Form- A

FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 356/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	13.05.2024	The implementation petition of Mr. Daud Jan submitted today Mr. Noor Muhammad Khattak Advocate. It is fixed for implementation report before Single Bench at Peshawar on .Original file be requisitioned. AAG has noted the next date. Parcha Peshi given to the counsel for the petitioner. By the order of Chairman REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 356 /2024
In
Appeal No. 698/2018

DAUD JAN **VS** **H.EDU: DEPTT:**

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PETITIONER

Through:

Noor Mohammad Khattak
Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 356 /2024
In
Appeal No. 698/2018

Mr. Daud Jan, Stenographer (BPS-16)
O/O Directorate of Higher Education Department,
Presently posted in Government Girls Degree College Yaka Ghund District Mohmand.

.....PETITIONER

VERSUS

1. The Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. The Secretary Establishment Department Khyber Pakhtunkhwa, Peshawar.
3. The Secretary Finance Department Khyber Pakhtunkhwa, Peshawar
4. The Secretary Higher Education, Archives & Libraries Department Khyber Pakhtunkhwa, Peshawar.
5. The Director of Higher Education Department Khyber Pakhtunkhwa, Peshawar.
6. The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.

..... RESPONDENTS

EXECUTION PETITION UNDER SECTION 7(2)(d) OF THE KP SERVICE TRIBUNAL ACT 1974, RULE 27 OF THE KP SERVICE TRIBUNAL RULES 1974 READ WITH SECTIONS 36 AND 51 OF THE CIVIL PROCEDURE CODE AND ALL ENABLING LAWS ON THE SUBJECT FOR THE IMPLEMENTATION OF THE JUDGMENT DATED 08/12/2020 IN LETTER AND SPIRIT.

R/SHEWETH:

1- That the petitioner filed service appeal bearing No. 698/2018 before this august Service Tribunal, against the inaction of the respondents by not allowing/granting proper seniority to the petitioner in the cadre of stenographer in the parent department of the appellant i.e Higher Education department.

2- That the appeal of the petitioner was finally heard on dated 08/12/2020 and as such the ibid appeal was accepted with the following terms by this august Service Tribunal:

In view of the situation, the instant appeal is accepted on the above terms with directions to the respondent No. 4 to place the appellant on the seniority position, he was holding in the seniority list prior to bifurcation of the department and to consider his promotions both of BPS-16 and 17 from the dates his other colleagues

were promoted with all consequential benefits. ". Copy of the judgment dated 08/12/2020 is attached as annexure.....**A**

3- That after obtaining copy of the judgment dated 08/12/2020 the same was submitted with the respondents for implementation of his grievance coupled with an application, but the respondents/ department failed to do so, which is the violation of the judgment supra.

4- That the respondent department filed Civil appeal No 1556/2021 against the Judgment dated 08/12/2020 but vide judgment dated 08.11.2023 the supreme Court upheld the Judgment of this august tribunal. Copy of the judgment dated 08.11.2023 is attached as annexure.....**B**

5- That in light of the Judgments of Supreme Court and Service Tribunal the secretary Higher Education directed the respondent No. 5 to implement the Judgments of Supreme Court and Service Tribunal but of no avail. Copy of letter darted 01.02.2024 is attached as annexure.....**C**

6- That petitioner having no other remedy but to file this implementation petition.

It is therefore, most humbly prayed that on acceptance of the instant execution petition the respondents may kindly be directed to implement the Judgment dated 08/12/2020 passed in Appeal No. 698/2018 in letter and spirit. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the petitioner.

PETITIONER

THROUGH:

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Mr. Daud Jan, Stenographer (BPS-16)O/O Directorate of Higher Education Department, Presently posted in Government Girls Degree College Yaka Ghund District Mohmand. do hereby solemnly affirm that the contents of this Execution Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

DEPONENT

WALI KHAN MOHMAND ADVOCATE Peshawar High Court
ATTESTED NOTARY PUBLIC

"A" -3- (I

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtukhwa Service Tribunal
Diary No. 742
Dated 21-5-2018

APPEAL NO. 698 /2018

Mr. Daud Jan, stenographer (BPS-16),
O/O the Directorate of Higher Education Department,
Presently posted in the O/O Director Education FATA,
FATA Secretariat, Warsak Road, Peshawar..... **APPELLANT**

VERSUS

1- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
4- The Secretary Higher Education, archives & Libraries Department, Khyber Pakhtunkhwa, Peshawar.
5- The Director of Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
6- The Director of Education FATA, FATA Secretariat, Warsak Road, Peshawar.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION -4 OF THE KHYBER PAKHTUNKHWA SERVICE ACT, 1974 AGAINST THE INACTION OF THE RESPONDENTS BY NOT ALLOWING/GRANTING PROPER SENIORITY TO THE APPELLANT IN THE CADRE OF STENOGRAPHER IN THE PARENT DEPARTMENT OF THE APPELLANT I.E. HIGHER EDUCATION DEPARTMENT AND NOT IMPLEMENTING THE CLEAR DIRECTIONS OF THE RESPONDENT No.2, 3 & 4 ISSUED VIDE LETTERS DATED 27.4.2018, 17.4.2018 & 7.5.2018 AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

Filed to day
Registrar 21/5/18

PRAYER:

That on acceptance of this service appeal the respondent No.5 may be directed to allow/grant proper seniority to the appellant in the cadre of Stenographer in the parent Department of the appellant i.e. Higher Education Department by implementing the directions of the respondent No.2, 3 & 4 issued vide letters dated 27.4.2018, 17.4.2018 and 7.5.2018. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

ATTESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALPESHAWAR

Service Appeal No.698/2018

Date of Institution: 21.05.2018
Date of Decision: 08.12.2020

Daud Jan Stenographer (BPS-16) O/O Directorate of Higher Education Department, presently posted in the O/O Director Education FATA, FATA Secretariat, Warsak Road Peshawar.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa and five others

... (Respondents)

Mr. Noor Mohammad Khattak
Advocate ... For Appellant

Muhammad Jan
Deputy District Attorney ... For Respondents

Mrs. ROZINA REHMAN ... **MEMBER (J)**
Mr. ATIQ UR REHMAN WAZIR ... **MEMBER (E)**

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

JUDGEMENT: -

Mr. ATIQ UR REHMAN WAZIR: - Appellant Mr. Daud Jan, stenographer of Education Department has assailed the inaction of the respondents by not allowing/granting proper seniority to the appellant in the cadre of Stenographers in the parent department of the appellant, not implementing the clear directions of the respondents No. 2, 3 & 4 issued vide letters dated 27-04-2018, 17-04-2018 & 07-05-2018 and against no action taken on the departmental appeal of the appellant within the statutory period of ninety days.

2. Brief facts of the case are that the appellant was initially appointed as stenographer on 22-11-1986(BPS-12) in the Directorate of Education (Colleges), subsequently allowed selection grade (BPS-15) on 15-05-1991. In 2002, his services

were placed at the disposal of Directorate of Education FATA, where he served until merger of FATA into the Province. The Higher Education Department promoted Assistants/ Stenographers to the post of Superintendent and the appellant was ignored, under the pretext that the appellant is not enlisted in any seniority list of stenographers in higher education department after his transfer to directorate of education FATA. The appellant preferred departmental appeal on 23-01-2018, which was processed at the level of Establishment Department, Finance Department and Higher Education Department with instructions to Directorate of Higher Education to place the appellant at the right position in the seniority list and process his case as per his request, but the Directorate of Higher Education did not respond, hence the instant service appeal.

ATTESTED

Khyber Pakhtunkhwa Service Tribunal, Peshawar

3. Written reply/comments were submitted by respondents.

4. Arguments heard and record perused.

5. Learned counsel for the appellant contended that the appellant was initially appointed as stenographer (BPS-12) on 22-11-1986 by the Directorate of Colleges and was awarded selection grade (BPS-15) with effect from 15-05-1991. Learned counsel for the appellant contended that the appellant served for eighteen years in the Directorate of Colleges and it was in the year 2002, when his services were placed at the disposal of Directorate of Education FATA. Services of the appellant were placed back at the disposal of Respondent No. 4 on 27-06-2013, but his arrival report was not accepted as his name was not available in the seniority list. It was also observed that the seniority of ministerial staff (BPS-5 to BPS-15) working on FATA side shall be maintained by the Directorate of Elementary & Secondary Education. In view of the situation, his services were placed at the disposal of Directorate of Elementary & Secondary Education on 09-08-2013, which also responded with the same observations that name of the appellant does not exists in the seniority list of steno typist working on their strength, hence the appellant remained posted at the strength of Directorate of Education FATA. The learned counsel for the appellant further argued that during the

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course, the appellant preferred numerous appeals to the high ups for his placement in the correct position in the seniority list of stenographers, but no heed was paid to his requests. In the meanwhile the appellant found that Respondent No. 4 promoted Assistants/Stenographers to the post of Superintendent (BPS-16) on 27-02-2014 and ignored the appellant inspite of the fact that the appellant stood at serial No. 9 of the provincial seniority list issued on 30-06-2001, whereas his junior, who were promoted on 27-02-2014 were at Serial No. 17, 20, 21 28 & 29 of the said seniority list. The learned counsel contended that Section 8(4) of the Civil Servant Act, 1973 provides that: "civil servants who are selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post". He further argued that Respondent No 4 deleted his name after placing his services at the disposal of the Directorate of FATA in 2001, which is contrary to rule 8(2) of Civil Servant Act,1973, which provides that: "Seniority of a civil servant shall be reckoned in relation to other civil servants belonging to the same service or cadre, whether serving in the same department or office or not". Feeling aggrieved, the appellant preferred appeals before the parent department for promotion and fixation of seniority at the right position but to no avail, hence the appellant preferred appeal before respondent No. 1 on 23-01-2018 for the same purpose, which was processed at the level of Respondents No. 2, 3 & 4 and after due deliberation, Respondent No 2 issued its advice to Respondent No 4 that since the appellant was appointed as stenographer in the directorate of education (Colleges) and subsequently placed his services at the disposal of directorate of education (FATA), his previous service as such has been with the Directorate of Education (Colleges) before bifurcation of department of School & Literacy, so directorate of Higher Education shall include his name in the seniority list in the cadre/service in the relevant position in light of Section-8(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-17(1)(a) of Khyber Pakhtunkhwa Govt. Servant (appointment, promotion & transfer) Rules, 1989. Respondent No. 4 communicated the advice of Respondent No. 2 to the Directorate of Higher Education for implementation, but the same was not

ATTESTED

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implemented, inspite of series of correspondence between respondent No. 4 & 5 including warnings to respondent No-5 for implementation of the directives. Learned counsel for the appellant further argued that inspite of clear directions, respondent No. 5 in utter disregard of law and rules is not willing do the same. That the appellant having no other remedy but to file the instant appeal. That the inaction of respondent No. 5 by not implementing the directions of respondent No. 2,3 & 4 regarding seniority of the appellant is against the law, facts and norms of natural justice. Learned counsel for the appellant further contended that respondent No. 5 now promoted the appellant as Senior Scale Stenographer (BPS-16) with immediate effect, who however was already in grade 16 on selection grade basis and if he had been granted promotion from 2014 to BPS-16 on regular basis like his other colleagues, he would have been in grade 17 like his other colleagues according to previous rules, whereas the case of appellant was processed under new rules, hence deprived the appellant of his valuable rights accrued to him at that particular time. Learned counsel for the appellant prayed that respondent No. 5 may be directed to allow/grant proper seniority to the appellant in the cadre of stenographers in the parent department of the appellant i.e. Higher Education Department by implementing the directions of the respondents No. 2, 3 & 4 issued vide letters dated 27-04-2018, 17-04-2018 and 07-05-2018 and grant him promotions from the dates his other colleagues were promoted.

ATTESTED

Khyber Service Tribunal Peshawar

6. The learned Deputy District Attorney appeared on behalf of official respondents contended that the appellant has a long history of protracted litigation under various pretext in the High Court, Supreme court of Pakistan as well as in this Tribunal. The learned Deputy District Attorney however admitted that the appellant was initially appointed on the strength of Directorate of Colleges, hence is employee of the Higher Education Department, but so far as promotion is concerned, promotion is always made to a post and not to a scale. That after bifurcation of School & Literacy Department in 2007 into Elementary & Secondary Education and Higher Education Department, a committee was constituted on 12-11-2007 to resolve the issues arising as a result of

bifurcation amongst the ministerial staff (BPS-5 TO 15) and the appellant was supposed to consult the said committee for resolution of his seniority issue, but he remained silent till 2014. He further contended that the appellant was stenographer in BPS-15 on selection grade, and was promoted to the post of Senior Scale Stenographer (BPS-16) on 11-12-2019 by respondent No. 5 as well as issued tentative seniority list of stenographer as stood on 24-02-2020, where the appellant is placed at Serial No. 1 of the seniority list. Now he will be on probation as per (Appointment Promotion & Transfer) Rules, 1989 and after completion of his probation period, can be considered for promotion to the next grade as per availability of post and seniority cum fitness. His promotion order and tentative seniority list were submitted to the Court. The learned Deputy District Attorney explained that the appellant wanted to be promoted from grade 15 to grade 17, which is not possible under the prevailing rule and law.

7. This Tribunal examined the facts and grounds mentioned in the memo of appeal and the documents annexed thereto as well as the Para wise comments of the respondents and the arguments of the learned counsel for the parties in detail. The Tribunal observed that until 2007, School & Literacy Department was a unified unit, holding Directorate of School & Literacy and Directorate of Colleges separately. The appellant was initially appointed dated 22-11-1986 on the strength of Directorate of Colleges and from his initial appointment onward, the appellant served the directorate until 2002, when his services were placed at the disposal of Directorate of FATA. Last joint seniority list pertaining to the year 2001 in respect of stenographers, issued to this effect and available on record shows name of the appellant at Serial No. 9, where after his name was deleted from the seniority list by respondent No. 5 with understanding that now his seniority will be maintained at the level of directorate of FATA, not knowing the fact that all employees working in the directorate of FATA and even in the whole FATA Secretariat to this effect, belong to the Province and are considered as on deputation, but without deputation allowance as per policy. Such employees having their own parent departments in the province, where seniority, promotion and other

ATTESTED

EX... R
Khyber ... Tribunal
Peshawar

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allied issues of their service are taken care of at the level of their parent department. In the nutshell, the appellant was employee of Directorate of Colleges (Now Directorate of Higher Education) after bifurcation of School & Literacy Department. In case of the appellant, respondent No. 5 violated Section 8 (2) of the Civil Servant Act 1973, by deleting his name from the seniority list, which however was incumbent upon respondent No. 5 to maintain his seniority at the level of his directorate as per provisions contained in Section 8(2) of Civil Servant Act 1973.

In 2007, School & Literacy Department bifurcated into two Departments i.e. Department of Elementary & Secondary Education and Higher Education Department with separate Directorates as such. As per formula devised for the purpose, seniority of ministerial staff (BPS-5 to 15) belonging to college side will be dealt with by the Directorate of Higher Education, but the directorate disowned the appellant, when he was repatriated back in 2013 to his parent department with the understanding that since his services were placed at the disposal of Directorate of Education FATA, hence his seniority shall be maintained by the directorate of elementary and secondary education, whereupon he knew that his name is not available in the seniority list either of Directorate of Elementary & Secondary or Higher Education Department, as both the directorates refused to adjust him due to non-availability of his name on their list. Simultaneously the Directorate of Higher Education promoted his colleagues to BPS-16, which further aggravated the issue and the appellant agitated the issue at various forums. Respondent No. 4 after obtaining advice from Establishment Department realized that request of the appellant being genuine need to be inserted in the correct position and for the purpose directed respondent No. 5 that the name of the appellant shall be included in the seniority list in the cadre/service in the relevant position in light of Section 8(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with Rule 17(1)(a) of Khyber Pakhtunkhwa Govt. Servant (Appointment, Promotion & Transfer) Rules 1989. In order to conceal its own omission, respondent No. 5 was still adamant defending his earlier stance. On the other hand, respondent No. 4 in a series of

ATTESTED

Khyber Pakhtunkhwa Service Tribunal Peshawar

correspondence finally directed that failure in implementation of the directives would entail penal consequences, but still the respondent No. 4 failed to comply with the orders in its true spirit. Finally, respondent No. 4 constituted a committee under the chair of Special Secretary Higher Education Department with representative from respondent No. 5 to resolve the issue of inclusion of appellant in the seniority list in relevant place and promotion to the post of superintendent. The forum observed that due to non-inclusion of his name in the relevant position, the appellant was deprived of his due right for a long period of seven years. Last Para of the report is reproduced as under: "after threadbare discussion, the forum unanimously decided to give the due right of seniority to the appellant in light of Establishment Department, Finance and Elementary & Secondary Education Department advice subject to the condition that he will withdraw his appeal pending before Service Tribunal. The forum also directed Director Higher Education to immediately include/place his name at the appropriate position in the seniority list in light of Establishment Department advice and notify the same within one week positively without fail. The Director Higher Education shall submit working paper for promotion of the appellant, Mr. Daud Jan, stenographer within two days of the issuance of seniority list to DPC". Respondent No. 4 again did not place the appellant in the relevant position in the seniority list, as by doing so he would have face issues like his promotion from the date, when his other colleagues and juniors were promoted to BPS-16 in 2014 and again promotion to BPS-17, the way his other colleagues were promoted, so to avoid such complications, the appellant was promoted to BPS-16 on 11-12-2019, which was required to be on 27-02-2014, when his other colleagues and juniors were promoted. Equity demands that the appellant shall travel together with his colleagues as reflected in the last seniority list issued in 2001, where name of the appellant was at Serial No. 9, but obstinate approach of respondent No. 4 deprived the appellant from his rightful claim of seniority as well as promotions, hence subjected the appellant to resort to the instant litigation.

ATTESTED

Khyber Pakhtunkhwa Service Tribunal Peshawar

8. In view of the situation, the instant appeal is accepted on the above terms with directions to the respondent No. 4 to place the appellant on the seniority position, he was holding in the seniority list prior to bifurcation of the department and to consider

his promotions both of BPS-16 and 17 from the dates his other colleagues were promoted with all consequential benefits. No orders as to costs. File be consigned to record room.

ANNOUNCED
08.12.2020

(ROZINA REHMAN)
MEMBER (J)

(ATIQ UR REHMAN WAZIR)
MEMBER (E)

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

Bench
Mr. Justice Jamal Khan Mandokhail
Mr. Justice Muhammad Ali Mazhar

Civil Appeal No. 1556/2021 & CMA No. 212-P/2021
(Against the judgment dated 08.12.2020 of the KPK Service Tribunal passed in Service Appeal No. 698/2018)

Government of Khyber Pakhtunkhwa thr. Chief Secretary, Peshawar and others ***...Appellant(s)***

Versus

Daud Jan and another ***...Respondent(s)***

For the Appellant(s): Mr. Zahid Yousaf Qureshi, AOR

For the Respondent(s): Mr. Zulfikar Khalid Maluka, ASC (R-1)

Date of Hearing: 08.11.2023

ORDER

Jamal Khan Mandokhail, J. The learned counsel for the appellants states that the judgment of the Khyber Pakhtunkhwa Service Tribunal, Peshawar has been implemented pursuant to which the respondent No. 1 has been promoted to BPS-16 on 11.12.2019 and to BPS-17 on 06.07.2023.

In view of the above, the petition and the CMA stand disposed of.

Sd/-J
Sd/-J

Certified to be True Copy

Senior Court Associate
Supreme Court of Pakistan
Islamabad

SUPREME COURT OF PAKISTAN

GR No. 2174/23 Civil/Criminal
Date of Presentation: 15-11-23
No of Words 360
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08th November, 2023
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ATTESTED

GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND LIBRARIES DEPARTMENT

NO.SO(C-IV)/HED/19-7/ Dawood Jan/Supdt/Court Case/promotion/2023
Dated Peshawar the, **February 1, 2024**

To

The Director,
Higher Education, Khyber Pakhtunkhwa.

SUBJECT: **IMPLEMENTATION OF COURT JUDGMENT IN CIVIL APPEAL 1556/2021 ALONGWITH CMA NO. 212-P/2021**

I am directed to refer your letter No. 413/CA-VII/Estt: Branch/A-167/Dawood Jan Steno Fata dated 23.01.2024 on the subject noted above and reproduce the conclusion para of the judgement dated 08.12.2020 of the Service Tribunal Khyber Pakhtunkhwa as under:-

2. In view of the situation, the instant appeal is accepted on the above terms with the direction to the respondent No. 04 i.e Secretary HED to place the appellant on the seniority position, he was holding in the seniority list prior to bifurcations of the department and to consider his promotion both of (BPS-16) and (BPS-17) from the dates his other colleagues were promoted with all consequential benefits.

3. The learned Counsel/Advocate on record stated at the Bar before the Apex Supreme Court that the judgement dated 08.12.2020 of Khyber Pakhtunkhwa, Service Tribunal Peshawar has been implemented vide judgement dated 08.11.2023 of the Apex Supreme Court of Pakistan.

4. It is, therefore, requested that in the light of judgement of Service Tribunal, Khyber Pakhtunkhwa dated 08.12.2021 and Apex-Supreme Court of Pakistan dated 08.11.2023 may be implemented and his seniority position be placed on proper place with his colleagues and the same seniority list may be furnished to this office for the perusal of competent authority, In case of failure, if the petitioner file contempt of Court in the Supreme Court of Pakistan the responsibility be fix at your end, please.

(ZAHID KAMAL)
SECTION OFFICER (C-IV)

Endst of Even No. & Date

Copy forwarded for information to the:-

1. P.S to Secretary, Higher Education Department.
2. Master File.

ATTESTED

SECTION OFFICER (C-IV)

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Execution No ____/2024

Daud Jan (APPELLANT) (PLAINTIFF) (PETITIONER)

VERSUS

Govt of KPK etc (RESPONDENT) (DEFENDANT)

I/We Daud Jan

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

Dated.____/____/202

CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

WALEED ADNAN

UMAR FAROOQ MOHMAND

&

MEHMOOD JAN
ADVOCATES

OFFICE:
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(0311-9314232)