 2 & 3 respectively may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service in BPS 04 to BPS-12 with all back benefits.

**Dated: 03.02.2024**

*Basmeen*

**Mst. Basmeen Bibi**  
(Appellant)

**Through: -**

*Malik*

**Malik Ishfaq Ahmed Jillani**  
Advocate High Court,  
District Courts (Mansehra)

**Verification:**

**I, MST. BASMEEN BIBI, EX-PRIMARY SCHOOL TEACHER AT GOVERNMENT CENTINAL MODEL PRIMARY SCHOOL SHALKHAN ABBAD, TEHSIL PALAS DISTRICT KP KOHISTAN DO HEREBY VERIFIED THAT THE CONTENTS OF FOREGOING SERVICE APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONORABLE COURT.**

**MST. BASMEEN BIBI**  
**(DEPONENT)**

*Basmeen*

P-8

**BBEFORE THE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA**  
**PESHAWAR**

SERVICE APPEAL NO: \_\_\_\_\_/2024

Mst. Basmeen Bibi.....Appellant

Versus

Govt. of KPK etc.....Respondents

**SERVICE APPEAL**

**AFFIDAVIT**

**I, MST. BASMEEN BIBI, EX-PRIMARY SCHOOL  
TEACHER AT GOVERNMENT CENTINAL  
MODEL PRIMARY SCHOOL SHALKHAN  
ABBAD, TEHSIL PALAS DISTRICT KP  
KOHISTAN DO HERE SOLEMNLY AFFIRM AND  
DECLARE ON OATH THAT NO SUCH SUBJECT  
MATTER SERVICE APPEAL HAS EVER BEEN  
FILED, NOR PENDING, NOR DECIDED THAT  
THE CONTENTS OF FOREGOING AFFIDAVIT  
ARE TRUE AND CORRECT TO THE BEST OF MY  
KNOWLEDGE AND BELIEF AND NOTHING HAS  
BEEN CONCEALED OR SUPPRESSED FROM  
THIS HONORABLE COURT.**

**MST. BASMEEN BIBI**  
**(DEPONENT)**

*Basmeen*

P-9

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

SERVICE APPEAL NO: \_\_\_\_\_/2024

Mst. Basmeen Bibi.....Appellant

**Versus**

Govt. of KPK etc.....Respondents

**SERVICE APPEAL**

**CORRECT ADDRESSES OF THE**  
**PARTIES**

**Respectfully Sheweth!**

Correct addresses of the parties are  
as below: -

**APPELLANT:**

Mst. Basmeen Bibi, Ex-Primary School  
Teacher At Government Centinal Model  
Primary School Shalkhan Abbad, Tehsil  
Palas District Kp Kohistan


**RESPONDENTS:**

1. The Government of KPK through  
Secretary Elementary and  
Secondary Education, Peshawar.
2. The Director Elementary and  
Secondary Education, Peshawar.
3. The District Education Officer  
(Female) District KP Kohistan at  
Pallas

**Dated: 03.02.2024**

**Mst. Basmeen Bibi**  
(Appellant)

Through: -

  
**Malik Ishfaq Ahmed Jillani**  
Advocate High Court,  
District Courts (Mansehra)

Annex "A"

P(10)

(30)

Attested  
Gentry

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

WHERE AS, you Mst; Besmin bibi PST GCMS Shalkan Abad was found absent by the IMU & your School was reported closed during April 2014 & on 19/11/2014.

WHERE AS, you were again found absent on 11/2/2015 & 12/5/2015 without any application.

WHERE AS Mr. Abdur Rahman ASDEO (F) was asked to conduct enquiry .

WHERE AS as per report of enquiry officer you are declared will full absent & remained continuous absent .AS your absence willful, hence Keeping in view of the above facts and by perusal of material on record, I The District Education Officer being competent authority decided to impose the major penalty upon you removal from service w.e.f. 12/5/2015 under the powers conferred upon me in (E&D) rules 2011. & as per DSC directions .

District Education Officer  
(female) Kohistan

Endst; No. IMU / 3145-48 / DEO (F) KH; Dated 13-8 /2015;

Copy of the above is forwarded to ;

- 1.The PA to The Director, Elementary & Secondary Education ,Khyber Pakhtunkhwa Peshawar.
- 2.The Deputy Commissioner Kohistan Lower/Upper.
3. The District Monitoring Officer (IMU)District Kohistan.
4. The District Accounts Officer Kohistan .
5. The Deputy District Education Officer (Female ) Kohistan .
- 6.The Sub Divisional Education Officer(female)Kohistan .
7. The Circle ASDEO Palass.
- 8.Teacher Concerned .

District Education Officer  
(female) Kohistan

Attested  
Gajju

P 11

Amir B

The director E/S education  
Khyber pakhtunkhwa,  
Peshawer.

Sub,

Application for reinstatement of service.

R/sir,

Kindly refer to the DEO(F) Kohistan office Endst.no IMU/3145-48/DEO(F)KH 13-08-2015.

It is humbly request that I have been serving as a PST trained teacher in govt girls primary CMS shalkhan Abad tehsil palas distt kohistan since 01-12-2006. Sir I was astonished when I came to know about removal me from my service by DEO(F) distt kohistan on the report of IMU absenties,

Sir, I had lost my CNIC in October 2014, Due to this I was considered absent by IMU from my duty. Even I had reasoning with her for the lost of my CNIC, while I have been attending my duty regularly and faithfully except the 1<sup>st</sup> week of march, during this I was ill and under treatment and I put forward an application which is not recommended and I was absented by DDEO(F) KH. Because in this hard culturalized area I got education and had gotten professional diploma of PTC. Being a trained and a needy one am attending my duty whole heartedly and faithfully, Because I have to support my family and have to feed and educate my kids.

Respected sir further I issuer you that I will offer my services more honestly and punctually. There for I beg to you sir kindly order to reinstate my service and release my stopped salaries on the effected date 12-05-2015, because.....

- (1) I had lost my CNIC and was consider absent only by IMU report.
- (2) There hasn't no inquiry was conducted against me.
- (3) There hasn't no show cause notes was issued against me.
- (4) There hasn't no newspaper notice issued against me.
- (5) No personal hearing letter issued to me.

Kindly take pity on my request and save my future as well as of my kids.

We shall be very thankful to you for your this act of kindness attached attested copies of my attendance register along with the written recommendations from head mistress of my school.

Dated. 13-10-2015

Your obediently,

Basmeem

Basmeem Bibi PST D/O Saifoor

CNIC #.13503-7596173-4

Personal no.388828



*Attested*  
*Samir*

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

*Annex 'C'*  
*(P-12)*

**Reminder-I**

No. 3256 /FNo.325/Appeal/Kohistan  
Dated Peshawar the 22/10 /2021

To

✓  
The District Education Officer,  
(Female) Kohistan Kolai Palas

Subject:- **APPEAL**

I am directed to refer to this officer letter No.3245 dated 23.10.2020 on the subject cited above the case in respect of Mst. Basmin Bibi, PST, District Kohistan Kolai Palas is still awaited at your end, to ask you once again to submit report to this directorate to proceed further into the matter.

*Samir* 22/10/21  
Assistant Director Female  
(E&SE) Khyber Pakhtunkhwa,

Endst No. \_\_\_\_\_

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Assistant Director (Female)  
E&SE Khyber Pakhtunkhwa

*DA*  
*Put up to Dyk DEO (F)*  
*on note sheet in New/Deck File*  
*For further orders please.*  
*Samir 2/11/2021*



*Almas*  
*Subject*

(P. 13)

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DISTRICT  
KOLAI PALLAS KOHISTAN**

No. 7762 / dated 12/05/2022

To,

The Director,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

*A. A. Khan* (D)

Subject: **APPEAL**

Memo: kindly refer to your letter No. 3256/FNo325/F/Appeal/Kohistan Dated 22/10/2021 on the subject cited above.

It is submitted for your kind information that this office started official work in the Month of June/2019, which the removal order of the Mst Basmeen Bibi Ex: PST GGPS Shilkhan Abad Kohistan has been issued by the DEO Female Upper Kohistan, all previous record i-e before June 2019 are available in the office of DEO Female Kohistan Upper. This regard office has already requested to DEO Female Upper Kohistan in connection with provision of record related to District Kolai Pallas vide Letter No 976 Dated 19/09/2019, But the same record has not been provided to this office so far.

Thirteen Schools non-functional in district kolai pallas Kohistan for the Month of March 2022 due to non-availability of teaching staff in the report of District Monitoring Officer Kolai Pallas Kohistan.

In view of the above the undersigned recommended for re-instate the above mention teacher for functionalization of nonfunctional schools in district kolai pallas Kohistan for the best interest of public.

Endstt: No 7763-65 Dated 12/05/2022

Copy of the above is forwarded to the,

- 1-District Education Officer Female Upper Kohistan.
- 2-Deputy Commissioner Kolay Pallas Kohistan.
- 3-Sub-Divisional Education Officer Female Pallas

*12/5/22*  
District Education Officer Female  
District Kolai Pallas Kohistan

*12/5/22*  
District Education Officer Female  
District Kolai Pallas Kohistan

Annex "E" (P-14)



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

Attended  
Dary

No. 2083 / 116 5/11/11/PT Basmo  
Bibi/Kohistan/2023

Dated Peshawar the 08 / 01 / 2024

To

Mst. Basmoon Bibi,  
Ex-PST GCMPS Shilkhan Abad Kollai Palas Kohistan.  
Cell No. 0343-9492210

Subject: - PROVISION OF INFORMATION UNDER RTI ACT 2013.

I am directed to refer to your application dated 18.12.2023 on the subject cited above and to state that your appeal for reinstatement dated 14.10.2022 has been rejected by the Worthy Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide this office Notification Endst: No. 5130-32 dated 01.07.2022. (Copy attached)

Encis: As Above

AD (RTI & Ombudsman)  
Directorate of E&SE KP

Endst: No. \_\_\_\_\_

Copy forwarded to the: -

1. P.A to Director E&SE KPK Peshawar.

AD (RTI & Ombudsman)  
Directorate of E&SE KP

*Allestad*

*Director*

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

15

*Arif*

NOTIFICATION

Consequent upon the approval of the competent authority in the light of DEO  
Kolla Pallas Kohistan report vide letter No.7762 dated 12.5.2022, the appeal of Mst.  
Hasmeen Bibi, Ex-PST, CGPS Shikhan Abud is hereby rejected under rules 17 (2)(a) of E&D  
Rules 2014.

DIRECTOR  
Elementary & Secondary  
Education Khyber Pakhtunkhwa.

Dated Peshawar the 02/07/2022

Order No. 5730-30 F.No. 325/Appeal Kohistan

Copy forwarded for information to the:-

1. District Education Officer (Female) Kolla Pallas Kohistan with the direction to inform the teacher concerned accordingly.
2. Teacher concerned.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa

*o/c*

*Asst*  
*Dir*  
*1-7-2022*  
Assistant Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa.

Attested  
Copy

BETTER COPY.

P (16)  
18

"F-2"

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

**NOTIFICATION**

Consequent upon the approval of the competent authority in the High of DEO Female Kolai Pallas Kohistan report vide letter No. 7762 dated 12.05.2022, the appeal of Mst. Basmeen Bibi, EX-PST, GGPS Shilkhan Abad is hereby rejected under rules 17(2)(a) of E&D Rules 2014.

**DIRECTOR**

ELEMENTARY & SECONDARY  
Education Khyber Pakhtunkhwa.

ENDST No5730-32 NO 325/ Appeal Kohistan

Dated Peshawar the 01.07.2022

**Copy Forwarded for information to the:-**

1. District Education Officer (Female) Kolli Pallas Kohistan with the direction to inform the teacher concerned accordingly.
2. Teacher Concerned.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.

**ASSISTANT DIRECTOR (FEMALE)**  
Elementary & Secondary Education  
Khyber pakhtunkhwa.

Attested  
CMS شیکھن آباد ریگولر اینٹی ڈیوٹی کے ساتوں سے  
رہتے جلی آرہے ہیں

اللہ کے رحم سے کنویں کی وجہ سے فائبر تک  
Reasoning ہوتی رہے اور شاہدہ CNIC  
یوں ہے کہ غیر حاضر تصور کیا جاتا ہے

کہا اور پھر کنویں کے ناکے لگو دینے کی بات  
تفواہ اور ملنے کا ہے

READ MISTRESS  
CMS Shikhanabad  
Distt Kohistan  
28-09-15

ڈپٹی سٹریٹس کنوینشن  
CMS شیکھن آباد



# وکالت نامہ

بعد ازاں جناب سر جسٹس بی بی بیگم ایسٹریٹ لاء کورٹ مانسہرہ  
 بسیمین بی بی نام حکومت پاکستان کے لیے  
 دعویٰ یا جرم سر جسٹس ایبل منجانب ایبلانٹ  
 باعث تحریر آنکہ

اندریں مقدمہ عنوان اپنی طرف سے برائے پیردی وجود ہی مقام ایسٹریٹ لاء کورٹ مانسہرہ

## ملک اشفاق احمد جیلانی ایڈووکیٹ

کو بدیں شرٹ وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور ہوتے  
 پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوں اور غیر حاضری کی وجہ  
 سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب  
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری  
 کے مقرر اوقات سے پہلے یا بروز تعطیل پیردی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقامی کچہری کے علاوہ کسی اور جگہ  
 سماعت ہو یا کچہری کے اوقات کے آگے یا پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ  
 ہوں گے۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی ایبل منگرائی دائر کرنے نیز ہر قسم کی  
 درخواست پر دستخط تصدیق کرنے کا کسی اختیار ہوگا۔ نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی  
 حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرٹائش و  
 راضی نامہ دستبرداری و اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت ایبل و برآمدی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم  
 استثنائی یا فیصلہ قبل از ڈگری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادا تنگی ملحدہ مختیار نہ کرنے کا مجاز ہوگا۔ اور بصورت  
 ضرورت بدوران مقدمہ یا ایبل و منگرائی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانونی  
 کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو  
 صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیردی نہ کریں۔ اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے  
 برخلاف نہیں ہوگا۔ لیکن مل سائنس پر دائرہ موصوف مثل ذات خود منظور قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے کہ تاسند رہے  
 مضمون وکالت نامہ سن لیا ہے اور آپنی طرح کچھ لیا ہے اور منظور ہے۔

مورخہ 03/02/2014

والعبد العبد العبد العبد

بسیمین بی بی ایس لاء لاء کورٹ مانسہرہ  
 KP کو بیٹان ایبلانٹ  
 Besmeem

ATTESTED & ACCEPTED

*(Signature)*

Advocate High Court,  
 Mansehra.