

21.3.2014

Counsel for the appellant present, but he requested for withdrawal of his Wakalat Nama as, according to the learned counsel for the appellant, the appellant has not established contact with him since long. The appellant is absent, and security amount and process fee have also not been deposited by the appellant. Anyhow, at this stage, the appeal is dismissed for want of prosecution. File be consigned to the record.

ANNOUNCED.

21.3.2014



Chairman

Appeal No. 1241/2013.
Mr. Naveed Qureshi

3.

20.11.2013

Appellant with counsel present and heard. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The impugned appellate order dated 17.07.2013 communicated to the appellant on 29.08.2013 is illegal without law full authority, no reason has been given. Moreover no proper procedure adopted before the issuance original order dated 22.05.2013, no charge sheet, statement of allegation and no proper inquiry has been conducted against the appellant. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply on 23.01.2014.

[Handwritten mark]

[Signature]

Member.

4.

20.11.2013

This case be put before the Final Bench I for further proceedings.



[Signature]
Chairman

27.1.14

The Bench, bench is on Rules,
Respect, case is referred to B 21³/₁₄
[Signature]
Resub

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 1241/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21/08/2013	<p>The appeal of Mr. Naveed Iqbal presented today by Mr. Amanullah Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	30-8-2013.	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>20-11-2013.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1241 /2013

Naveed Iqbal.....Appellant

V E R S U S


Govt of KPK and others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of service appeal with affidavit		1-7
2.	Application for condonation of delay with affidavit		8-9
3.	Addresses of Parties		10
4.	Copy of appointment letter dt.22.08.07	A	11
5.	Copy of show cause notice	B	12
6.	Copy of reply of show cause notice	C	13-15
7.	Copy of dismissal order dt.22.05.2013	D	16
8.	Copy of departmental appeal dt.17.06.13	E	17-18
9.	Copy of order dated 17.07.2013	F	19
10.	Wakalat Nama		

Through Appellant

Date: 21/08/2013


Amanullah Marwat
Advocate, Peshawar
Cell: 0334-9054585

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. 1241 /2013

[REDACTED]
[REDACTED] 1266
[REDACTED] 21-8-13

Naveed Iqbal S/o Kuto Ram
R/o Sector I-10/2, House No.1844, Islamabad.....**Appellant**

V E R S U S

1. Govt of KPK,
Through Chief Secretary,
Civil Secretariat, Peshawar
2. Secretary Administration,
Administration Department,
Civil Secretariat, Peshawar
3. Secretary Finance,
Finance Department,
Civil Secretariat, Peshawar
4. Accountant General, KPK,
Near Governor House, Peshawar
5. Section Officer,
Administration Department,
Civil Secretariat, Peshawar.....**RESPONDENTS**

[REDACTED]
[REDACTED]
[REDACTED] 21/8/13

Appeal u/s 4 of the NWFP Service Tribunal Act, 1974 against the impugned order dated 17.07.2013 of respondent No.1 conveyed to the appellant through respondent No.4, whereby departmental appeal filed by appellant against the dismissal order dated

**22.05.2013 passed by respondent
No.2, has been dismissed.**

Prayer in Appeal:

On acceptance of this service appeal, the impugned orders dated 17.07.2013 and 22.05.2013, passed by respondent No.1 and 2 respectively may kindly be set aside and the appellant may please be reinstated in service with all back benefits.

Respectfully Sheweth:

Brief facts giving rise to the appeal are as under:

1. That the appellant was appointed by respondent No.2 as House Keeper in BPS-09 in Khyber Pakhtunkhwa House, Islamabad and was performing his duties regularly and to the entire satisfaction of his superiors. (Copy of appointment letter is Annexure "A").
2. That appellant was issued a show cause notice by competent authority on 20.04.2013, on the following acts/ omissions, which are as under:

"Lacking devotion in performance of duty, keeping the Block under your supervision in deplorable condition resulting in damage to the government property and remaining habitual absentee"

(Copy of Show Cause Notice is Annexure "B").

3. That on 23.04.2013, appellant submitted his reply in response to show cause notice dated 20.04.2013, issued by respondent No.2, as a result of which, he was dismissed from the service vide order dated 22.05.2013. (Copy of reply of show cause notice and dismissal order dated 22.05.2013 is Annexure "C & D").
4. That on 17.06.2013, appellant preferred departmental representation/ appeal to respondent No.1, whereby his departmental appeal stood dismissed by respondent No.1 without assigning any reason vide order dated 17.07.2013. (Copy of departmental appeal and order dated 17.07.2013 is Annexure "E & F").
5. That feeling aggrieved from above referred orders of respondents No.1 and 2 respectively, the appellant assails these orders before this Honourable Tribunal, inter alia, on the following grounds:

GROUND S:

- A. That the orders dated 17.07.2013 and 22.05.2013 of respondents No.1 and 2, are against law, facts and record of the case, hence liable to be set aside.
- B. That the allegations levelled against the appellant are general in nature and to proceed him on the basis of vague allegations, is against the principles of administration of justice, the said orders are illegal,

without lawful authority and jurisdiction, hence liable to be struck down.

- C. That the major penalty has been imposed upon the appellant by respondent No.2 and upheld by respondent No.1 without holding regular inquiry, which was pre-requisite for imposing such penalty, so, non-holding of regular inquiry is against law, procedure and canons of principles of administration justice.
- D. That the appellant was never provided an opportunity of hearing of being heard, so, the respondents have violated golden principles of natural justice "no one should be condemned unheard"
- E. That both impugned orders dated 17.07.2013 and 22.05.2013 passed by respondents No.1 and 2 respectively in a slipshod manner and are based on assumptions & presumptions, arbitrary and are not sustainable in the eyes of law.
- F. That both orders passed by respondents No.1 and 2 are not speaking orders, passed without assigning any cogent reasons, so, it cannot be termed by no stretch of imagination to be a speaking order.
- G. That appellant has not been provided an opportunity to explain his position with regard to the charges

levelled against him during the inquiry proceedings, so, he was condemned unheard.


- H. That impugned orders are arbitrary, capricious and not maintainable and is the result of misreading and non-reading evidence, hence liable to be set aside.
- I. That impugned orders are result of malafide of respondents, which is so evident that respondents are not providing record of inquiry to the appellant, which is also against the natural justice.
- J. That appellant belong to a poor family, low-scale employee, jobless since his termination from service and is sole bread-earner of his entire family. He is not engaged in any profitable activity for earning butter & bread, so, his dismissal in such circumstances, is against the rights of fundamental enshrined in Constitution of Islamic Republic of Pakistan, 1973.
- K. That action against the appellant was taken during Caretaker Government and all actions taken by such government has been declared null & void by Supreme Court of Pakistan in C.P No.30 of 2013 titled "Khwaja Muhammad Asif Vs Federation of Pakistan and others" therefore, the dismissal order of the respondents are not sustainable in the eyes of law.

L. That any other ground may be adduced during the course of arguments, with the kind permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned orders dated 17.07.2013 and 22.05.2013, passed by respondent No.1 and 2 respectively may kindly be set aside and the appellant may please be reinstated in service with all back benefits.

AND

Any other relief which may be deemed proper in circumstances of the case may also be granted in favour of the appellant.


Naveed iqbal

Appellant

Through


Amanullah Marwat

&

Abdul Salam Kundi
Advocates, Peshawar

Date: 21/08/2013

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2013

Naveed Iqbal.....Appellant

VERSUS

Govt of KPK and others.....Respondents

AFFIDAVIT

I, Amanullah Marwat Advocate, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




DEPONENT

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2013

Naveed Iqbal.....Petitioner/ Appellant

V E R S U S

Govt of KPK and others.....Respondents

**APPLICATION FOR CONDONATION
OF DELAY (IF ANY)**

Respectfully Sheweth:

1. That the above titled service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That the petitioner/ appellant was dismissed from service on 22.05.2013, thereafter, he preferred departmental representation/ appeal within time, which was decided on 17.07.2013 by respondent No.1 and communicated to the petitioner/ appellant on 19.08.2013, so, the appeal in hand is within time.
3. That the petitioner/ appellant was not provided opportunity of being heard and he was dismissed from service without holding regular inquiry, which is essential requirement of law, therefore, the order passed by respondents without holding regular inquiry, is illegal, void ab-initio, therefore, no

limitation runs against void order as held by Apex Court of the country in various judgments reported from time to time.

4. That delay in filing the titled service appeal, is neither willful nor deliberate but due to reason mentioned above.
5. That the law favours adjudication rather on technicalities.

It is, therefore, most humbly prayed that on acceptance of this application, the delay, if any, in filing the above titled service appeal may kindly be condoned in the interest of justice.

~~WFO~~ *WFO* *WFO*
Petitioner/ Appellant

Through

Amanullah Marwat
Amanullah Marwat
Advocate, Peshawar

Date: 21/08/2013

AFFIDAVIT

I, Amanullah Marwat Advocate, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Amanullah Marwat
DEPONENT

BEFORE THE SERVICES TRIBUNAL, KPK, PESHAWAR

Service Appeal No. _____/2013

Naveed Iqbal.....Appellant

V E R S U S

Govt of KPK and others.....Respondents

ADDRESSES OF PARTIES

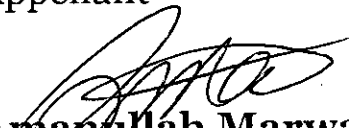
APPELLANT

Naveed Iqbal S/o Kuto Ram
R/o Sector I-10/2, House No.1844, Islamabad

RESPONDENTS

1. Govt of KPK Through Chief Secretary,
Civil Secretariat, Peshawar
2. Secretary Administration, Administration Department,
Civil Secretariat, Peshawar
3. Secretary Finance, Finance Department,
Civil Secretariat, Peshawar
4. Accountant General, KPK,
Near Governor House, Peshawar
5. Section Officer,
Administration Department,
Civil Secretariat, Peshawar

Through Appellant


Amanullah Marwat
Advocate, Peshawar

Date: 21/08/2013

4

11 "A"

GOVERNMENT OF N.W.F.P.
ADMINISTRATION DEPARTMENT

Peshawar, the August 22, 2007.

ORDER

NO.E&A(AD)4(75)/2007. Under rule-10 sub rule-2 of the NWFP Civil Servants (Appointment, Promotion & Transfer) Rules, 1989 read with amendment vide notification No.SOR.VI(E&AD)1-3/2003-Vol.V, dated 3.7.2003 and No.SOR.VI(E&AD)1-13/2005, dated 10.8.2005, Mr.Naveed Iqbal s/o Koto Ram r/o Sector I-10/2, H.No.1844, Islamabad is hereby appointed as House Keeper (BPS-9) (Rs.3185-190-8885) against an existing vacancy in Frontier House, Islamabad, in relaxation of ban, with immediate effect on the following terms and conditions:-

- i. He will get pay at the minimum of BPS-9 including usual allowances as admissible under the rules. He will be entitled to annual increment as per existing policy.
- ii. His services will be liable to termination with or without any reason on two months notice from either side. In case of termination without notice by the employer or two months notice from the employee for resignation, two months pay and allowances shall be paid by the Government or refunded by the employee as the case may be.
- iii. He will not be entitled for pension/gratuity benefits.
- iv. He will not contribute towards G.P.Fund. However, he will contribute C.P.Fund @ 10% of minimum of pay scale and an equal amount of 10% will be made by the Government as per rules.
- v. His appointment will be purely temporary and will not confer on him any right for regular appointment.
- vi. He will be allowed conveyance, medical, house rent allowance, leave and T.A/D.A as per Government rules.
- vii. He will be consider appointment against higher post, if found eligible and due for promotion.
- viii. He will be entitled to facility of Benevolent Fund as per new recruitment policy.
- ix. He shall produce a medical certificate of fitness from Medical Superintendent, Civil Hospital, Peshawar before reporting for duty as required under the rules.

SECRETARY TO GOVT. OF NWFP
ADMINISTRATION DEPARTMENT

Endst.No.& date even.

Copy forwarded to:-

1. Accountant General, NWFP, Peshawar.
2. Comptroller, Frontier House, Islamabad.
3. Bill Assistant, Administration department.
4. Mr.Naveed Iqbal s/o Koto Ram r/o H.No.1844, Sector I-10/2, Islamabad.

[Handwritten Signature]

[Handwritten Signature]

[Handwritten Signature]



(12) "B"

25
26

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

SHOW CAUSE NOTICE

I, Hifz-ur-Rahman, Secretary to Government of Khyber Pakhtunkhwa, Administration Department, as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you – Mr. Naveed Iqbal, House Keeper (BPS-09), Pakhtunkhwa House, Islamabad – that keeping in view the available information I am satisfied in terms of Rule-7 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 that you have committed misconduct, as specified in Rule-3(b) of the Rules *ibid*, by the following acts/omissions:

“Lacking devotion in performance of duty, keeping the Block under your supervision in deplorable condition resulting in damage to the government property and remaining habitual absentee”

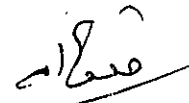
2. As a result thereof, I, as Competent Authority, have tentatively decided to impose upon you the penalty of “Dismissal from service” under Rule-4 of the Rules *ibid*.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

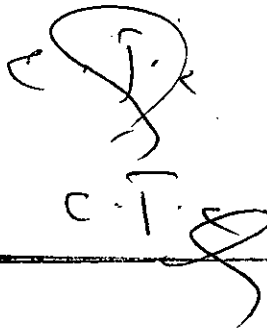
4. If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

Mr. Naveed Iqbal, House Keeper (BPS-09),
Pakhtunkhwa House, Islamabad

U.O.NO.E&A(AD)2(568)2007


COMPETENT AUTHORITY
SECRETARY
Administration Department
Govt. of Khyber Pakhtunkhwa

DATED 20.04.2013



گورنمنٹ جناب سینکٹری ایڈمنسٹریشن ڈیکارٹمنٹ سکریٹریٹ پشاور

Show cause notice no: U.O.No.E & A (AD) 2 (568) 2007. 2013 Date 23/4

جناب عالی! مسائل پر جوابات لگے ہیں۔ سراسر غلط اور بے بنیاد ہیں۔ لہذا
زاتیات پر وہی ہیں۔ کیونکہ مسائل کو اس سے پہلے بھی کئی دفعہ انوائسٹریوں اور
بے بنیاد الزامات میں اٹھایا گیا تھا۔ لیکن مسائل نے اپنی عاجزانہ اور دردمندانہ
باتوں سے تمام افسران بلا کو آغا کر دیا تھا۔ یہ صبر سے سناؤ یہ منہ لگے ہیں۔
کبھی وجہ نہ کہتا جاتا ہے۔ کبھی صبر اور بے بنیاد الزامات رکھتے ہیں۔
ہیں۔ کو کبھی وجہ دینی پر لسانی سے دوچار کیا جاتا ہے۔

جناب والا میں غریب بندہ ہوں میں اپنی ڈیوٹی اپنی اہم داری سے نبھاتا
لہذا اپنے جیوں کو حلال زرق کھاتا ہوں۔ اسی وجہ سے تمام افسران بلا
اور انوائسٹری افسران نے مسائل کے حق میں فیصلے دیئے۔ صبر کے طرح طرح
کے بیانے ڈھونڈے جاتے ہیں۔ جس سے صبر کوئی واسطہ نہیں ہوتا۔ کیونکہ
میں اتنا بھی پائی اٹھا زنی نہیں ہوں کہ ہا جس کے پلڈنگ لہذا ہم ترین
باتوں کی قسم داری مجھ پر عائد ہو۔

جناب والا مجھ سے پائی اٹھا زنی کٹر وکٹر نادر خان لہذا اس سب کے لئے زرق زان
Section Officer (Admn)
Establishment & Admn. Deptt
Govt. of Khyber Pakhtunkhwa

خ

یہ ذمہ داریاں جو مجھ پر الزامات لگے ہیں۔ یہ ان کے ذمے ہیں آتے ہیں۔
 کیونکہ مسائل ڈیوٹی کو وقت پر آتا ہے اور مسائل سے چھوڑ دی گئی ہیں۔
 کی جاتی ہے۔ وہ روزانہ کی بنیاد پر عہد کرتا ہوں۔ تو لہذا جو الزامات
 مجھ پر لگے ہیں۔ وہ میرے ذمے ہیں، بس آتے ہیں۔ کیونکہ میں اس کے
 ذمہ دار ہوں اور روزانہ کی بنیاد پر کنٹرول کرتا ہوں اور اس کے ذمے دار ہوں۔
 پر وہم کرتا ہوں۔ صاف آپ آفسران سے التجا ہے کہ میری انکوٹری
 ضروری جائے اور اس انکوٹری سے فدا کر کے مسئلہ کیا جاوے۔ کیونکہ اگر
 انکوٹری الزامات کی بارش ہوگی ہے۔ میں سے مسائل کو حل کرنے کے لیے
 یہ نہیں ہوتا ہے۔ اور مجھے بے جا تنگ نہ کیا جائے۔ تاکہ میں اپنے
 کیوں کو حلال رزق کما سکوں اور ملک اور قوم کی خدمت کر سکوں۔

صاف والا صاف تک میرے غیر حاضر ہونے سے سوال ہے۔ تو یہ میرا سر
 بے بنیاد ہے۔ کیونکہ سٹاف کی حاضری کا ریکارڈ چیک کر کے ثابت
 ہو سکتا ہے کہ میں بے حضور ہوں۔ کیونکہ میں ٹائم پر آتا ہوں

Section Officer (Admin)
 Establishment
 Govt. Dept.
 Government of Punjab

آء

آء
 21-8-2023

ادرا پر از صبر انگری ہوئی ہو۔ جس دن جو پیر عتر حاقری رو
الزام رکھا گیا ہے۔ تو اسی دن میں پادشاه میں موجود تھا۔ جسکی انگری

میں کئی طرح کی شیل پراج کر پائس موجود ہے۔ جسے دیکھ کر ہائے۔

دریں اثناء مسائل سٹاف بڈن میں کھلدا کے بندہ۔ خلیل (الکلیٹر)

کھسا کہ مگرہ عمیر ۱۶ ص ۷۷ صرف تھا۔ جس میں وہ جو مسائل
نور مسائل حاضرین (عمیر کی کچھ نوٹوں میں ان کی
خود میں پیش کرتا ہے۔ جس سے بالکل بنگلہ دیشی

۷۵۷۸۳۲۵۷۵-۰۳۲۱)

ضیاء عالی! میں کوئی عمیر حاقری نہیں کرتا ہوں اور جس دن چھی کی ضرورت

پڑے جس کے لئے اس سے اجازت لیکر جانا ہوں۔

میں سے لہر انوار کو چھی کرتا ہوں جو حاقری کی رہیے سے ثابت ہو

اور آپ آفسران ہال سے ایجا کرتا ہوں کہ فقیر اس کیس میں غور و فکر

کریا کو قریب کیا جاوے۔ میں لکھنے والے و عمال ہمیشہ آپ صاحبان کے
مشورہ و عنون رائے لے۔ (شیخ ذہب انصاف یا میں لکھنے والے کے ہاں لکھتا ہوں)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

Dated :22-05-2013

ORDER

No.E&A(AD)2(568)/2007. WHEREAS, Mr.Naveed Iqbal, Housekeeper (BPS-09) Administration Department was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for the charges as per Show Cause Notice bearing even number dated 20-04-2013.

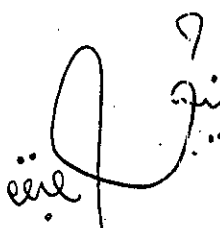
2- NOW, THEREFORE, I, as Competent Authority, after having considered the charges, evidence on record, the explanation of the accused official (including personal hearing); and exercising powers under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, have decided to impose upon Mr.Naveed Iqbal, Housekeeper (BPS-09) the major penalty of "Dismissal from Service" with immediate effect.

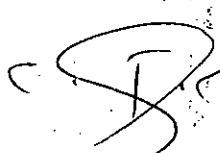
SECRETARY ADMINISTRATION

ENST OF EVEN NO & DATE.

Copy forwarded to the :-

- 1) Accountant General, Khyber Pakhtunkhwa.
- 2) Comptroller Pakhtunkhwa House, Islamabad
- 3) PS to Secretary Administration Department.
- 4) PA to Deputy Secretary Administration Deptt;
- 5) Bill Assistant, E&A Department.
- 6) Establishment Asst;-II E&A Deptt;
- 7) Official Concerned.
- 8) Personal File


(MAQBOOL HUSSAIN)
SECTION OFFICER (ADMN)
Section Officer (Admn)
Establishment & Admn. Deptt
Govt. of Khyber Pakhtunkhwa


21-8-2013

ایجنل

PS/C.S Khyber Pakhtunkhwa
Diary No. 6521
Date. 17-6-13

PS. Secy: Administration Deptt
Diary No. 2407 Dated. 17-6-13

سول سیکریٹری شہار

حضرت جناب چیف سیکریٹری محکمہ سول سیکریٹریات

Section Officer (Admn)
Establishment & Ad Deptt:
Govt. of Khyber Pakhtunkhwa
S.O. (Admn:) Administration Deptt:
No. 2447
Date. 19/6/2013

PA. DCA Administration Deptt
733 18/6/13
عنوان ایجنل

بجالی ملازمت

Secy: Admn
Govt. of Khyber Pakhtunkhwa

حضرت عالی اساتذہ بہت ہی مہربانہ طریقے سے آپ سے ملنے کے لیے آمین

ایجنل کے نکات پیش کرتا ہوں۔

SECY: (ADMN) S/PLA
17/6/13

① - یہ کہ سال 2006-7 سے جنرل فواد بھٹو اسٹریٹجک سروسز میں بطور
ریٹائرڈ سروسمنٹ اپنی ڈیوٹی سر انجام دیتا رہا ہے۔

② - یہ کہ سال اپنی ڈیوٹی ایمپلائمنٹ کے لیے درخواستیں - اور اپنے ملک و قوم
کی خدمت سے ہوتے کرتا رہا ہے۔

③ - یہ کہ سال کو 22-5-2013 آرڈر سے
ERA(AD) 2(568)/2007

کے ذریعے جناب سیکریٹری ایف ڈی میں خدمت سے
Dismissed کیا گیا ہے۔ جو کہ سال کے سروس ریکارڈ میں اضافی ہے۔

C-T
C

4۔ یکم نومبر 2013-5-22 کو سائل کی Dismissal کی جو بنیاد بنائی گئی ہے وہ بھی سائل کے ساتھ سپر ایسپر نار اٹھائی ہے۔ اور زبردستی ہے۔

5۔ یہ کہ نگران وزیر اعلیٰ (مسابقہ) جناب طارق پرویز صاحب جس دن یارنس میں انٹریکشن کر رہے تھے اس دن سائل یارنس میں حاضر ہونے کے باوجود غیر حاضر بنائے گئے۔ (جو کہ سپر ایسپر ظلم لگا رہا ہے)

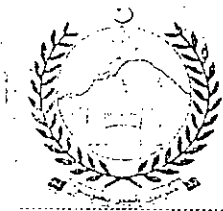
6۔ یہ کہ سائل ایک محترم لکھنؤ فائنانس سے تعلق رکھتا ہے۔ لکھنؤ

قول کر چکا ہے۔
7۔ یہ کہ سائل کی ایک بزرگ والدہ لکھنؤ میں بال بچے ہیں۔

8۔ یہ کہ سائل کا علاؤ الدین کھٹک کوئی آئینہ زرعہ میں ہے۔
9۔ یہ کہ جیسا سپریم کورٹ آف پاکستان نے بھی اپنے حالیہ فیصلے کے ذریعے نگران حکومت کو تمام سادوں، ٹیپوں وغیرہ سے اقتدارات

کو کا اعدا قرار دیا ہے۔ (فیصلے کی چند صفحات ریفرنس میں ہیں)
10۔ یہ کہ سائل عند صبح بالائے آپ صا صا سے 30 دن اندر کرنا ہے۔

لکھنؤ اسٹیشن رییل کے ذریعے اپنے لکھنؤ فائنانس کے ایف اے کے ساتھ
شکر ہے آپ نا صبار۔ نومبر 2013



19 F
GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

No.E&A(AD)/02(568)/2007

Dated Peshawar the 17-07-2013

To

Mr.Naveed Iqbal (ex-Housekeeper)

S/O Koto Ram

R/O Sector I-10/2, House No.1844, Islamabad

SUBJECT:- APPEAL : RE-INSTATEMENT INTO SERVICE.

I am directed to refer to your application/representation dated 17-06-2013 on the subject noted above and to convey that your appeal /representation has been set aside by the Appellate Authority.

(MAQBOOL HUSSAIN)

SECTION OFFICER (ADMN)

Section Officer (Admn)

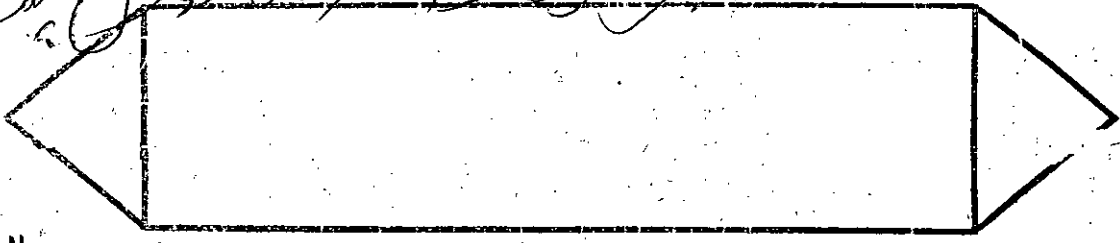
Establishment & Admn. Deptt:

Govt. of Khyber Pakhtunkhwa

Received copy
on 19/8/2013

Reasons
No eqm/8
When 1/8

بعد االت جسٹریٹوں خواہ سرویس ٹرانزیشنل مسٹریٹس اور



مخائب اپیلانٹ

بنام

فکوس

مورخہ

مقدمہ

دعویٰ

جرم

Service Appeal

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی وجواب دہی وکل کارروائی متعلقہ

آن مقام مسٹریٹس کے لیے امانت دہی کے لئے مقررہ وقت کے اقرار کیا جاتا ہے۔ کہ صاحب موصولہ مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و نظر ثانی و فیصلہ بر حلف دینے، جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور اصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیقی ذرائع پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یا ٹکٹ فرسٹ یا اپیل کی برآمدگی اور مشورتی نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دور پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیروی مذکورہ کے لئے لہذا وکالت نامہ لکھ دیا کہ سند رہے۔

المرقوم 21 ماہ اکت 2013ء

مقام

Muhammad Ali

19/8/2013

Accepted

21-8-2013

شیخ عزیز گل

21-8-2013