BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 157/2022

Engr. Muhammad Ishaq

..... Appellant.

V E R S U S

The Secretary Public Health Engineering Department and others

.....Respondents

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Respondents No. 6 to 16,12 to 15

Through

Akhtar Ilyas

Advocate High Court. TF-287, Deans Trade Center, Peshawar

Cell # 0333-9417974

12.03, 2084

ħ.,

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 157/202

Engr. Muhammad Ishaq, Planning Officer-II, Public Health Engineer Department.

..... Appellant

VERSUS

The Secretary Public Health Engineering Department.

- 2. Section Officer Establishment Public Health Engineering Department.
- 3. Section Officer Finance Public Health Public Health Engineering Department.
- 4. Chief Engineer (Center) Public Health Engineering Department.
- 5. Chief Engineer (South) Public Health Engineering Department.
- 6. Syed Azam Shah, S.D.O, P.H.E, Department, Takht Bhai, Mardan.
- 7. Shehzad Khan, SDO, Batkhela, Malakand.

1.

- 8. Attaullah, SDO Public Health Engineering Department, Matta-II Swat-II.
- 9. Mazhar Khan, SDO Public Health Engineering Department, Miran Shah, North Waziristan.
- 10. Zia Ur Rehman, SDO Public Health Engineering Department, Sub Division No-2, Nowsherea.
- 11. Wisal Khan, Assistant Director (Technical) Public Health Engineering Department.
- 12. Tariq Mehmood, SDO Public Health Engineering Department, Sub Division Jamrud, Khyber.
- 13. Muhammad Zubair Khan, SDO Public Health Engineering Department, Sub Division Lachi Kohat.
- 14. Atta ur Rehman, SDO Public Health Engineering Department, Sub Divisdion, Chakdara Dir Lower.
- 15. Shahab Khan, SDO Public Health Engineering Department, Sub Division Khar Bajaur.

.....Respondents

2

REPLY BY AND ON BEHALF OF RESPONDENTS NO. 6 TO 10 & 12 to 15

Sheweth:

Preliminary Objections:

- 1. That appellant has got no cause of action to file the instant Service Appeal.
- 2. That the appeal is not maintainable in its present form.
- 3. That the appellant has not come to this Hon'ble Tribunal with clean hands.
- 4. That the appeal has filed by the appellant for ulterior motives.
- 5. That with great respect, this Hon'ble Tribunal has lacks the jurisdiction to entertain the present appeal.
- 6. That on recommendation of KPSC, respondents No. 6 to 8 were inducted into service on 19.02.2021. (Copy of order is attached as Annex. "R/1") and they have assumed the charge on 21.02.2021. (Copy of Charge Reports are attached as annexure "R/2"). Respondents No. 10 to 15 were appointed on 05.03.2021. (Copy of appointment order is attached as annexure "R/3") and they have assumed the charge on 08.03.2021. (Copy of Charge Reports are attached as annexure "R/4"). It is worth to mention here that

3

respondents No. 6 to 15 are direct inductee and are recommended by KPSC and belong to one and the same selection and their seniority has been determined by the Department as per Rule 17(a) of Khyber Pakhtunkhwa Civil Servants (Appointment & Transfer) Rules, 1989.

- 7. That the appellant has been recommended by the DPC on 26.05.2021 and promoted to the post of Assistant Engineer / SDO (BPS-17) on 13.07.2021, much later than the respondents NO. 6 to 15. As such, they are selectees of two different selection process.
- 8. That the induction of respondents No. 6 to 15 and promotion of appellant carries two different Selections and different dates, therefore, the department has rightly placed the appellant junior to respondents No. 6 to 15.

If the two dates i.e. induction by initial appointment and promotion were same, than the appellant would have gain the Seniority as per Sub-Rule(2) of Rule-17 of the Rules ibid, which is not the case here. Suffice it to say, that both the selection are two different categories and dates, therefore, the seniority has rightly been determined by the department.

- 9. That the appeal is hopelessly time barred.
- 10. That the appeal is false and frivolous, entitling the answering respondents to special compensatory costs.



ON FACTS:

- 1. Para No. 1 pertains to record, hence needs no reply.
- 2. Para No. 2 pertains to record, however, the official respondents would be in better position to explain the same.
- 3. Para No. 3 of appeal relate to official respondents, hence, needs no reply by the answering respondents.
- 4. Para No. 4 of the appeal pertains to record, hence needs no reply.
- 5. Para No. 5 does not relate to the answering respondent, hence needs no reply.
- 6-7 Para No. 6 & 7 as drafted are not correct, hence denied with vehemence. The detailed reply has been offered in paras No. 6, 7 & 8 of the Preliminary Objections.

ON GROUNDS

A. Ground A of the appeal as drafted is not correct, hence denied. The department has rightly determined the seniority of the appellant and respondents No. 6 to 15. Detailed has been offered in paras No. 6, 7 & 8 of the Preliminary Objections.

(5)

- B. The appellant has been promoted on the recommendation of DPC in later selection hence he has been rightly placed junior to the respondents No. 6 to 15.
- C. The contents of Ground C is not clear, hence the answering respondents are unable to reply the same.
- D. The Ground D of the appeal relates to official respondents, hence, needs no rely by the answering respondents.
- E-F These grounds as drafted are not correct. The detailed have been offered in paras No. 6, 7 & 8 of the Preliminary Objections.
- G. The grounds to be taken in the memo of appeal, during arguments no fresh ground can be agitated to the utter surprise of the opponent party.

It is, therefore, prayed that the appeal being bereft of merit may kindly be dismissed with cost.

Respondents No. 6 to 15

Through

Akhtar Ilyas

Advocate High Court.

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 157/202

Engr. Muhammad Ishaq Appellant. VERSUS

The Secretary Public Health Engineering Department and others:

.....Respondents

Affidavit

I, Zia ur Rehman S/o Inayat ur Rehman R/o Kamran Road Mardam, do hereby solemnly affirm and declare on oath that the contents of the Reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

ATTESTED

Com

16101-2904036-5



GOVERNMENT OF KHYBER PAKHTUNKHWA PUBLIC HEALTH ENGG: DEPARTMENT

Dated Peshawar, the February 19, 2021

NOTIFICATION

No.SO(Esit)/PHED/4-1/2070: On their selection by the Khyber Pakhtunkhwa Public Service Commission, the Provincial Government is pleased to appoint the following Assistant Engineers/Sub Divisional Officers in the Public Health Engineering Department in BPS-17 (Rs.30370-2300-76370) with other usual allowances as admissible under the rules, with immediate effect:

S.No	Name of Candidate with father's name
1.	Syed Azam Shah
	S/O Syed Khadim Shah
2.	Mr. Sheh Zad Khan,
	S/O Shah Nazar Khan
3.	Mr. Attaullah,
	S/O Abdur Rahim

- 2. Their seniority will be determined in accordance with the merit assigned by the Khyber Pakhtunkhwa Public Service Commission. They will be on probation for a period of one year in terms of Rule-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.
- 3. On their appointment, the following transfers/postings of Assistant Engineers/SDOs are hereby ordered with immediate effect, in the public interest:-

S.No	Name	From	To .	Remarks
1.	Syed Azam Shah, BPS-17	On initial appointment as Assistant Engineer/SDO (BPS-17)	SDO Public Health Engg: Sub Division Alpuri Shangla	Against the vacant post
· ₂ . –	Mr. Sheh Zad Khan, BPS-17	, On initial appointment as Assistant Engineer/ SDO (BPS-17)	SDO Public Health Engg: Sub Division Samar Bagh Dir Lower	Against the vacant post
3.	Mr. Attaullah, BPS-17	On initial appointment as Assistant Engineer/ SDO (BPS-17)	SDO Public Health Engg: Sub Division Karak	Against the vacant post

SECRETARY PHE DEPARTMENT

Endst: No & Date as above:

-Copy forwarded for information & necessary action to the:-

- 1. Accountant General Khyber Pakhtunkhwa Peshawar.
- Chief Engineer (South) PHE White Pakhtur khwa Peshawar
- 3. Chief Engineer (Morth) (195 %), her Pakhtunkhwa Peshawar.
- 4. Chief Engineer (Cente), ITHE Khaber Palintunkhwa Peshawar
- 5. Chief Engineer (Mergdo Areas) PHE Khyber Pakhtunkhwa Peshawar
- 6. Superintending Enginéer PHE Circle Kohat/Malakand/Swat
- 7. Executive Engineer PHE Division Karak/Dir Lower/Shangla
- 8. District Accounts Officer Karak/Dir Lower/Shangla
- 9. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission Peshawar w/r to his letters No.PSC-SR-I/013319 dated 07-12-2020.
- 10. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
- 11. PS to Secretary PHE Department Khyber Pakhtunkhwa Peshawar
- 12. Officers concerned.
- 13. Office Order/Personal Files.

SECTION OFFICER (ESTT)

Annex- R/2

OFFICE OF THE EXECUTIVE ENGINEER PHE DIVISION KARAK.

ASSUMPTION OF CHARGE.

In compliance with notification of worthy Secretary PHED Government Khyber Pakhtunkhwa Peshawar vide No. SO (Estt)/PHED/4-1/2020 dated February 19, 2021, I Mr. Atta Ullah (BPS-17) assumed the charge of the post of Sub Divisional Officer PHE Sub Division Karak by today on 24/02/2021 (F.N).

(Mr. ATTA ULLAH) SUB DIVISIONAL OFFICER PUBLIC HEALTH ENGG:S/DIVISION KARAK.

No. 1-7/E-1

Dated PHE Karak

The 24/02/2021.

Copy of the above is forwarded for information to:-

The Secretary to Govt: of PHED Khyber Pakhtunkhwa Peshawar please.

2 The Chief Engineer (South) PHED Govt: Khyber Pakhtunkhwa Peshawar please.

3 The Section Officer (Estt.) PHED Peshawar please.

The Superintending Engineer PHE Circle Kohat please.

5 The Deputy Commissioner District Karak please.

6 The District Accounts Officer Karak please.

7 The Manager National Bank Karak. 8, The X cm PITE Prive Leaver

(Mr. ATTA ULLAH)

SUB DIVISIONAL OFFICER PUBLIC HEALTH ENGG:S/DIVISION

KARAK.

Atested

Annex- R/3 (9

GOVERNMENT OF KHYBER PAKHTUNKHWA PUBLIC HEALTH ENGG: DEPARTMENT

Dated Peshawar, the March 05, 2021

NOTIFICATION NOTIFIED / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the recommendations of the Khyber No.50(Estt) / PHED / 4-1/2020: On the Provincial Covernance (Covernance (No.50/ESLETI.

No.50/ pakhtunking the following Assistant Engineers/Sub Divisional Officers in the Public appoint the Findineering Department in BPS-17 (Re 2027) 2000 Terror appoint the Public appoint the Engineering Department in BPS-17 (Rs.30370-2300-76370) with other usual Health areas as admissible under the rules with immediate for the rules with immediate Health Lines as admissible under the rules, with immediate effect:

S.No	Name of Candidate with father's name
1.	Mr. Wisal Khan
	S/O Kamal-ud-Din
2.	Mr. Tariq Mahmood Ahmad
	S/O Niaz Muhammad
3.	Mr. Zia-ur-Rehman
	S/O Inayat-ur-Rehman
4.	Mr. Muhammad Zubair Khan
	S/O Behram Khan Afridi
5.	Mr. Attaur Rahman
"	S/O Rahmanul Mulk
6.	Mr. Shahab Khan
}	S/O Laiq Khan

Their seniority will be determined in accordance with the merit assigned by the Khyber Pakhtunkhwa Public Service Commission. They will be on probation for a period of one year in terms of Rule-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.

On their appointment, the following transfers/postings of Assistant Engineers/SDOs are hereby ordered with immediate effect, in the public interest:-

nginee	ers/SDOs are nereo		To	Remarks
S.No	Name	From	SDO PHE Sub Division	Against the
1.	Mr. Wisal Khan S/O Kamal-ud-Din	On initial appointment as Assistant Engineer/SDO	D.I. Khan	vacant post
2.	Mr. Tariq Mahmood Ahmad S/O Niaz	(BPS-17) On initial appointment as Assistant Engineer/ SDO (BPS-17)	SDO PHE Sub Division Mirali Wazir Bittani North Waziristan	vacant post
3.	Muhammad Mr. Zia-ur-Rehman	On initial appointment as Assistant Engineer/ SDO	SDO Public Health Engg: Sub Division	Against the vacant pos
	S/O Inayat-ur- Rehman Mr. Muhammad	(BPS-17)	No.2 Bannu SDO Public Health Engg: Sub Division	Against to vacant pos
4.	Zubair Khan S/O Behram Khan Afridi	Assistant Engineer/ SDO (BPS-17) On initial appointment as	Lachi Kohat SDO Public Health	Against t
5.	Mr. Attaur Rahman S/O Rahmanul Mulk	Assistant Engineer/ 300 (BPS-17)	Warhi Dir Upper	Against t
6.	Mr. Shahab Khan S/O Laiq Khan	On initial appointment as Assistant Engineer/ SDO (BPS-17)	No.1 Mohmand	vacant po

SECRETARY PHE DEPARTMENT

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Endst: No & Date as above:

Copy forwarded for information & necessary action to the:-

- Accountant General Khyber Pakhtunkhwa Peshawar.
- Chief Engineer (South) PHE Khyber Pakhtunkhwa Peshawar
- Chief Engineer (North) PHE Khyber Pakhtunkhwa Peshawar 3.
- Chief Engineer (Center) PHE Khyber Pakhtunkhwa Peshawar 4.
- Chief Engineer (Merged Areas) PHE Khyber Pakhtunkhwa Peshawar 5.
- Superintending Engineer PHE Circle concerned 6.
- Executive Engineer PHE Division concerned 7.
- District Accounts Officer concerned 8.
- Director Recruitment, Khyber Pakhtunkhwa Public Service Commission 9. Peshawar w/r to his letters No.PSC-SR-I/014570 dated 24-12-2020.
- PS to Chief Secretary Khyber Pakhtunkhwa Peshawar. 10.
- PS to Secretary PHE Department Khyber Pakhtunkhwa Peshawar. 11.
- Officers concerned. 12.
- Office Order/Personal Files. 13.

SECTION OFFICER

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Assumption of charge

In Compliance of Secretary PHE Department Khyber Pakhtunkhwa Peshawar Notification No. SO (Estt) /PHED/4-1/2020, Dated: 05.03.2021 | Engr Shahab Khan Sub Divisional Officer (BPS-17) assumed the Charge of Sub Divisional Officer PHE Sub Division No.1 District Mohmand today on 08.03.2021 (A.N).

> (Engr Shahab Khan) Sub Divisional Officer PHE Sub Division No.1 District Mohmand

03 / E - 01

Copy Forwarded to:-

Ps to Secretary PHE Department Khyber Pakhtunkhwa Peshawar.

1. Accountant General Khyber Pakhtunkhwa Peshawar.

Chief Engineer (South)/(North) & (NMA's) Khyber Pakhtunkhwa Peshawar. 2.

Superintending Engineer PHE Circle Northern Tribal Districts at Peshawar. 3.

Executive Engineer PHE Division District Monmand. 4.

District Account office Tribal District Mohmand. 5.

Personal file.

(Engr: Shahab Khan) Sub Divisional Officer PHE Sub Division No.1 District Mohmand





OFFICE OF THE SUB-DIVISIONAL OFFICER, PUBLIC HEALTH ENGG: SUB-DIVISION NO-II BANNU

CHARGE ASSUMPTION REPORT.

In pursuance to the order of the Secretary, Public Health Engineering Department, Khyber Pakhtunkhwa, Peshawar vide Notification No. SO(Estt:)/PHED/4-1/2020 dated 05/03/2021.

I, Zia-Ur-Rehman, assumed the charge of the vacant post of Sub-Divisional Office (SDO) Public Health Engineering Division No-II Bannu today on 08/03/2021 (F.N).

> (Zia-Ur-Rehman), Sub-Divisional Officer, P.H.E Sub-Division-II Bannu

Endst: No. / - 8 / /E-1

Dated

Bannu the, _2 /03/2021

Copy with reference to above cited office order is forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.

2. The Chief Engineer (South), PHE Department Khyber Pakhunkhwa Peshawar.

3. The Superintending Engineer, PHE Circle Bannu.

4. The District Accounts Officer Bannu.

5. PS to Secretary PHE Department Khyber Pakhtunkhwa Peshawar.

6. The Ministry of Water Sources O/o Pakistan Commissioner for Indus Waters 6-Ataturk Avenue G-5/1 Islamabad for information.

7. The Manager National Bank of Pakistan Bannu Bonah ch .

8. Office concerned.

(Žia-Ur-Rehman), Sub-Divisional Officer. P.H.E Sub-Division-II Bannu

ASSUMPTION OF CHARGE.

In compliance of Secretary to Govt: of Khyber Pakhtunkhwa, Public Health Lingg Department Peshawar Order No.SO(Estt)/PHED/4-1/2020, dated 05:03 2021 I. Engr Muhammad Zubair Khan (BPS-17) do hereby assume the charge of the post of Sub Divisional Officer Public Health Engg: Sub Division Lachi at Kohat today on 08.03.2021 (F.N).

(Muhammad Zubair Khan) Sub Divisional Officer Public Health Engg: Sub Division Lachi at Kohat.

Endst: No. <u>C1-8</u> /E-1

Dated Kohat the

08/ 03 / 2021

Copy forwarded for information to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.

- 2 Chief Engineer (South) Public Health Engg: Department Khyber Pakhtunkhwa, Peshawar.
- 3. Superintending Engineer Public Health Engg: Circle Kohat.
- 4. Deputy Secretary (Admn) PHE Department Khyber Pakhtunkhwa, Peshawar
- 5. District Accounts Officer Kohat.
- 6 Manager National Bank of Pakis an Kohat.
- 7. PS to Secretary PHE Department Peshawar.
- & XEN PHE Divinion Kennyl.

Sub Divisional Officer
Public Health Engg: Sub Division
Lachi at Kohat.

Altored

Phone :091-9213551 Fax : 091-9211795 Extn :201

Extn :201 Website: www.kppsc.gov.pk



No. PSC/SR-II/ <u>n37323</u> Dated: 3 | / 8 /2021



To

The Secretary to Govt: of Khyber Pakhtunkhwa. Public Health and Engineering Department.

Peshawar.

Subject:

COMBINED INTER-SE-MERIT OF ASSISTANT ENGINEER/SDO (CIVIL) (BPS-17) IN PUBLIC HEALTH ENGINEERING DEPARTMENT (ADVT: NO. 08/2018 S.NO.49,08/2019 S. NO. 12 AND 11/2019 S. NO. 06.

Dear Sir.

Peshawar 07/07/2022 on the subject noted above and to enclose herewith combined inter-se-merit in respect of Assistant Engineer/SDO (Civil) (BPS-17) advertised in Advertisement No. 08/2018 S.No. 49,08/2019 S.No. 12 and 11/2019, S.No. 06 for further nesscery action.

Encl: As above

Yours faithfully,

(ALEAH DAD)
Assistant Director-III

Copy forwarded to the Chief Engineer (Center) PHE Department.

Peshawar for information please.

Assistant Director-III

e/c

Alter



REVISED INTER-SE-SENIORITY OF FIVE POSTS OF ASSISTANT ENGINEER/SDO (CIVIL) (BPS-17) IN PUBLIC HEALTH ENGINEERING DEPARTMENT (Advertisement No. 08/2018, S.No. 49

Oetails of Posts:	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5	Total Posts
ASSISTANT ENGINEER/SDO (CIVIL)	1	1	2	1	· · -		
Post Filled	1	1	2	-			0
Balance	l <u>.</u>	<u> </u>		.!	·	- 	

Inter-Seniority of the selectees

Merit Order No.	Interview Marks	Total Marks	Date of Birth	Name with rather 5 years	Domicile/Zone Mardan/2	Remarks
1.	20	74	18.04.94	Syed Azam Shah S/O Syed Khadim Shah		
; -	19	74	20.09.92	Sheh Zad Khan S/O Shah Nazar	Dir Lower/3	-\
! !.	19	74	09.07.94	Attaul'ah S/O Abdur Rahlm	Malakand/3	. -
	19	73	30.08.94	Mazhar Khan S/O Nageeb Daraz	FR Bannu/1	
-	20	71	15.03.89	Zia Ur Reman S/O Inayat Ur	Mardan/2 	
	1		1	Rehman		-1-

Subject:

REVISED INTER-SE-SENIORITY OF FIVE POSTS OF ASSISTANT ENGINEER/SDO (CIVIL) (BPS-17) IN PUBLIC HEALTH ENGINEERING DEPARTMENT (Advertisement No. 08/2019, S.No. 12)

Subject	Merit	Zone-1	Zone-2	Zone-3	Zone-4	5	Total Posts
ASSISTANT ENGINEER/SDO (CIVIL)	2	1	1	1	1	1	7
Post Filled	1	1	1	1	11 -	1	16

Inter-Seniority of the selectee's

Merit Order No.	Interv iew Marks	Total Mark	Date of Birth	Name with Father's Name	DomicII/Zon e	Remarks
1.	22	76	26.03.92	Wisal Khan S/O Kamalud Din	Mardan/2	
2. ·	20	74	07.04.89	Tariq Muhmood Ahmad S/O Niaz Muhammad	Lakki Marwat/4	
3.	:		15.03.89	Zia Ur Rehman S/O Inayat Ur Rehamn	Mardan/2	The post remained vacant due to the reason that selectee opted for the post of Advt No. 08/2018. S.No. 48.
1.	21	73	18.03.88	Muhammad Zubair Khan S/O Behram Khan Afridi	Khyber Agency/1	
j.	19	73	14.02.92	Attaur Rahman S/O Rahman-Ul Mulk	Dir lower/3	À
	22	72	24.08.89	Shabab Khan S/O Laiq Khan	Swabi/2	C)
	22	68	16.02.93	Hasib Ur Rehman S/O Ghulam Rabbani	Mansehra/	5

POWER OF ATTORNEY / VAKALATNAMA



BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

Appeal No. 157/2028

Engr.	Muhammad	Ishaq
-------	----------	-------

.. Appellant.

VERSUS

The Secretary Public Health Engineering Department and others

.....Respondents

1/We (Respondents No. 6 to 10) do hereby appoint Akhtar Ilyas Advocate High Court in the above mentioned case, to do all or any of the following acts, deeds and things.

- 1. To appear, act and plead for me/us in the above mentioned case in this or any other court/tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2. To sign and verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal, or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by aim for the conduct, prosecution or defence of the said case at all its stages.
- 3. To receive payment of, and issue receipts for, all moneys that may or power and authorities hereby conferred on the advocate whenever he may think fit to do so.

AND HEREBY AGREE:

That the advocate shall be entitled to withdraw from the prosecution/defence of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof I/We have signed this Power of Attorney hereunder, the contents of which have been read/explained to me/us and fully understood by me/us on this day of March, 2024.

Signature of Executant (s)

(1) Syed Azam Shah

(2) Sheh 3nd (Chan

(3) Atta ullah

(4) Mazhar Khan

5) Zis er Rahman

Ruffranc

Attested & Accepted by

Akhtar Ilyas

Advocate High Court BC No. 11-1572

Cell # 0333-9417974

CNIC: 17301-9777330-1

Off: TF 287, Deans Trade Center,

Peshawar.

7) Tarrig Mehmored

8) Muhammed Zelsan

(9) Ath we Rehma

wheb I Cham.

Ceran angles