

BEFORE THE HON, BLECHAIRMAN SERVIS TRIBUNAL

KHYBER PAKHTUNKHAWA PESHAWER

Mst .Qurat ul Ain d/o Mushtaq khan resident of baffa , Distric Mansehra

Distric Mansehra

Appeal no 195/2022
(APPELLANT)

VERSES

Secretary Elementry and secondry Education Khyber Pakhtunkhawa
Peshawer and others.

(RESPONDENTS)

**SCANNED
KPST
Peshawar.**

SERVICE APPEAL

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DATED ;8 -2-2022

APPLICANT

KAMAL FARID TANOLI
AND
UMMAN AYUB
ADVOCATES HIGH COURT
ABBOTTABAD

Ug

**UMMAN AYUB ADVOCATE
ABBOTTABAD**

①

**BEFORE THE HON, BLECHAIRMAN SERVICES TRIBUNAL,
KHYBER PAKHTUNKHAWA PESHAWAR**

Mst. Qurat-Ul-Ain d/o Mushtaq Khan resident of Baffa, District Mansehra
District Mansehra.

... (APPELLANT)

VERSUS

1. Secretary Elementary & Secondary Education Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. DEO (F) District Mansehra.
4. DDO, Education Mansehra.

... (RESPONDENTS)

SERVICE APPEAL

APPEAL AGAINST THE ORDER BEARING
EDR: NO. 6279-303 DATED 02.07.2021 OF THE
DIRECTOR ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHAWA,
PESHAWAR WHEREBY THE CONTRACT OF
APPELLANT HAS BEEN WITHDRAWN.

&

APPEAL AGAINST THE ORDER DATED
10997 DATED 21-09-2021, OF THE OFFICE OF
DEO (F), MANSEHRA, WHEREBY THE
APPELLANT HAS BEEN SERVED WITH A

NOTICE OF RECOVERY OF SALARY FOR
THE PERIOD MENTIONED THEREIN.

Respected sir,

I take the honor to refer to the subject noted above and in this regard it is submitted that the appellant was appointed as SST(G) vide Endr:No.1515-21 A/-17/SST/Adhoc/Apptt: Mansehra dated Peshawar 18.09.2018 with a posting at GGCMS Choain, however, the contract of the appellant has been withdrawn and the appellant has been issued the impugned notice for recovery of salary vide subject noted above, which is illegal, against the facts and law and is ineffective upon the rights of the appellant and are liable to be set aside.

That feeling aggrieved from the above situation, appellant preferred an appeal before the respondent No.01 bearing No.3515 and 3516 dated 20.10.2021, however, till date the respondent No.01 has not decided the fate of the said appeal and having been aggrieved from the said position, and being within time, appellant is preferring the present appeal. Copy of appeal is annexed as annexure "A".

Appellant seeks and prays for setting aside the subject notification on the following facts and grounds.

1. That the appellant was appointed as SST(G)vide Endr:No.1515-21 A/-17/SST/Adhoc/Apptt: Mansehra dated Peshawar 18.09.2018 with a posting at GGCMS Choain. Copy of notification is annexed as annexure "B".
2. That prior to appointment in the present institution, the appellant was working in Bank of Punjab having different assignments, however, due to present appointment; the appellant has resigned from her job and joined the present service. Relevant record to this effect is annexed as annexure "C".
3. That after being notified as SST(G) with the present department and after having resigned, the appellant made her arrival with Head Teacher in GMS Choain on 18.09.2018. Copy of arrival letter is annexure "D".
4. That thereafter vide Endr.No:12776-81/AE-II/Transfer file SST/ dated 03.11.2018, the appellant was transferred through adjustment order noted above to GGMS Malkan. The arrival report of appellant

addressed to DEO (F) District Mansehra dated 08.11.2018 is self explanatory. Copy of order and arrival reports are annexed as annexure "E" & "F" respectively.

5. That thereafter the pay of appellant was stopped by the department due to some inquiry the reasons of which were best known to the DEO(F) and the worthy Director.
6. That the appellant feeling aggrieved of the same moved an application for extension of contract as well as issuance of salary, however, in vain.
7. That later on the appellant was served with the impugned notice alongwith a notice for recovery of salary. Both the notices are annexed as "G" and "H" respectively.
8. That the impugned notice of withdrawal of contract and recovery of salary are against the law, facts, service rules, thus ineffective upon the rights of the appellant and are liable to be set aside interalia on the following grounds.

GROUND:

- a. That the impugned notifications are against the law, facts and service rules, as, the appellant was notified to be SST(G) vide Endr:No.1515-21 A/-17/SST/Adhoc/Apptt: Mansehra dated Peshawar 18.09.2021 with a posting at GGCMS Choain, which was duly issued under the stamp/seal and signatures of respondent/Director E&S Education KPK.
- b. That the appellant made her arrival vide letter annexure "D" which was duly forwarded to DEO (F), Mansehra.
- c. That the jurisdiction of posting/transfer of the appellant never vested with the appellant, rather the posting was made by Director E&S, Education KPK , while transfer was made by DEO(F), Mansehra and if any sheer violation of law/rules or any negligence of official duty has been done by the respondents, for that purpose the appellant cannot be burdened with the same.
- d. That the Honourable Supreme Court of Pakistan has time and again held that the employee cannot be burdened with the neglect and failure of

appointing authority and the law point shall be urged at the time of arguments.

- e. That the appellant being female was already working the Bank of Khyber and due to the notification, the appellant resigned from the said post and made arrival for the present post. The acts of the respondents have affected the fundamental rights of the appellant as envisaged in Constitution of Islamic Republic of Pakistan.
- f. That issuance of withdrawal letter of contract by the respondent/Director is also against the law, as, the said Director has issued the appointment letter/notification stated above in favor of appellant, and then, the said should have been withdrawn by any higher authority.
- g. That the inquiry officer/Principal GGCHS, School Abbottabad has not recommended for initiating proceedings against the respondent/Director, as, the appointment notification was issued under the letter head and signature of Director E&S Education, KPK, Peshawar.

- h. That unless the Director is not prosecuted, penalization of appellant is against the norms of justice.

- i. That the person/authority issuing the appointment order has not been associated in the inquiry upon which the appellant has been recommended for the withdrawal of contract, then, withdrawal order is not sustainable in the eye of law.

- j. That the appellant has been serving as a Teacher upon the notification of competent authority/respondent and deserves to receive the salary for the same. In spite of issuing the salary for the services provided the appellant was served with a notice of recovery of salary, which is neither sustainable in the eye of law nor in rules and even not in substantial justice.

- k. That as per scheme of law and the dictums laid down by the superior courts, One cannot be penalized due to the negligent/misconduct/criminal act of another. Herein the present case, even if for the sake of an argument someone who is liable to be removed is the Director E&S Education KPK

and DEO (F), who have acted negligently and unprofessionally and for the said act, appellant cannot be penalized.

- 1. That rest of the points shall be urged at the time of arguments.

- m. That the appellant shall be highly obliged and requests that she should be provided an opportunity of personal hearing.

It is, therefore, requested that the impugned notifications issued being against the law, facts and rules may graciously be set aside and in consequence thereof, the contract of the appellant may kindly be restored and extended and the appellant may kindly be issued the suspended salary for the period mentioned therein and any other relief as per law and rules, the Honourable Tribunal may deem appropriate.

...APPELLANT

Through

Dated: 08/02/2022

(KAMAL FARIDTANOLI)
Advocate High Court, Abbottabad

BEFORE THE HON. BLECHAIRMAN SERVICES TRIBUNAL,
KHYBER PAKHTUNKHAWA PESHAWAR

Mst. Qurat-Ul-Ain d/o Mushtaq Khan resident of Baffa, District Mansehra
District Mansehra.

... (APPELLANT)

VERSUS

Secretary Elementary & Secondary Education Khyber Pakhtunkhawa,
Peshawar & others.

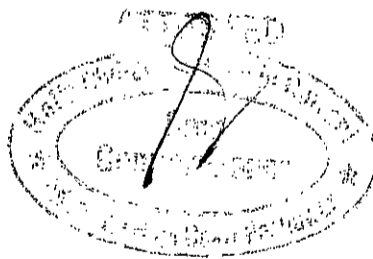
... (RESPONDENTS)

SERVICE APPEAL

AFFIDAVIT

I, Mst. Qurat-Ul-Ain d/o Mushtaq Khan resident of Baffa, District
Mansehra, do hereby solemnly affirm and declare that the contents of
foregoing appeal are to the best of my knowledge and belief and nothing has
been suppressed from this Honourable authority.

08 FEB 2022



DEPONENT

**BEFORE THE HON. BLECHAIRMAN SERVICES TRIBUNAL,
KHYBER PAKHTUNKHAWA PESHAWAR**

Mst. Qurat-Ul-Ain d/o Mushtaq Khan resident of Baffa, District Mansehra
District Mansehra.

... (APPELLANT)

VERSUS

Secretary Elementary & Secondary Education Khyber Pakhtunkhawa,
Peshawar & others.

... (RESPONDENTS)

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF
OPERATION OF ORDER BEARING EDR: NO.
6279-303 DATED 02.07.2021 OF THE
DIRECTOR ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA,
PESHAWAR WHEREBY THE CONTRACT OF
APPELLANT HAS BEEN WITHDRAWN.

&

SUSPENSION OF ORDER DATED 10997
DATED 21-09-2021, OF THE OFFICE OF
DEO(F), MANSEHRA, WHEREBY THE
APPELLANT HAS BEEN SERVED WITH A
NOTICE OF RECOVERY OF SALARY FOR
THE PERIOD MENTIONED THEREIN.

Respected sir,

I take the honor to refer to the subject noted above and in
this regard it is submitted that;

1. That applicant has filed the subject main appeal before your good self for consideration in accordance with law and rules.
2. That the applicant has a prima facie case with a balance on convenience in her favor and if the operation of impugned notifications are not suspended, the appellant would suffer irreparable loss.
3. That the appeal of the applicant is based on sounds reason of fact and law and is likely to be accepted at the time of proper hearing, hence, applicant requests that the operation of subject order may kindly be suspended.
4. That the legal and factual grounds shall be urged at the time of hearing.

It is, therefore, requested that the operation of the impugned/subject order may kindly be suspended till the hearing and decision of main appeal.

[Signature]
 ...APPLICANT

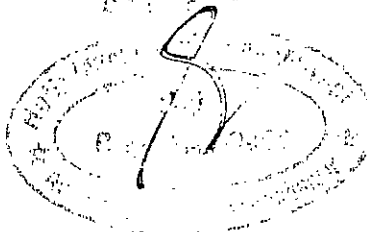
Dated: 08/02 /2022

Through

[Signature]
 (Kamal Farid Tanoli)
 Advocate High Court,
 Abbottabad

AFFIDAVIT

I, Mst. Qurat-UI-Ain d/o Mst. Qurat-UI-Ain d/o Mushtaq Khan resident of Baffa, District Mansehra do hereby solemnly affirm and declare that the contents of foregoing application are to the best of my knowledge and belief and nothing has been suppressed from this Hon,ble authority.

08 FEB 2022


[Signature]
 DEPONENT

Before the Hon,ble Secretary Elementary & Secondary Education

Khyber Pakhtunkhwa Peshawar

Mst. Qurat-UI-Ain Khan SSt(G) GGMS Malkan District

Mansehra.....(Appellant)

Vs

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
2. DEO(F) District Mansehra
3. DDO, Education Mansehra.....(Respondents)

Service Departmental Appeal

Appeal against the order bearing Edr: No. 6279-303 dated 02.07.2021 of the

Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

whereby the contract of appellant has been withdrawn

&

Appeal against the order dated 10997 dated 21-09-2021, of the office of DEO(F),

Mansehra, whereby the appellant has been served with a notice of recovery of

salary for the period mentioned therein

Respected sir,

I take the honor to refer to the subject noted above and in this regard it is submitted that the appellant was appointed as SST(G) vide Endr:No.1515-21 A/-17/SST/Adhoc/Apptt: Mansehra dated Peshawar 18.09.2021 with a posting

Received
3516
20/10

Attested by
me
(10/10)

10/10

at GGCMS Choain, however, the contract of the appellant has been withdrawn and the apple ant has been the impugned notice for recovery of salary vide subject noted above, which is illegal, against the facts and law and is ineffective upon the rights of the appellant and are liable to be seaside.

Appellant seeks and prays for setting aside the subject notification on the following facts and grounds.

1. That the appellant was appointed as SST(G)vide Endr.No.1515-21 A/- 17/SST/Adhoc/Apptt: Mansehra dated Peshawar 18.09.2021 with a posting at GGCMS Choain. Copy of notification is annexed as annexure "A"
2. That prior to appointment in the present institution, the appellant was working in Bank of Punjab having different assignments, however, due to present appointment; the appellant has resigned from her job and joined the present service. Relevant record to this effect is annexed as annexure "B"
3. That after being notified as SST(G) with the present department and after having resigned, the appellant made her arrival with Head Teacher in GMS Choain on 18.09.2018. Copy of arrival letter is annexure "C"
4. That thereafter vide Endr.No:12776-81/AE-II/Transfer file SST/ dated 03.11.2018, the appellant was transferred through adjustment order noted above to GGMS Malkan. The arrival report of appellant addressed to DEO(F) District Mansehra dated 08.11.2018 is self explanatory. Copy of order and arrival report are annexed as annexure "D"& "E" respectively.
5. That thereafter the pay of appellant was stopped by the department due to some inquiry the reasons of which were best known to the DEO(F) and the worthy Director.

Attested by
MR
W.S.

UMMAN AYUB ADVOCATE
ABBOTTABAD

4. That the Honorable Supreme Court of Pakistan has time and again held that the employee cannot be burdened with the neglect and failure of appointing authority and the law point shall be urged at the time of arguments.
5. That the appellant being female was already working the Bank of Punjab and due to the notification, the appellant resigned from the said post and made arrival for the present post. The acts of the respondents have affected the fundamental rights of the appellant as envisaged in Constitution of Islamic Republic of Pakistan.
6. That issuance of withdrawal letter of contract by the respondent/Director is also against the law, as, the said Director has issued the appointment letter/notification stated above in favor of appellant. and then, the said should have been withdrawn by any higher authority.
7. That the inquiry officer/Principal GGCHS, School Abbottabad has not recommended for initiating proceedings against the respondent/Director, as, the appointment notification was issued under the letter head and signature of Director E&S Education, KPK, Peshawar.
8. That unless the Director is not prosecuted, penalization of appellant is against the norms of justice.
9. That the person/authority issuing the appointment order has not been associated in the inquiry upon which the appellant has been recommended for the withdrawal of contract, then, withdrawal order is not sustainable in the eye of law.
10. That the appellant has been serving as a Teacher upon the notification of competent authority/respondent and deserves to receive the salary for

Attested by
me
①

USMAN ANJUM ADVOCATE
ABBOTTABAD

the same. In spite of issuing the salary for the services provided the appellant was served with a notice of recovery of salary, which is neither sustainable in the eye of law nor in rules and even not in substantial justice.

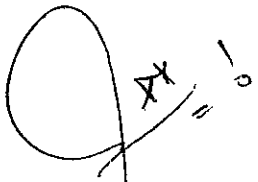
11. That as per scheme of law and the dictums laid down by the superior courts, One cannot be penalized due to the negligent/misconduct/criminal act of another. Herein the present case, even if for the sake of an argument someone who is liable to be removed is the Director E&S Education KPK and DEO (F), who have acted negligently and unprofessionally and for the said act, appellant cannot be penalized.
12. That rest of the points shall be urged at the time of arguments.
13. That the appellant shall be highly obliged and requests that she should be provided an opportunity of personal hearing.

It is, therefore, requested that the impugned notifications issued being against the law, facts and rules may graciously be set aside and in consequence thereof, the contract of the appellant may kindly be restored and extended and the appellant may kindly be issued the suspended salary for the period mentioned therein and any other relief as per law and rules, the Hon,ble authority may deem appropriate.

Dated: 20-10-2021

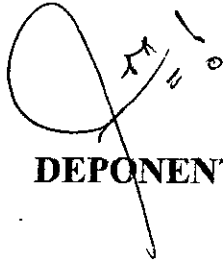
Attested by
ME


USMAN KHAN ADVOCATE
ISCOOTABAD


Mst. Qurat-Ul-Ain Khan
SST(G) Malkan
d/o Mushtaq Ahmed
resident of Baffa, District
Mansehra

AFFIDAVIT

I, Mst. Qurat-Ul-Ain khan d/o Mushtaq Ahmed resident of Baffa, District Mansehra do hereby solemnly affirm and declare that the contents of foregoing appeal are to the best of my knowledge and belief and nothing has been suppressed from this Hon,ble authority.


DEPONENT

Attested by
ME



USMAN AHMED ADVOCATE
COCHIN

Before the Hon,ble Secretary Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Mst. Qurat-Ul-Ain Khan SST(G) GGMS Malkan District

Mansehra.....(Applicant)

Vs

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa,
Peshawar & 2 Others.

.....(Respondents).

Service Departmental Appeal

**Application for Suspension of operation of order bearing Edr: No. 6279-303
dated 02.07.2021 of the Director Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar whereby the contract of appellant has been withdrawn**

&

**Suspension of order dated 10997 dated 21-09-2021, of the office of DEO(F),
Mansehra, whereby the appellant has been served with a notice of recovery of
salary for the period mentioned therein**

Respected sir,

I take the honor to refer to the subject noted above and in this regard it is
submitted that

1. That applicant has filed the subject main appeal before your good self for
consideration in accordance with law and rules.

Received

3515
2024

Attested by
MR

①

CHAMAN KHAN ADVOCATE
ISCOITABAD

2. That the applicant has a prima facie case with a balance on convenience in her favor and if the operation of impugned notifications is not suspended, the appellant would suffer irreparable loss.
3. That the appeal of the applicant is based on sound reason of fact and law and is likely to be accepted at the time of proper hearing, hence, applicant requests that the operation of subject order may kindly be suspended.
4. That the legal and factual grounds shall be urged at the time of hearing.

It is, therefore, requested that the operation of the impugned/subject order may kindly be suspended till the hearing and decision of main appeal.

Dated: 20-10-2021

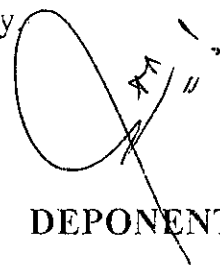
Mst. Qurat-Ul-Ain Khan
D/O Mushtaq Ahmed
SST(G) Malkan
Resident of Baffa, District
Mansehra

AFFIDAVIT

I, Mst. Qurat-Ul-Ain Khan d/o Mst. Qurat-Ul-Ain Khan d/o Mushtaq Ahmed resident of Baffa, District Mansehra do hereby solemnly affirm and declare that the contents of foregoing application are to the best of my knowledge and belief and nothing has been suppressed from this Honorable authority.

Attested by
MR




DEPONENT

GHANM ANUB ADVOCATE
ABBOTTABAD

26

Mansehra Female Appointment Order SST Adhoc

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

P.H. No. 091-9225339, 9225345

Annexure

'B'



APPOINTMENT.

Attested by
ME
W. J. ANJUB ADVOCATE
PESHAWAR

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem) (SST Maths Phy), (SST General) School based in HPS-16 (Rs. 18710-15210-64510) @ Rs. 18710/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

(SST Bio: Chem:)

Sr	Roll No	Name	Father Name	Permanent Address	Academic Marks (Out of 100)	NTS Marks (Out of 100)	Total Marks (Out of 200)	School
1	261000907	TAHIRA	FAZAL ELAHI	Mohala Dub No 1 Mansehra	67.35	72	139.35	GGHS Jabon
2	261000793	REEMA JAMIL	KHALID JAMIL	Gandhan Mansehra	75	61	136	GGHS Bherband
3	261000359	NAFEESA	MUHAMMAD NAZIR	Choti Duan Mansehra	79.27	56	135.27	GGHSS Sankari
4	261000151	FALAR NAZ -BB-SI	ZAFAR IQBAL ABBASI	Pana Duan Mansehra	66.12	67	133.12	GGHSS Bherband
5	261000349	JAVARIA CHAND	MUKHTAR HUSSAIN	Choti Duan Mansehra	73.625	60	133.625	GGHS Jarad
6	261000012	HUMAIRA	MUHAMMAD ASLAM	Mohallah Handi Abad Mansehra	70.33	63	133.33	GGHS Sangar
7	261000382	TAYYIBA SABA	MUHAMMAD SABIR	Khawari Mansehra	72.27	61	133.27	GGHS Moharyan
8	261000753	BUSHRA ASHRAF	MUHAMMAD ASHRAF	Khawari Mansehra	73.68	59	132.68	GGCMS No 1 Mansehra
9	261000429	MUHAMMAD ABEELA	MUHAMMAD IRSHAD KHAN JADOON	Ghandol Teh. Balokot Mansehra	64.63	68	132.63	GGHSS Lussen Nawab
10	261000738	SAIMA BATOOL	PIR BAKHSH KHAWAJA	Bagunwari Mansehra	69.17	63	132.17	GGHS Gab Uadral
11	261000001	SIDRA KHAN	EJAZ AHMED KHAN	Khwa Mansehra	70.08	62	132.08	GGHS Bal Bal
12	261000542	SIDRA RIAZ	MUHAMMAD RIAZ	Dub NO 1 Mansehra	65.94	66	131.94	GGHSS Thathi Khurd

(SST Maths: Phy:)

Sr	Roll No	Name	Father Name	Permanent Address	Academic Marks (Out of 100)	NTS Marks (Out of 100)	Total Marks (Out of 200)	School
1	262000079	SANA HASHID	ABDUL RASHID	MANSEHRA	65.45	63	128.45	GGHSS Thathi Khurd
2	262000048	WAZRA ISHAQ	MUHAMMAD ISHAQ	MANSEHRA	66.08	59	125.08	GGHSS Oghi
3	262000116	JANNAT RIAZ	MUHAMMAD RIAZ	MANSEHRA	62.63	60	122.63	GGHS Khabi
4	262000025	HAYAB MATLOOB	MUHAMMAD MATLOOB	MANSEHRA	64.43	57	121.43	GGHSS Lussen Nawab

(2)

Mansehra Female Appointment Order SST Ailhoes

7	262000146	SANAF RANI	AJDUK KHALIQ	MANSEHRA	04 8	50	120 8	GGHS Jabbari
8	262000007	SUNDUS NAWAZ	HAQ NAWAZ	MANSEHRA	04 27	50	120 27	GGHS Mora Arsyd Ali
	262000144	SALMAH YOUSAF	MUHAMMAD YOUSAF	MANSEHRA	04 74	55	119 74	GGHS Alzar Abad
9	262000051	HASIBA MALIK	QADEER AHMED MALIK	MANSEHRA	05 60	54	119 60	GGHSS No 2 Mansehra
10	112000117	ANEELA KANWAL	RAZA AHMED KHAN	MANSEHRA	04 31	54	118 31	GGHS Paron
11	262000091	ANABIA ROSHEEN	MUNIR AHMED	MANSEHRA	02 31	50	118 31	GGHS Daryal
12	262000005	HAMMAR A AISLAM	JAVAD AHMED	MANSEHRA	05 17	53	118 17	GGHS Datta
13	112001134	TAYYBA BIBI	NAEEM UR REHMAN	MANSEHRA	08 81	49	117 81	GGHSS Baffa
14	262000014	ANUM PERVEZ	MOHAMMAD PERVEZ KHAN	MANSEHRA	07 98	49	118 98	GGHS Nohol
15	262000058	LARAIB ARIF	MUHAMMAD ARIF	MANSEHRA	05 31	51	118 31	GGHS Bari Bala
16	262000089	SADIA BILAL	QAZI AHMAD SHAH	MANSEHRA	07 77	52	118 77	GGHS Bapra
17	262000107	ZANIB ILLYAS	MUHAMMAD ILLAYS	MANSEHRA	09 4	53	112 4	GGHS Bari Bahal

(SST General)

Sr	Roll No	Name	Father Name	Permanent Address	Acadmic Marks (Out of 100)	NTS Mark As (Out of 100)	Total Marks (Out of 200)	School
1	264000119	WARDA	AJDUK MOHIN TANOLI	MANSEHRA	77 38	64	141 38	GGHS Koron
2	263000719	SEEMAB AZAM	MUHAMMAD AZAM	MANSEHRA	09 70	70	139 70	GGMS Paros
3	264000237	FAKHRA YOUSAF	MUHAMMAD YOUSAF	MANSEHRA	06 87	72	138 87	GGMS Jagan
4	264000040	HAJIRA MUSHTAQ	MUSHTAQ AHMAD	MANSEHRA	05 47	73	138 47	GGMS Kurkati
5	114000543	MUNEEZA FARMAN	FARMAN SHAH	MANSEHRA	06 22	72	137 22	GGMS Mang
6	263000681	SARA BANO	MUHAMMAD YOUSAF	MANSEHRA	04 03	72	136 03	GGHS Danda Khulan
7	263000537	ANDREEN ASHRAF	MUHAMMAD ASHRAF	MANSEHRA	08 9	67	135 9	GGMS Naran
8	263000798	ASRA SYED	S ARIF HUSSAIN SHAH GILLANI	MANSEHRA	58 35	78	134 35	GGMS Banda Gesuch
9	264000089	ASMAA JAMIL	JAMIL UR REHMAN	MANSEHRA	58 28	70	134 28	GGMS Singh
10	264000714	BUSHRA MASROOR	MASROOR AHMED NASIR	MANSEHRA	50 12	78	134 12	GGHS Jareed
11	264000198	NAVEELA BIBI	ABDUL KHANAN	MANSEHRA	68 96	66	132 96	GGMS Chapra Bala
12	264000582	IZBA NAWAZ	GUL NAWAZ	MANSEHRA	72 82	60	132 82	GGMS Karnal Ban
13	264000529	Qusatul Ain Khan	Mushtaq Khan	Dhokal Mansehra	58 50	74	132 50	GGMS Choran
14	263000849	Kunza Shafiqat	Muhammad Shafiqat	Balatal Mansehra	57 04	75	132 04	GGMS Bhoru
15	264000216	Saira Qasim	Maria Ghulam Saira	Maloon Hand Abad Mansehra	58 34	73	131 34	GGMS Mohar
16	264000121	Bushra Nawaz	Muhammad Nawaz Khan	Baffa Mansehra	69 69	61	130 69	GGMS Ramkol

Attested by
M.P.S
MANSEHRA ADVOCATE
BUSTREAB

Munsehra Female Appointment Order SST Adhoc

TERMS & CONDITIONS

1. NO TA/DA etc is allowed
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year w.e.f 15th September, 2018 to 14th September 2019.
4. She should not be handed over charge if she exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the D.O. (concerned), any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by D.O. (concerned) is issued that her certificates are verified
8. She should join her post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
12. Her appointment is made on School based, she will have to serve at the place of posting, and her service is not transferable to any other station.
13. Before handing over charge any document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.
14. Any candidate as average less than 2 years, their upper age limit less than 2 years as hereby relaxed.
15. If any meritorious candidate is deprived from appointment by this order and the competent authority accepted her appeal, the appointment of the low merit candidate will be withdrawn and adjustment order will be revised according to merit.

(Farid Ahmad Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Encls: No. 1515-21

1/A-17/SST/Adhoc/APPNT: Munsehra Dated Peshawar the 18/9/2018.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officer (Female) Munsehra
4. District Accounts Officer Munsehra
5. Official Concerned.
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File

Attested by
MRMEERAN ANSAR ADVOCATE
LEGGOTTABAD

/Noor/18/

Dy: Director (Etab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Mansehra Female Appointment Order SST Adhoc

**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR
PH No. 091-922339, 9225345**

APPOINTMENT.

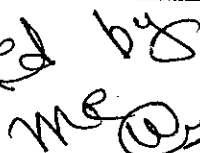
Consequent upon recommendation of the Department Selection Committee, appointment of the following candidates are hereby ordered against the post of Secondary School Teacher (SST Bio Chem) (SST Maths Phy) (SST General) school based in the BPS-16 (Rs. 18910-1500-64510) or Rs.18910/- fixed plus usual allowances as admissible under the rules of adhoc of basis on Contract under the existing policy of the Provisional Government, in teaching cadre on the terms and conditions given below with effect from the date of their taking over charge:-

(SST Bio: Chem:)

Sr	Roll No.	Name	Father name	Permanent Address				School
1	281000907	Tahira	Fazal Elahi	Mohala Dub No.1 Mansehra	67.35	72	139.5	GGHS Jabori
2	281000793	Reema Jamil	Khalid Jamil	Gandian Mansehra	75	81	136	GGHS Bherkund
3	281000359	Nafeesa	Muhammad Nazir		79.27	56	135.27	GGHSS Shankiari
4	761000151	Talar Naz Abbasi	Zafar Iqbal	Pano Dhari Mansehra	66.12	67	135.12	GGHSS Belrai
5	261000349	Javaria Chand	Mukhtar Hussain	Chatti Dhari Mansehra	73.825	60	133.825	GGHS Jarand 5
6	261000012	Humaira	Muhammad Aslam	Mohalla Hanif Abad Mansehra	70.30	63	133.33	GGHS Sangar
7	261000362	Tayyeba Saba	Muhammad Sabir	Khawan Mansehra	72.27	51	13.27	GGHS Moharyan
8	261000753	Bushra Ashraf	Muhammad Ashraf	Khawan Mansehra	73.65	50	132.58	GGCMS No 1 Mansehra
9	261000429	Muhamma d Abeela	Muhammad Irshad Khan Jadoon	Ghanoor Teh Balakot Mansehra	64.63	58	132.63	GGHSS Lassan Nawab
10	261000738	Saima Batool	Pir Baksh Khawaja	Bagurmarig Mansehra	69.17	63	132.17	GGHS Gah Uadral
11	261000001	Sidra Khan	Ejaz Ahmed Khan	Khau Mansehra	70.08	62	132.08	GGHS Boi Bala
12	261000542	Sidra Riaz	Muhammad Riaz	Dub No 1 Mansehra	65.94	66	131.94	GGHS Thathi Khurd

(SST Maths: Phy:)

Sr #	Roll No.	Name	Father name	Permanent Address				School
1	262000079	Sana Rashid	Abdul Rashid	Mansehra	65.45	63	128.45	GGHS Thathi Khurd
2	262000048	Wizra Ishaq	Muhammad Ishaq	Mansehra	66.08	59	125.08	GGHS Oghi
3	262000116	Jannat Riaz	Muhammad Riaz	Mansehra	62.63	50	122.83	GGHS Khaki
4	262000023	Nayab	Muhammad	Mansehra	64.43	57	121.43	GGHS Lassan

Attested by
ME @ 
ADVOCATE
PESHAWAR

		Matloob	Matloob					Nawab
5	262000145	Sanaf Rani	Abdul Khaliq	Mansehra	64.8	56	120.8	GGHS Jaboon
6	262000097	Sundus Nawaz	Haq Nawaz	Mansehra	64.27	56	120.27	GGHS Mera Amjad Ali
7	262000144	--- Yousaf	Muhammad Yousaf	Mansehra	64.74	55	119.74	GGHS Afzal Abad
8	262000051	Hasina Malik	Qadeer Ahmed Malik	Mansehra	65.60	54	119.60	GGHS No 2 Mansehra
9	112000117	Aneela Kanwal	Raza Ahmed Khan	Mansehra	64.31	54	118.31	GGHS Paron
10	262000091	Anabia Rosheen	Munir Ahmed	Mansehra	62.31	56	116.31	GGHS Dharyal
11	262000005	Hammara Aslam	Javaid Ahmed	Mansehra	65.17	53	118.17	GGHS Datta
12	112001134	Tayyaba Bibi	Naeem ur Rehman	Mansehra	68.81	49	117.81	GGHSS baffa
13	262000014	Anum Pervez	Mohammad Pervez Khan	Mansehra	67.96	49	115.96	GGHS Nokot
14	262000058	Laraib Arif	Muhammad Arif	Mansehra	65.31	51	116.31	GGHS Boi Bala
15	262000089	Sadia bibi	Qazi Ahmed Shah	Mansehra	62.77	52	114.77	GGHS Harno
16	262000102	Zanib Illyas	Muhammad Illyas	Mansehra	59.4	53	112.4	GGHS Boi Bohal

(SST General)

Sr #	Roll No.	Name	Father name	Permanent Address				School
1	264000119	Warda	Abdul Momin Tanoli	Mansehra	77.38	64	141.38	GGHS Karon
2	263000719	Seemab Azam	Muhammad Azam	Mansehra	69.76	70	139.76	GGMS Paras
3	264000237	Fakhita Yousaf	Muhammad Yousaf	Mansehra	66.87	72	138.87	GGMS Jhangra
4	264000040	Hajira Mushtaq	Malik Mushtaq Ahamd	Mansehra	65.47	73	138.47	GGMS Konar
5	114000543	Muneeza Farnan	Farman Shah	Mansehra	65.22	72	137.22	GGMS Mang
6	263000881	Sara Bano	Muhammad Yousaf	Mansehra	64.03	72	36.03	GGHS Danda Khukan
7	263000537	Ambreen Ashraf	Muhammad Ashraf	Mansehra	68.9	67	135.9	GGMS Naran
8	263000796	Asra Syed	Sarif Hussain Shah Gillani	Mansehra	58.35	76	134.35	GGMS Banda Gesuch
9	264000089	Asmaa Jamil	Jamil ur Rehman	Mansehra	58.28	76	134.28	GGMS Singh
10	264000714	Bushra Masroor	Masroor Ahmed Nasir	Mansehra	56.12	78	134.12	GGHS Jareed
11	264000198	Naveeda Bibi	Abdul Khanan	Mansehra	56.96	66	132.96	GGMS Chapra Bala
12	264000582	Izba Nawaz	Gul Nawaz	Mansehra	72.82	60	132.82	GGMS Kamal

Attested by
 M P W S
 ADVOCATE
 HOSAINABAD

25

BETTER COPY

264000529	Quratul Ain Khan	Mushtaq Khan	Dhodial Mansehra	58.50	74	132.56	Ban GGMS Choran
4 263000849	Kinza Shafqat	Muhammad Shafqat	Balakot Mansehra	57.04	75	132.04	GGMS Bhorual
15 164000216	Saima Qandeel	Malik Ghulam Sarwar	Mohalla Hanif Abad Mansehra	58.34	73	131.34	GGMS Mohar
16 254000121	Bushra Nawaz	Muhammad Nawaz Khan	Baffa Mansehra	69.69	51	130.69	GGMS Ramkot

Endst No.1515-21/A-17/SST/Adhoc/Apptt/Mansehra Dated Peshawar the 18/09/2018.

Copy forwarded for information and necessary action to the

1. *Accountant General Khyber Pakhtunkhwa Peshawar.*
2. *Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.*
3. *District Education Officer(Female) Mansehra.*
4. *District Accounts Officer Mansehra.*
5. *Official concerned.*
6. *PS to the Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.*
7. *PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.*
8. *M/File*

**Dy: Director(Establishment)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

*Attested by
me
[Signature]*

**AMMAN ANUB ADVOCATE
ISCOHTABAD**

26

8



Annexure
cc

The Manager,
The Bank Of Punjab
TIB Mansehra.

RESIGNATION FROM BANK SERVICE

Respected Sir,

I joined The Bank of Punjab on 09-01-2014 and work in various branches since my joining.

I learned a lot from my seniors and colleagues, and will remember these memories for long period of time.

Now due to some personal reasons I cannot continue my service with BOP any more so I forwarding my resignation today 25-09-2018 with immediate effect.

Regards,

Qurat-ul-ain Khan

OG-II

EMP # 9490

25th Sept, 2018.

Attested by
MR

MUSKAN AFUB ADVOCATE
SCOTTAGAD

Resignation of officer
received on 25th Sept 2018
at 5.00 PM

IRUKHAR GOHAR
AVP/ Branch Manager
The Bank of Punjab



THE BANK OF PUNJAB

Passion Reborn

Human Resource Division
Head Office, BOP Tower,
10-B, Block E-II,
Main Boulevard,
Gulberg-III, Lahore.
Ph: 92-42-35783700-10
Fax: 92-42-35783795
Email: hrd@bop.com.pk

HRD/SBZ/9490/03/29520
November 12, 2018

TO WHOM IT MAY CONCERN

This is to certify that Ms. Qurat Ul Ain Khan joined the Bank of Punjab on 09.01.2014. She resigned from the Bank's service w.e.f. 25.09.2018 of her own free will and accord.

At the time of leaving, she was posted as OG-II at our TIB - Mansehra Branch.

As per record, no staff liability is outstanding against her name.

[Signature]
12-11-2018
Manager Separation Unit

[Signature]
Unit Head

Attested by
me
[Signature]


UMMAM AHMED ADVOCATE
- ACCOTTABAD

Annexure
'D'

ARRIVAL REPORT

In compliance with the order of Government of Khyber Pakhtunkhwa, Elementary
& Secondary Education Department Peshawar vide File No. 12910-1620-1/18

I Mst: Qurat ul Ain SST submitted my arrival report for duties as SST at GGCMS
Choian (Mansehra) today on 18/09/2018 (A.N).



QURAT UL AIN
SST (General) BPS No-16

GGCMS Choian

Time 11:30 am

18-10-18

Jc - Rina
Head Teacher
GGCMS Choian
Distt: Mansehra

Attested by
me
Pr

CHAMAN AYOUB ADVOCATE
ABBOTTABAD

(29)

Annexure
'E'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA
ADJUSTMENT.

Mst. Qura-Tul-Ain SST(G) GGMS Choian is hereby adjusted at GGMS Malkan against vacant post on her own pay & grade in the interest of public service with immediate effect after relaxation of ban.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst: No. 12776-81 /AE-II/Transfer file SST /

Dated 03/11/2018

Copy to the:-

1. Director (E&SE) KPK Peshawar.
2. District Accounts Officer Mansehra.
3. BMO Mansehra.
4. B&AO Local Office.
5. Official Concerned.
6. Master File.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Attested by
MR


USMAN AYUB ADVOCATE
SCOTTABAD

ARRIVAL REPORT

In reference to The Endst: NO. 12776-81/AE-II/Transfers
File SST ; I Msi. Qurat-ul-ain Khan
SST (G) submitted my arrival report for
duties of SST at GGMS Malkan. (Batal)
Today on 08-11-2018 at 10:15 am.

Charge Taken From:
Iqra Waheed.

Charge Taken by:
Qurat-ul-ain Khan

Iqra
HEAD TEACHER
GGMS MALKAN

Qurat-ul-ain
HEAD TEACHER
GGMS MALKAN

Attested by
me

W

WASIM AHMED ADVOCATE
RODOTTAGAD

16

27

Annexure
'F'

The D.O. Sirs

District Manshera

Subject: Annual Report

R/Madam

It is submitted that I
Miss Qurat-ul-ain has assumed
the charge of the post of GST on
08.11.2018 vide L.O. No 12277A
at G.G.M.S. Malkan.

Thanks.

Qurat-ul-ain Khan

8/11/2018

HEAD TEACHER
G.G.M.S. Malkan

11/11/2018

Attested by
me


OFFICIAL STUB ADVOCATE
REGISTERED

(32)

The DEo female District Mansehra

Subject ; arrival report


R/ MADAM

It is submitted that I miss qurat u lain has assumed recharged of the post of SST on 8/11./2018 VIDE ENDV NO 122776-8 at GGMSS malkan

Thanks

Qurat al ain khan

8/11/2018

Attested by
me


ADVOCATE
MANTAPAD



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

*ANNEXURE
"G"*

NOTIFICATION

1. WHEREAS, Mst Qurat Ul Ain D/O Mushtaq Khan, was appointed as SST (G) at GGCMS Choian Manshera vide Endst. No. 1513-21/A-17/SSI/Adhoc/Appnt/Manshera dated 18-09-2018 on contract basis for initially one year
2. AND WHEREAS, the DFO (F) Manshera has forwarded detail report against Mst Qurat Ul Ain D/O Mushtaq Khan, SST (G), GGCMS Choian Manshera about her appointment order as the teacher concerned was transferred to GGCMS Malkan (this school has not been opted by the teacher concerned) vide letter No. 7839 dated: 02-11-2020.
3. AND WHEREAS, This office inquired the instant case through an inquiry officer, Ms. Samina Mushtaq Principal, BPS-20, GGC/ISS Abbottabad vide this office notification Endst. No. 4085-88 dated. 13-12-2020.
4. AND WHEREAS, The inquiry officer submitted inquiry report to this office vide No. 717 dated 02-02-2021 in which it was recommended that the contract order in respect of Mst. Qurat Ul Ain, SST (G), GGCMS Choian Manshera may be withdrawn.
5. NOW THEREFORE, in the light of the above mentioned facts, the Competent Authority, i.e., Director, E&SE KP is pleased to withdraw the contract regarding appointment of Mst Qurat Ul Ain D/O Mushtaq Khan, SST (G) at GGCMS Choian Manshera working in GGCMS Malkan w.e.f 18-09-2018 in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst. No. 657A-303 /A-17/P.F/Qurat Ul Ain/Hina Raza/Manshera Dated: 02/07/2021

Copy forwarded for information and necessary action to the:-

1. District Education Officer (F) Manshera w/r to her letter No.7839 dated: 02-11-2020, with the direction to recover all the salaries paid to the teacher concerned and deposits if in the Govt. Treasury under intimation to this office.
2. District Accounts Officer Manshera.
3. Deputy Director (Legal) Local Directorate.
4. Mst Qurat Ul Ain D/O Mushtaq Khan, SST (G) GGCMS Choian Manshera.
5. PA to Director E&SE Local Directorate.
6. Master file.

*RAMZAN SHAH SAB
Do the Need file*

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

11/7/21

*Chin and
19/7/21*



*Attested by
MR*

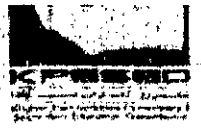
(Signature)

**USMAN AYUB ADVOCATE
ABBOTTABAD**

34



**DISTRICT EDUCATION OFFICE (FEMALE)
MANSEHRA**



@ denfmansehra@yahoo.com



(+92) 0997-390035

No. _____

Dated Mansehra the 21-9- 2021

Ms: Qurat Ul Ain
SST(G) GGCMS
Choian Mansehra.

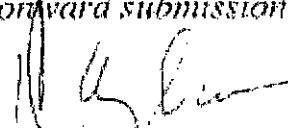
Annexure
44

Subject: RECOVERY OF ALL SALARIES.

Memo.

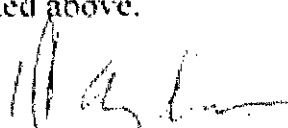
Please find enclosed herewith a copy of notification issued by Director E&SED KPK Peshawar vide his Endst:No.6279-303/A-17/P F Qurat Ul Ain Hina Raza Mansehra Dated 2-7-2021 regarding the withdrawal of contract of your appointment for necessary action on account of recovery of salaries already paid to you.

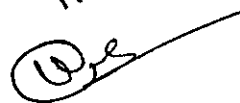
In the light of above referred Notification, you are directed to deposit the salaries amount drawn w-e-f 18-9-2018 i.e the date of appointment into Govt. Treasury under intimation to this office for record and onward submission to the quarter concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst:No. _____

Copy to: Director Elementary & Secondary Education KPK Peshawar for information with reference to his letter No. & Date quoted above.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Attested by
me


ANJUM ANJUM ADVOCATE
ABBOTTABAD

S.No. 161118
 Name of Advocate علان الجوب
 D.J.A NO. 553 TBA NO. _____
 BC No. 13-4268 R.s.200/=



وکالت نامہ
 District Bar Association
 Abbotabad

بعدالت صاحب رنج مسرور (سرویل ایسٹاڈ)
 عنوان: مسماة مہنا الحسن
 منجانب: petitioner
 نوعیت مقدمہ: مسرور ایسٹاڈ
 باعث تحریر آنکہ: علان الجوب

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجود ہی برائے پیشی یا تفسیر مقدمہ بمقام سرویل ایسٹاڈ کے لیے کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی ساعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل مگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا طرز درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ مختار بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 2022/02/08
 دن 08 / ماہ 02 / سال 2022
 لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔
 مضمون وکالت نامہ سن لیا گئے اور علان الجوب سمجھ لیا ہے اور منظور ہے۔

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

مسماة مہنا الحسن (Petitioner)
 علان الجوب (Advocate)