

26.07.2016

Junior to counsel for the appellant, Mr. Mahaz Khan, Assistant alongwith Addl. AG for the official respondents No. 1 to 5 and counsel for private respondent No. 6 present. Wakalatnama placed on file. Requested for adjournment. To come up for written reply/comments on 25.08.2016 before S.B. Status quo be maintained.


Chairman

25.08.2016

Appellant in person, Mr. Ziuallah GP for official respondents No. 1 to 5 and counsel for private respondent No. 6 present. Seeks adjournment. To come up for written reply/comments before S.B on 26.09.2016. Status quo be maintained.

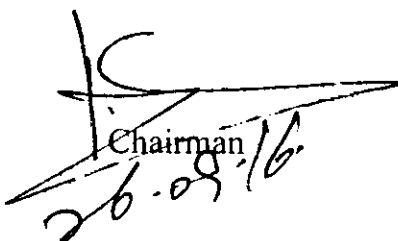

Chairman

26.09.2016

None present for the appellant despite repeated calls. Mr. Muhammad Adeel Butt, Addl. AG for the official respondents present. The court time is about to over.

In view of the above the appeal is dismissed for want of prosecution. File be consigned to the record room.

ANNOUNCED
26.09.2016


Chairman
26.09.16

Appeal No. 654/2016
Dr. Zakir Hussain B Govt

17.06.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Agency Surgeon Bajaur Agency. That as Agency Surgeon he is discharging his functions and performing his duties with utmost dedication and has earned appreciations including letter dated 11th June, 2014 vide which apart from cash amount their services were highly appreciated. That under the garb of good governance and letter of Secretary Social Sectors FATA dated 25.2.2016, an inappropriate authority, appellant was illegally transferred from the post of Agency Surgeon Bajaur Agency and posted as Medical Superintendent Agency Headquarter Hospital, Wana S.W Agency despite the fact that the appellant is serving in BPS-17 while the post of M.S at Wana is in BPS-19. That, additionally, the appellant is also under threats from the militants and therefore not in a position to secure himself and his family at the station of his proposed posting.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.07.2016 before S.B. Notice of stay application shall also be issued to the respondents for the date fixed. Status quo be maintained till the date fixed.

Appellant Deposited
Security & Process Fee


Chairman

D- (113)



FATA SECRETARIAT, WARSAK ROAD, PESHAWAR

Ph# 091-9210212, Fax # 091-9212110.

No. _____/DHS/FATA/Admn

Dated: _____/09/2016.

OFFICE ORDER:

The competent authority has been pleased to order the following postings/transfers of the Agency Surgeons and Medical Superintendents of AHQ Hospitals in the best interest of public with immediate effect.

S#	Name & Designation	From	To	Remarks
1	Dr. Raza Ullah, BS-17, G. Cadre	Agency Surgeon Mohmand	MO Mohmand Agency	Against the Vacant Post
2	Dr. Shad Muhammad (BS-18), G. Cadre	SMO AHQ Hospital, Ghallanai Mohmand	Agency Surgeon Mohmand	Vice No. 1
3	Dr. Wazir Khan (BS-17), G. Cadre	Agency Surgeon Bajaur	Medical Officer, Mohmand Agency	Against the Vacant Post
4	Dr. Abdul Haq, BS-18. G. Cadre.	SMOs Bajaur Agency	Agency Surgeon Bajaur	Vice No.3
5	Dr. Inayat Ur Rahman.	Agency Surgeon NWA	MO Bajaur Agency	Against the vacant post
6	Dr. Zakir	MS Wana SWA	Agency Surgeon NWA	Vice No. 5
7	Dr. Hayat, BS-17, G. cadre	Agency Surgeon FR Peshawar	MO FR Peshawar	Against the Vacant post
8	Dr. Zarin, BS-17, G. Cadre	FSMO Khyber Agency	Agency Surgeon FR Peshawar	Vice No. 7
9	Dr. Khan Saeed, BS-18, G. Cadre	MS AHQ Hospital Landikotal, Khyber Agency	MS AHQ Hospital Khar, Bajaur	Vice No. 11
10	Dr. Zar Alam, BS-18, Specialist cadre	SMO, THQ Hospital Dogra Picket	MS AHQ Hospital, Landikotal, Khyber	Vice No. 9
11	Dr. Ikram Ullah, BS-17, G. Cadre,	MS AHQ hospital Bajaur	MO Mohmand Agency	Against the vacant post

Sd/xxx

Additional Chief Secretary FATA.

No. 14641-58 /DHS/FATA/Admn, dated 06 /09/2016.

Copy for information:

1. The Secretary Social Sectors Department FATA, Peshawar.
2. The Political Agents, Khyber, Mohmand, Bajaur, North Waziristan, South Waziristan & FR Peshawar.
3. The Agency Surgeons, Khyber, Mohmand, Bajaur, North Waziristan, South Waziristan & FR Peshawar.
4. The AGPR Sub Office, Peshawar.
5. The Agency Accounts Officers, Khyber, Mohmand, Bajaur, North Waziristan & South Waziristan.
6. The Medical Superintendents, AHQ hospital, Landikotal and AHQ Hospital Khar, Bajaur Agency.
7. The P.S to Additional Chief Secretary FATA, Peshawar.
8. Officers concerned.

For information and necessary action.

ATTESTED



[Signature]

[Signature]
 Director Health Services,
 FATA Peshawar.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 654/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/06/2016	<p>The appeal of Dr. Zakir Hussain presented today by Mr. Amin-ur-Rehman Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	17-6-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on. <u>17-06-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE K.P.K. SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 654 / 2016
(alongwith interim relief)

Dr. Zakir Hussain APPELLANT

VERSUS

Federation of Pakistan etc RESPONDENTS

I N D E X

S.No.	Description of documents	Annexures	Pages
1.	Service appeal		1 - 8
2.	Affidavit		8 - 9
3.	Addresses of parties		9 - 10
4.	Application for suspension		11 - 12
5.	Copy of detailed C.V. alongwith Notification dated 4-09-2002 & Office order dated 16-02-2005.	'A'	13 - 26
6.	Copy of Notification dated 9-04-08.	'B'	27 - 28
7.	Copy of office order dated 28-05-2013	'C'	28 - 29
8.	Copies of letters of appreciation dated 11-06-2014, 13-01-2016, 26-01-2016, 1-04-2016 & Mujahid Din Islam Warning letter	'D'	30 - 33/1
9.	Copy of Notification dated 25-2-2016	'E'	33 - 34
10.	Copy of Notification 25-5-2016 with departmental representation.	'F'	34 - 35
11.	Copy of office letter 9-06-2016	'G'	36 - 37
12.	Copy of President's Order No.13/1972	'H'	37 - 38
13.	Copy of application for order dated 15-06-2016 of PHC with memo of W.P. No. 2224/2016	'I'	39 - 40
14.	Wakalat Nama		40 - 41

PESHAWAR

8-06-2016

Appellant
through
(Amin-ur-Rehman)
Advocate, Peshawar

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 654 /2016 Khyber Pakhtunkhwa
Service Tribunal
(ALONGWITH INTERIM RELIEF)

Diary No. 639

Dated 16-6-2016

Dr. Zakir Hussain S/o Hakim Khan
R/o Village & Tehsil Khar, Bajawar Agency APPELLANT

...VERSUS...

1. Federation of Pakistan, through Secretary SAFRAN, S-Block, Pak Secretariat Islamabad.
2. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
3. Additional Chief Secretary, FATA Secretariat, Warsak Road, Peshawar.
4. Secretary Social Sector Department (SSD) FATA Secretariat, Warsak Road, Peshawar.
5. Director Health Services, FATA Secretariat, Warsak Road, Peshawar.
6. Dr. Wazir Saafi, Medical Officer (BS-17), BHU, Sanger Mohmand Agency.

..... RESPONDENTS

SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, R/W
ALL ENABLING PROVISIONS OF LAW, GOVERNING
THE SUBJECT, AGAINST:

- i. NOTIFICATION No. FS/SO (HH)/ FATA/161-64
DATED: 25.02.2016 OF RESPONDENT No. 4,
- ii. NOTIFICATION No. FS/E/100-93 (VOL-
10)/8164-77 DATED: 25.05.2016 OF
RESPONDENT No. 3,
- iii. OFFICE LETTER No. 8842-43/DHS/FATA/Admin
DATED: 09.06.2016

Filed to-day
[Signature]
Registrar
16/6/16

VIDE THE FORMER NOTIFICATION DATED:
25.02.2016, POLICY OF POSTING/ TRANSFER
HAS IRONICALLY BEEN CHANGED, WHILE
THROUGH SUBSEQUENT NOTIFICATION

DATED: 25.05.2016, THE IMPUGNED POLICY HAS BEEN GIVEN EFFECT & VIDE THE LATER OFFICE ORDER DATED: 09.06.2016, DECISION OF THE APPELLATE AUTHORITY ON THE DEPARTMENTAL REPRESENTATION OF APPELLANT WAS COMMUNICATED

PRAYER

IMPUGNED NOTIFICATIONS & SUBSEQUENT PROCEEDINGS THERETO, AS WELL AS ORDER OF THE APPELLATE AUTHORITY COMMUNICATED DATED: 09.06.2016, MAY BE DECLARED ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY, VOID AB INITIO AND OF NO LEGAL EFFECT, THEREFORE BE SET AT NAUGHT AND RESPONDENTS MAY BE DIRECTED NOT TO INTERFERED WITH LAWFUL SERVICE/ POSTING OF PETITIONER AS AGENCY SURGON BAJAUR, AGENCY, BUT STRICTLY IN ACCORDANCE WITH LAW WITH ALL ADHERENCE TO THE KP CIVIL SERVANTS ACT, 1973 AND KP CIVIL SERVANTS (APPOINTMENT PROMOTION & TRANSFER) RULES, 1989, SO AS TO ENABLE SECURE THE ENDS OF JUSTICE

Respectfully Sheweth:

1. That Appellant is MBBS (KMC) & MPH qualified & bonafide peaceful citizen of Pakistan and permanent resident of Bajawar Agency, FATA and was appointed as Medical Officer (BS-17), vide Notification No. SO(ESTT:)3-18/2002, dated: 14.09.2002, on contract basis for a period of one year against the non transferable posts in District Batagram, however, his contract was renewed from time to time, due to satisfactory performance and work with zeal and devotion, up till 2005, and was subsequently appeared in the competitive examination, held under the supervision of Khyber Pakhtunkhwa Public Service Commission (KP PSC), and got successful to mark entry on the merit table and was thereafter recommended to be appointed as MO (BS-17), on 03 years contract basis, eventually, the competent authority, vide office order No. 4028/AD(Admn). dated: 16.02.2005, appointed him and

further posted as Medical Officer, Agency Headquarter Hospital (AHQ), Bajawar Agency at Khar.

(COPY OF DETAIL CV ALONGWITH NOTIFICATION DATED: 04.09.2002 & OFFICE ORDER DATED: 16.02.2005 ARE ATTACHED AS ANNEXURE "A").

2. That the competent authority vide Notification No. SOH(E-II)3-18/2008 dated: 09.04.2008, regularized services of Appellant, U/S 19 of KP Civil Servants Act, 1973 (KP Act. XVIII of 1973), as amended vide KP Civil Servants (Amendment) Act, 2005(KP Act. IX of 2005) w.e.f the date of enactment of the Act 2005 ibid i-e 23.07.2005.

(COPY OF NOTIFICATION DATED: 09.04.2008 IS ATTACHED AS ANNEXURE "B").

3. That, in appreciation of Appellant's performance, particularly in eradication of POLIO from Bajawar Agency, the competent authority posted him as Agency Surgeon Bajawar Agency in the best interest of public service vide office order No. FS/SO(H)/SSD/716-21, dated: 28.05.2013.

(COPY OF OFFICE ORDER DATED: 28.05.2013 IS ATTACHED AS ANNEXURE "C").

4. That during posting of Appellant, the Bajawar Agency in particular and FATA, remained under Military operation against the miscreants/ out laws and to continue POLIO eradication campaign was almost negligible but he, without care of his life, always preferred professional duties and remained successful to achieve the goal of POLIO free Bajawar Agency, which was applauded and warmly appreciated by the commandant Head Quarter Bajawar Scouts at Khar, vide his appreciation letter No. 226/9/A/Med, dated: 11.06.2014, contents whereof are of paramount consideration hence the relent part whereof are reproduced as under;

"Your efforts speaks highly about your dedication to the medical profession and show your trust, commitment and loyalty with security forces.

Your efforts are highly appreciated and Rs. 20000/- are presented to you as a humble token of recognition"

Similarly, commissioner Malakand Division, vide appreciation letter No. 466-68/2/6/Estt: dated. 13.01.2016, acknowledged his services in the following words;

"The efforts made by you and you team for providing medical care soon after earthquake are hereby acknowledged and appreciated. Quick and spontaneous response your end has augmented image of the Nobel profession (Medicine) in the eye of public. It is anticipated that the same spirit will continue in future. Please convey my appreciation to all the members of you team who endeavored to successfully accomplished post-earthquake task in you sector and areas of responsibility. Very good job done by all of you... keep it up"

The POLIO emergency operation center, Directorate of Health Services FATA, vide its appreciation letter No. 382-89/PEI/EOC/FATA: dated. 26.01.2016, appreciated his efforts in the following words:

"A thorough analysis of the performance of Jan, 2016 NID campaign shows the following status of Bajawar Agency:

- *Administrative coverage was 100%.*
- *Market Survey (MS) result showed 97 %.*
- *PCM Result (Received from Federal Office) 100%*
- *27/28 lots were passed in LQAS.*

The above findings reflect the serious efforts made by yourself and the team that has improve the quality and the coverage of the campaign and we congratulate you on this"

The secretary Law & Order/Coordinator, EOC, FATA vide its letter dated: 01.04.2016, applauded his performance as under:

"EOC FATA is cognizant of the progress made by the team under your supervision in March, 2016 campaign.

A thorough analysis of the performance of March NID showed below picture of Bajawar Agency:

- Administrative coverage was 97%.
- Market Survey (MS) result showed 96 %.
- PCM Result (Received from Federal Office) 97%
- 21/22 lots were passed in LQAS.
- 229 children are reported still missed

The above findings show improvement and the same momentum is needed to maintain under your leadership"

But at the same time he remained at the top of the hit list of miscreants/ outlaws and has been receiving continuously threats of dire consequences, evident from one amongst numerous such like letters, communicated to him recently, vide which Mujahideen-e- Islam Bajawar, in retaliation of his POLIO eradication campaign, issued FITWA of his assassination and declared him the Revert (Murtad), contents whereof are of worth perusal, hence reproduced as under:

ڈاکٹر ذاکر

لعنت ہو تم پر! ہمیں اسوس ہے۔ کہ تمہارے

راشے میں بڑی رکاوٹ مسلمان بنتے جا رہے ہیں۔ کتنے مار تینوں کو سوجانا۔ علم تم جسے بہ نیت اور ذلیل انسان تم مجھے کے قابل ہے۔ اور نہ ذرہ بھر ایمان ہے، اس لئے تمہیں اس لئے خبردار کر رہے ہیں۔ تاکہ تمہارا خیانت کے دن، تمہارے اوپر گواہی دی۔ کہ تمہیں مطلع کیا گیا تھا۔ علم تم خبیث انسان سے جو کے قابل ہی نہیں ہے۔ اور وہ اس لئے کہ تمہیں دنیاوی لہج اور ڈالروں کے باغی بنا دیا تھا۔ تمہارا کیا خیال ہے۔ کہ تمہاری کڑوٹوں کا ہمیں علم نہیں۔ تمہارے زنا ملازمین سے تمہارے روابط، سرکاری دعوای املاک میں تھر د بھر د سرکاری دوائی میں کلرکوں کی امداد سر جوڑی اور سرکاری ملازمین سے رشوت کے لین دین تمہاری خیانت داری کے واضح دلائل ہیں۔ ومن یفعل یات بما غفل یوم العساة۔ ملتا ہے۔ تم ملکر دین میں شامل ہو۔ تمہاری عظیم گناہ ہے۔ کہ تم نے تمہارا اور جہت انسان تمہارے مسلمان معاشی کے جوان لڑکیوں کو این۔ جی۔ او کی طرف سے لالچ دیا اور اس کی خاطر بے دینی پھیلا رہے ہو، کیا تم تمہارے زعموں پر مٹ رہے ناک ڈالنا نہیں۔ امیر کے مسلمانوں کے مبارک بہ لوں کا کیا ہے بنا دیا۔ طلباء، مجاہدین اور علماء کو ٹھکڑے ٹھکڑے کر دیا۔ گوروں کو تباہ و برباد کیا۔ اور علم ذلیل و خوار، لالچی و منافق انسان چند ڈالروں کے عوض ان کا غائبہ بن کر تمہاری طرف آئی اختیار کی سادہ کر لے ہو۔ بلکہ ان کے لئے عظیم جاسوس بن گئے ہو۔ تم ہم سے کیسے خفیہ کر سکتے ہو۔ جبکہ قرآن میں وعدہ ہے۔ کہ واللہ ان جاہدو قینا لنعذبہم بئس عذابا۔ کیا تمہیں یقین نہیں آتا۔ کہ اللہ مجاہدین کیلئے راستے آسان بنا دیتا ہے۔ آخ فرق

(6)

ڈالروں کے بدلے منقولہ مسلمانوں کا کنارے سے سودا کر رہے ہو۔ اور
کبھی کسی نے نہیں بتایا۔ کہ اللہ فرماتا ہے۔ ” (انلقو یا پیرکم الی التصلک)
اب الرتم خود کو تباہی کی طرف لے جاتے ہو۔ تو ہمیں کبھی نڈ صاف
کرتے ہیں مہرہ آتا ہے۔ انتظار رکھنے اپنی کرتوتوں کے ترے کا۔
روز مہرہ مثالیں تم سنتے اور دیکھتے ہو۔ تم نے ہمارے ہیر کا
بہیمانہ لہر دیا ہے۔

منجانب اجماعہ بن اسلام باجور۔

(COPIES OF LETTERS OF APPRECIATION DATED: 11.06.2014, 13.01.2016, 26.01.2016, 01.04.2016 & MUJAHEDDEEN-E-ISLAM WARNING LETTER ARE ATTACHED AS ANNEXURE "D").

5. That respondent No. 4, vide notification No. FS/SO(HH)/FATA/161-64: dated. 25.02.2016, on the pretext of good governance, communicated decision of the competent authority vide which it has been decided that the Agency Surgeons and Medical Superintendents shall not be posted in their areas of domicile, and only doctors having requisite qualification and professional capacity will be posted as Agency Surgeons/MS in agencies /frontier regions of FATA in the best interest of the Govt, pursuantly ACS/ respondent no.3, vide notification No. FS/E/100-93(Vol-10)/8164-77: dated 25.05.2016, posted/transferred Appellant from the position as Agency Surgeon Bajawar Agency to the post of Medical Superintendent Agency Head Quarter Hospital, South Waziristan Agency, feeling aggrieved whereof and keeping in view peculiar circumstances of his case, particularly repeated threats of Mujahedeen-e-Islam Bajawar, Appellant preferred departmental representation on 01.06.2016 and requested for cancellation of his transfer order ibid, however, regretted by the competent authority unilaterally and communicated decision to appellant vide office letter no. 8842-43/DHS/FATA/Admin dated: 09.06.2016.

(COPIES OF NOTIFICATION DATED: 25.02.2016, NOTIFICATION DATED: 25.05.2016 ALONGWITH DEPARTMENTAL REPRESENTATION AND OFFICE LETTER DATED: 09.06.2016 ARE ATTACHED AS ANNEXURE "E", "F" & "G" RESPECTIVELY).

6. That Appellant being aggrieved of:

- i. **NOTIFICATION No. FS/SO (HH)/ FATA/161-64 DATED: 25.02.2016 OF RESPONDNET No. 4,**
- ii. **NOTIFICATION No. FS/E/100-93 (VOL-10)/8164-77 DATED: 25.05.2016 OF RESPONDENT No. 3,**
- iii. **OFFICE LETTER No. 8842-43/DHS/FATA/Admin DATED: 09.06.2016**

VIDE THE FORMER NOTIFICATION DATED: 25.02.2016, POLICY OF POSTING/ TRANSFER HAS IRONICALLY BEEN CHANGED, WHILE THROUGH SUBSEQUENT NOTIFICATION DATED: 25.05.2016, THE IMPUGNED POLICY HAS BEEN GIVEN EFFECT & VIDE THE LATER OFFICE ORDER DATED: 09.06.2016, DECISION OF THE APPELLATE AUTHORITY ON THE DEPARTMENTAL REPRESENTATION OF APPELLANT WAS COMUNICATED,

approaches this Hon'ble Tribunal, inter alia on the following grounds;

GROUNDS:

- A. That the impugned notification dated 25.02.2016, vide which strange phenomena has been introduced for the first time in the history of Health Department FATA, that too, not for the interest of public but for the interest of the Government, evident from minutely perusal whereof, which is against the law and not executable in its letter and spirit, particularly, keeping in view peculiar circumstances of the case of Appellant, who is receiving continuous threats of dire consequences at the hands of miscreants/ outlaws and his life is at stake and needs special care, but without care and caution of its legal consequences, issued subsequent notification dated 25.05.2016, vide which he was

transferred to the hub of miscreants; which is equated to death penalty for him, hence requires to be rescued, in order to enable him to survive honorably, and appropriate writ be issued to the concerned quarters, not to make him scapegoat on the behest of personal whims and wishes of few individuals, so as to secure the ends of justice.

- B. That the impugned notifications are lacking the lawful authority and have been issued in utter disregard to the law and constitution, perhaps the authority indulged itself in erroneous business, by overlooking 14 years spotless career of Appellant and the material available on his personal file, which speaks volume of malafides on their part, furthermore, services of Appellant were always applauded by all the stakeholders, particularly the international team for Polio Eradication in Bajaur Agency, such factum may also be verified from the record, wherefrom it can safely be concluded that since 2013, no polio case has been dictated, within the area of his jurisdiction, similarly, the appreciation/ commendation letters, already annexed at "D" are self-explanatory, which attracts constitutional jurisdiction of this august court, in order to annul the impugned notifications, issued by unauthorized person, under the shelter of good governance, but actually the same speaks otherwise and their actions could not be termed a positive step towards the good governance, rather it is against the interest of public, hence the impugned notification deserves to be set at naught.
- C. That respondents No.4 & 5 are bent upon to compel Appellant to surrender before their wrong deeds and to remove him from the scene, come what may, due to his outstanding performance, which is obviously a serious threat for their career and in presence of Appellant they cannot camouflage their illegal activities and to play tricks with the Government as well as international community, by presenting fake reports, irrespective of the factual position, which makes the impugned notifications as illegal, unlawful, without lawful authority, void-ab-initio and of no legal

effect, hence required to be re-visited, in order to ensure fair play and justice.

- D. That the impugned notification dated 25.02.2016 is the brainchild of respondent No.4, issued for extraneous considerations and malafide intentions and mere on the pretext of good governance, his wrong deeds could not be overlooked, for instance impugned notification dated 25.05.2016, issued by respondent No.3, vide which Appellant has been transferred from the post of Agency Surgeon Bajaur Agency to South Waziristan Agency as Medical Superintendent, but astonishingly, a Medical Officer from BHU Sanger, Mohmand Agency has been appointed as Agency Surgeon Bajaur agency, which is ridiculous for the sole reason that a person, having no experience even to run the affairs of RHC, what to say about the administration of whole agency, that too, in a situation like undeclared war and Bajaur Agency is situated in a conflict zone and is of paramount consideration for the sustainability of peace in the entire country, therefore, such factors may not be overlooked and the illegal actions of concerned quarters may not go unchecked, not only because the same have been issued without lawful authority, but the same may be termed conspiracy against the public interest, hence the impugned notifications deserve to be set aside and Appellant be allowed to continue his service wherefrom he has illegally been transferred.
- E. That services of Appellant, at present, is protected under the Centrally Administered Tribal Areas (Employees Status) Order, 1972 (President's Order No.13 of 1972), word employee is defined under Article 2(b) whereof in the following words;

"Employees means, employees serving in connection with the affairs of the Centrally Administered Tribal Areas within or outside those areas including members of the civil service of the North-West Frontier Province and all other Government servants not belonging to any Central or Provincial service"

Similarly, status of the employee of the Centrally Administered Tribal Areas has been defined under Order-3 of the President's Order *ibid*, hence contents whereof are reproduced as under;

"Notwithstanding anything contained in their conditions of service, the employees shall, as from the appointed day, be the employees of the Provincial Government on deputation to the Central Government and shall work under the overall administrative control of the Provincial Government, on the same terms and conditions of service as respects remuneration, leave and pension and the same rights as respects disciplinary matters or tenure of office as were applicable to them immediately before that day.

Provided that the employees shall not be entitled to deputation allowance for their service after appointed day."

Minutely perusal of the above legal position of the case, although Appellant is civil servant within the meaning of KP Civil Servants Act, 1973, but if the relevant provisions of the Act 1973 *ibid*, put in juxtaposition with the command of the President's Order *ibid*, it would transpire that presently Appellant would be deemed to be a civil servant and in that eventuality he cannot invoke jurisdiction of Services Tribunal, therefore, the sole remedy available to him is under the Constitution of Pakistan, 1973, in shape of Article-199 and this august court has ample jurisdiction to annul the impugned actions of the concerned quarters and to provide protection to Appellant against their wrong deeds, being his fundamental right, guaranteed under the Constitution.

(COPY OF PRESIDENT'S ORDER NO.13 OF 1972 IS ATTACHED AS ANNEXURE "H").

- F. That, in view of peculiar circumstances of the case coupled with insistence of respondents, who were bent upon to give effect to the impugned transfer notification of appellant, therefore he left with no option after inordinate delay occasioned in disposal of his departmental appeal, but to invoke constitutional jurisdiction

under Article-199 of the Constitution of Islamic republic Pakistan of the august Peshawar high Court in W.P No. 2224/2016, which was disposed of vide order dated: 15.06.2016, with the directions to the departmental authority to dispose of his pending representation expeditiously but not later than a month time, but surprisingly the decision of appellate authority was also communicated on the same day i.e. 15.06.2016, but after pronouncement of the judgment *ibid*, though the decision is not in affirmative, but had enabled appellant to prefer the titled appeal, in order to get justice and to enable appellant to kept continue service as Agency Surgeon, Bajaur agency with zeal and devotion, but after interference of this august tribunal in order to annul the impugned herein, including the decision of the appellate authority *ibid*, so as to ensure fair play and justice.

Application for
(Copy of order dated: 15.06.2016 of the august Peshawar High Court alongwith memo of W.P 2224/2016 is attached as Annexure "I")

- G. That any other ground, with the permission of this Honourable Court, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, impugned notifications & subsequent proceedings thereto, as well as order of the appellate authority communicated dated: 09.06.2016, may be declared illegal, unlawful, without lawful authority, void ab initio and of no legal effect, therefore be set at naught and respondents may be directed not to interfered with lawful service/ posting of petitioner as Agency Surgeon Bajaur, agency, but strictly in accordance with law with all adherence to the KP Civil Servants Act, 1973 and KP Civil Servants (appointment promotion & transfer) rules, 1989, so as to enable secure the ends of justice

Any other relief, not specifically prayed for and deemed appropriate to this Honourable Court in circumstances of the case may also be granted to the Appellant.

THROUGH

APPELLANT

AMIN-UR-REHMAN

KASHIF SHAHBAZ KHAN

KHALID HUSSAIN

&

WAQAS HASSAN

ADVOCATES, PESHAWAR

DATED: 16.06.2016

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. _____/2016
(ALONG WITH INTERIM RELIEF)

Dr. Zakir Hussain..... PETITIONER

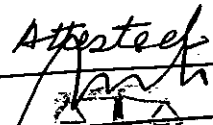
...VERSUS...

Federation of Pakistan & others RESPONDENTS

AFFIDAVIT

I, Dr. Zakir Hussain S/o Hakim Khan R/o Village & Tehsil Khar, Bajawar Agency, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

DEPONENT
CNIC: 17301-1581517-5

Attested


Mian Sibghat Ullah Shah 16-06-2016
Advocate
Notary Public / Oath Commissioner
Peshawar High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

SERVICE APPEAL No. _____/2016
(ALONG WITH INTERIM RELIEF)

Dr. Zakir Hussain..... PETITIONER

...VERSUS...

Federation of Pakistan & others RESPONDENTS

ADDRESSES OF THE PARTIES

PETITIONER:

Dr. Zakir Hussain S/o Hakim Khan
R/o Village & Tehsil Khar, Bajawar Agency

RESPONDENTS:

1. Federation of Pakistan, through Secretary SAFRAN, S-Block, Pak Secretariat Islamabad.
2. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
3. Additional Chief Secretary, FATA Secretariat, Warsak Road, Peshawar.
4. Secretary Social Sector Department (SSD) FATA Secretariat, Warsak Road, Peshawar.
5. Director Health Services, FATA Secretariat, Warsak Road, Peshawar.
6. Dr. Wazir Saafi, Medical Officer (BS-17), BHU, Sanger Mohmand Agency.

THROUGH

APPELLANT

AMIN-UR-REHMAN
ADVOCATE, PESHAWAR

DATED: 16.06.2016



BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

**SERVICE APPEAL NO. _____/2016
(ALONGWITH INTERIM RELIEF)**

Dr. Zakir Hussain..... **PETITIONER**

...VERSUS...

Federation of Pakistan & others **RESPONDENTS**

**APPLICATION FOR SUSPENSION OPERATION OF
IMPUGNED TRANSFER NOTIFICATION DATED:
25.05.2016 TILL FINAL DECISION OF THE TITLED APPEAL**

Respectfully Sheweth:

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of the instant application.
3. That, in view of more than 13 years spot less career of applicant, he deserves to be extended the subject relief in the best interest of justice.
4. That valuable rights of applicant are involved and will suffer irreparable loss if the subject relief has not been extended, rather the titled appeal would become infructuous, hence proprietary demands suspension operation of impugned transfer notification, till final decision of the titled appeal.
5. That applicant has got good prima facie case in his favour and very much sanguine of its success. Moreover, balance of convenience also lies in his favour, hence deserves to be granted the relief prayed for.

6. That there is no legal bar to grant the subject relief to applicant, till final decision of the main case, rather, it would secure the ends of justice and equity and would enable him to defend himself, in accordance with law and rules governing the subject.

It is, therefore, most humbly prayed that on acceptance of instant application, impugned transfer notification dated: 25.05.2016 may be suspended, till final decision of the titled appeal, so as to secure the ends of justice.

THROUGH

APPELLANT

AMIN-UR-REHMAN

KASHIF SHAHBAZ KHAN

KHALID HUSSAIN

&

WAQAS HASSAN

ADVOCATES, PESHAWAR

DATED: 16.06.2016

Annex "A"

13

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Dated Peshawar the 04th of September 2002

S-376
P-19

NOTIFICATION

NO.SO(ESTT):3-18/2002. The Competent Authority is pleased to appoint the following doctors as Medical Officer (BS-17) on contract basis for a period of one year on the non-transferable posts in the District/Agency as mentioned against each:-

S.No.	Name	Father's Name	Place
1.	Abdul Aziz	Abdur Rashid	Shangla
2.	Abdul Haleem Afridi	Fozal Shah	Dir Upper
3.	Abdul Hamed	Saadullah	Dir Lower
4.	Abdul Janan Khan	Abdul Manan	Dir Lower
5.	Abdul Karim	Mir Abbas Khan	Khyber Agency
6.	Abdul Latif	Abdul Haq	Mansehra
7.	Abdullah Jan	Gul Mohd Khan	SW Agency
8.	Abrar Hussain	Said Muhammad	DI Khan
9.	Afsar Ali	Murtaz Ali	Abbottabad
10.	Afsheen Mahmood	Fazal Mahmood	Nowshera
11.	Ahmad Din	Rasool Muhammad	NW Agency
12.	Ahmed Ali Khan	Sher Bahadar Khan	Nowshera
13.	Alam Zeb	Aurangzeb	Mohmand Agency
14.	Alam Zeb Khan	Sher Afsar Khan	Orakzai Agency
15.	Alamzeb Khan	Gul Shah Baz Khan	NW Agency
16.	Ali Asghar	Abdul Akbar Khan	Dir Upper
17.	Amanullah	Gul Marjan Bhitani	Tank
18.	Amir Hameed Minhas	Abdul Hamid Minhas	Haripur
19.	Amir Muhammad	Faqir Muhammad	Peshawar
20.	Amjad Hussain	Muhammad Hussain	Charsadda
21.	Amjad Hussain	S.Lal Khan	Khyber Agency
22.	Amna Ghani	Sher Ghani Khan	Abbottabad
23.	Aneela	S.Wali Shah	Nowshera
24.	Ansaar Ur Rehman	M.R.Abbasi	Abbottabad
25.	Anwar Ali	Badshah Zada	Swat
26.	Arshad Hussain	Nijat Hussain	Kurram Agency
27.	Asghar Ali	Rahmat Ullah	Mansehra
28.	Asghar Khan	Muhabat Khan	Swabi
29.	Ashraf Ali	Muhammad Salim	NW Agency
30.	Asif Farooq	Malik Khan	DI Khan
31.	Asif Kamal Khan	Muhammad Kamal	DI Khan
32.	Asif Mehmood	M. Afsar Khan	Abbottabad
33.	Asim Saif Ahmed	Haji Muhammad Ahmad	Abbottabad
34.	Asma Asrar	Asrar Hussain	Nowshera
35.	Ataullah	Gul Ambar Khan	Swat
36.	Atta Muhammad Khan	Sher Mohd. Khan	Peshawar
37.	Attaul Haq	Ihsanullah	Swabi
38.	Aurangzeb Afridi	Ghulam Hussain	Khyber Agency
39.	Aurangzeb Afridi	Amir Nawaz Khan	SW Agency
40.	Awal Hakeem	Gul Hakeem	Khyber Agency
41.	Azhar Ijaz	Rab Nawa Khan	DI Khan
42.	Azhar Yaqoob	Muhammad Yaqoob	Hangu
43.	Aziz Ullah	Mian Gul	Dir Lower
44.	Aziz Ur Rehman	Malik Khan Badshah	Orakzai Agency
45.	Badshah Khan	Rais Khan	Lakki Marwat

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46.	Bakht-Amal-Jan	Ali Mar Jan	NW Agency
47.	Bashir Ud Din	Shawat-Khan	Khyber Agency
48.	Bela Inayat	Inayat Ur Rehman	Nowshera
49.	Bushra Manan	Abdul Manan	Mansehra
50.	Bushra shah	Fayyaz Ali Shah	Charsadda
51.	Daud Ahmed	Abdul Ghaffar	Dir Upper
52.	Dilawar Khan	Saif Ullah Jan	Dir Lower
53.	Dilawar Khan	Jalaluddin	SW Agency
54.	Ejaz Ahmad	Muhammad Aslam	Mansehra
55.	Ejaz Ahmad Khan	Said Karim	Mansehra
56.	Ejaz Ajmal Khan	Ajmal Khan	Bajaur Agency
57.	Flaz Ahmed	Niaz Khan	Abbottabad
58.	Faiz Ur Rehman	Kifayatullah	Swabi
59.	Fakhr Zaman	Khana Jan	DI Khan
60.	Fakhrul Islam	Abdus Salam	Abbottabad
61.	Farhatullah Nasr Malik	Nasrullah Khan	Kohat
62.	Farid Ali Khan	Muhd: Ashraf	Charsadda
63.	Farrak Deeba	Faza-Mahmood	Peshawar
64.	Farukh Sair	Amir Zada	Swabi
65.	Farzana Niaz	Niaz Muhammad	DI Khan
66.	Fayyaz Ahmed	Miraj Ud Din	Swabi
67.	Fazal Ghafoor	Muhammad Amin	Malakand
68.	Fazal Majeed	Muhammad Aslam	Nowshera
69.	Fazal Rabi	Sahib Noor	Charsadda
70.	Fazilat Jamala	Sardar Hussain	Mardan
71.	Fida Ullah	Tehsin Ullah	Dir Lower
72.	Fouzia Israr	Muhammad Israr	Abbottabad
73.	Ghazala Shiraz Khan	Sheraz Khan	Abbottabad
74.	Ghazanfar Ali	Shaukat Ali	Chitral
75.	Ghulam Dastagir	Malik Saleh	DI Khan
76.	Ghulam Farooq	Ismail Jan	Bajaur Agency
77.	Ghulam Muhammad	Noor Sultan	Mansehra
78.	Ghulam Qadir	Sohbat Khan	Charsadda
79.	Ghulam Qadir	Malley Khan	Tank
80.	Goharullah	Muhammad Karim	DI Khan
81.	Gohar Ali	Siraj Muhammad	Shangla
82.	Gul Taj Habib	Said Habib	Hangu
83.	Gulab Din	Muhammad Din	Mohmand Agency
84.	Hafiz Ur Rehman	Abdur Rehman	Buner
85.	Hakim Jari	Gul Nawaz Khan	Lakki Marwat
86.	Hameed Ali	Sadeq Ali	Kurram Agency
87.	Hameed Ullah	Muhd: Subhan	SW Agency
88.	Hameedullah	Fazal Nabi	Dir Lower
89.	Hameedullah	Mahsoob Ullah	Peshawar
90.	Hamid Gul	Badshah Gul	Mansehra
91.	Hamid Iqbal	Iqbal Hussain	Kurram Agency
92.	Haroon Ur Rashid	Abdul Jabbar	Charsadda
93.	Hassam Sadiq Lodhi	M. Saqib Lodhi	Mansehra
94.	Hassan Nasir	Abdul Malik	Bajaur Agency
95.	Humaira Tabassum	Abdul Wadood Jan	Lakki Marwat
96.	Hussain Shah	S. Bahadur Shah	Mansehra
97.	Iftikhar Ahmad Khan	Qasim Jan	Lower Dir
98.	Ihsan Ul Haq	Samullah	Mohmand Agency
99.	Ihsan Ullah	Lal Saleh Din	SW Agency
100.	Ihsanullah	Taza Khan	Peshawar
101.	Ihsanullah Khan	Dost Muhammad	Bannu
102.	Ikram Ullah	Said Ali Shah	Dir Lower

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103.	Ikram Ullah Khan	Khuda Bakhsh	Swat
104.	Iltaf Khan	Muhd: Ajmal Khan	Abbottabad
105.	Imdad Ul Haq	M. Yaqub Khan	Lower Dir
106.	Imran Khan	Rashid Ali	Swat
107.	Imtiaz Ahmed	Khawaja Muhd:	Malakand
108.	Imtiaz Ahmed	Ghulam Sarwar	Mansehra
109.	Inam Ul Haq	Bakht Zamin	Shangla
110.	Inam Ur Rehman	Noor Mehmood	Mansehra
111.	Inamullah Akbar	M. Akbar Khan	Dir Upper
112.	Inayat Khan	Sarwar Khan	Dir Upper
113.	Inayat Ur Rehman	Habib Ur Rehman	Peshawar
114.	Inayatullah	M. Ubaid Ullah	Mansehra
115.	Iqbal Ahmed	Khaisata Bacha	Swat
116.	Irum Zahoor	Zahooruddin	Peshawar
117.	Ismatullah	M Akbar Zaman	Lakki Marwat
118.	Jamal Ud din	Muhammad Din	Mansehra
119.	Jamil Ahmed Khan	Hameedullah Khan	SW Agency
120.	Jamil Ashraf	M. Ashraf Khan	Abbottabad
121.	Jamshed Ali	Liaqat Ali	Kohat
122.	Jamshid Alam.	Rustam Khan	Battagram
123.	Jan Muhammad	Haji Umar Khan	Kohistan
124.	Javail Ullah Khan	Mir Khajan	Bannu
125.	Javed Khan	Gulab Khan	Nowshera
126.	Jehangir Akbar	Abdul Akbar Afridi	Battagram
127.	Jehangir Khan	Malik Hamid Khan	Haripur
128.	Jehangir Shah	Mian Rahim Shah	Charsadda
129.	Jehanzeb	Munawar Khan	Dir Upper
130.	Jehanzeb	Muhd: Bashir	Mansehra
131.	Jehanzeb Khan	Jamal Gul	FR Peshawar
132.	Junaid Faisal Wazir	Noor Khan Wazir	Bannu
133.	Kamal Hussain	Hussain Ghulam	FR DI Khan
134.	Kamran Durrani	Bashir Durrani	Mansehra
135.	Kashan Aslam Shah	Aslam Shah	FR Peshawar
136.	Kh Fawad Parvez	Parvez Khawaja	Nowshera
137.	Khalid Khan	Abdur Rehman	Abbottabad
138.	Khan Akbar Afridi	Zafar Shah Afridi	Kohat
139.	Khurshid Khan	Arbab Khan	Khyber Agency
140.	Laila Zarak	Zafar Ali Khan	Mardan
141.	Lal Zada Khan	Umar Gul	Dir Upper
142.	Liaqat Ali	Faqir Said	FR Peshawar
143.	M Ajmal Khan	Musa Khan	SW Agency
144.	M Akram Shah	Suleman shah	Battagram
145.	M Asghar Khan	Eidat Shah	Hangu
146.	M Assad Khan	M Ayub Khan	Haripur
147.	M Haroon Shahid	Hashim Khan	Peshawar
148.	M Ismail Khan	Qasim Khan	Lakki Marwat
149.	M Jamil Khan	Fazal Mabood	Haripur
150.	M Jamil Khan	M. Shafi Khan	Mansehra
151.	M Javed Khan	Taj Muhd: Khan	Lakki Marwat
152.	M Nazir Khan	Marjan Khan	Chitral
153.	M Umar Rafiq	Amin Asghar	Hangu
154.	M Umer Orakzai	Gul Muhd: Khan	Tank
155.	M. Mustafa Alam	Nasrullah Jan	Charsadda
156.	Malik Jan	Baghi Jan	Buner
157.	Mansoor Ahmed	M. Sehrab Khan	Shangla
158.	Masood Ahmed	Abdullah Jan	Nowshera
159.	Masood Ahmed	Sultan Muhammad	Swat

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160.	Matiullah	Fazal Maula	Bajaur Agency
161.	Matiullah Khan	Saadullah Jan	DI Khan
162.	Misbahullah	Noor Muhammad	NW Agency
163.	Mubashir Hassan	Amir Nawaz	Nowshera
164.	Muhabat Ali Khan	Abdul Baqi	Kohat
165.	Muhammad Ajmal Khan	Anwar Ul Islam	Shangla
166.	Muhammad Akif Rauf	Abdur Rauf	Manséhra
167.	Muhammad Alam	Muhammad Ayub	Mohmand Agency
168.	Muhammad Ali Afridi	Mir Badshah Afridi	Khyber Agency
169.	Muhammad Ali Khan	Ayaz Khan	Karak
170.	Muhammad Amjad	Sher Alam	FR Kohat
171.	Muhammad Ashfaq	Din Rehman	FR Bannu
172.	Muhammad Ayaz	Noor Ayaz Khan	SW Agency
173.	Muhammad Ayub Jan	Ahmed Jan	Buner
174.	Muhammad Bilal	Muhammad Daud	Haripur
175.	Muhammad Bilal	Amanullah	Peshawar
176.	Muhammad Dost Khan	Zahir Gul	FR Kohat
177.	Muhammad Fahim	Muhammad Shafiq	Battagram
178.	Muhammad Farid	Khaista Azam	Tank
179.	Muhammad Hameed	Muhd. Rashid	Dir Upper
180.	Muhammad Hanif	Muhammad Yousaf	Charsadda
181.	Muhammad hanif	Abdul Hadi	Peshawar
182.	Muhammad Humayun	Fazal Elahi	FR Peshawar
183.	Muhammad Hussain	Ghazan Khan	Mardan
184.	Muhammad Ishaq	Ismatullah	Abbottabad
185.	Muhammad Ishaq	Haji Izat Khan	Hangu
186.	Muhammad Jalil	Muhammad Khalil	Hangu
187.	Muhammad Jameel	Sarfraz Khan	Mansehra
188.	Muhammad Jamshed	Muhd. Iqbal	Tank
189.	Muhammad Kashif	Abdul Munaf	Swabi
190.	Muhammad Khalid	Muhammad Aslam	Abbottabad
191.	Muhammad Mamoon	Muhd. Usman	Mohmand Agency
192.	Muhammad Noman	Muhammad Yousaf	DI Khan
193.	Muhammad Owais	Muhammad Ilyas	Charsadda
194.	Muhammad Riaz Afridi	Abdul Jabbar	FR Kohat
195.	Muhammad Riaz Afridi	Lal Noor	Swat
196.	Muhammad Riaz Khan	M. Aslam Khan	Abbottabad
197.	Muhammad Safeer	Muhammad Alam	Kohat
198.	Muhammad Sartaj	Muhammad Hanif	Nowshera
199.	Muhammad Shafiq	Raza Khan	Abbottabad
200.	Muhammad Tahir Shah	S. Marbof Jan	Bajaur Agency
201.	Muhammad Tariq	Muhammad Shaffi	Abbottabad
202.	Muhammad Tariq	Nazar Hussain	Dir Lower
203.	Muhammad Tariq	Halim Khan	Malakand
204.	Muhammad Tariq	Lal Noor	Shangla
205.	Muhammad Tariq	Muhd. Sher	Swabi
206.	Muhammad Tariq Jamil	Jamil Ur Rehman	Swat
207.	Muhammad Zaib	Said Ghani	Malakand
208.	Muhammd Javed Iqbal	Allah Diwaya	DI Khan
209.	Mukhtar Ahmed Afridi	Hukam Khan	Kohat
210.	Mumtaz Ahmed	Zarbab Khan	Mansehra
211.	Mumtaz Hussain	Asghar Hussain	Kurram Agency
212.	Mumtaz Khan	Abbas Ali Khan	Abbottabad
213.	Munawar Jamil	Muhd. Shafi Khan	Haripur
214.	Munir Ahmed Khan	Bashir Ahmed	Abbottabad
215.	Musa Khan	Arsala Khan	Dir Lower
216.	Musharaf Kamal	Kamal Khan	Bannu



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217.	Mushtaq Ahmed	Abdul Malik Khan	Abbottabad
218.	Mushtaq Ahmed	Hag Nawaz	Kohat
219.	Mushtaq Ul Mulk	Alamgir	Shangla
220.	Musta Ali Khan	Majanai	DI Khan
221.	Nadeem Sadiq	Muhammad Sadiq	Abbottabad
222.	Naeem Khan	Muhammad Jan	FR Bannu
223.	Naek Muhammad	Khawaja Muhd.	DI Khan
224.	Naila Ismat	Ismat Khan	Kohat
225.	Naseer Hassan	Nazir Hussain	Swabi
226.	Nasim Khan	H. Pir Khan	Battagram
227.	Nasrullah Khan	Izat Khan	Kohat
228.	Nasrullah Khan	Mudayarn Khan	Shangla
229.	Nauman Afridi	Nawab Khan Afridi	Khyber Agency
230.	Nayyaruz Zaman	Malik ur rehman	Orakzai Agency
231.	Neelam Junaid Faisal	Said Ahmed Shah	Bannu
232.	Neelam Naseema	Tilla Muhammad	Dir Upper
233.	Niamatullah	Qamar Ullah	Battagram
234.	Niamatullah	Abdul Muhammad	Khyber Agency
235.	Niaz Akbar Afridi	M. Akbar Afridi	Mansehra
236.	Niaz Ali Khan	Raza Khan	Karak
237.	Niaz Ud Din	Badruddin	Haripur
238.	Nisar Muhammad	Lal Muhammad	FR Kohat
239.	Nizam Ud Din	Moambar	Shangla
240.	Noor Daraz Khan	Muhd. Hameed	Mansehra
241.	Nosheen Aslam	M. Aslam Khan	DI Khan
242.	Parveen Azam	Pyo Azam	SW Agency
243.	Parveen Hussain	M. Hussain Khan	Kohat
244.	Parvez Khan	Said Alam	Nowshera
245.	Pio Ur Rehman	Amin Khan	Abbottabad
246.	Pordil Khan	Zarawar Khan	Dir Upper
247.	Qaisar Hussain	Muhd. Sharif	Kurram Agency
248.	Qaisar Taj	Zabata Khan	Dir Upper
249.	Rafatullah Khan	Taseer Ghulam	Bannu
250.	Rafiullah	Ghulam Yousaf	Orakzai Agency
251.	Rafiullah Khan	Balqiaz Khan	Mansehra
252.	Rafiullah Khan	Feroz Khan	Swat
253.	Rahat Khan	Shah Khan	Mansehra
254.	Ramzan Ali	Haji Marjan Ali	Orakzai Agency
255.	Rashid Ahmed	Taj Muhammad	Dir Upper
256.	Rashid Khan	Qabil Shah Khan	Dir Lower
257.	Razaullah Khan	Attaullah Khan	Bajaur Agency
258.	Rehana Abrar	Abrar Ahmed	Nowshera
259.	Rehman Ali	Jani Mulk	Shangla
260.	Rehmatullah Jan	Ghazi Marjan	Kohat
261.	Riaz Ahmed	Berchah Gul	Chitral
262.	Riffat Umar	Sardar M. Umar	Mardan
263.	Rizwania Irum	Kifayatullah	Charsadda
264.	Roshan Zada	Said Latif	Haripur
265.	Rozina Tariq	Tariq Zubair	Mansehra
266.	Rubina Faisal Paul	Mumtaz Khan	Mansehra
267.	S. Maqsood Ali Shah	S. Gul Rehman	Dir Upper
268.	S. Muhammad Munir	S. Noor Hassan Jan	Hangu
269.	S. Mungadullah	S. Mahidullah	Dir Upper
270.	S. Shah Hassan	S. Shabir Hussain	Kohat
271.	S. Zafar Hussain	S. Nazar Hussain	Orakzai Agency
272.	Sabin Kamal	Muhammad Kamal	Abbottabad
273.	Sabir Hussain	Ahmed Khan	FR Kohat

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274.	Sabir Muhammad	Mubarak Khan	SW Agency
275.	Sadia Anwar	Ghulam Rabbani Anwar	DI Khan
276.	Sadia Begum	Abdul Dayan Khan	Malakand
277.	Sadia Shahid	Mian Shahid Alam	Abbottabad
278.	Sadia Shamsher	Shamsher Ali	DI Khan
279.	Saeed Khan	Daud Khan	Karak
280.	Saeed Ullah Khan	Muhd. Jalil	Mansehra
281.	Said Wali Khan	Gul Amin	Peshawar
282.	Said Zaman	Bakht Zaman	Malakand
283.	Saifullah Khan	Faiz Ullah Khan	Karak
284.	Saifur Rehman	Noor Muhammad	Battagram
285.	Sajjad Ahmed	Zahir Ullah Jan	Haripur
286.	Sajjad Ahmed	Ahmed Jan	Peshawar
287.	Sajjad Ahmed Balouch	Attaullah Khan	DI Khan
288.	Sajjad Karim Ali Khail	Fazli Karim Khan	Dir Lower
289.	Sajjad Nadeem	Sardar Bahadur	DI Khan
290.	Sakhawat Khan	Gulbar Khan	Mansehra
291.	Sakhi Jan	Sher Azam	Dir Upper
292.	Salma Habib	Habib Ur Rehman	Swat
293.	Samar Jalil	Muhammad Jalil	Peshawar
294.	Samdana Anwar	M. Anwar Sidiqui	Nowshera
295.	Sami Ul Haq	Muhd. Nazif Khan	Charsadda
296.	Sami Ullah	Wishta Khan	Mansehra
297.	Samia Gul	Sameen Jan Khan	DI Khan
298.	Samia Saeed	Muhammad Saeed	Kohat
299.	Samreen Ahmed	Ahmed Ali	Peshawar
300.	Sanallah	Warid Ullah	Dir Lower
301.	Sardar Alam	Sher Alam Khan	Buner
302.	Sardar Ali	Muhammad Rafiq	Swat
303.	Sardar Ayub	M. Wali Khan	Mansehra
304.	Sardar Hussain	Ghulam Hussain	Mohmand Agency
305.	Sardar Nawaz	Abdul Nawaz Khan	Chitral
306.	Sarfraz Khan	Hajjat Din	Karak
307.	Sayed Khan	Sher Khan	DI Khan
308.	Shafiullah	Janaki	Tank
309.	Shah Hussain	Noor Rehman	Dir Lower
310.	Shah Jehan	Painda Khan	Malakand
311.	Shah Mehmood	Mir Wali Khan	Tank
312.	Shahid Alam	Abdul Hakim	Dir Lower
313.	Shahid Ali Turi	Nasir Hussain	Kurram Agency
314.	Shahid Aman	Amanullah Khan	Peshawar
315.	Shahid Ayaz	Jehangir Khan	Mansehra
316.	Shahid Khan	Umar Din	Peshawar
317.	Shahid Suhail	Muddasar Shah	Swabi
318.	Shahzad Najeeb	Arab Khan	Abbottabad
319.	Shaista Noreen	Muhammad Shafiq	DI Khan
320.	Shakeel Ahmed	Ghulam Murtaza	Dir Upper
321.	Shandana Babar	Siraj Ali	Dir Lower
322.	Shaukat Ali	Muhammad Ali	Mohmand Agency
323.	Shaukat Hayat Khan	Dost Muhd Khan	Shangla
324.	Shazia Ayub	Muhammad Ayub	Haripur
325.	Shazia Jamil	Jamil Ur Rehman	Abbottabad
326.	Shazia Rehman	Muhammad Rehman	Peshawar
327.	Shehzad Gul	Muhammad Shafiq	Mansehra
328.	Sher Ali Khan	Amir Khan	Kohistan
329.	Sher Umar Khan	Fateh Khan	Shangla
330.	Sibghatullah	Abdullah Shah	Orakzai Agency

Handwritten Signature
ATTESTED

19

331.	Suhail Jan	Siyar Ahmad	Charsadda
332.	Sultan Muhammad	Roshan Muhammad	Orakzai Agency
333.	Syed Amin Shah	Abdullah Shah	Kohat
334.	Syed Iqtidar Ali Raza	S. Mir Jaffar Shah	Kohat
335.	Syed Muhd. Hasnain	Syed Ali Askar	Kurram Agency
336.	Syed Tahir Ali Shah	Syed Mehtab Hussain	Orakzai Agency
337.	Syeda Nargis Jabeen	Syed Israr Ullah	Chitral
338.	Tahir Iqbal	Muhammad Iqbal	Abbottabad
339.	Taj Muhammad	Sher Akbar	Orakzai Agency
340.	Taqvim Ul Haq	Fazal Subhan	Battagram
341.	Tariq Ali Shah	Muhd. Ali Shah	Mardan
342.	Tariq Khan	Adalat Khan	Mansehra
343.	Tariq Nawaz	Faqir Nawaz	Bannu
344.	Tariq Nawaz Khan	M Nawaz Khan	Dir Lower
345.	Tawaf Gul	Hakim Gul	Kohat
346.	Tehseen Ullah	Sher Bahadur	Abbottabad
347.	Tehseen Ullah	Khair Ullah	Bajaur Agency
348.	Tehsin Ilyas	Ilyas Khan	Abbottabad
349.	Tikka Khan	Haji Kot Khan	DI Khan
350.	Tikka Khan	Gula Khan	Kurram Agency
351.	Tila-Ahmed Raza	Mumtaz Ahmed	Nowshera
352.	Umar Sidique	Wali Zad shah	Kohat
353.	Usman Ullah	Zaram Jan	DI Khan
354.	Waheed Zaman	Mir Ghulam	Peshawar
355.	Wahid Ullah	Abdul Qayyum	Battagram
356.	Wahid Zaman	Fakhar Zaman	Tank
357.	Wajid Ahmed	Rehman Gul	Shangla
358.	Wajid Akram Shah	S. Fazal Akram	Dir Upper
359.	Wali Khan	Mamir Khan	Orakzai Agency
360.	Wali Ullah Khan	Qasim Khan	Lakki Marwat
361.	Wali Zaman	Sardar Ali Khan	Mansehra
362.	Waqar Ahmed	Wazir Zada	Swabi
363.	Waqar Ul Mulk	Mukhtar Ul Mulk	Malakand
364.	Waqas Khattak	Asadullah Khattak	Kohat
365.	Wisal Mehmood Khan	Fazli Mehmood	Dir Upper
366.	Yar Muhd Jadoon	Khan Muhammad	Battagram
367.	Yousaf Khan	Muhd. Ibrahim	SW Agency
368.	Zafar Ullah	Sibghatullah	Tank
369.	Zaheer Ud Din Babar	Taj Muhd. Tanoli	Abbottabad
370.	Zahid Irfan Marwat	Mosam Khan	Karak
371.	Zahid Shah	Yousaf Shah	Haripur
372.	Zahid Ur Rehman	Abdullah Khan	SW Agency
373.	Zahida Bibi	Shamsul Abrar	Buner
374.	Zahidullah Khan	Asmatullah	Lakki Marwat
375.	Zakaullah Khan Wazir	Mein Dil Wazir	FR Bannu
376.	Zakir Hussain	Hakim Khan	Battagram
377.	Zakir Khan	Ray Khan	Dir Upper
378.	Zamir Hassan Orakzai	Habib Ali	Orakzai Agency
379.	Zardad Khan	Ghulam Nabi	Peshawar
380.	Zari Baz	Said Baz	Mohmand Agency
381.	Zartaja Begum	Sher Bahader I	Bannu
382.	Zeenat Ara	Alaf Din	Nowshera
383.	Zohra Aurangzeb	W/O Aurangzeb	SW Agency

ATTESTED

Their appointments shall be subject to the condition that they have completed house job requirements of one year on 05.07.2002 i.e. the last date of

DIR

No

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No- 23

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for infor

P.S.

20

application, their services have not been dispensed with on disciplinary grounds as contract MOs earlier, and that the holders of MD Degree produce certification from PMDC besides acceptance of terms and conditions of contract appointments mentioned in the Agreement to be signed by them with the Director General Health Services NWFP. Their services shall be terminated without any notice if found guilty of misconduct.

3. If the above terms and conditions, read with the clauses of the Agreement are acceptable, arrival may be given to the place of posting within 15 days of this Notification.

SECRETARY HEALTH

DIRECTORATE GENERAL HEALTH SERVICES, NWFP, PESHAWAR.

No. 23294 - 384 /E-I

Dated Peshawar the 07 /09/2002.

Copy forwarded to the:

1. Director Health Services, FATA, Peshawar.
2. Chief Executive Govt. LRH, KTH and HMC Peshawar.
3. Chief Executive Saidu Group of Hospitals Saidu Sharif Swat, Ayub Teaching Hospital, Abbottabad, Gomal Medical College, DIKhan
4. Dean PGMI/HMC Peshawar.
5. All Executive District Officers(Health) in NWFP.
6. All Medical Superintendents DHQ.Hospitals in NWFP
7. All Agency Surgeons in FATA.
8. All Medical Superintendents AHQ.Hospitals in FATA.
9. Accountant General, NWFP, Peshawar
10. All District Accounts Officers, in NWFP
11. All Agency Accounts Officers in FATA
12. Doctors concerned

For information and necessary action. They are requested to intimate their places of posting to this Directorate for further necessary action.

[Signature]

FOR DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR

No. 23395-86 /E-I

1. P.S. to Secretary to Govt. of NWFP, Health Department, Peshawar for information with reference to their notification referred to above.
2. P.S. to Minister for Health, NWFP, Peshawar for information please.

[Signature]

FOR DIRECTOR GENERAL HEALTH SERVICES, NWFP, PESHAWAR

[Signature]
ATTESTED

4027
19/2

21

Directorate of Health Services FATA Peshawar.

Governor's Secretariat Warsak Road Peshawar.

Ph No. 091-9210212 Fax No. 091-9212110.

No /AD (Admn), Dated at Peshawar the 10/2/2005.

Office Order: -

Dr. Zakir Hussain S/o Hakim Khan appointed as Medical Officer BPS (17) on basis for 3 years on the recommendation of Public Services Commission vide of NWFP, Health Deptt: Notification No. SO (Estab) 3-18/2004 and dated 2005 is hereby posted to AHQ Hospital Khar at Bajaur Agency in the interest of

report should be submitted to Directorate for record.

Director Health Services,
FATA, Peshawar.

1698-1704 /DHS/FATA/Admin: dated 16/02/2005.

Copy to

- 1- PS to Secretary to Governor FATA.
- 2- PS to Secretary to Govt: of NWFP Health Deptt: Peshawar.
- 3- Director General Health Services, NWFP.
- 4- Agency Surgeon Bajaur Agency
- 5- Agency Account Officer Bajaur Agency.
- 6- Officer concerned.
- 7- Dealing Assistant local office DHS (FATA).

Director Health Services,
FATA, Peshawar

APPESTED

سید الشہداء

University of Peshawar (Pakistan)

SESSION SUPPLEMENTARY 1993

This is to certify

ZAKIR HUSSAIN

that

Son

of

HAKIM KHAN

has obtained the Degree of

of the

KHYBER MEDICAL COLLEGE, PESHAWAR

Bachelor of Medicine & Bachelor of Surgery

from this University at the Examination held in JANUARY, 1995, and that
he/she is hereby authorised to practice Medicine Obstetrics and Surgery

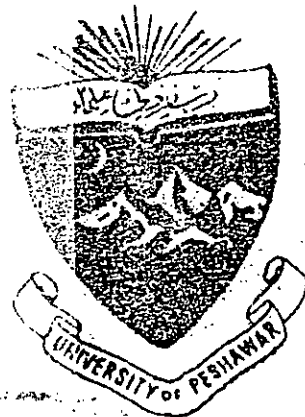
Serial No 003841

Registered No. 88-KMC-5979

Roll No. 1121

FEBRUARY 25, 1995

ATTESTED



Attested
Chairman/Director
Children Hospital
Nishtar Abad Peshawar

Fazlita
Registrar

Countersigned
Vice-Chancellor

Chairman/Director

3

Khyber Medical College Peshawar Pakistan

Academic Certificate



23

Certify that Dr. ZAKIR HUSSAIN S/O HAKIM KHAN
of this institution. from 22.11.1988 to 25.02.1995 his/her
record is as under:-

- Professional M.B., B.S examination 1990 (Supplementary) Passed Under Roll No 237
obtained 596 out of 1100 marks in 2ND attempts.
- 2nd Professional M.B., B.S examination 1991 (Annual) Passed Under Roll No 814
obtained 295 out of 500 marks in 1st attempts.
- 3rd Professional M.B., B.S examination 1992 (Annual) Passed Under Roll No 323
obtained 470 out of 800 marks in 1st attempts.
- Final Professional M.B., B.S examination 1993 (Supplementary) Passed Under Roll No: 1124
obtained 1011 out of 1700 marks in 2ND attempts.



Certificate No. 49 Registration No. 88-KMC-5979
Prepared by: Zaid Checked by: [Signature]
Issued on 25.02.1995

Attested
Principal/Dean
[Signature]
Chairman/Director
Children Hospital
Nishtar Abad Peshawar

[Signature]
ATTESTED

24

University of Peshawar
(Pakistani)
Session SUPPLEMENTARY 1995

This is to certify

ZAKIR HOSSAIN
HAKIM KHAN

that _____ of _____ has obtained the Degree of

KHYBER MEDICAL COLLEGE, PESHAWAR

of the _____ Bachelor of Medicine & Bachelor of Surgery

of the _____ Examination held in _____ JANUARY, 1995, and that

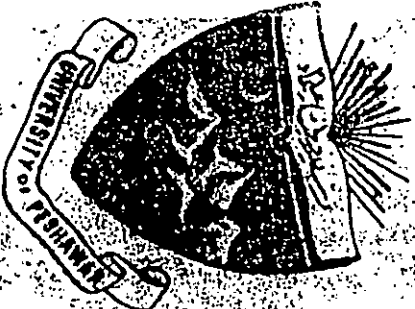
from this University at the _____ Obstetrics and Surgery
he/she is hereby authorized to practice medicine

Serial No: 003841

Registered No. 88-KMP-5979

Roll No. 1121

FEBRUARY 25, 1995



Attested

Chakrabarti Director
Children Hospital
Nishtar, Abdd Resistor
Vice-Chancellor

Fazl Khan
Registrar

Comptroller Signature

Children Hospital

ATTESTED

24

ISSUED ON 25.02.1995

Khyber Medical College Peshawar Pakistan

Provisional & Character Certificate
Bachelor of Medicine & Bachelor of Surgery

25

This is to certify that Dr. ZAKIR HUSSAIN S/O HAKIM KHAN

has successfully completed 5 years MB.B.S course of studies at Khyber Medical College, Peshawar and passed the final professional M.B.B.S _____ 1993 ~~main~~ / Supplementary Examination under Roll No. 1121 and secured _____ out of 1200 marks and found worthy to receive the Degree of Bachelor of

Medicine & Bachelor of Surgery from the University of Peshawar, N.W.F.P, Pakistan

During his/her stay in the college his/her character and conduct remained satisfactory
Absent

Chairman/Director
Children Hospital
Nishtar Road Peshawar

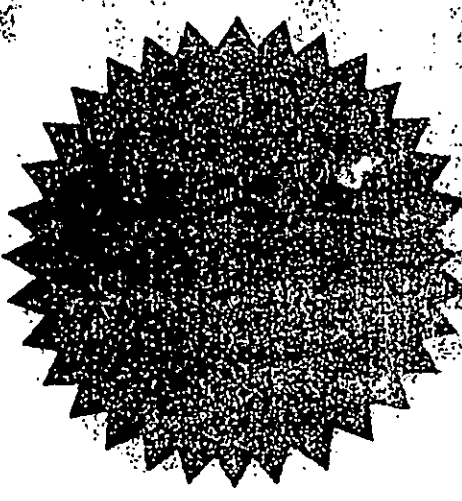
Principal/Dean

Certificate No. 49 Registration No. 88-KMC-5979

Prepared by [Signature] Checked by [Signature]

Issued on 25.2.1995

APPROVED



25

GOVERNMENT OF NWFP
HEALTH DEPARTMENT

Dated April 9, 2008

27

Annex 'B'

Benifited
2005
Act

NOTIFICATION

SOH(E-11)3-18/2008. The Competent Authority is pleased to order that the following Medical Officers/Dental Surgeons (BS-17) appointed in prescribed manner through NWFP Public Service Commission, on contract basis shall be deemed to have been regularized in terms of section 19 of the NWFP Civil Servants Act 1973(NWFP Act. XVIII of 1973) as amended vide NWFP Civil Servants (Amendment) Act 2005 (NWFP Act No. IX of 2005) with effect from 23-7-2005. i.e. the date of commencement of the said act.

S.No	Name/Father's Name/ Domicile	Date Of Joining	Present Place of posting
01	Dr. Abdul Jabbar s/o Mir Abdul Shakoor, Shangla (1-4-75)	04.03.2005	TMO PGMI Peshawar ✓
02	Dr. Farhan Ahmad s/o Imtiaz Ahmad, Peshawar (1-1-77)	14.02.2005	MO DHQ. Hospital Charsadda ✓
03	Dr. Sharifuz Zaman Khan s/o Badiuz Zaman Khan, MKD Agency (4-7-75)	17.02.2005	TMO PGMI Peshawar ✓
04	Dr. Ashfaqullah s/o Saifullah, Charsadda (8-3-76)	19.03.2005	MO DHQ Hospital Charsadda. ✓
05	Dr. Muhammad Abdul Mabood Khalil s/o Fazli Mabood Khalil, Peshawar	24.03.2005	MO KTH Peshawar ✓
06	Dr. Said Amin s/o Sameen Jan, Khyber Agency. (2-7-75)	05.03.2005	TMO PGMI Peshawar ✓
07	Dr. Altaf Khan s/o Muhammad Ajmal Khan, SW Agency (12-7-74)	23.02.2005	PGMI LRH Peshawar ✓
08	Dr. Inamullah Khan s/o Anasullah Khan, Charsadda (10-6-76)	30.04.2005	TMO PGMI Peshawar ✓
09	Dr. Muhammad Tabir s/o Fazal Karim Haqqani, Distt: Buner (20-1-80)	05.03.2005	MO CH Totalai, Distt: Buner ✓
10	Dr. Muhammad Hussain s/o Shah Hussain Landi, Khyber Agency. (2-11-75)	28.03.2005	MO SHS Orakzai Agency. ✓
11	Kamran Khan s/o Wahab Ali Khan, MO KMU Muhammad Zai Kohat (7-2-75)	15.02.2005	MO BHU Fatima Khel Distt: Bannu ✓
12	Dr. Abdul Sattar s/o Mumawar Khan, Swabi (5-1-76)	07.03.2005	TMO PGMI Peshawar ✓
13	Dr. Umar Zia Khan Mahsud s/o Umar Farooq Khan Mahsud, SW Agency (2-3-79)	07.03.2005	TMO PGMI, Peshawar ✓
14	Dr. Iftikhar Ahmad s/o Haji Ahmad, Manshera	26.03.2005	DHQH Manshera ✓
15	Dr. Manzoor Ahmad Khan s/o Bahadar Khan, Bannu (1-11-68)	16.03.2005	MO KTH Peshawar. ✓
16	Dr. Javed Iqbal Khan s/o Muhammad Iqbal Khan, Haripur (7-7-75)	24.02.2005	TMO PGMI Peshawar ✓
17	Dr. Gul Hassan s/o Sher Hassan, Peshawar (15-3-76)	05.03.2005	MO KTH Peshawar ✓
18	Dr. Mian Abdul Hafeez Jan s/o Mian Abdul Azim, Charsadda (25-4-74)	22.03.2005	EDO (H) Office Kohistan ✓
19	Dr. Pio Ur Rehman s/o Amin Khan, Karak.	02.06.2006	TMO PGMI, Peshawar. (5-5-75)
20	Dr. Fazal Ghafoor s/o Muhammad Amin, Bajaur Agency (2-5-76)	17.02.2005	TMO PGMI Peshawar ✓
21	Dr. Muhammad Mujebur Rehman s/o Muhammad Said Jan, Bajaur Agency (1-4-76)	28.03.2005	At the disposal of EDO (H) District Lower ✓
22	Dr. Muhammad Parvez Khan s/o Ghulam Haider Khan, Bajaur agency (1-6-76)	24.03.2005	MO DHQ Hospital Chitral ✓

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2

1	Dr. Muhammad Ismail Khan s/o Ismail Khan, FR Kohat	07.03.2005	MO DHQH Hangu.	(B)
2	Dr. Ahmad Faraz s/o Shah Wali Khan, Orakzai Agency	24.03.2005	AHQH Khar Bajaur	(28)
3	Dr. Zakir Hussain s/o Hakim Khan, Bajaur Agency	17.02.2005	MO AHQ: Hospital, Bajaur.	
4	Dr. Fawad Ahmad s/o Abdul Hameed, Bannu	08.03.2005	TMO PGMI Peshawar	
5	Dr. Muhammad Khalid Jan s/o Ghazi Marjan, Bannu	14.02.2005	MO DHQ Hospital Bannu.	
6	Dr. Muhammad Ismail Khan s/o Haji Umar Khan, NW Agency	17.02.2005	MO CH Kalaya Orakzai Agency.	
7	Dr. Zar Ali Khan s/o Taj Ali Khan, Mohmand Agency	21.02.2005	MO RHC Battagram, Distt: Charsadda	
8	Dr. Ghulam Rehman s/o Bekhar Khan, Mohmand Agency	07.04.2005	At the Disposal of DHS FATA.	
9	Dr. Muhammad Samiullah Khan s/o Hasanullah Khan, UDA Manshra	30.03.2005		
10	Dr. Saghir Ahmad s/o Noor Elahi, Haripur	16.02.2005	MO EDO (Health) Office Haripur	
11	Dr. Anwarul Haq s/o Amir Ghawas (Swat) Distt	02.2005	CH Khwaza Khela Distt: Swat	X
12	Dr. Atta Muhammad Khan s/o Sher Muhammad Khan, Peshawar	24.02.2005	TMO PGMI/KTH Peshawar	
13	Dr. Azizullah s/o Mian Gul, Dir Lower	19.03.2005	MO AHQ Hospital, Batkhela	
14	Dr. Muhammad Nazir s/o Muhammad Yousaf, Mansehra	02.2005	J/r Registrar ATH A/Abad	
15	Dr. Fazli Subhan s/o H. Sharaf Khan, Kurram agency	02.2005	MO Police Training College Hangu	
16	Dr. Naveed Ahmad Shahi s/o Dilawar Khan, Mardan	02.2005	MO MMC, Mardan (Qualified Ophthalmologist and presently is working as Distt: Specialist Ophthalmology at MMC Mardan in his own pay scale)	
17	Dr. Hafizur Rehman s/o Abdur Rehman, Buner	03.03.2005	TMO PGMI/ LRH Peshawar	
18	Dr. Muhammad Ismail Khan s/o Qasim Khan, Lakki Marwat	17.02.2005	TMO PGMI/LRH Peshawar	
19	Dr. Muhammad Naeem s/o Niaz Moin, Karak	07.07.2005	MO LRH Peshawar.	(20-2-76)
20	Dr. Niamatullah s/o Abdul Muhammad, Khyber Agency	03.03.2005	MO Govt: LRH Peshawar	
21	Dr. Muhammad Rafiq s/o Muhammad Akram, Kohistan	22.02.2005	MO RHC Shinkiyari, Distt Mansehra.	
22	Dr. Khalid Iqbal Barki s/o Akhtar Khan Barki, SW Agency	02.2005	TMO PGMI/ LRH Peshawar	
23	Dr. Noor Rehman s/o Abdur Rehman, Buner	10.02.2005	TMO PGMI Peshawar	
24	Dr. Muhammad Shafiq s/o Sheikh Akbar, DI Khan	03.03.2005	MO DHQ Hospital Tank	DMS/SHAFIQ
25	Dr. Sardar Khan s/o Bacha Khan, Bajaur Agency	10.03.2005	MO THQ Hospital Matta Swat	DMS/SHAFIQ
26	Dr. Hameedullah s/o Mahsoobullah, Charsadda	02.2005	TMO PGMI/ LRH Peshawar	
27	Dr. Amir Muhammad, s/o Faqir Muhammad, Swabi	02.2005	TMO PGMI Peshawar	
28	Dr. Momen Khan s/o Usman Ghani, Swat	03.2005	TMO PGMI Peshawar	
29	Dr. Mahmood Akhtar Khattak s/o Muhammad Yousaf, Karak	09.02.2005	TMO PGMI Peshawar	
30	Dr. Muhammad Naeem Awan s/o Muhammad Bashir Awan, Mansehra	09.03.2005	EPI Coordinator EDO (H) Mansehra	
31	Dr. Muhammad Haroon Shahid s/o Hasham Khan, FR Peshawar	24.02.2005	MO RHC Akora Khattak	

DMS H: 5/20

(2/73)

(4-12-76)

(20-2-76)

(2-2-74)

(1-6-76)

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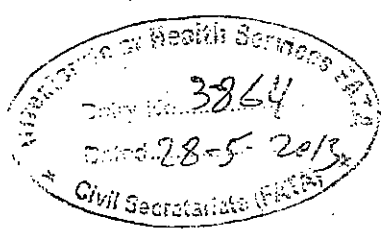
Annex "c" (29)

FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)
WARSAK ROAD, PESHAWAR.

No. FS/SO (H)/SSD/ 716-211
 Dated: 28/5/2013

OFFICE ORDER:

The Competent authority has been pleased to order posting of Dr Zakir Hussain Medical Officer (BPS-17) as Agency Surgeon Bajaur Agency with immediate effect in the best interest of public service. (1)



---Sd---
 Secretary
 Social Sectors Department FATA

Copy forwarded to the:

- 1- Director Health Services, FATA.
- 2- Agency Surgeon Bajaur Agency
- 3- PS to Additional Chief Secretary FATA.
- 4- Agency Accounts Officer Bajaur Agency.
- 5- Dr. Zakir Hussain Bajaur Agency.
- 6- PS to Secretary Social Sectors Department FATA.

(Signature)
 Section Officer, (Health)

OFFICE OF THE DIRECTOR HEALTH SERVICES FATA

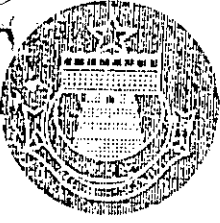
No. 8581-86 /DRS/FATA/Admn Dated: 28 / 05 / 2013

Copy forwarded to the:-

1. Political Agent Bajaur Agency.
2. Agency Surgeon Bajaur Agency.
3. Medical Superintendent AHQ: Hospital Khar Bajaur.
4. Agency Accounts Officer Bajaur at Khar.
5. PS to Secretary Social Sectors Deptt: FATA.
6. Officer concerned

(Signature)
ATTESTED

Director Health Services,
 FATA, Peshawar



Annex: "D"

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RESTRICTED

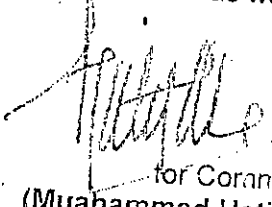
HQ Bajaur Scouts
Khar
Tel : Khar - 220898
No.226/9/A/ /Med
11 Jun 2014

To MS Agency Headquarter Hospital
Khar
Agency Surgen
Khar

Info. FATA Health Secretariat
Peshawar

Subj: Appreciation

1. I take this opportunity to convey appreciation on behalf of Commandant Bajaur Scouts for extraordinary medical support provided by your hospital administration, doctors, paramedical and civil staff during recently conducted operation to FC/ Army troops.
2. Your efforts speak highly about your dedication to the medical profession and show your trust, commitment and loyalty with security forces.
3. Your efforts are highly appreciated and Rs. 20,000 are presented to you as a humble token of recognition.
4. I, thank you once again and anticipate that this cooperation will continue in future as well.


Major
for Commandant
(Muhammad Hatif Iqbal)

RESTRICTED


ATTESTED



OFFICE OF THE
COMMISSIONER MALAKAND DIVISION
SAIDU SHARIF SWAT

31

Tel# (0946)9240458/9240225

Dated: 13-01-2016

Fax# (0946)9240229/9240223

Subject: APPRECIATION FOR EXTRA ORDINARY EFFORTS AFTER EARTHQUAKE OF 26TH OCTOBER, 2015.

My dear: *Zakir*

It gives me immense pleasure to convey appreciation for your team work and contribution made for health care of the injured of earthquake of 26th October, 2015. It is not clandestine that the disaster was of much greater intensity and the damages were commensurate accordingly. Soon after emergency was declared in whole of Malakand Division let me acknowledged that all Medical Officers, Specialists, Para Medical staff and Nurses etc responsively attended patients. All the injured victims were taken care of, at DHQ Hospitals and at the other allied health facilities under your supervision and control. The best available Medical treatment with provision of Medicines was ensured for the injured victims at the hospitals together with timely transportation of patients to tertiary hospitals/health facilities in other parts of the country.

The efforts made by you and your team for providing Medical care soon after earthquake are hereby acknowledged and appreciated. Quick and spontaneous response from your end has augmented image of the noble profession (Medicine) in the eyes of public. It is anticipated that the same spirit will continue in future. Please convey my appreciation to all the members of your team who endeavoured to successfully accomplish post-earthquake task in your sector and areas of responsibility. Very good job done by all of you Keep it up.

Wishing you success in future.

Dr. Zakir
Agency Health Officer, Bajaur.

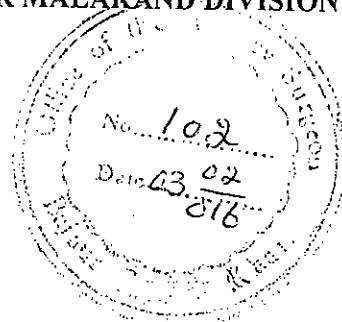
Usman Gul
(USMAN GUL)
COMMISSIONER MALAKAND DIVISION

No. 4166-68 /2/6/Estt:

Copy for information is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Health Department Peshawar.
2. PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
3. PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.

Usman Gul
(USMAN GUL)
COMMISSIONER MALAKAND DIVISION



D/A:
Letter of acknowledgment (thanks
to Commissioner Malakand Division)

Seen
Jmf
2.2.016.

[Signature]
ATTESTED

[Signature]
2.2.016.



32

DIRECTORATE OF HEALTH SERVICES-FATA
Polio Emergency Operation Centre

No. 382-89 / PSH/EOC/FATA: Dated: 26 / January / 2016

To

*The Political Agent &
Agency Surgeon Bajour Agency*

SUBJECT: APPRECIATION LETTER

EOC FATA appreciates the efforts made thus far in improving the quality of vaccination campaign in your Agency.

A thorough analysis of the performance of January 2016 NID campaign shows the following status of Bajour Agency:

- * Administrative coverage was 100%.
- * Market Survey (MS) result showed 97%.
- * PCM Result (Received from Federal Office) 100%
- * 27/28 lots were Passed in LQAS

The above findings reflect the serious efforts made by yourself and the team that has improved the quality and coverage of the campaign and we congratulate you on this.

We expect that this momentum is maintained till making your Agency Polio free.

[Signature]
Coordinator EOC FATA

Copy to...

1. ACS FATA
2. Principal Secretary to Governor
3. Director Health Services, FATA
4. Team Leader WHO & UNICEF-FATA
5. N-Stop Officers, FATA
6. Technical Focal Person, FATA

AS (PP)

FATA SECRETARIAT, WARSAK ROAD, PESHAWAR
Ph: 091-9222788-9, Fax: 091-9222797, E-mail: foia@whco.com

1000-1000 Es

VIV/007

1812228100+ XVA KA 09:11 0102 70-37

[Signature]
ATTESTED

DIRECTORATE OF HEALTH SERVICES

To: The Political Agent, Bajour Agency
Agency Surgeon, Bajour Agency

Subject: Feed Back on March 2016 campaign

EOC FATA is cognizant of the progress made by the team under your supervisions in the March, 2016 campaign.

A thorough analysis of the performance of March MID showed below picture of Bajour Agency.

- Administrative coverage was 97 %
- Market Survey (MS) result is 96%
- PCM Result (Received from Federal Office) 97 %
- 21/22 lots were passed in LQAS
- 229 children are reported still missed.

The above findings show improvement and the same momentum is needed to be maintained under your leadership.

You are advised to keep team motivated and guide them for the peak performance in the coming rounds.

[Signature]
Secretary Law & Order/Coordinator
EOC, FATA

Copy to...

1. Director Health Services, FATA
2. Team Leader WHO & UNICEF-FATA
3. N-Stop Officers, FATA
4. Technical Focal Person, FATA

Noted:
Keep on P.F

FATA SECRETARIAT, WARSAK ROAD, PESHAWAR
Ph# 091-9222793-6, Fax # 091-9222797, E-mail (fatapcr@yahoo.com)

[Signature]
A.T. 016

[Signature]
ATTESTED

ہمیں افسوس ہے کہ ہمارے راستے میں بڑی رکاوٹ مسلمان بچے جا رہے ہیں کتنی بار آسمان کو سمجھایا مگر تم نیسے بد بخت اور ذلیل انسان نہ
 سمجھنے کے قابل ہیں اور نہ ذرا بھرا ایمان سینے میں زندہ رکھتے ہیں۔ ہم تمہیں اس لیے خبردار کر رہے ہیں تاکہ روز قیامت یہ تیری اوپر گواہی دیں
 کہ تمہیں اطلاع کیا گیا تھا مگر تم خبیث انسان سمجھ کے قابل بن نہیں تھے اور وہ اس لیے کہ تمہیں دنیاوی لالچ اور ڈانٹوں سے پاگل بنا دیا تھا۔ تمہارا
 کیا خیال ہے کہ تمہاری کرتو تو کا ہمیں علم نہیں؟ ہسپتالوں کے زمانہ ملازمین سے تمہارے روابط، سرکاری و عوامی املاک میں خورد برد،
 سرکاری دوائی میں کلرکوں کی ایماں پر جو رہی اور سرکاری ملازمین سے رشوت کے لین دین تمہاری خیانت داری کے واضح دلائل ہیں۔

وہن بیفعل ایماںتہ بہما نکل ایماں التقییہ، لگتا ہے تم مسرین میں شامل ہو۔ تمہاری عظیم گناہ یہ ہے کہ تم نکما اور خبیث انسان
 ہمارے سامنے ان معاشرے کے جوان نرئیوں کو این۔ جی۔ او کی طرف سے لالچ دیکر امریکہ کی خاطر بے ذہنی پھیلا رہے ہو، کیا یہ ہمارے
 ذہنوں پر مزید نمک ڈالنا نہیں؟ اگر یکہ نے مسلمانوں کے مبارک بدنوں کا کباب بنا دیا، طلباء، مجاہدین اور علماء کو ٹکڑے ٹکڑے کر دیا، گھروں کو
 تباہ و برباد کر دیا اور تم ذلیل و خوار، لالچی و منافق انسان چند ڈالر روپے کے عوض ان کا نمایندہ بن کر نہ صرف انکی اخلاقی معاونت کر رہے ہو بلکہ
 ان کیلئے عظیم جاسوس بن گئے ہو۔ تم ہم سے کیسے خفیہ رہ سکتے ہو جبکہ قرآن میں وعدہ ہے کہ **وَالَّذِينَ جَاهَدُوا فِيْنَا لَنُؤْتِيَنَّهُمْ**
سُورًا كَرِيمًا کیا تمہیں یقین نہیں آتا کہ اللہ مجاہدین کیلئے راستے آسان بنا دیتا ہے۔ تم صرف ڈالروں کے بدلے مظلوم مسلمانوں کا کفار سے
 سودا کر رہے ہو اور کبھی کسی نے نہیں بتایا کہ اللہ فرماتا ہے کہ **لَا تَقْتُلُوا نَفْسًا يَدْعُ إِلَى كَفْرٍ هِيَ كَذٰلِكَ تَقْتُلُونَ** اگر تم خود کو تباہی کی طرف لے
 جاتے، تو ہمیں بھی گند صاف کرنے میں مزہ آتا ہے۔ انتظار کیجئے اپنی لرتو توں کے ثمرے کا۔ روز مرہ مثالیں تم سنتے اور دیکھتے ہو، تم نے
 ہمارے صبر کا پیمانہ بھر دیا ہے۔

مجاہد مجاہدین اسلام باجوڑ

ATTESTED

Annex - (E)

35



FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)
WARSAK ROAD PESHAWAR

Dated 25-02-2016

NOTIFICATION:-

Notification No. FS/SO (HH)/FATA/181-64 .For good governance and ensuring efficient service delivery to public in Health Sector, the Competent Authority has been pleased to decide that henceforth Agency Surgeons and medical Superintendents shall not be posted in their areas of Domicile. Only doctors having requisite qualification and professional capacity will be posted as Agency Surgeons/Medical Superintendents in Agencies/ Frontier Regions of FATA in the best interest of the government.

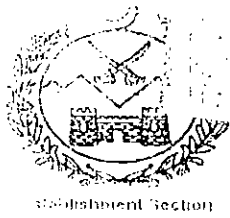
Secretary Social Sectors FATA

Copy to :-

1. Secretary Social Sectors FATA ✓
2. Secretary AI&C Department FATA
3. ~~Director Health Services FATA~~
4. PS to Additional Chief Secretary FATA


Section Officer (Health)


ATTES



Annex - (F)

FATA SECRETARIAT
(ADMINISTRATION, INFRASTRUCTURE & COORDINATION DEPARTMENT)
WARSAK ROAD PESHAWAR

35

NOTIFICATION :-

No. PS/E/100-93 (Vol-1) 8164-77. The following posting / transfers are hereby ordered with immediate effect in the public interest:-

Sl No	Name & Designation	From	To	Remarks
1.	Dr. Wazir Safi Medical Officer (BS-17)	Medical Officer SHU Mohmand Agency.	Agency Surgeon Bajaur Agency in his own pay & scale.	Vice No-2
2.	Dr. Zakir Medical Officer (BS-17)	Agency Surgeon Bajaur Agency.	Medical Superintendent, Agency Headquartes Hospital Wana South Waziristan Agency in his own pay & scale.	Dr. Muhammad Arif Medical Officer (BS-17) is relieved of the charge of the post of Medical Suprintendent AHQ Hospital Wana S.W Agency and is posted to his original post of Medical Officer in the said Hospital.

ADDITIONAL CHIEF SECRETARY (FATA)

Dated 25/05/2016
Copy to:-

1. Secretary Social Sectors Department FATA Secretariat.
2. Political Agent Bajaur Agency.
3. Political Agent Mohmand Agency
4. Political Agent South Waziristan Agency at Tank.
5. Director Health Services (FATA) Peshawar.
6. Medical Superintendent Agency Headquarters Hospital Bajaur Agency.
7. Medical Superintendent Agency Headquarters Hospital Wana S.W. Agency.
8. Agency Surgeon Bajaur Agency.
9. Agency Surgeon Mohmand Agency
10. Agency Surgeon South Waziristan Agency.
11. Agency Accounts Officer Bajaur Agency.
12. Agency Accounts Officer Mohmand Agency.
13. Agency Accounts Officer South Waziristan Agency.
14. Doctors concerned.


ATTESTED


Section Officer (Estab)



DIRECTORATE OF HEALTH SERVICES FATA
FATA SECRETARIAT WARSAK ROAD PESHAWAR

Phone# 091-9210212

Fax# 091-9212110

No. 8842-43/DHS/FATA/Admn

Dated: 09/06/2016

Annex - (9)


36/A

To

Dr. Zakir Hussain
Ex Agency Surgeon
Bajaur Agency

Subject:- **APPEAL**

With reference your appeal to the competent authority for cancellation of transfer, the competent authority has advised you to assume your charge as Medical Superintendent AHQ Hospital Wana, failing which initiate disciplinary action against you. It is further clarified that you have completed your tenure (3 ½ year) as Agency Surgeon Bajaur.


07/6/16

Director Health Services
FATA, Peshawar

CC:

1- PS to Secretary SSD FATA

Director Health Services
FATA, Peshawar

(37)

To:

The Director Health Services,
FATA at FATA Secretariat
Peshawar.

Subject:- Appeal for cancellation of
transfer order.

R/Sir,

with due respect and reverence it is
stated that I have been transferred
from Bajaur Agency to South Waziristan
Agency through AIC Notification No. FS/E/100-93
(Vol-10)/8164-77 dated 25.5.2016.

In this regard I have some issues:

1) My family is residing in Bajaur Agency
and it is difficult for me to shift the family
and school going children to South Waziristan.

2) The current financial year 2015-016 is
near closing and being on administrative
post I wish to clear my accounts for this
year.

3) The notification/policy of Non-locals on
administrative post is not mentioned in
TORS/Job descriptions for Agency Surgeon/M.S.
Keeping in view the above I humbly request
for cancellation of the said order.

Dr. Zakir Hussain

ATTESTED

1.6.016.

38

Annex- (674)

[Chapter No. I] Constitutional Provisions Regarding the Tribal Areas 15

Provided that nothing in this clause shall affect the jurisdiction which the Supreme Court or a High Court exercised in relation to a Tribal Area immediately before the commencing day.

Sl. No. 11

PRESIDENT'S ORDER 13 OF 1972

CENTRALLY ADMINISTERED TRIBAL AREAS (EMPLOYEES' STATUS) ORDER, 1972

[Gazette of Pakistan, Extraordinary, 12th April, 1972]

No. F. 24(1)/72-Pub.---The following Order made by the President on the 10th April 1972, is hereby published for general information:--

Whereas clause (2) of Article 5 of the Province of West Pakistan (Dissolution) Order, 1970 (P.O. No. 1 of 1970), hereinafter referred to as the said Order, provides that the Centrally Administered Tribal Areas shall be administered by the President acting, to such extent, as he thinks fit, through such officers as he may appoint, and that the President may, in that behalf, give such directions as he deems fit;

Now, therefore, in pursuance of the proclamation of the 25th day of March 1969, read with the Proclamation of the 20th day of December 1971, and in exercise of all powers enabling him in that behalf, the President and Chief Martial Law Administrator is pleased to make the following Order:--

1. **Short title and commencement.**--- (1) This Order may be called the Centrally Administered Tribal Areas (Employee's Status) Order, 1972.

(2) It shall come into force at once and shall be deemed to have taken effect on the 1st day of July 1970, hereinafter referred to as the appointed day.

2. **Definitions.**---In this Order, unless there is anything repugnant in the subject or context,--

(a) "Centrally Administered Tribal Areas" shall have the same meaning as in the **ATTESTED** Order;

(b) "employees" means employees serving in connection with the affairs of the Centrally Administered Tribal Areas within or outside those areas including members of the Civil Service of the North-West Frontier Province and all other Government servants not belonging to any Central or Provincial Service; and

(c) "Provincial Government" means the Government of the North-West Frontier Province.

38/A

16

Laws Extended to the Tribal Areas with Jirga Laws (Third Ed.)

3. Status of the employees of the Centrally Administered Tribal Areas.-- Notwithstanding anything contained in their conditions of service, the employees shall, as from the appointed day, be the employees of the Provincial Government on deputation to the Central Government and shall work under the overall administrative control of the Provincial Government, on the same terms and conditions of service as respects remuneration, leave and pension and the same rights as respects disciplinary matters or tenure of office as were applicable to them immediately before that day:

Provided that the employees shall not be entitled to deputation allowance for their service after appointed day.

Sl. No. 12

PRESIDENT'S ORDER 15 OF 1972

RULERS OF ACCEDING STATES (ABOLITION OF PRIVY PURSES AND PRIVILEGES) ORDER, 1972

[Gazette of Pakistan, Extraordinary, 18th April, 1972]

No. F. 24 (I)/72-Pub.--The following Order made by the President on the 16th April 1972, is hereby published for general information:--

Whereas it is expedient to abolish the privy purses of, and other privileges admissible to, the Rulers of Acceding States:

Now, therefore, in pursuance of the Proclamation of the 25th day of March 1969, read with the Proclamation of the 20th day of December 1971, and in exercise of all powers enabling him in that behalf, the President and Chief Martial Law Administrator is pleased to make the following Order:--

1. **Short title and commencement.**---(1) This Order may be called the Rulers of Acceding States (Abolition of Privy Purses and Privileges) Order, 1972.

(2) It shall come into force at once and shall be deemed to have taken effect on the 22nd day of December 1971.

2. **Order to override other laws.**---The provisions of this Order shall have effect notwithstanding anything contained in the Provisional Constitution Order or in any other law for the time being in force, or in any Instrument of Accession or any agreement with a Ruler.

3. **Interpretation.**---In this Order, unless there is anything repugnant in the subject context,--

(a) "Acceding State" means an State which has at any time after the fourteenth day of August 1947, been in accession with Pakistan;


ATTESTED

[Chapter

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IN THE PESHAWAR HIGH COURT, PESHAWAR
APPLICATION FORM FOR ATTESTED COPY

COURT-FEE

1	Nature:	Urgent Routine	<input checked="" type="checkbox"/>
2	Detail of Documents / Order Required:		Judgment
3	For what Purpose Required:	Personal Appeal	
4	Status of Applicant: Whothor	<input checked="" type="checkbox"/> A. Petitioner B. Respondant C. Thrd Party	
5	Name of Applicant:	Khalid Hussain	
6	Father's Name:	Muhammad Hussain	
7	Present Address:	Peshawar	
8	Case Title:		
9	Case No. & Nature with the valuation, for the purpose of court fee, if any (W.P, Cr. A, Cr.M, C.R, R.F.A, F.A.O, C.C, L.A)		WP 2224/16
10	Motion / Notice		
11	Pending Cases:	Dated of Institution:	
		Next Date of Hearing:	
		Date of Order:	
12	Decided Case:	Date of Decision:	16-6-2016
13	Name of Court (SB / DB):	12/13	
14	Contact / Cell No. of the Applicant:	0346-9302996	
15	Signature of the Applicant:	KS-12	
16	Date of Forwarding Application	16-6-2016	
17	Allowed if Admissible:		
18	Suporintendent Judicial:		

Note:- INCOMPLETE FORMS SHALL NOT BE ENTERTAINED.

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

WRIT PETITION No. 2224 /2016
(ALONG WITH INTERIM RELIEF)

Dr. Zakir Hussain S/o Hakim Khan
R/o Village & Tehsil Khar, Bajawar Agency **PETITIONER**

...**V E R S U S**...

1. Federation of Pakistan, through Secretary SAFRAN, S-Block, Pak Secretariat Islamabad.
2. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
3. Additional Chief Secretary, FATA Secretariat, Warsak Road, Peshawar.
4. Secretary Social Sector Department (SSD) FATA Secretariat, Warsak Road, Peshawar.
5. Director Health Services, FATA Secretariat, Warsak Road, Peshawar.
6. Dr. Wazir Saafi, Medical Officer (BS-17), BHU, Sanger Mohmand Agency. **R E S P O N D E N T S**

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN, 1973.**

Respectfully Sheweth:

1. That petitioner is MBBS (KMC) & MPH qualified & bonafide peaceful citizen of Pakistan and permanent resident of Bajawar Agency, FATA and was appointed as Medical Officer (BS-17), vide Notification No. SO(ESTT:)3-18/2002, dated: 14.09.2002, on contract basis for a period of one year against the non transferable posts in District Batagram, however, his contract was renewed from time to time, due to satisfactory performance and work with zeal and

		33944
	<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p>	
<p>ایڈووکیٹ/دستخط:</p> <p>بار کونسل ابادا ایسوسی ایشن</p> <p>رابطہ نمبر: 0321-9027964</p>	<p>BC-11</p>	

بعدالت جناب:

<p>Appellant</p> <p>Dr. Zakia Hussain</p> <p>بنام</p> <p>Dr. Zakia Hussain & others</p>	<p>دعویٰ:</p> <p>علت:</p> <p>مورد:</p> <p>جرم:</p> <p>تھانہ:</p>
<p>بابت تحریر آنکہ</p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ خالد حسین، کاشف شہباز، امینہ و صاحبان کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندگی و فیصلہ برطرف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہرقسم کی تصدیق زریں ہند منتقل کرنے کا اختیار ہوگا، نیز پیروی و جواب دہی کا کٹرفہ یا اہیل کی برآمدگی اور منسوخی، نیز دائر کرنے اہیل نگرانی و نظربانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساتھ ہر ذراختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے بجائے سے ہوگا وہ وکیل موصوف وکیل کے لئے کا مختار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا بھرنہ ہوں گے کہ پیروی و جملہ ذکورہ اختیارات، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

الموقع:

Wahidullah
Advocate

ATTESTED & ACCEPTED

Amin-ur-Rehman
Advocate
