


FORM OF ORDER SHEET

Court of _____

Appeal No. 457/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/03/2024	<p>The appeal of Mr. Fazal Subhan presented today by Mr. Umar Farooq Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 29.03.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. 457 /2024

FAZAL SUBHAN

VS

Edu: Deptt:

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APPELLANT
THROUGH: 
UMAR FAROOQ MOHMAND
ADVOCATE HIGH COURT

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. _____/2024

Mr. Fazal Subhan, PST (BPS-12)
GPS No 01, Tela Band, Inzary, Peshawar

.....**APPELLANT**

VERSUS

- 1) Director Elementary and Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 2) The District Education Officer (M), District Mohmand.

..... **RESPONDENT**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED REMOVAL ORDER DATED 08/04/2023, COMMUNICATED ON 28/12/2023, WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED UPON THE APPELLANT 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 08/04/2023 communicated on 28/12/2023 may very kindly be set aside and the respondent be directed to re-instate the appellant into his service with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

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

- 1- That the appellant was appointed as PTC now PST (BPS-07) vide order dated 06/03/2003 and since then performed duties in the respondent department with honesty, full devotion, zeal and zest and with the entire satisfaction of his high ups. Copy of the Service Book is attached as annexure.....**A**

- 2- That vide order dated 30/08/2013 the service of the appellant was regularized by the respondent department. Copy of order dated 30/08/2013 is attached as annexure.....**B**
- 3- That it is important to mention here that due to personal enmity of the appellant, the appellant was unable to continue his duties at GPS Manzary China Tehsil Bazai, District Mohmand, that's why the appellant moved an application for leave without pay, the same has been allowed w.e.f. 01/11/2021 to 31/10/2022 vide order dated 26/11/2021. Copy of order dated 26/11/2021 is attached as annexure.....**C**
- 4- That on completion of the said leave the appellant continued his service against the said post, the appellant had moved an application before the Director E&S Department for Inter District Transfer and the respondent also give NOC for the said transfer. Copies of application and NOC are attached as annexure.....**D&E**
- 5- That in pursuance of the said NOC, the Director Elementary & Secondary Education vide notification dated 28/03/2023, transferred the appellant from the District Education Officer Mohmand to District Education Officer, Peshawar and in response to the ibid notification the DEO Peshawar further posted the appellant at GPS No 1 Tela Band, Inzari, District Peshawar vide order dated 29/03/2023. Copies of order dated 28/03/2023 & 29/03/2023 are attached as annexure.....**F&G**
- 6- That in pursuance to the said the appellant submitted his arrival report against the said post in the concerned school. Copy of the Arrival Report is attached as annexure.....**H**
- 7- That the appellant was intimated by the DEO Peshawar to obtain reliving certificate from respondent but the respondent issued Show Cause notice to the appellant to which the appellant replied accordingly, besides reply of the appellant after being consider not satisfactory, was called upon for personal hearing. Copies of the show cause notice and letter for personal hearing are attached as annexure.....**I**
- 8- That the appellant time and again approached to the respondent for obtaining reliving certificate but astonishingly the respondent No 1 issued the impugned order dated 08/04/2023 communicated to appellant on 28.12.2023, whereby the appellant has been removed from the service. Copies of the application and impugned order dated 08.04.2023 are attached as annexure.....**J&K**
- 9- That the appellant feeling aggrieved form the ibid impugned order dated 08/04/2023 filed departmental appeal before the competent

authority, which was not decided within the statutory period of 90 days. Copy of departmental appeal is attached as annexure.....L

- 10-** That the appellant feeling aggrieved from the impugned order dated 08/04/2023, and having no other remedy preferred the instant Service Appeal before this Honourable Tribunal inter alia on the following grounds:-

GROUND:

- A-** That the impugned Order dated 08/04/2023 of the respondent No 3, whereby the appellant has been removed from service is against the law, facts and principles of natural justice, therefore, the same is liable to be set aside.
- B-** That the impugned order is illegal and void ab-initio, hence untenable in the eyes of law.
- C-** That mandatory provisions of law and rules have badly been violated and the appellant has not been treated according to law and rules.
- D-** That the appellant was discriminated too in violation of the Constitution of the land.
- E-** That the impugned order is not a speaking order and thus not tenable in the eyes of law.
- F-** That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- G-** That it is important to mention here that before issuing the impugned removal order, the appellant has been transferred to District Education Officer District Peshawar and submit his charge report.
- H-** That the codal formalities required for the departmental proceeding has not been fulfilled by the respondents while issuing the impugned Order dated 08/04/2023.
- I-** That no proper inquiry was conducted to find out the true facts and circumstances, no one was examined in presence of the appellant and the appellant was not provided opportunity of cross examination.
- J-** That the respondent acted in arbitrary and mala fide manner while issuing the impugned Order dated 08/04/2023.

(4)

K- 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.

Umar Farooq Mohmand
APPELLANT

THROUGH:

UMAR FAROOQ MOHMAND

WALEED ADNAN

MAHMOOD JAN

&

KHANZAD GUL

ADVOCATES HIGH COURT

CERTIFICATE:

No such like appeal against impugned Order dated 08/04/2023 is pending or filed between the parties on the subject matter before this Honorable Tribunal.

[Signature]

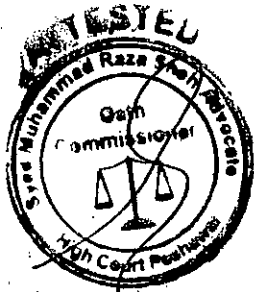
Advocate

AFFIDAVIT

I, Mr. Fazal Subhan, PST (BPS-12) GPS No 01, Tela Band, Inzary, Peshawar, do hereby solemnly affirm on oath that the contents of the above appeal are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

DEPONENT

[Signature]



27 MAR 2024

(For use in Police Department only).

Heirs,

A, (5)

- 1.
- 2.
- 3.

Verification Roll No. *See original* dated _____ received back _____

Left Thumb Impression

*SSC - verified
PTE - verified
PA - verified
Domestic - verified
Atten A. J. [unclear]
14/11/2017*

Qualification	Date	Qualification	Date
English		passed SSC Examination from BISE part under R.N. 41679 in 1st in C grade	
Pushto		First Arts A.E.O. Mohmand Agency	
Urdu		B.L. or B.A. Passed FA Examination from BISE des below under Roll no. 53607 Session 2003 Pleadership examination Annual Mark: obtained 606/1000 and Degree	
Plan-drawing		A.E.O. Mohmand Agency Training School Final examination	
Finger Print		Other qualifications -	
Drill Instructing		Passed the PTC Examination from	
Court Duties		Departmental Examination in school interest Departmental Examination under Roll no. 1059 under District	
Reserve Duties		Roll no. 1000 under roll no. 30-12-2000	

[Signature]
A.T.O.

وقعا و صحيا

FAZLI SUBHAN

~~ABDUL LATIF~~ Mohmand (Afghan)

Place of birth: LAKHKAR KILLI ATMER KHEL

P.O. Box Yousof Khel

Father's name and residence:

ABDUL LATIF Lakhkar killi

Date of birth by Christian era as early as can be ascertained:

Twenty May nineteen eighty five
(20-5-85)

Exact height by measurement:

6'

Personal marks for identification:

wound on right foot (leg)

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



Little Finger:



Ring Finger:



Middle Finger:



Fore Finger:



Thumb:



Signature of Government Servant:

[Handwritten signature]

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

[Handwritten signature]
A.P.O.
Mohmand Khel

[Handwritten signature]

6

501/11/03

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. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.T.C post at		B.P.S No. 2 (2220-120-5820)					
C.S Manzaricheena bager. Lower Mahand			RS-2220/-PM			12/03	
			P.	2220/-		11/03	
			P.	2220/-		11/04	
		B.P.S No. 7 (3555-140-5667)					
			P.	3555/-		7/05	
			P.	3555/-		11/05	
			P.	3555/-		11/06	
		B.P.S No. 7 (2940-160-720)					
			P.	2940/-		7/07	
		B.P.S No. 9 (3770-165-7720)					
			P.	3770/-		30/05	
			P.	3770/-		12/06	

UP

Designation of the officer and office No. of to 8	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.	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 debtible to another Government		
				Period	Government to which debtible		
<i>[Signature]</i> A.E.O. Mehmand Agency	11 30/03	Fix	<i>[Signature]</i> A.E.O. Mehmand Agency		Appointed against P.T.C post in B.P.S No 2 on contract basis for the project period. at C.S Manzari Cheena Fater Lower Mehmand.		
<i>[Signature]</i> A.E.O. Mehmand Agency	11 30/04	Fix	<i>[Signature]</i> A.E.O. Mehmand Agency		vide A.E.O Mehmand Agency Endst No 4998-5089 Date 06-03-2003		
<i>[Signature]</i> A.E.O. Mehmand Agency	6 30/05	py Rev	<i>[Signature]</i> A.E.O. Mehmand Agency				
<i>[Signature]</i> A.E.O. Mehmand Agency	11 30/05	Fix	<i>[Signature]</i> A.E.O. Mehmand Agency				
<i>[Signature]</i> A.E.O. Mehmand Agency	11 30/06	Fix	<i>[Signature]</i> A.E.O. Mehmand Agency		Allowed BPS No 9 w.e 6 20/10/05 vide A.E.O Endst No 13403-06 correct 19/11/07		
<i>[Signature]</i> A.E.O. Mehmand Agency	6 30/07	py Rev	<i>[Signature]</i> A.E.O. Mehmand Agency				
<i>[Signature]</i> A.E.O. Mehmand Agency	12 29/05	Allowed BPS No 9	<i>[Signature]</i> A.E.O. Mehmand Agency				
<i>[Signature]</i> A.E.O. Mehmand Agency	11 30/06	mi.	<i>[Signature]</i> A.E.O. Mehmand Agency		<i>[Signature]</i> A.E.O. Mehmand Agency		
<i>[Signature]</i> A.E.O. Mehmand Agency	6 30/07	py Rev	<i>[Signature]</i> A.E.O. Mehmand Agency				

[Signature]
REGISTERED

47
(7)

Name of post

Whether substan-
tive or officiating
and whether
permanent or
temporary.

If officiating, 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

Signature of
Government Servant

B.M. No: 963185-190-8885

B. 3375/A

7/07

A. 3565/A

1/09

2/10

UF

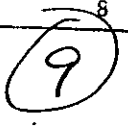
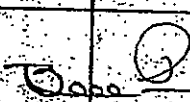
1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
PST	<i>[Signature]</i>		Rs. 7 (5800-320-15400)				<i>[Signature]</i>
G.P.S. Faiz Mi Baiz			Rs. 5800/-			1.9.13	
		BPS No. 9 (6800-380-17600)					
		Rs. 6800/-				19	
2015-B-9 (Rs=8015-495-82865)		Rs=6580/-				2013	
		Rs=8510/-				12 2015	
		Rs=9005/-				12 2015	
2016-B-9 (Rs=9860-610-28160)							
		Rs=11080/-				7 2016	

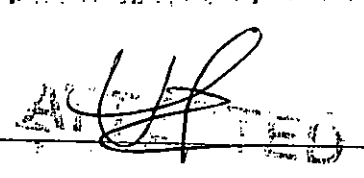
[Signature]

Regular Services

Designation of the officer (1 to 8)	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.	13 Leave		Signature of the head of the office or other attesting officer.	Reference to any recruited 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 debitible to another Government			
					Period			Government to which debitible
<p>A.E.O. Mohmand</p>	<p>19/8/13</p>	<p>Allowed B-9</p>	<p><i>[Signature]</i></p>	<p>Adjusted as a Regular PST Post at APS Raizke wef 1/9/2013 with this off' No. 10647-52 dt. 30/8/13 and this off' No 18157 dt. 23/9/2013.</p>	<p><i>[Signature]</i></p>	<p>Agency Education Officer Mohmand Agency at Ghallanah</p>		
		<p>Duration 29 months / arrears pay & bills to be supplied by staff w.e.f. 1/9/13 to 11/8/13</p>	<p><i>[Signature]</i></p>	<p>Duration Rs. 2970/- as a part of pay & allowances wef 1/9/2013 to 31/10/2013 due to regularization of Post</p>	<p><i>[Signature]</i></p>			
			<p><i>[Signature]</i></p>	<p>Allowed BPS No. 9 vide AEO No. 10644-53 dated 07-11-2011</p>	<p><i>[Signature]</i></p>			

APPROVED

1	2	3	4	5	6	7	8
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 371, C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
	Revised entry due to W-4 regulation from B-9 to B-12 w.e.f. 1-9-2013 (7000-500-22000)						
PST B-12			Pay on 1-9-2013 in B-9 Rs = 6200/-				 Signature of Government Servant
			Pay on 1-9-2013 in B-12 Rs = 7000/-			1-9-2013	
						Rs = 7500/-	
						1-12-2014	
2015-B-12		(Rs = 9055-650-28555)		Rs = 9705/-		1-7-2015	
2016-B-12		(Rs = 11140-800-35146)		Rs = 10355/-		1-12-2015	
				Rs = 12740/-		1-7-2016	
 Agency Education Officer Mohmand Agency, Ghallani							
				13540/-		12	
				16200/-		17	
BPS-12		(13320-960-4212)		17160/-		12	
				18120/-		18	
				19080/-		19	
				20040/-		20	


 Agency Education Officer

B, 11

OFFICE OF THE AGENCY EDUCATION OFFICER MOHMAND AGENCY AT GHALLANAI

REGULARIZATION OF COMMUNITY TEACHERS.

Consequent upon the notification No.SO(E)/SSD/CSCR 99-108, dated 11.5.2012 and on the basis of honourable High Court decision dated 06.8.2013, re-appointment order of 52 community teachers issued vide this office No.1636-42 dated 17.8.2012 and No.1643-49 dated 17.8.2012 is hereby implemented with effect from 01.9.2013 in the interest of public service, with partial modification at S.No.19 and 42 in order No.1636-42 and at S.No.3 in order No.16343-49, with the remarks that:-

1. The said appointment was made from Agency wise merit on the verbal directions of Director of Education (FATA) at that time, if Directorate of Education (FATA) declared this order against the present recruitment policy of the Govt: in response to this office letter No.1306 dated 20.8.2013, then regularization of community teacher will be made on tehsil wise merit basis.
2. If any post against which community teacher was regularized was not vacant, then the incumbent will vacate the post for the community teacher on his regularization.
3. Any Community school for which regular posts have not been sanctioned and teachers of this Community Schools got regular posts then this community school will be considered as closed, and class IVs of this school will be considered as terminated w.e.f 1.9.2013 and students of this schools will be advised by the teachers to get admission in near by regular school.
4. Documents, both Professional and academic will be verified by the committee constituted for the purpose. A single person will not carryout the verification process.

Note:- Cases regarding the scales of newly adjusted teachers will be decided individually on the basis of their qualification.

S.No	Name with Father's Name	Name of Community School	Station of posting as regular PST	Tehsil	Remarks
1	Fazle Subhan S/O Abdul Latif	CS Atam Killi	GPS Zoor Killi Aflatoon	Baizai	Against newly created post
2	Muhammad Irshad S/O Abdur Rahman	CS Manzari Cheena	MPS Abdul Jabbar	Halimzai	Against Vacant Post
3	Abdul Samad S/O Muhammad Rafiq	CS Gul Wali	GPS Lakhkar Killi Faiz Ali	Baizai	Against newly created post
4	Salim Saradar S/O Hakim Said	CS Shamir Khan Abad	GPS Babi Khel Kamali	Halimzai	Against Vacant Post
5	Sameer Ahamad S/O Ahmad Gul	CS Kuzi Kas	GPS Manzari Cheena	Khwezai	Against newly created post
6	Adil Shah S/O Gul Shah	CS Atam Killi	GPS Said Rahman Gurbaz	Halimzai	Against Vacant Post
7	Aslam Khan S/O Hazrat Muhammad	CS Muhammad Naik	GPS Bahi Dag	Khwezai	Against newly created post
8	Azizullah S/O Itbar Khan	CS Muhammad Yad	GPS Grang No.1	Halimzai	Against Vacant Post
9	Khanadan S/O Malik wazir Khan	CS Ijazat	GPS Karrer Habibzai	Halimzai	Against Vacant Post
10	Muhammad Sadiq S/O Muhammad Yar	CS Mateena Malik	GPS Zoor Killi Aflatoon	Baizai	Against newly created post
11	Ali Akbar S/O Hazrat Muhammad	CS Muhammad Naik	GPS Ashraf Abad	Khwezai	Against Vacant Post
12	Muhammad Raz Khan S/O Zarghun Shah	CS Toora Khwa	GPS Din Muhammad	Halimzai	Against Vacant Post
13	Muhammad Idrees S/O Taj Muhammad	CS Mateena Malik	GPS Chamarkand No.1	Safi	Against Vacant Post

ATUL

14	Muhammad Ishaq S/O Gul Said	CS Shawal	GPS Chamarkand No.2	Halimzai	Against Vacant Post
15	Akbar Khan S/O Sher Jan	CS Kankar Killi	GPS Shewa Farsh	Halimzai	Against Vacant Post
16	Ilyas Khan S/O Muhammad Shakil	CS Gulzar Baidnmanai	GPS Sangar Ambar	Ambar	Against Vacant Post
17	Lal Zada S/O Sautar Khan	CS Karkana	GPS Karkana	Ambar	Against newly created post
18	Miaz Muhammad S/O Noor Muhammad	CS Masti Kore Gulab	GPS Manzari Cheena	Baizai	Against newly created post
19	Hayat Muhammad S/O Toot Muhammad	CS Lakhkar Killi	GPS Lakhkar Killi Khel Atmar	Baizai	Against newly created post
20	Sultan Muhammad S/O Muhammad Shah	CS Kung	GPS Masti Kore Gulab	Khwezai	Against newly created post
21	Daftar Khan S/O Muhammad Akbar	CS Kung	GPS Abdul Kore	Khwezai	Against Vacant Post
22	Zahir S/O Bashir	CS Khanjar Killi	GPS Chamarkand	Halimzai	Against Vacant Post
23	Janul Shah S/O Hakim Khan	CS Khang Baig Fazle Manan	GPS Masti Kore Gulab	Khwezai	Against newly created post
24	Hazrat Shah S/O Sahib Jamal	CS Ijazat	GPS Shamsher	Khwezai	Against Vacant Post
25	Sajjad S/O Khanzad Gul	CS Nazar Kore	GPS Warsak Gat	Khwezai	Against Vacant Post
26	Gul Nabi S/O Lal Said	CS Soor Dagi	GPS Zanawar Gul Said	Khwezai	Against newly created post
27	Bakht Zada S/O Shahzada	CS Bahlola	GPS Yousaf Baba	Prang Ghar	Vacant
28	Bacha Hassan S/O Ibrahim Shah	CS Faiz Ali	GPS Kharai Dara	Halimzai	Against newly created post
29	Sajid Ali S/O Tawas Khan	CS Faiz Ali	GPS Bacha Kandao	Halimzai	Against Vacant Post
30	Hfikhar Khan S/O Bahadar Khan	CS Shawal	GPS Gul Rahman	Baizai	Against Vacant Post
31	Anwar Khan S/O Habib Khan	CS Gul Rahman	GPS Yaqoob Khanzadgan	Khwezai	Against Vacant Post
32	Murad Ali S/O Akhtar Jan	CS Samghakhi	GPS Ghanam Shah	Khwezai	Against Vacant Post
33	Arif Shah S/O Rahil Shah	CS Samghakhi	GPS Amrai Kore	Ekka Ghund	Against Vacant Post
34	Abdullah Shah S/O Hussain Shah	CS Masti Kore Nusuib Khan	GPS Pai Khan	Ekka Ghund	Against Vacant Post
35	Ajmal Khan S/O Pir Ghulam	CS Ghairdand	GPS Uchko Suran	Baizai	Against Vacant Post
36	Abidullah S/O Ghulam Muhammad	CS Rahman Gul	GPS Suran	Khwezai	Against Vacant Post
37	Taj Muhammad S/O Sheikh Muhammad	CS Karkana	GPS Karkana	Prang Ghar	Against Vacant Post
38	Amin Khan S/O Rawesh Khan	CS Sikandar	GPS Selai Dawa Jan	Khwezai	Against newly created post
39	Murad Ali S/O Muhammad Ali	CS Shamir Khan Abad	GPS Taraki Tangi	Halimzai	Against Vacant Post

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(13)

41	Janai Gul S/O Zulfan Khan	CS Ghair Dand	GPS Bakhtal Shah	Halimzai	created post
42	Anwar Shamim S/O Ahmad Gul	CS Kuzo Kas	GPS Lakhkar Kili Faiz Ali	Khwezai	Against Vacant Post
43	Faridullah S/O Zazif Khan	CS Kankar Kili	GPS Olai Ambar	Baizai	Against Vacant Post
44	Muhammad Shafiq S/O Karim Khan	CS Manzari Cheena Malang	GPS Shati Miana	Baizai	Against Vacant Post
45	Azmat Gul S/O Rahat Gul	CS Nazar Kore Aslam	GPS Shamsher Sra Khwa	Halimzai	Against Vacant Post
46	Niqab Khan S/O Khan Sharif	CS Kung Sabzali	GPS Had Kore Ambar	Khwezai	Against Vacant Post
47	Shahid Nasim S/O Muhammad Halim	CS Zoor Kili Aflatoon	GPS Yaqoob Khanzadgan	Halimzai	Against Vacant Post
48	Amir Khan S/O Hamid Khan	CS Dag Qilla	GPS Gumbati Ambar	Halimzai	Against Vacant Post
49	Nasira D/O Akhtar Gul	FCS Ucha Jouna Rawesh	GGPS Kung Farmanullah	Baizai	Against newly created post
50	Nighat Bano D/O Jehan Zeh	FCS Samghakhi	GGPS Baghi Shah	Safi	Against newly created post
51	Falooda D/O Gul Zada	FCS Kuzo Kas	GGPS Kuzo Kas	Baizai	Against newly created post
52	Aisha Bibi D/O Ahmad Jan	FCS Umar Khel Suliman	GGPS Baghi Shah	Safi	Against newly created post

تاسی

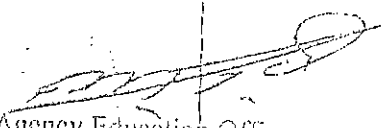
Endst No. 11/2017-59 Project/ Appointment

Copy of the above is forwarded to the:-

1. PA to Secretary to Governor KPK, Peshawar.
2. Director of Education FATA, K.P.K, Peshawar.
3. Political Agent Mohmand Agency.
4. Agency Accounts Officer Mohmand Agency at Ghallanai.
5. AAEOs concerned.
6. Accountant local office.
7. Teachers concerned.

(SAID MUHAMMAD)
Agency Education Officer
Mohmand Agency at Ghallanai.

Dated 30/8 /2013


Agency Education Officer
Mohmand Agency at Ghallanai



C, (14)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MOHMAND TRIBAL DISTRICT

Ph. No. : 0924-290180

FAX : 0924290180

Email :- demohmand@gmail.com



EARNED LEAVE.


Under the provision of civil servant revised leave rules 1981, Sanction is hereby accorded to the grant of Earned leave for a period with effect from 01/11/2021 to 31/10/2022 (365-days) on without Pay on his own request in respect of Mr. Fazl Subhan PST (BPS-12) GPS Manzari Cheera Tehsil Baizai District Mohmand.

1. Necessary entry to this effect should be made in his Service Book.

(NOOR HASSAN KHAN)
District Education Officer,
(Male) District Mohmand.

43
Endst. No. 8142 /Etab: III/Leave Cases/ dated: 26 /11/2021
Copy to the:-

01. ADEO concerned in this office.
02. Pay Clerk in this office.
03. Official concerned.
04. Office record.


District Education officer,
(Male) District Mohmand.



D, 18

بخدمت جناب ڈائریکٹر ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

درخواست برائے (ضلع مہمند سے ضلع پشاور تبادلاً)

جناب عالی!

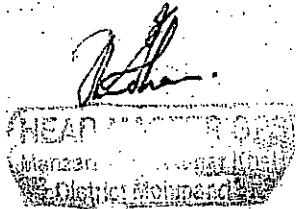
مودبانہ گزارش ہے کہ میری ڈیوٹی ضلع مہمند کے دور افتادہ علاقہ پاک افغان بارڈر جی پی ایس منڈری چینہ ملنگ میں ہے۔ میری اپنے علاقے میں پرانی دشمنی ہے جس کی وجہ سے میری جان کو شدید خطرات لاحق ہے۔ اور گھر پر میرا والد صاحب انتہائی بیمار ہے۔ ان دو وجوہات کی وجہ سے میں نے پشاور میں رہائش اختیار کی ہے۔

ان حالات کی وجہ سے پشاور سے روزانہ اپنے فریض پر حاضری میرے لیے انتہائی تکلیف دہ ہے۔ اس روزانہ حاضری کی وجہ سے میری روزمرہ زندگی بہت متاثر ہوئی ہے۔ اس وجہ سے میں وہاں پر اپنی ڈیوٹی احسن طریقے سے سرانجام نہیں دے سکتا۔

لہذا آپ صاحبان سے یہ گزارش ہے کہ میرے لیے یہاں پشاور میں ایک خالی پوسٹ کا بندوبست کریں۔ تاکہ میں یہاں اپنی فرائض خوش اسلوبی سے سرانجام دے کر ملک و قوم کی صحیح معنوں میں خدمت کر سکوں۔

عین نوازش ہوگی

الحاضر



17/8/2021 PST فضل سبحان

جی پی ایس منڈری چینہ ملنگ ضلع مہمند

پر سٹل نمبر: 357113

03465961290 ڈسٹریکٹ ایجوکیشن آفیسر

موبائل نمبر

Director Ex-Off
Peshawar
Khyber Pakhtunkhwa

Minister For Elementary &
Secondary Education
Khyber Pakhtunkhwa

Handwritten signature and initials at the bottom of the page.



(E)

(6)

APPLICATION FORM FOR INTER DISTRICT TRANSFER

1. Name of the Teacher/Applicant & District of Domicile. Fazal Subhan
Mohmand
2. Designation/Post held with BPS PST BPS 12
3. Date of 1st Appointment 06-03-2003
4. Date of taking over charge (District of Present Post) 06-03-2003
5. Name of Present School of Posting GPS Manzari Chena Malang
6. Name of School where posting is required
 1. GPS no 2 Deen Bahar
 2. Peshawar
 3. _____
7. Reason for Transfer Enemity
8. G.P. Fund No. 6047
9. Personal No. 357113
10. Numbers of C/leave (Availed) _____
11. Signature of Prt./HM/HT [Signature]
12. Signature of A.D.O in case of primary Teacher [Signature]

Head Master
GPS, Faiz Ali
Lakkar Killy
M. Agency
Mohmand Tribal District

I solemnly declare that all above information's from S.No. 1 to 12 are correct and nothing has been concealed.

Signature
Name of Applicant
N.I.C No.

[Signature]
Fazal Subhan
21406-7480713-1

CERTIFICATE BY THE RELIVEING EDO E&SE

1. Certified that I have no objection to the transfer of Mr. Mst: Fazal Subhan
From GPS Manzari Chena Malang to GPS Deen Bahar Peshawar
2. The following arrangement will be made by me for filling up the post of PST
In case of transfer of Mr. Mst: Fazli Subhan

It is certified that.

- I. The study/Education of the students of the school will not suffer with proposed transfer
- II. The applicant is regular employee and not contract (Mention) Period. _____

Signature
Name of EDO E& SE
Endst. No. 2531

[Signature]
District Education Officer
Mohmand Tribal District
Dated 17/01/2021

POST AVAILABILITY CERTIFICATE FO THE EXECUTIVE DISTRICT OFFICER ELEMENTRY & SECONDARY EDUCATION WHERE POST IS PROPOSED

I have no objection to the transfer of Mr. Mst. _____
Of against a vacant post of _____ at (Name of School) _____
Of District _____

I have also examined his/her relevant documents and found correct. It is also certified that no N.O.C has been issued to any person against this post.

Name of EDO E& SE _____ Signature _____
Endstt. No _____ / Dated _____ Stamp _____

Note;

The following documents duly attested should be provided.

1. Service Book (photo states)
2. 1st appointment order (original or attested photo copies by EDO E& SE)
3. Last pay Roll
4. Last Balance sheet of GP Fund.

[Signature]

E, 17



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

NOTIFICATION

The services of following teachers are hereby placed at the disposal of District Education Officer (Male) Peshawar for further adjustment against the vacant post on his own pay & BPS in the interest of public service with immediate effect in the light of letter received from Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department Civil secretariate Peshawar Signed by Section Officer (Primary/F) vide No SO(P/F)/E&SED/2-1/Minutes/IDT/2021 Dated: 27-03-2023.

S#	Name & Designation	From	To
1.	Muhammad Zaheer Ud din PST (BPS-12)	GPS No.1 Upper Chitral	Peshawar
2.	Mr. Tanveer Ahmad PST(BPS-12)	GPS Samagula Upper Chitral	Peshawar
3.	Mr. Fazle Subhan PST (BPS-12)	GPS Manzari Cheena Tehsil Baizai	Peshawar
4.	Mr. Ammad Ud Din PST (BPS-12)	GPS Khalil Swabi	Peshawar
5.	Mr. Arsalan Zahid CT (BPS-15)	GMS Kalito Malakand	Peshawar
6.	Muhammad Zafaran CT (BPS-15)	GMS Barbara Karak	Peshawar

TERMS & CONDITIONS

1. Charge Report should be submitted to all concerned.
2. No TA/ DA is allowed.
3. The District Education Officer concerned with the direction to check and verify their original Service Books and all documents before release of salary.
4. Their Seniority will be determined at the bottom of the seniority list of the PSTs/CTs in District Peshawar as per rules.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No. 1505-30 F.No./Transfer/Posting/Peshawar Dated 28/03/2023

Copy forwarded to the:

1. Section Officer (Primary/F) w/r to his letter No. & Date as cited above.
2. District Education Officer (M) Peshawar.
3. District Accounts Officer Peshawar.
4. Mr. Hidayat Ullah focal person IEMIS Local Directorate.
5. Officers Concerned.

Assistant Director (Estab M-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa,

G 18

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR



OFFICE ORDER

In pursuance of the Notification issued by Director Elementary & Secondary Education Khyber Pakhtunkhwa, Endst: NO 1525-30, F.No./Transfer/Posting/Peshawar/ Dated: 28/03/2023, the following teachers transferred from various districts to district Peshawar, are hereby posted at stations mentioned against each name at their own BPS at against vacant posts, in the interest of public service, with immediate effect.

S.NO.	NAME	DESG.	FROM	ADJUSTED AT	REMARKS
1	MUHAMMAD ZAHIR	PST	GPS NO. 01, UPPER CENTRAL	GPS FIDA ABAD, PESHAWAR	A.P.P
2	TANVEER AHMAD	PST	GPS SAMAGHHA, UPPER CENTRAL	GPS FIDA ABAD, PESHAWAR	A.P.P
3	FAZLE SUBHAN	PST	GPS MANZARI CHEENA, TEHSIL BANZAI	GPS NO. 01, TELA DAMA, INZARI PESHAWAR	A.P.P
4	AMMAD UD DIN	PST	GPS KHALIL, SAIWABI	GPS NO. 01, FAQIR BUNR, PESHAWAR	A.P.P

NOTE:

- i Charge Report should be submitted to all concerned after the verification of the transfer order from the undersigned.
- ii T.A/D.A is not allowed.

(SAJJAD AKHTAR IQBAL)
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Endst: No: 6273-83 /Estb: Primary/ Dated 28 / 03 /2023.

- 1 Copy of the above is forwarded for information and for necessary action to the
- 2 Accountant General Khyber Pakhtunkhwa Peshawar.
- 3 Director (E&SE) Khyber Pakhtunkhwa Peshawar w/r to the Office Order No. & Date Mentioned above.
- 4 P.S to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa.
- 5 District Education Officer (Male) Concerned.
- 6 SDEO/ASDEO (Male) Concerned, Peshawar.
- 7 PA to District Education Officer (M) Peshawar.
- 8 Teachers concerned.
- EMIS Local Office.

DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

(19)

(+1)

چارچہ ایوارڈ

میں سے فقیل بہانہ آئیڈیو PS آئیڈیو نے بطور آرڈر فونو 30-1525 مورخہ 28/3/23

کہ جس کی ایڈریس ایڈریس ٹیلہ بند میں بحیثیت آئیڈیو PS پیپر حکم ADE کے ساتھ

8/4/23 بعد از دوپہر اپنے عہدے کا چارج سنبھالا۔

چارچہ کئی

فقیل بہانہ آئیڈیو

8/4/23

چارچہ کئی

ایوارڈ (Signature) 08/04/2023

Head Master
G.P.S No 1
Telaband Inzaray
Peshawar

copy

(Signature)

(1) (20)

**OFFICE OF THE DISTRICT EDUCATION
OFFICER DISTRICT MOHMAND**
Email: edmo@khyber.gov.pk

SHOW CAUSE NOTICE

I LIAQAT ALI, District Education Officer (Male) Mohmand as Competent Authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 do hereby serve upon you, Mr Fazli Subhan PST GPS Manzari China Tehsil Baizai this show cause notice as follow

- 1) That as per EMA Mohmand report for the month of January 2023, you have been found absent from your school duty since 12/11/2021 to 09/1/2021 (424 days) without prior permission approval of leave.
- 2) That you are guilty of professional dishonesty, abetment and inefficiency under the Rule-3(a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011

By reasons of the above, you appear to be guilty of inefficiency under Rule-3(a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the rules ibid

As a result thereof, I, as the Competent Authority, have tentatively decided to proceed against you under the above mentioned rules. You are, therefore, required to show cause as to why the said penalty or any other penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 should not be imposed upon you and also intimate whether you desire to be heard in person. If no reply to this office is received within 07 days of its delivery, it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you under rules ibid.

(LIAQAT ALI)
District Education Officer
(Male) Mohmand

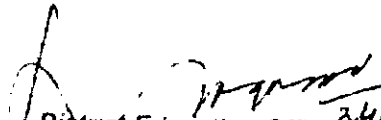
Mr. Fazli Subhan PST GPS Manzari China Tehsil Baizai

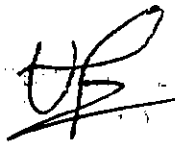
Encl No 709/96 *Etab (Pr)

Dated 02/2023

Copy forwarded to the:

- 1) Director of elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar
- 2) DMO EMA Mohmand
- 3) SDEO concerned with the direction to deliver this notice to the said official with acknowledgement on the office copy under intimation to this office and do the needful as per rules
- 4) Official concerned
- 5) Office Copy


District Education Officer
(Male) Mohmand
24/2/2023





OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MOHMAND

Email: deomohmand@gmail.com

No. 2217/Estab:

Dated: 15/3/2023

To

Fazli Subhan PST
GPS Manzari Cheena Tehsil Baizai .

SUBJECT: PERSONAL HEARING

Memo:

Reference to Show Cause Notice served upon you vide this office No.7091-96 dated 24/02/2023 and your reply received on 10/3/2023 is found unsatisfactory being devoid of any cogent and reliable document/proofs in terms of your defense.

You are, therefore, directed to appear for "Personal Hearing" under rule 15 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 amended in 31/12/2021 before the Competent Authority on 25/03/2023 at 11 a.m at the office of the District Education Officer (Male) Mohmand for final defense on your part if any.

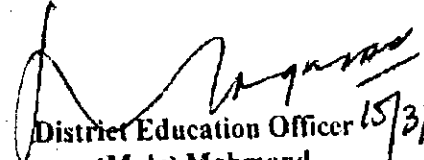
In case of failure, ex-parte action shall be taken against you under the rules it id.

(LIAQAT ALI)
District Education Officer
(Male) Mohmand


Encl: No & date: Even

Copy forwarded to the:-

- 1) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2) Deputy Commissioner Mohmand
- 3) District Accounts Officer Mohmand
- 4) Principal/SDEO HM concerned.
- 5) Office copy.


District Education Officer 15/3/2023
(Male) Mohmand

To D.A concerned for
doing the needful.

 17-03-2023
SDEO (M) Pnj. U.M



گورنمنٹ ہائیڈرو گریڈنگ اور سٹیٹس اسٹیٹس پبلک سروس

صوبہ خیبر پختونخوا (درخواست نمبر، ایکسٹرنل ریلیف سروس)

درخواست ذیل عنوان سے

مردانہ گزارش ہے کہ کل ایسے ڈیپوٹس 954 ہیں جن میں سے ایک کے لئے
 اسی دن کوئی ایجنسی فراہم نہیں کی گئی۔ اس کے علاوہ یہ ڈیپوٹس
 کئی چھ ماہ سے پہلے فارغ ہو چکے ہیں۔ اس لئے یہ ڈیپوٹس اب
 کے دفتر سے 500 ماہل کے ڈیپوٹس کے لئے درخواستیں
 تیار کرنا اور جاری کرنا چاہئے۔ یہ درخواستیں 28/12/2023
 کو تیار کی گئیں۔ تاہم یہ ڈیپوٹس اب بھی فراہم نہیں کیے گئے۔
 اس لئے اس بارے میں درخواستیں تیار کرنا چاہئے۔ اور اس کے لئے
 ڈیپوٹس شروع کرنے کے لئے اس بارے میں درخواستیں
 Repetitional Inquiry شروع کرنے کے لئے Show Cause نوٹس
 تیار کرنا چاہئے۔ اس کے علاوہ اس بارے میں درخواستیں
 تیار کرنا چاہئے اور اس کے لئے اس بارے میں درخواستیں
 فراہم کرنا چاہئے۔

اس لئے اس بارے میں درخواستیں تیار کرنا چاہئے
 یہ کہ یہ ڈیپوٹس فراہم نہیں کیے گئے۔ اس کے علاوہ
 یہ ڈیپوٹس ابھی فراہم نہیں کیے گئے۔ اس کے علاوہ
 اس بارے میں درخواستیں تیار کرنا چاہئے۔ اس کے علاوہ
 اس بارے میں درخواستیں تیار کرنا چاہئے۔ اس کے علاوہ

المسعود
 28/12/2023

اس کے لئے
 عمل سیکرٹری
 (Pst.) GPS
 تہ بند سٹیٹس

Handwritten signature and stamp



K (23)

**OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT MOHMAND**

Email:- deomohmand@gmail.com



OFFICE ORDER

1. Whereas Mr. Fazli Subhan PST GPS Manzari Cheena Tehsil Baizai was proceeded for having committed the following gross irregularities which constitute inefficiency under rule 3 (a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
2. And whereas he was reported for long absenteeism by EMA Mohmand and ASDEO after expiring of his EOL which was granted by the then DEO (M) Mohmand w.e.f 01/11/2021 to 31/10/2022. vide this office No.8142-45 dated 26/11/2021.
3. And whereas Show Cause Notice was served upon him vide this office No.7091-96/Estab(Pry) dated 24/02/2023 through SDEO concerned and his reply was received on 10/3/2023 vide this office Diary No 1847 which was found unsatisfactory.
4. And whereas another opportunity of Personal hearing was given to him vide this office No.7248 dated 15/03/2023 through SDEO concerned therein he was directed to appear before the Competent Authority on 25/3/2023 at 11:00 am.
5. And whereas he appeared before the committee constituted vide this office No 7343-44 dated 25/3/2023 for Personal hearing on the said date and confessed that he has been unable to perform his duty at present station.
6. And whereas the concerned SDEO submitted an updated report vide his office No 1837 dated 6/4/2023 that the said teacher has not resumed his duty after the expiring of his extra ordinary leave i.e. w.e.f. 1/11/2022 till date and also annexed the statement of the head teacher of GPS Manzari Cheena.
7. And whereas the competent authority, the District Education officer Mohmand, after having considered the charges, evidence on record and facts of the case, is of the view that the charge of wilful and unauthorized absence against the accused official has been proved.

By reasons of the above, he appears to be guilty of inefficiency under Rule-3(a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

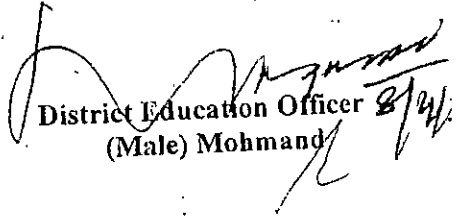
Now therefore, in exercise of the powers conferred under rule 4 (1) (b) (ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority (DEO Male Mohmand) is pleased to impose major penalty of "Removal from Service" upon Mr. Fazli Subhan PST GPS Manzari Cheena Tehsil Baizai with immediate effect.

(LIAQAT ALI)
District Education Officer
(Male) Mohmand

Endst No. 7482-86 / Estab (Pry)
Copy forwarded to the:

Dated 8/04/2023

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. DMO Education Monitoring Authority Mohmand.
3. SDEO concerned with the direction to recover the amount drawn illegally if any and deposit the same into the Govt. Exchequer as per rules.
4. Official concerned
5. Office Copy.


District Education Officer
(Male) Mohmand

جناب عالی! (درخواست برائے ملازمت)

موجودہ پندرہ سالہ عمر کے ہیں۔ (مجموعی طور پر)۔

24

اپنے علم کے مطابق کام کرنا چاہتا ہوں۔ اس سے پہلے میری پوسٹنگ DPS مظفر پور میں تھی۔ میں نے صرف 22/11/2023 کو ملازمت سے استعفیٰ دیا۔

1) میری اپنی علاقہ میں خاندانی دشمنی ہے۔ جن کا وجہ سے میری جان کو شدید خطرہ لاحق ہو گا۔ اور وجہ سے میں نے گزشتہ 14 سال سے ریٹائرمنٹ اختیار کر لی ہے۔

2) اس سلسلہ ذمہ داریوں کے وجہ سے میں نے 22/11/2023 تا 21/11/2023 تک سکول سے ریٹائر ہو گیا۔ جس کی تفصیل درخواست کے ساتھ منسلک ہے۔ دفتر انتظامیہ اور MU میں درخواستیں جمع کروائی ہیں۔

3) اس کے بعد جب چھٹی لوری ہوئی تو میں نے ایڈجسٹمنٹ کی درخواست اپنے سرکل انچارج کو بھیج دی۔ اور ساتھ میں یہ بھی بتایا کہ اس مذکورہ سکول میں میری جان کو خطرہ ہے۔ یہاں ایک دن بھی ٹھہرنا نہیں کر سکتا۔

4) میں نے انتہائی جھجھکیوں کے عالم میں اپنے سرکل انچارج کو استعفیٰ دینا کہا۔ جس کا وہ خود گواہ ہے۔

5) مجھے جتنے بھی نوٹس ملے ہیں۔ میں نے اس بھر پور جواب دیا۔ اور پرنسپل ڈیپارٹمنٹ کا DEO خود گواہ ہے۔

6) میری جی رہاں لیڈر میں ٹرانسفر میری تو DEO نے Reliving دینے کے بجائے میری ملازمت ختم کر دی۔

میرا ایک صاحب بھائی ہے۔ وہ ایک غیر بااثر آدمی ہے۔ میری اپنی موت نہیں ہے کہ میں اپنے دفتر انتظامیہ کے ساتھ عدالت جٹا لڑوں۔ میں اپنے لکڑ کاواہ کفیل ہوں۔ میری چار بیٹیاں اور دو بیٹے ہیں۔ والد کا بیمار ہے۔ میری 12 بہنیں ہیں۔ میرے لیے ان حالات میں گھر چلانا انتہائی مشکل ہے۔

میں ایک اعلیٰ تعلیم یافتہ نوجوان لیڈر میں ہاتھ لگا رہا ہوں۔ میری ملازمت ختم ہو گئی۔ میرا ایک صاحب بھائی ہے۔ وہ ایک بااثر آدمی ہے۔ میری اپنی موت نہیں ہے کہ میں اپنے دفتر انتظامیہ کے ساتھ عدالت جٹا لڑوں۔ میں اپنے لکڑ کاواہ کفیل ہوں۔ میری چار بیٹیاں اور دو بیٹے ہیں۔ والد کا بیمار ہے۔ میری 12 بہنیں ہیں۔ میرے لیے ان حالات میں گھر چلانا انتہائی مشکل ہے۔

اللہ اعلم

حفیظ سبحان ولد عبداللطیف

GPS مظفر پور

29/12/2023

Handwritten signature

بعدالت

جناب صدر محترم سپریم کورٹ
شمار

فصل سبھا
2 پنجاب
بنام

Appellant

مورخہ
مقدمہ
دعویٰ
جرم

Umar Farooq
Mohammad
A. H. C

B.C. 14-4822

باعث تحریر آنکہ

مقدمہ صدر درجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام صدر محترم سپریم کورٹ کیلئے عرضی روٹی مندرجہ ذیل
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
بھروسہ ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوفی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار 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 باختیارات حاصل ہوں گے
اور اس کا ساختہ پرداختہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

فصل سبھا
Ex-Part
GPS Talwar
Peshwa

الرقوم 27 ماہ مارچ 2024

الع دے واہ الع

مقام صدر محترم سپریم کورٹ کے لئے منظور ہے۔

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