

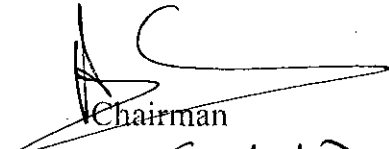
1036/2016

25.01.2017

Learned counsel for the appellant seeks withdrawal of the appeal as grievance of the appellant has been redressed.

In view of the above the appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
25.01.2017


Chairman
25.01.17.

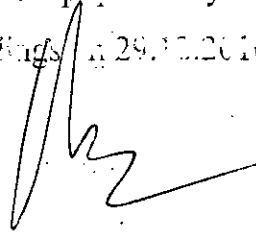
17.11.2016

Agent of counsel for the appellant present. Seeks adjournment as counsel for the appellant is not in attendance. Adjourned for preliminary hearing to 30.11.2016 before S.B.


Chairman

30.11.2016

Counsel for the appellant present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 29.12.2016 before S.B. ~~29.12.2016 before S.B.~~



Member





29.12.2016

Agent of counsel for the appellant present and requested for adjournment as counsel for the appellant is not in attendance. Last opportunity granted. Adjourned for preliminary hearing to 25.01.2017 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 1036/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	06/10/2016	<p>The appeal of Mr. Ahmad Hussain presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25-10-16</u></p> <p> MEMBER</p>
	25.10.2016	<p>Counsel for the appellant present. Seeks adjournment. Adjourned for preliminary hearing on 17.11.2016 before S.B.</p> <p>  Chairman</p>

BEFORE THE KHYBER PA KHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1036 /2016

AHMAD HUSSAIN

VS

GOVT: OF KPK

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1- 3.
2.	Service book	A	4- 12.
3.	Order	B	13- 37.
4.	Order	C	38.
5.	Orders	D, E & F	39- 41.
6.	Impugned order	G	42.
7.	Departmental appeal	H	43- 44
8.	Vakalat nama	45.

APPELLANT

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1036 /2016

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1045

Dated 06-10-2016

Mr. Ahmad Hussain, Stenographer (BPS-15),
O/O the Deputy Commissioner Malakand.

.....APPELLANT

VERSUS

1. The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. The Commissioner Malakand Division at Saidu Sharif Swat.
3. The Deputy Commissioner Malakand.

.....RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED ORDER DATED 8.4.2016
WHEREBY THE APPELLANT WAS PRE-MATURELY
RETIRED FROM SERVICE AND AGAINST NOT TAKING
ACTION ON THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN THE STATUTORY PERIOD OF
NINETY DAYS**

PRAYER:

**That on acceptance of this appeal the impugned order
dated 8.4.2016 may very kindly be set aside and the
respondents may be directed to re-instate the appellant
with all back benefits. Any other remedy which this
august Tribunal deems fit that may also be awarded in
favor of the appellant.**

Filed to-day

Registrar

6/10/16 **R/SHEWETH:**

ON FACTS:

Brief facts giving rise to the present appeal are
as under:

- 1- That initially the appellant was appointed as junior clerk (BPS-5) in the office of Political agent Malakand on the proper recommendation of Departmental Selection Committee vide order dated 1.5.1980. That after appointment the appellant started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the service book is attached as annexure.....A.

- 2- That vide order dated 21.3.1991 the appellant was appointed as junior scale stenographer (BPS-12) in the office of Assistant Political Agent Dargai Malakand Agency on the proper recommendation of Departmental Selection Committee. Copy of the order is attached as annexure.....**B.**
- 3- That during service the appellant was awarded/granted Selection Grade to (BPS-15) w.e.f 14.10.1998 on the proper recommendation of Departmental promotion Committee vide Notification dated 12.10.2004. Copy of the order is attached as annexure.....**C.**
- 4- That during service the concerned Deputy Commissioner Malakand got against the appellant on the issue of appellant son's transfer to his local station who is serving as Sepahi in the Malakand Levies. That on the said issue the appellant was transferred to the office of the Chairman District Development Advisory Committee Malakand at Batkhela vide dated 22.2.2016 and where after he was again transferred to P.S section Malakand vide dated 25.3.2016 within a span of one month. Copies of the orders are attached as annexure.....**D, E & F.**
- 5- That due to the above mentioned personal grudges the appellant was pressurized by the Deputy Commissioner Malakand to get pre-mature retirement and for the said purpose the concerned authority i.e. Deputy Commissioner Malakand forcefully signed the drafted application regarding pre-mature retirement from the appellant.
- 6- That vide impugned order dated 8.4.2016 the concerned authority pre-maturely retired the appellant from service. That appellant feeling aggrieved from the impugned order dated 8.4.2016 preferred Departmental appeal before the respondent No.2 but no reply has been received so far. Copies of the impugned order and Departmental appeal are attached as annexure.....**G & H.**
- 7- That appellant having no other remedy filed this appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 8.4.2016 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject

noted above and as such the concerned authority violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.

- C- That the respondent Department acted in arbitrary and malafide manner by issuing the impugned order dated 8.4.2016.
- D- That the impugned order dated 8.4.2016 has been issued by the respondent No.3 due to personal grudges with the appellant.
- E- That appellant has forcefully been retired from service, therefore the said order dated 8.4.2016 is not tenable in the eye of law.
- F- That the impugned order dated 8.4.2016 regarding premature retirement is against the Rules, therefore the same is void ab initio.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 23.9.2016

APPELLANT



AHMAD HUSSAIN

THROUGH:

NOOR MOHAMMAD KHATTAK

&

**SYED IMDAD HUSSAIN SHAH
ADVOCATE**

ATTESTED

[Handwritten signature]

It is to be drawn under the qualification you have

Political Agent, Bangalore

[Handwritten signature]

[Handwritten signature]

marks out of 100.

1993 and Award 451

India Roll No. 51225

Passed - FA examination

Other qualifications

Training School final examination

Pleadership examination

B.L. or B.A.

First Arts

Qualifications

Date

Left thumb-impression.

received back

dated

Examination Roll No.

③ A-1

Ahmad Hussain
Afghan.

(5)

Place ... Totakam (Malakand Agency)

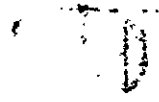
Holder's name and residence ... Mir Baz Khan of Totakam


Date of birth by Christian era as far as can be ascertained ... 4.4.1957 Forth April N.H and fifty seven.

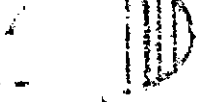
Height by measurement ... 5-5


Special marks for identification ... A Scar Mark vertical on the forehead

Hand Thumb and Finger impressions of (non-gazetted) officer

Finger. 

Ring Finger. 

Fore-Finger. 

Fore-Finger 

Signature of Government servant ... Ahmad Hussain

Signature and designation of the Officer of the Office, or other Attesting Officer

Jahid
Political Agent Malakand

ATTESTED



ATTESTED

[Signature]

11/2/81

320/-

— op —

— op —

11/17/81

310/-

— op —

— op —

290-10-350/12-470-14-540

11/2/80

300/-

— op —

junior clerk

1-5-1980

290/-

offg./temp

Temporary
Appointment

junior clerk

NRS. 290-10-350/12-470

6

Date of appointment

Additional pay for officiating

Pay to substantive post

What is the status of the appointment or service counts for post under Art. 371, C.S.R.

Whether substantive or officiating and whether permanent or temporary

Name of post

7

10	11	12	13	14	15
			Leave		
Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer
			Period	Government to which debitable	Reference to any recorded punishment or censure, or reward or praise of the Government servant
30/11/80	Annual increment	<i>[Signature]</i> Political Agent Malakane		Transferred from G. G. B. Fund to regular cadre with effect from 1/5/1980 (F.N), vide PA's office order issued endst. No. 3071-74/2/1/1 (79-80) dated 5/5/1980.	<i>[Signature]</i> Political Agent Malakane
30/6/81	Advance increment	<i>[Signature]</i> Political Agent Malakane		Service from 1/5/80 to 30/11/80 verified from office copies of pay bills & other office records and found correct.	<i>[Signature]</i> Political Agent Malakane
30.11.81	Increment	<i>[Signature]</i> P. A. Malakane		w.e.f. 1/7/1981 pay of all govt. servants advanced by one stage vide Notification No. FDES(1)-8/76 dated 6-7-1981 from Secretary to govt. of M.P. Finance Dept. Bhopal.	<i>[Signature]</i> Political Agent Malakane
		<i>[Signature]</i>		Service from 1.12.80 to 30.11.81 verified from office copies and other records and found correct.	<i>[Signature]</i> P. A. Malakane

ATTESTED

[Signature]

[Signature]

[Signature]
P. A. Malakane

R/M

1/1/82
1/6/82
1/12/82

[Signature]
P. A. Malakane

No. of the office or station 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
30-11-82	30-11-82	Increment	[Signature]	Political Agent, Malakand	34	Service from 1.12.81 to 30.11.82 verified from office copies of pay bills & other record and found correct.	9
30-6-83	30-6-83	Revision of pay	[Signature]	Political Agent, Malakand			
30-11-83	30-11-83	Increment	[Signature]	Political Agent, Malakand			
30-11-84	30-11-84	"	[Signature]	Political Agent, Malakand	8-1		
30-11-85	30-11-85	"	[Signature]	Political Agent, Malakand	4/1/85		
30-6-86	30-6-86	Revision of pay	[Signature]	Political Agent, Malakand		Service from 1.12.82 to 30.11.83 verified from the office copies of pay bills and other relevant records and found correct.	
30-6-87	30-6-87	Revision of pay scale	[Signature]	Political Agent, Malakand		Service from 1.12.83 to 30.11.84 verified from the office copies of pay bills & other relevant records and found correct.	

9

34

30-11-82

30-6-83

30-11-83

30-11-84

30-11-85

30-6-86

30-6-87

TESTED

Granted Selection Trade and Promoted to BPS-7(750-31-12) w.e.f. 1-7-1987 vide P.A.S order No. 4750-88/11/118-87 (AC) 20-8-1987

Service from 1.12.83 to 30.11.84 verified from the office copies of pay bills & other relevant records and found correct.

DARA 1983 A 165

Agency Accounts

Service from 1.12.82 to 30.11.83 verified from the office copies of pay bills and other relevant records and found correct.

Service from 1.12.83 to 30.11.84 verified from the office copies of pay bills & other relevant records and found correct.

ATTESTED

N.W.S.
Accounts Office
21/12/87

Office of the Accountant General
N.W.S.P., Postmaster
Pay fixed in the Revised Basic Pay Scales 1987, (A.B.S.)
of Rs. 70-25-12-05
at Rs. 936/- P.M.W. c. 1.7.1987
with merit increment on 1-12-1987

Office of the Accountant General
N.W.S.P., Postmaster
Pay fixed in the Revised Basic Pay Scales 1987, (A.B.S.)
of Rs. 75-31-12-05
at Rs. 936/- P.M.W. c. 1.7.1987
with merit increment on 1-12-1987

Total 1058/-

1 pay 29/-

pay 1029/-

Total 1026/-

9 pay 28/-

pay 998/-

Total 994/-

9 pay 27/-

pay 967/-

Total = Rs. 987/-

1.12.89

1.12.88

1.12.88

Grade BPS-7 (1750-31-1370)
pay fixed in BPS-7 (part month) by order
pay in BPS-5 on 1.7.87 = Rs. 900/-
Next above stage in BPS-7 = Rs. 905/-
Premature increment = Rs. 31/- (1.7.87)
pay fixed in BPS-7 on Rs. 936/-
1.7.1987.
Re-fixation of pay on 1.12.1987
pay on 1.12.87 in BPS-5 = Rs. 925/-
Next above stage in BPS-7 = Rs. 936/-
premature increment = Rs. 31/-

Junior clerk
P. Officer Holakand

1/12/Temp.

Name of post

Whether substantive or officiating and whether appointment or temporary

If officiating, state - (i) substantive or (ii) whether appointment or service counts under Art. 371, C.S.R.

Pay in substantive post

Additional pay for officiating

Other emolument falling under the term "Pay"

Date of appointment

(10)

ATTESTED

State General
Auditor

Junior Clerk
PAIS off/week
off/Temp

Name of post	Number of posts live or officiating and whether permanent or temporary	(i) substantive appointment or (ii) whether service counts for pension under Art. 37c, C. S. R.	Pay in substantive post	Additional pay for officiating	Other employment falling under the term "Pay"	Date of appointment
			1060	30		12

Particulars of pay with particulars

270-52-2010(BPS12) Pay fixed - Rs. 1060/-
 1) Pay - BPS-7 on 80 2/3 - Rs. 1060/-
 2) Pay fixed - BPS-12 on 203 2/3 - Rs. 1060/-
 Total Rs. 11587/-

10-6
10-6
10-6

Revised Grade 1355-46-2795 (BPS-12)
 1) old pay - BPS-12 @ (11267) 2/3
 2) pay fixed - Rs. Revised
 BPS-12 on 1-6-1991 - 1643/- X 11/6/91

Total 1643/-
 1739 1/12
 1835 1/12

Office of The Accountant General,
 N.W.F.P. Province
 and in the year and Base Pay 1991
 1355-46-2795-12
 1643 1/12
 1835 1/12
 1991

Office of The Accountant General,
 N.W.F.P. Province
 and in the year and Base Pay 1991
 1355-46-2795-12
 1643 1/12
 1835 1/12
 1991

etc.)

leave taken

Government period to which debtable

Government servant

Service from 1-7-88 to 30-11-89

verified from office copies of pay-bills and other service records and found correct.

P.A. Malakand

B-13

Political Agent, Malakand

Political Agent, Malakand

30/9/91

Appointed as ^{junior} stenographer in BPS-12 to APP, Dargui vide PWS order No. 1754-57/ XIII/175-A Vol-II dtd. 21/3/91

Transfer

Political Agent, Malakand

Political Agent, Malakand

Service from 1-12-89 to 30-11-90

verified from office copies of pay bills and other service records and found correct.

P.A. Malakand

Political Agent, Malakand

30/11/91 Annual increment

Political Agent, Malakand

ATTESTED

10 years service def 1-5/1180

to 30/11/91 verified on the basis of departmental service certificate

recorded in the S-1 Book subject to the cutting attestation at S No. 8 and 12

30/11/92 increment

Political Agent, Malakand

30/11/93 increment

Service from 1/12/92 to 30/11/93

verified from office copies of pay bills and other service records and found correct.

Political Agent, Malakand

P.A. Malakand

ATTESTED

Junior Scale
Senior Scale
Slowly

BPS-12 = 1355-96-2795

1931

1 1/2

Granted Two advance 192
increments for passing
higher qualification
1-2 F.A

Total 2123

W.e.f. 1-5-1994 with
P.A. No. 232-35
XIII/116-RCAG dt 19-5-84

Political Agent,
Malabar
Camp

Reward Scale BPS-12 = 1830-130-3780

WIFE OF THE ACCOUNTANT GENERAL,
N.W.F.P. Poshwar

1830-130-3780
M.W.E.F. 1-6-1934
Increment on 1-12-1932

Accounts Office
N.W.F.P. Poshwar

R.S.C. de
A.A.

Office of the Accountant General
N.W.F.P. Poshwar
Pay fixed in the Reward Pay Scale 1931
1355-96-2795
M.W.E.F. 1-4-1931
With next increment on 1-12-1931

(5.52/21 3/31 8.5/13.9)

The following are pay
note to be

(44)

Name of post	Pay in	Additional	Other
	substantive post	pay for officiating	employment
	substantive post	pay for officiating	employment
	substantive post	pay for officiating	employment
	substantive post	pay for officiating	employment

Station 1 to 8 of appointment promoted on transfer, dismissal etc.) the head of the office or other attesting officer the duration of leave taken pay upto four months for which leave salary is debitable to another Government Signature of the head of the office or other attesting officer Reference to any recorded punishment or censure, or reward or praise of the Government servant

(12)

(15)

Service from 1-12-11 to 30-11-12
verified from office copies of pay bills and other service records and found correct,

P.A. Malakand

Relaxation FR-2 (b) granted vide BOP NWFP No. 14219-20/Admin/11/11/11-1-1998

Political Agent, Malakand

(17)

Service from 1-12-92 to 30-11-93
verified from office copies of pay bills and other service records and found correct,

P.A. Malakand

P.A. Malakand

Scale 31 S 94 Revised

Revision of pay scale with effect from 1-6-1994
Vide Finance Department NWFP, Peshawar Notification No. FD (PRC) 1-1/94 dated 30-6-1994.

ATTESTED

Handwritten notes and signatures at the bottom left, including names like 'P.A. Malakand' and various initials and dates.

Name of post

Whether substantive or officiating and whether permanent or temporary

If officiating, state—
(i) substantive appointment or
(ii) whether service counts for pension under Art. 37L, C.S.R.

Pay in substantive post

Additional pay for Officiating

Other emolument falling under the term "Pay"

Date of appointment

16

Stenographer

B.P.S. 12 (1830-130-3780)

3000/-

1 12/94

Al

3000/-

1 12/95

Al

3000/-

1 12/96

Al

3000/-

1 12/97

Al

ATTESTED

[Signature]

Whether substa... state...

Date of termination of appointment	Cause of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
------------------------------------	--	--	------------------------------------	--	--	--

30/11/94

(14)

(17)

Annual Increment
 Political Agent,
 Malakand

service from 1-12-93 to 30-11-94
 verified from office copies of pay bills and other service records and found correct.

P.A. Malakand
 gm

T 20
 9/11/95

2 ann of 2nd class
 sent - Punjab FA
 wt 15/6/94 (2123-1921)
 384/- = 261
 120/- seen as on pay pag 19
 25/10/94

~~Handwritten text, possibly crossed out or illegible~~

ATTESTED

[Signature]

Month small paid
 P. Malakand
 Malakand

[Signature]

Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Allocation of periods of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
------------------------------------	---	--	------------------------------------	--	--	--

30/11/94

(14)

(17)

Annual increment.
 Political Agent,
 Malakand.

service from 1-12-93 to 30-11-94
 verified from office copies of pay bills and other service records and found correct.

P.A. Malakand.

Malakand
 Malakand
 Malakand

11
 720
 9/11/94

De amt of 2nd class
 mail - Punjab FA
 w/ 15/6/94 (2125-1921)
 384/- = 267
 120/- seen as on pay page 12
 25/10/94

~~Handwritten text, possibly crossed out or illegible.~~

ATTESTED

[Signature]

Month mail paid
 P.A. Malakand
 Malakand.

(14)

Name of post

Whether substantive or officiating and whether permanent or temporary

legislative state... (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C.S.R.

Pay in substantive post

Additional pay for Officiating

Other emolument falling under the term "Pay"

Date of appointment

Restriction due to Appointment & Section of FR-22.b

18

S/Typist

(BPS07(Rs.750-31-1320))

Rs.1060/- ✓

12/90

(BPS-12(Rs.970-52-2010))

Rs.1074/- Next Stage

3/21/91

BPS-12(Rs.1355-96-2795)

Rs.1643/- ✓

6/91

Rs.1739/- ✓

12/91

Rs.1835/- ✓

12/92

Rs.1931/- ✓

12/93

BPS-12(1830-137-3780) 2 adv: Incr

Rs.2123/-

15/94

ATTESTED

Rs.2870/- ✓

6/94

Rs.3000/- ✓

12/94

ATTESTED

[Handwritten signature]

OR

OF

(19)

Reference to any recorded punishment or censure, or reward or praise of the Government servant

Signature of the head of the office or other attesting officer

Allocation of period of leave on average pay upto four months for which leave salary is payable to another Government department to which Government servant is debitable

Nature and duration of leave taken

Reason of termination (such as promotion (except as mentioned in the rules), dismissal, etc.)

Date of termination or appointment

Office or station to which appointed

Political Agent, Malakand	Annual Increment	30/95	30/95
Political Agent, Malakand	Annual Increment	30/94	30/94
Political Agent, Malakand	Revision of Scale	31/94	31/94
Political Agent, Malakand	Annual Increment	30/94	30/94
Political Agent, Malakand	Annual Increment	30/93	30/93
Political Agent, Malakand	Annual Increment	30/92	30/92
Political Agent, Malakand	Annual Increment	30/91	30/91
Political Agent, Malakand	Revision of Scale	31/91	31/91
Political Agent, Malakand	Appointed as Special Agent	20/91	20/91

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under Art. 37r, C.S.R.	Pay in substantive post	Additional pay for Officiating	Other emolument falling under the term "Pay"	Date of appointment
			BPS-12 = 1830-130	3780		20
Steno Typist			Rs 3130/-			12/95
BPS-12						
do			Rs. 3260/-			12/96
do			Rs. 3390/-			12/97
do			Rs. 3520/-			12/98
do			Rs. 3650/-			12/99
do			Rs. 3780/-			12/2000
			Revised BPS-12 (2745-195-8595)			
do			Old pay in (BPS-12) Rs. 3780/- pay fixed 5670/-			12/2001
do			5865/-			12/2002

ATTESTED

[Signature]

Office of the Assistant General
N.W.F.P. Peshawar.
Pay Fixed in the revised pay scales 2000
of Rs. 2745-195-8595
at Rs. 5670/- with effect from 1-12-2001
with 5% increment on 1-12-2002

[Signature]

Assistant Officer

Date of appointment
 Promotion, transfer, dismissal etc.)
 The head of the office or other attesting officer
 Duration of leave taken
 leave salary is debitable to another Government
 Period to which debitable
 head of the office or other attesting officer
 of censure, or reward or praise of the Government servant

Service from 1-12-94 to 30-11-98
 Verified from office copies of pay bills and of other service records and found correct.

(21)

30/11/96 Annual Increment
 Political Agent, Malakand. Sp.

30/11/97 Annual Increment
 Political Agent, Malakand. Sp.

30/11/99 Annual Increment
 PA Political Agent, Malakand. Sp.

30/11/99 Annual Increment
 Political Agent, Malakand. Sp.

30/11/2000 Annual Increment
 Political Agent, Malakand. Sp.

30/11/2001 Revised
 D.C.R. & E. Bhatnagar
 Service from 1-12-98 to 30-11-99

30/11/2001 Annual Increment
 P.A. Malakand

30/11/2001 Service from 1-12-99 to 30-11-2000
 Verified from office copies of pay bills and of other service records and found correct.

30/11/2001 Service from 1-12-2000 to 31-8-2001
 Verified from office copies of pay bills and of other service records and found correct.

30/11/2001 Service from 1-12-2000 to 31-8-2001
 Verified from office copies of pay bills and of other service records and found correct.

30/11/2001 Service from 1-12-2000 to 30-11-2001
 Verified from office copies of pay bills and of other service records and found correct.

30/11/2001 Service from 1-9-2001 to 30-11-2001
 Verified from office copies of pay bills and of other service records and found correct.

T/119
 T/22/12

Arrangement of pay bills and of other service records -

F.R. 92 subject 12 to 30/11/95 98

Provisionally subject to fixation by

P.G. fixation part 1/9 to 1/6/99

Granted 7 (seven) days medical leave W.E. 7.13.1.2001 to 19.1.2001 vide PA's order issued under Encl. No 535-37/VII/16 dt 19.1.2001

Political Agent Malakand

Granted/extended 5 (Five) days medical leave vide order issued under Encl. No. 892-43 dt 11.2.2001 W.E. 7.20-1-2001 to 24.1.2001 with

Political Agent Malakand

Political Agent Malakand

Political Agent Malakand

Service from 1-9-2001 to 30-11-2001 verified from office copies of pay bills and of other service records and found correct.

ATTESTED

D.C.R. & E. Bhatnagar
 P.A. Malakand

Name of post	and whether permanent or temporary	appointment or (ii) whether service counts for pension under Art. 371. C. S. R.	Pay in substantive post	Additional pay for officiating	emoluments falling under the term "Pay"	Date of appointment
--------------	------------------------------------	---	-------------------------	--------------------------------	---	---------------------

(22)

Steno Typist
(BPS-12)

BPS-12 (2745-195-8595)

pay Rs. 6060/- 1/12/2003

Pay Fixation due to Grant of Selection Grade to BPS-15 (2190-177-4845)
W.E.F 14.10.1998

Steno Typist
(BPS-15)

① pay as on 13.10.1998 = Rs. 3390/- ✓

② pay as on 14.10.1998 = Rs. 3429/- ✓
in BPS-15 Next stage

③ pre-mature Increment Rs. 177/-

④ pay fixed on 14/10/98 in BPS-15 Rs. 3606/- ✓

⑤ pay on 1.12.98 Rs. 3606/- ✓

⑥ " " 1.12.99 Rs. 3783/- ✓

⑦ " " 1.12.2000 Rs. 3960/- ✓

⑧ " " 1.12.2001 Rs. 4137/-

Revised BPS-15 (3285-265-11235)

⑨ old pay in BPS-15 on 1.12.2001 Rs. 4137/-

⑩ pay fixed on 1/12/2001 Rs. 6200/- ✓

⑪ pay on 1.12.2002 Rs. 6465/- ✓

⑫ pay on 1.12.2003 Rs. 6730/- ✓

ATTESTED

[Signature]
D.O.R. & E. Bikhela

[Signature]

352

Date of termination of appointment Date of appointment (such as promotion, transfer, discharge)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
---	--	------------------------------------	---	--	--

23

Posted/adjusted in the office of D.O. R & E Mkd. at Bathkela vide D.C.O. Malakand office order No. 295/DCO (AC) dt: 16-8-2001.

[Signature]
D.O.R. & E. Bathkela

13
18/10/22

Drawn diff. & pay & allowance
made of S/Grade & B-15
14.10.98 to 29.04.04 Rs. 38196/-

Granted Selection grade BPS-15 w.e.f. 14.10.1998 vide D.C.O. Malakand order issued under Endst. No. 7228-32 dated 12.10.2004.

D.O.R. A

[Signature]

[Signature]
D.O.R. & E. Bathkela

21

Service from 1-12-02 to 30-11-03 verified from office copies of pay bills and other service records and found correct.

[Signature]
D.O.R & E, Bathkela

22

Service from 1-12-03 to 30-11-04 verified from office copies of pay bills and other service records and found correct.

[Signature]
D.O.R & E, Bathkela

30/11/04 Annual Increment.

[Signature]
D.O.R. & E. Bathkela

ATTESTED

Name of post

and whether permanent or temporary

appointment or (ii) whether service counts for pension under Art. 371. C. S. R.

Pay in substantive post

Additional pay for officiating

falling under the term "Pay"

Date of appointment

24

Steno Typist
(BPS-25)

— de —

— de —

Rs. 6995/- ✓

12/04

Rs. 8050/- ✓

7/05

Rs. 8355/- ✓

12/05

I hereby opt for regularization of my pay in

BPS-15 on 1-12-1998. Any over payments made to me may be recovered from my pay.

(Signature)
(Amad Hussain)
 stenographer.

Pay on 1/12/98 ✓
my from ✓
remains ✓

In view of the option by the official, the pay is fixed departmental as under:

Pay in existing pay scale BPS: on 12/98 Rs. 3520/- ✓

Pay fixed on eve of selection grade in BPS-15 (2190-177-4845) on 1-12-1998. Rs. 3783/- ✓

Pay on 1-12-1999. Rs. 3960/- ✓

Pay on 1-12-2000. Rs. 4137/- ✓

Pay on 1-12-2001. Rs. 4314/- ✓

new pay scale (3285-265-11235)

Pay fixed in BPS-15. Rs. 6465/- ✓

Pay on 1-12-2002. Rs. 6730/- ✓

Pay on 1-12-2003. Rs. 6995/- ✓

Pay on 1-12-2004. Rs. 7260/- ✓

Revised pay scale: 15 (3780-305-12930).

Pay fixed in BPS: 15 on 1-7-2005. Rs. 8355/- ✓

Pay on 1-12-2005. Rs. 8660/- ✓

ATTESTED

(Signature)
S. R. K. Bhattarai

25

10	11	12	13		14	15
			Nature and duration of leave taken	Leave		
				Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government		
Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
<i>E. Batkhela</i>					<i>g3</i>	
						<i>30-11-05</i>
<i>E. Batkhela</i>						
<i>E. Batkhela</i>	<i>Revision on 1-7-05</i>	<i>Annual increment</i>			<i>Service from 1-12-04 to 30-11-05 verified as correct. bills and other services and found correct.</i>	
<i>E. Batkhela</i>						

Service from 1-12-04 to 30-11-05 verified as correct. bills and other services and found correct.

E. Batkhela
D.O. R & E, Batkhela

TOR
EA

ATTESTED

[Handwritten Signature]

(26)

S. G. / 12198 / 2001
 6265 / 2005
 8355 / 2005

2001
 OFFICE OF THE ACCOUNTANT GENERAL
 PAY FIXED BASIC

OF RS. 3785 - 365 - 11235 (15)
 AT RS. 6465 /
 With Next increment on

Accounts Officer
 Pay Fixation Party N.W.P.F. Peshawar
 Sed

2005
 Office of The Accountant General
 PAY FIXED BASIC

OF RS. 3780 - 305 - 12930
 AT RS. 8355 /
 WITH RS.

Accounts Officer
 Pay Fixation Party N.W.P.F. Peshawar
 Sed

B.P.S: 15 (3780 - 305 - 12930)

Stenographer (Junior scale)
 in B.P.S. 15

Rs. 8355/-

12 / 2005

Rs. 8660/-

ATTESTED

12 / 2005

Rs. 8660/-

12 / 05

Rs. 8965/-

12 / 05

[Signature]

27

7893
2/6
(No 927)
291510

22.545/-
Down Rs. 14489 on c/c

of one increment of 1.12.08
to 31.5.2006 by adjustment
through computer in the pay
for 2006

Annual
Increment

[Signature]
D.O.R. E. E. Bithela

[Signature]
7/6/08

2M

Service from 12-05 to 30-11-06
verified from office copies of pay
books and other service records
and found correct.

[Signature]
D.O.R. E. Bithela

ATTESTED

[Signature]

[Signature]
E. Bithela

[Signature]
E. Bithela

[Signature]
E. Bithela

RECORD FOR LOSSES

28

District and post	No. of District Order	Date	District and post	No. of District Order
<p>Service from 1-12-06 to 30-11-07 verified bills for pay and found correct</p>				
<p>Stenographs (J. Seale) in DOR office Buttrick</p>		<p>Re 9070/-</p>	<p><i>Albraft</i> ✓ D.O.R. & Buttrick</p>	
<p><i>Albraft</i> D.O.R. & E. Buttrick</p>				
<p>ATTESTED</p>				
<p><i>[Signature]</i></p>				

Name: Ahmed Hussain ✓

Age: _____ (29) ✓

Residence: Village post office Totakan ✓

Tehsil, Batakhele, Distt: Malakand ✓

Father's name and residence:
M. Mir Baz Khan (late) vill. Totakan, Teh. Batakhele - Malakand ✓

Date of birth by Christian era as nearly as can be ascertained:
4-4-1957 ✓

Height by measurement:
5-6" ✓

Personal marks for identification:
- A scar mark visible on the forehead

Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: _____ Ring Finger: _____

Middle Finger: _____ Fore Finger: _____

ATTESTED

Thumb: _____

Signature of Government Servant: Ahmed Hussain

Signature and designation of the Head of the Office, or other Attesting Officer: _____

Drawing & Disbursing officer
Deputy Commissioner
Malakand

and whether permanent or temporary	Appointment, or (ii) whether service counts for pension under Art, 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment
Ahmad Hussain Steno Grapher J Scale KODS Office Muz B-15 (5220-420-17820)					(20)
				Pay fixed in the new pay + scale F.D NWFP circular order no. F.D (P) 1-1/2-08 dt 10-7-08	
					Rs 12780/-

do					Rs 13200/-
----	--	--	--	--	------------

Ahmad Hussain Steno Grapher J Scale BDS (15) (5220-420-17820)					
					Rs. 13200/- 1-0

Ahmad Hussain Steno Grapher J Scale (5220-420-17820)					
					Rs: 13620/- 1-

ATTESTED

[Signature]

					Rs 13620/- 01 7/200
					Rs 14040/- 01 12/200

(31)

Station Officer	10 Date of Termination or appointment	11 Reason of termination (such as Promotion, transfer, dismissal, etc)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government			
					Period			Government to which debtible
			(25)			(26)		
Balkhela					Service from 1-12-07 to 30-11-08 verified from office copies of pay bills and other service records and found correct.			
Balkhela		Annual increment						
						(27)		
					Service from 1-12-08 to 30-11-09 verified from office copies of pay bills and other service records and found correct.			
Sub Officer		Annual increment						
Balkhela								
						(28)		
					Service from 01-12-2009 to 30-11-2010 verified from office copies of pay bills and other service records and found correct.			
Balkhela								

ATTESTED

15
10300/107
128858
23200/81

Office of the Accountant General
Hyderabad
Pay fixed to the Revised Basic Pay Scales
R.P.S. 4350 350 4950 815
Pay Fixed to 5000 420 7820 R
Add @ Rs. 1275 p.m. 01-07-2007
Pay Fixed @ Rs. 23200 p.m. 01-07-2007
R.F. 3500 290 28500
Pay fixed @ Rs. 23200 p.m. 01-07-2007
Date of Next increment is on 12-2011

Accounts Officer
Pay Commission

Stenographer
R.P.S-15

Revised Bpy Scale (8500-700-2
vide Govt CPIC 1-mi Dept: CR
no. EP (PRC) 1-1 2011 dt: 14-7-2011

ATTESTED

Rs 23200 / 17 / 2011

R 23900 / 12 / 2011

Am

Am

Signature of the head of the office or other attesting officer	Signature of any recorded punishment or censure, or reward or praise of the Government Servant	Period for which leave salary is debitable to another Government	
		Period	Government to which debitable

(33)

[Signature]
 District Officer
 Revenue & Estate, District
 Annual
 30-11-2011

[Signature]
 Service from 1-12-2010 to 30-11-2011
 verified from office copies of pay
 bills and other service records
 and found correct.

[Signature]
 D. G. R. Bhatnagar

30-11-2013 Annual
 2013
[Signature]

GPF Non refundable Advr.
 Rs: 10000/- sanctioned
 by the DOR & E, District
 vide office No. 2064/16/A
 dated 2/9/2012.

Total amount Rs. 10000/-
 less 2500/-
 Net amount Rs. 7500/-

Branch B. Floor 7.05 MC
 of CVRA, Advance
 vide TRO-189
 12

[Signature]
 District Officer
 Revenue & Estate, District

(34)

Service from 1-12-2011 to 30-11-2012
 verified from office copies of pay
 bills and other service records
 and found correct.

ATTESTED

[Signature]
 D. G. R. Bhatnagar

and whether permanent or temporary

appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.

Pay in substantive post

Additional Pay for officiating

allowance falling under the term "Pay"

Date of Appointment

34

Stenographer
Bpd 15

~~Revised B pay scale~~

~~via Govt Rpt Bpd 15~~
No. FD (PRC) 11/12/11

~~Rs. 23200/-~~
~~Rs. 22200/-~~
~~Rs. 23900/-~~

~~Revised pay scale~~

Rs. 24600/- 1/12

Rs. 25300/- 1/12 2013

ATTESTED

[Signature]

Rs. 10000

order

2/2011

35

[Signature]
 District Officer
 Revenue & Estate, Bahadur Nagar

[Signature]
 Service from 1-12-10 to 31-11-2011
 verified from office copies of pay
 bills and other service records
 and found correct.

[Signature]
 D.O. R.E. Bahadur Nagar

2/2012

order

Rs. 10000

30/11/2013 Annual
 Account

[Signature]
 District Officer
 Revenue & Estate, Bahadur Nagar

PF Non refundable Adv.
 Rs. 10000/- same has been
 by the DCR & E Bahadur Nagar
 vide office No. 2004/16/11
 dated 12/9/2012.

Total amount Rs. 10000/-
 less 25% Adv. Rs. 2500/-
 Net amount Rs. 7500/-

Drawn by *[Signature]* M.C.
 of MPA, Advance
 vide Tr. No. 95/11/12

[Signature]
 District Officer
 Revenue & Estate, Bahadur Nagar

30

Service from 1-12-10 to 31-11-2011
 verified from office copies of pay
 bills and other service records
 and found correct.

[Signature]
 District Officer
 Revenue & Estate, Bahadur Nagar

ATTESTED

[Signature]
 D.O. R.E. Bahadur Nagar

No. of appointment	Transfer, dismissal, etc)	or other attesting officer.	tion of leave taken	which leave salary / is debitable to another Government		or other attesting officer	Statement of credit or debit of the Government Account
				Period	Government to which debitable		
6 30/11/2015	Revision of pay						(37)
				Service from 1-12-2012 to 30-11-2014 verified from office copies of pay bills and other relevant records and found correct.			
				<p style="text-align: center;">Deputy Commissioner Malakand at Batakhele</p> <p>Service verified w.e.f. 1-12-2012 to 30-11-2014 from the office Copies of Pay Bills and Other relevant record</p>			
11 2015	Annual increment						
				<p style="text-align: center;">Accounts Officer D.C. Office Malakand</p> <p>Service verified w.e.f. 1-12-2014 to 30-11-2015 from the office Copies of Pay Bills and Other relevant record</p>			
4 2016	Retired for Service						
				<p style="text-align: center;">ACCOUNT OFFICER D.C. MALAKAND</p> <p>Service verified w.e.f. 1-12-2015 to 30-11-2016 from the office Copies of Pay Bills and Other relevant record</p>			
<p>17/3/18/15 LPR encasement R 414180</p>							
<p>Mr. Ahmed Hussain Stenographer BPS-15 Retired from Govt. Service on his own request w.e.f. 01-05-2016, vide D.C. Order No. 4168/1 dated 8/4/2016.</p>							
						<p>DEPUTY COMMISSIONER MALAKAND</p>	
						<p>ATTESTED</p>	
						<p>DEPUTY COMMISSIONER MALAKAND</p>	

OFFICE OF THE DISTRICT COORDINATION OFFICER, MALAKAND.

C-38

O R D E R.

Dated Batkhela the
12th October, 2004.

No. _____ / 2/5/Acctt: Consequent Upon the recommendation of the Departmental Promotion/Selection Committee, Mr. Ahmad Hussain Junior Scale Stenographer, of District Officer, R&E office Batkhela, is hereby granted Selection Grade RPS-15 w.e.f. 14/10/1998.

self
DISTRICT COORDINATION OFFICER,
MALAKAND.

No. 7278-32 /

Copy forwarded to:-

1. The Secretary, Board of Revenue, NWFP, Peshawar.
2. The Executive District Officer, F&P, Batkhela.
3. The Commandant, Malakand Levies, Malakand.
4. The District Officer, R&E, Batkhela.
5. The Agency Accounts Officer, Malakand.

For information.

M. Khan
DISTRICT COORDINATION OFFICER,
MALAKAND.

Acctt:

DM
D O R
13/10/04

ATTESTED

DM



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DEPUTY COMMISSIONER
MALAKAND

D-(39)

OFFICER ORDER: -

Mr. Ahmad Hussain Stenographer office of the Additional Deputy Commissioner, Malakand at Batkhela ^{is k/by} has been transferred to the office ^{of} Chairman District Development Advisory Committee Malakand at Batkhela with immediate effect in the interest of general public.

DEPUTY COMMISSIONER
MALAKAND

No: 1304-61

Dated Malakand the: 22/2/2016

Copy forwarded to: -

1. The Chairman DDAC, Batkhela.
2. The Additional Deputy Commissioner, Malakand at Batkhela.
3. The Official concerned.

DEPUTY COMMISSIONER
MALAKAND

ATTESTED

OFFICE OF THE
DEPUTY COMMISSIONER
MALAKAND

Dated. 25/03/2016

40

OFFICE ORDER

No. 2587 /PS/DC/MKD. Reference to this office order No.1304-6/PS/DC/MKD dated 22.02.2016 is hereby withdrawn forthwith.

DEPUTY COMMISSIONER
MALAKAND

No. 2588-90 /DC/MKD Dated. 25 /03/2016

Copy forwarded to the:-

1. Chairman DDAC, Malakand.
2. Additional Deputy Commissioner, Malakand.
3. Mr. Ahmad Hussain, Steno for compliance.

DEPUTY COMMISSIONER
MALAKAND

ATTESTED



E-41

**OFFICE OF THE
DEPUTY COMMISSIONER
MALAKAND**

Dated: 25/03/2016

ORDER:

No.2596/PS/DC/MKD Mr. Ahmad Hussain, Steno Grapher of this office is hereby directed to perform his duties in the office of the undersigned at PS Section, Malakand with immediate effect till further orders.


s/c DEPUTY COMMISSIONER
MALAKAND

No.2597/PS/DC/MKD Dated: 25.03.2016

Copy forwarded to Mr. Ahmad Hussain, Steno Grapher, DC Office, Malakand for compliance.


s/c DEPUTY COMMISSIONER
MALAKAND

ATTESTED



OFFICE OF THE
DEPUTY COMMISSIONER
MALAKAND

Dated: 8 /04/2016

G-42

ORDER:

No. _____ /Estt: Mr. Ahmad Hussain Stenographer (BPS-15) of the office of undersigned is hereby retired from Government Service with full pensioner benefits with effect from 01.05.2016 (FN) on his own request.

Sanction is also hereby accorded to the grant of encashment of LPR equal to 365 days subject to availability of leave at credit after observing all codal formalities.

DEPUTY COMMISSIONER
MALAKAND

No. 4/69-731

Copy forwarded to the:

1. *Commissioner, Malakand Division, Saidu Sharif Swat, for information.*
2. *District Accounts Officer, Malakand.*
3. *Accents Officer, local.*
4. *Official Concerned.*
5. *Office order file.*

DEPUTY COMMISSIONER
MALAKAND

ATTESTED



To

The Commissioner Malakand Division,
at Saidu Sharif Swat.

H-43

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 8.4.2016 WHEREBY THE APPELLANT WAS PRE-MATURELY RETIRED FROM GOVERNMENT SERVICE

R/SHEWETH:
ON FACTS:

Brief facts giving rise to the present Departmental appeal are as under:

- 1- That initially the appellant was appointed as junior clerk (BPS-5) in the office of Political agent Malakand on the proper recommendation of Departmental Selection Committee vide order dated 1.5.1980. That after appointment the appellant performing his duty quite efficiently and upto the entire satisfaction of his superiors.
- 2- That vide order dated 21.3.1991 the appellant was appointed as junior scale stenographer (BPS-12) in the office of Assistant Political Agent Dargai Malakand Agency on the proper recommendation of Departmental Selection Committee.
- 3- That during service the appellant was awarded/granted Selection Grade to (BPS-15) w.e.f 14.10.1998 on the proper recommendation of Departmental promotion Committee vide Notification dated 12.10.2004.
- 4- That during service the concerned Deputy Commissioner Malakand got against the appellant on the issue of appellant son's transfer to his local station who is serving as Sepahi in the Malakand Levies. That on the said issue the appellant was transfer to the office of the Chairman District Development Advisory Committee Malakand at Batkhela vide dated 22.2.2016 and where after he was again transferred to P.S section Malakand vide dated 25.3.2016 within a span of one month.
- 5- That due to the above mentioned personal grudges the appellant was pressurized by the Deputy Commissioner Malakand to get pre-mature retirement and for the said purpose the concerned authority i.e. Deputy Commissioner Malakand forcefully signed the drafted application regarding pre-mature retirement from the appellant.

ATTESTED



- 6- That vide impugned order dated 8.4.2016 the concerned authority pre-maturely retired the appellant from service. That appellant feeling aggrieved from the said impugned order and having no other remedy filed the instant Departmental appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 8.4.2016 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the concerned authority on the subject noted above and as such the concerned authority violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan 1973.
- C- That the concerned authority acted in arbitrary and malafide manner by issuing the impugned order dated 8.4.2016.
- D- That the impugned order dated 8.4.2016 has been issued by the concerned authority due to personal grudges with the appellant.
- E- That appellant has forcefully been retired from service, therefore the said order dated 8.4.2016 is not tenable in the eye of law.
- F- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 8.4.2016 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 22.6.2016

ATTESTED



APPELLANT



AHMAD HUSSAIN, Stenographer (BPS-15),
O/O the Assistant Political Agent Dargai Malakand.

VAKALATNAMA

IN THE COURT OF KPK Service Tribunal Peshawar

Appeal No. 1036 OF 2016

Ahmad Hussain (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Gort. of KPK (RESPONDENT)
(DEFENDANT)

I/We Ahmad Hussain
Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___/___/2016

Ahmad Hussain
CLIENT

Noor Mohammad Khattak
ACCEPTED
NOOR MOHAMMAD KHATTAK
(ADVOCATE)

Syed Imdad Hussain
Advocate

OFFICE:
Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No 0345-0323141