


Form- A
FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 654 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	02.07.2024	<p>The implementation petition of Mr. Bahadar Khan received today by registered post through Mr. Abdul Aziz Tanoli Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on - 25.07.2024. Original file be requisitioned. AAG has noted the next date. Counsel for the petitioner has been informed telephonically.</p> <p>By the order of Chairman  REGISTRAR</p>

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

CHECK LIST

Bahadar Khan

Versus

Gaul of JPK

..... Appellant

..... Respondents

S No	CONTENTS	YES	No
1. 1	This petition has been presented by Abdul Aziz Advocate High Court	✓	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed he requisite documents?	✓	
3.	Whether appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned	NIL	
5.	Whether the enactment under which the appeal is filed correct	NIL	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested b competent Oath Commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished ?	NIL	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to AG/DAG	✓	
14.	Whether Power of Attorney of the Counsel engaged engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cutting/overwriting?	No	
17.	Whether list of books has been provided at the end of the appeal?	No	
18.	Whether case is relate to this court	Yes	
19.	Whether requisite number of spare copies attached?	Yes	
20.	Whether complete spare copy is filed in separate file cover	✓	
21.	Whether addresses of parties given are complete?	Yes	
22.	Whether index filed?	Yes	
23.	Whether index is correct	Yes	
24.	Whether security and process fee deposit? on _____	Yes	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 rule 11, notice along with copy of appeal and annexures has been to respondents? on _____	Yes	
26.	Whether copies of comments/reply/rejoinder submitted? On _____	No	
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	No	

it is certified that formalities/documentation as required in the above table have been fulfill

Name:- *Abdul Aziz Advocate*

Signature:- *[Signature]*

Dated:- *27/6/2024*

**BEFORE THE SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Execution Petition Service Appeal No. 3492/2021
No 654/2024

Bahadur Khan Son of Ali Gohar Khan Resident of Nasir Bagh
Dharian, P.O Bandi Go, Tehsil and district Battagram.

...Petitioner

Versus

Government of KPK through Secretary Elementary and Secondary
Education Peshawar and others.

...Respondents

EXECUTION PETITION

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S.#	Description	Page no	Annexure
1	Service Appeal	1-3	
2	Affidavit	4	
3	Copy of the judgment dated 23-10-2023	5-10	"A"
4	Copy of retirement order	11	"B"
5	Copy of the application	12	"C"
6	Copy of initial appointment order of petitioner	13	"D"
			"E"
7	Wakalatnama	14	

[Signature]
APPLICANT

Through,

Date *27/6/2024*

[Signature]
(Abdu Abdul Aziz Tanoli)
Advocate High Court
Abbottabad

①

**BEFORE THE SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Execution No: 654
Dated 02-07-2024
Service Appeal No 3492/2021

Bahadur Khan Son of Ali Gohar Khan Resident of Nasir Bagh
Dharian, P.O Bandi Go, Tehsil and district Battagram.

.....Petitioner/ Applicant

Versus

1. Government of Khyber Pakhtunkhwa, through secretary elementary and secondary education Peshawar.
2. District Education Officer elementary and secondary education male primary Battagram.
3. District Account Officer Battagram.

.....Respondents

**EXECUTION PETITION FOR IMPLEMENTATION OF
JUDGMENT PASSED IN SERVICE APPEAL NO.
3492/2021 DECIDED ON 23-10-2023 BY THIS HON'BLE
TRIBUNAL.**

PRAYER:

It is therefore humbly prayed that on acceptance of instant implementation petition the Respondent Department may kindly be directed to issue the Service /Pension benefits of the Applicant/Petitioner as per Judgment passed by this Hon'ble Tribunal in Service Appeal No. 3492/2021, failing which Contempt proceeding may be initiated against the Respondents to punish them.

Respectfully Sheweth,

The Petitioner/Applicant very humbly submits as under:

1. That the Petitioner/Applicant file Service Appeal NO 3492/2021 before this Hon'ble Tribunal.
2. That the appeal of the Applicant is decided by this Hon'ble Tribunal on 23-10-2023. Wherein the Appeal of the Appellant is accepted/allowed to the extent that the Appellant are allowed counting of their service from the date of promulgation of KPK Said Employ's (Appointment Act 2012) only for the payment of pension benefits. *Copy of the judgment dated 23-10-2023 of this Hon'ble Tribunal is annexed as annexure A.*
3. That the Petitioner/Applicant got retired from his service as SPST teacher BPS 14 on 03-03-2023. *Copy of retirement order is annexed as annexure B.*
4. That after the decision of Service Appeal of Appellant the Petitioner approach the Respondent for counting of his service with effect from promulgation of KPK said Employee's (Appointment Act 2012) as per judgment passes by this Hon'ble Tribunal on 23-10-2023 moved an application along with copy of judgment passed by this Hon'ble Tribunal on 08-12-2023. *Copy of the application is annexed as annexure C.*
5. That the Applicant time and again approach the Respondent's Department for release of his pension by counting his service as per judgment passed by this Hon'ble Tribunal but initially the Respondent's Department play delaying tactics and finally couple of days before, refused to Applicant. Hence the instant implementation is being filed before this Hon'ble Tribunal.
6. That noncompliance of the judgment passed by this Tribunal by Respondent's Department is clear violation of verdict laid down by this Hon'ble Tribunal.
7. That the Respondent's Department deliberately refused to release the pension benefits to the Applicant and floated the judgment of this Hon'ble Tribunal, hence committed contempt of Court. Therefore liable to be proceed under the law.
8. That the present implementation petition is well with in time.

PRAYER:

It is therefore humbly prayed that on acceptance of instant implementation Petition the Respondent Department may kindly be directed to issue the Service /Pension benefits of the Applicant as per judgment passed by by this Hon'ble Tribunal in Service Appeal No. 3492/2021, failing which Contempt proceeding may be initiated against the Respondents to punish them.

Petitioner /Applicant

Through

(Abdul Aziz Tanoli)

Advocate High Court

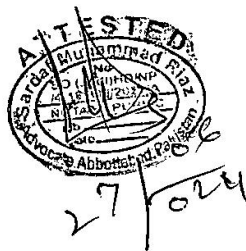
Abbottabad

Dated 27-6-2024

VERIFICATION:

Verified on oath that the contents of foregoing Implementation Application are true and correct to the best of my knowledge and belief and nothing has been mis-stated or concealed from this Honourable Tribunal.

Dated 27-6-2024



Petitioner /Applicant:



حکومت پاکستان

قومی شناختی کارڈ

13202-0775206-3



ساز خان

نام
جنس

والد کا نام
علاقہ

شناختی علامت
پہرے پر لکھیں

عثمان یوسف حسین

تاریخ پیدائش: 01/04/1963

دستخط حامل کارڈ

دستخط رجسٹرار جنرل



شناختی نمبر: 3-0775206-13202 خانہ نمبر: T2F9KF

موجودہ پتہ: ناصر باغ، دستریاں، ڈاکخانہ ہائڈریو، تحصیل و ضلع بگرام

برائے شناختی نمبر 12488031282

منسقل پتہ: ایضاً



تاریخ اجراء: 30/06/2020 تاریخ تسخیر: تاحیات
گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں



(4)

**BEFORE THE SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Execution in

Service Appeal No 3492/ 2021

Bahadur Khan Son of Ali Gohar Khan Resident of Nasir Bagh
Dharian, P.O Bandi Go, Tehsil and district Battagram.

....Petitioner

Versus

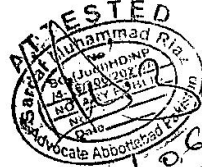
Government of KPK through Secretary Elementary and Secondary
Education Peshawar and others

...Respondents

EXECUTION PETITION

AFFIDAVIT

I *Bahadur Khan Son of Ali Gohar Khan Resident of Nasir Bagh Dharian, P.O Bandi Go, Tehsil and District Battagram.(Appellant)*, do hereby affirm and declare that the contents of instant Implementation Application are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.



Bahde

DEPONENT

Dated 27-6-2024

Service Appeal No.3492/2021 filed "Bahadur Khan & others vs- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar and others". Declared on 23.10.2023 by Division Bench comprising of Mr. Kalim Arshad Khan Chairman and Miss. Fareeha Paul, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar at Camp Court, Abbottabad.

(S)



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR
AT CAMP COURT, ABBOTTABAD

BEFORE: **KALIM ARSHAD KHAN** ... CHAIRMAN
FAREEHA PAUL ... MEMBER(Executive)
Service Appeal No.3492/2021 *Annex 'A'*

Date of presentation of Appeal.....18.02.2021
Date of Hearing.....23.10.2023
Date of Decision.....23.10.2023

Mr. Bahadur Khan, Son of Gohar Khan, Resident of Nasir Bagh Dharian, P.O Bandi Go, presently serving as SPST Tehsil & District Battagram.....(Appellant)

Versus

1. **Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.**
2. **Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.**
3. **District Education Officer, Elementary & Secondary Education (Male) Battagram**
4. **District Accounts Officer, Battagram.....(Respondents)**

Service Appeal No.3493/2021

Date of presentation of Appeal.....18.02.2021
Date of Hearing.....23.10.2023
Date of Decision.....23.10.2023

Nowsherawan son of Noor Ul Hassan, presently serving as SPST GPS Tehsil & District Battagram.....(Appellant)

Versus

1. **Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.**
2. **Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.**
3. **District Education Officer, Elementary & Secondary Education (Male) Battagram.**
4. **District Accounts Officer, Battagram.....(Respondents)**

Service Appeal No.3494/2021

Date of presentation of Appeal.....18.02.2021
Date of Hearing.....23.10.2023
Date of Decision.....23.10.2023

ATTESTED

[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

[Handwritten mark]

Service Appeal No.3492/2021 titled "Bahadur Khan & others -vs- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar and others", declared on 23.10.2023 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Miss. Farzeha Paul, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar at Camp Court, Abbottabad.

- 2. **Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.**
- 3. **District Education Officer, Elementary & Secondary Education (Male) Battagram.**
- 4. **District Accounts Officer, Battagram.....(Respondents)**

Present:


Mr. Abdul Aziz Tanoli, Advocate.....For the appellants
 Mr. Asif Masood Ali Shah Deputy District Attorney.....For respondents

CONSOLIDATED JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Through this single judgment all the above appeals are going to be decided as all the five are similar in nature and almost with the same contentions, therefore, all can conveniently be decided together.

2. Facts of the cases of the appellants, gathered from memorandums and grounds of appeals are that appellants were appointed in the years 1994-95 & 1996; that they were terminated from service vide orders dated 28.07.1997; that after announcement of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012, they were required to be reinstated in service but the appellants were not appointed accordingly, therefore, they filed Writ Petition before the Peshawar High Court for their appointment under the said Act; that as per judgment of the Peshawar High Court, they were appointed in the year 2013 but their previous service benefits were denied by the respondents; that feeling aggrieved, they filed departmental appeals, but fiasco, hence the instant service appeals.

3. On receipt of the appeals and their admission to full hearing, the respondents were summoned, who put appearance and contested the

ATTESTED

 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

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Service Appeal No.3492/2021 titled "Bahadur Khan & others vs- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar and others", declared on 23.10.2023 by Division Bench comprising of Mr. Kafun Arshad Khan, Chairman, and Miss. Fuzeha Paul, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar at Camp Court, Abbottabad.

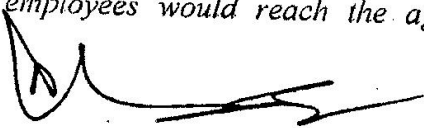
appeal by filing written reply raising therein numerous legal and factual objections. The defense setup was a total denial of the claim of the appellants.


4. We have heard learned counsel for the appellants and learned Deputy District Attorney for the respondents.

5. The learned counsel for the appellants reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned Deputy District Attorney controverted the same by supporting the impugned order(s).

6. This Tribunal vide its consolidated judgment passed in Service Appeal No.572/2019 titled "Muhammad Haroon VS. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar & others" decided on 18th March, 2021, while dealing with almost similar case, has found as under:

"6. From the record it is evident that appellants and others who were appointed back in 1994-95 were terminated in 1996-97. Sacked Employees (Appointment) Act, 2012 was specifically promulgated to extend relief to such sacked employees. Appellants were not considered for the reason best known to the respondents. The respondents, however, considered other similar cases just after promulgation of the Act *ibid* which was discriminatory on the part of respondents. It was upon the intervention of the Hon'ble Peshawar High Court that appellants were reinstated at a belated stage in 2017 but with immediate effect. The main concern of the appellants is that such employees would reach the age of superannuation before earning



ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

9

Service Appeal No.3492/2021 titled "Bahadur Khan & others -vs- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar and others", declared on 23.10.2023 by Division Bench comprising of Mr. Kullu Arshad Khan, Chairman, and Miss. Fareeha Paul, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar at Camp Court, Abbottabad.

qualifying service for pensionary benefits. We have observed that appellants had possessed all the qualifications as prescribed in the Act like others. It is also on record that co-employees tried their level best for back benefits and their cases were dismissed by this Tribunal as their earlier stance was to get all service benefits. Feeling aggrieved from the judgment of this Tribunal CPLAs were filed in the Apex Court and relief of back benefits to co-employees was refused by the Apex Court too. However, Apex Court allowed counting of their service for the protected period for payment of pensionary benefits. The present appellants have a strong case as they had every right to be reinstated just after promulgation of the Act as they were having requisite qualification as prescribed in the Act. Their claim was accepted by the august High Court and reinstatement was ordered.

7. The present appellants have also prayed for all service back benefits with a request for counting of their service for the protected period in the light of judgment of the Apex Court which was passed in the case of co-employees. So, from the record, it is crystal clear that after promulgation of an Act in the year 2012, appointment order of the appellants were issued in the year 2017 and that too, on the directions of the august High Court. No doubt, similar appeals of the sacked employees were dismissed regarding the back benefits but the Apex Court allowed the co-employees counting of their service for the protected period for payment of pensionary benefits only. Case of the present appellants is at par with those sacked employees who were granted this benefit by the Apex Court, therefore, these appeals are

ATTESTED

CHIEF CLERK
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



(10)


Service Appeal No.3492/2021 titled "Bahadur Khan & others -vs- Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar and others", declared on 23.10.2023 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Miss. Fareeha Paul, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar at Camp Court, Abbottabad.

accepted to the extent that the appellants are allowed counting of their services from the date of promulgation of the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 only for payment of pensionary benefits. No order as to costs. File be consigned to the record room."

7. As the prayer of the appellants in the present service appeals is also the same as was in the above mentioned service appeals, which had been granted to those appellants vide the above mentioned judgment. Therefore, appellants in the instant service appeals are also entitled for counting of service for protected period and for payment of pensionary benefits only. Case of the present appellants is at par with those sacked employees who were granted this benefit by the Apex Court, therefore, these appeals are accepted to the extent that the appellants are allowed counting of their services from the date of promulgation of the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 only for payment of pensionary benefits. (Copy of this judgment be placed on file in the connected service appeals). Consign.

8. *Pronounced in open Court at Camp Court, Abbottabad and given under our hands and the seal of the Tribunal on this 23rd day of October, 2023.*


KALIM ARSHAD KHAN
Chairman


FAREEHA PAUL
Member (Executive)

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 04-12-2023
Number of Words 5/1
Copying Fee 25/1
Urgent 5/1
Total 5/1
Name of Copyist _____
Date of Completion 04/12/23
Date of Delivery 04/12/23



**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT BATTAGRAM**



Email: emisbattagram@gmail.com



esembattagram

0997543540-539



RETIREMENT SANCTION (SACKED EMPLOYEE) ON SUPERANNUATION

Annex 'B'

Whereas, Mr. Bahadar Khan SPST B-14 GPS Bandigo was appointed as Primary Teacher (PT) by the then DEO (M) Sec/Pry Battagram office order No. 27 under Endstt No. 1546-41, Dated. 29-11-1994 at Serial No.9 at GMPS Kiar Gali Umara Khan.

2. And whereas, he performed his duties regularly for the period w.e.f 30-11-1994 to 27-7-1997 (2 Years, 7 Months and 27 Days).
3. And whereas, he was terminated from Govt Service w.e.f 28-7-1997 Vide DEO (M) Battagram under Endstt No. 2414-18 Dated. 28-7-1997 at Serial No. 69. (Termination Period: 15 Years 6 Months and 18 Days [Service Break Period] and previous service declared as E.O.L {Leave Without Pay}).
4. And whereas, in the light of Khyber Pakhtunkhwa Sacked Employees Act No. XVII and Peshawar High Court Abbottabad Bench Judgment Dated. 17-1-2013, he was appointed as Primary School Teacher at GPS Kanai Allai Battagram under terms and Conditions mentioned in the Act, vide DEO (M) Battagram Endstt No. 7825-31, Dated. 15-2-2013 (4 Years, 11 Months and 16 Days).
5. And whereas, in the light of Terms and Conditioned mentioned in the appointment order of the above teacher at Serial No. 7, he was terminated from Govt Service Vide DEO (M) Battagram Endstt No. 1305-10, Dated. 31-1-2018, due to less qualification.
6. And whereas, he was re-instated into Govt Service by acceptance his appeal by the Director E&SE Peshawar, vide DEO (M) Battagram Endstt No. 4731-36, Dated. 30-4-2019 (Intervening Period: 1 Year. 3 Months and 28 Days[Service Break Period]).
7. And whereas, he performed his duties regularly w.e.f. 30-4-2019 to 31-3-2023 (3 Years, 9 Months and 1 Day).
8. And Whereas, his service detail is mentioned as below;

S No	Spell	Para	Years	Months	Days	Remarks
1	1 st Spell	No. 2	2	7	27	
2	2 nd Spell	No. 4	4	11	16	
3	3 rd Spell	No. 7	3	9	1	
GRAND TOTAL			11 Years	4 Months	14 Days	

9. Now, Therefore, In Pursuance of section-13 (I) of Khyber Pakhtunkhwa Civil Servants, Act, 1973 (Khyber Pakhtunkhwa Act, No XVIII of 1973), Mr. Bahadar Khan SPST B-14 GPS Bandigo Battagram (EMIS.26301) Personal No: 00699253 CNIC No. 13202-0775206-3 stands retired from Government Service on superannuation basis w.e.f. 31-3-2023 (AN), along with LPR of 104 days admissible to him under rules and policy.

Note

Necessary entry should be made in his Service Book accordingly.

1. His length of service (with two breaks) is 11 years 4 Months 4 days.
2. His DOB is 01-04-1963.
3. Recovery of over payment if any be made from the official concerned.

(Hafiz Muhammad Nawaz)
District Education Officer (M)
Battagram
Dated: 18/05/2023

[Signature]
Sub Divisional
Education Officer (M)
Battagram

Endstt:No. 4010-14 /Estab/Pry

Copy for information to the:

1. Sub Divisional Education Officer (M) Battagram with reference to your office letter No.1526 Dated: 20-03-2023 along with original service Book of above mentioned Teacher.
2. District Accounts Officer Battagram, with request to check all orders/notifications referred above while processing the case for financial benefits.
3. Official Concerned.
4. DMO EMA Battagram.
5. Office Copy.

[Signature]
17/05/2023
District Education Officer (M)
Battagram

Attched
[Signature]
27/6/2023

محترم صاحب ڈسٹرکٹ ایجوکیشن آفیس ایف ڈی ایف ایف

(12)

لا C Annex

دو فراہم ہونے والے شمارے کے بارے میں مسائل
30¹¹/₁₉₉₄ تا 31³/₂₀₂ کے متعلق درخواست و کلمات

صاحب عالی مسائل 30¹¹/₁₉₉₄ کو ایجوکیشن ڈسٹرکٹ میں
مقرر ہوئے۔ اور مسئلہ ایجنڈے میں آتا ہے اور کہہ رہے ہیں
ہذا سیکشن 5(a) کے تحت درخواست مقرر ہوئی ہے۔

صاحب عالی مسائل کے سابقہ سرورسنگ کی اطلاع طلب کی گئی
مقرر ہونے والے فراہم ہونے والے سرورسنگ کی اطلاع طلب کی گئی
اسپیکٹ 3492/2021 کے تحت مسائل کو پیش کرنے پر
درخواست و کلمات کی اطلاع طلب کی گئی

تاریخ 11¹²/₂₀₂₃

صدر دفتر ایف ڈی ایف ایف
Bakde

Attested
27/6/2024

(13)

(10)

Annex

Attested
27/6/2024

3

Note:—The entries in this page should be renewed or re-attested at least every five years and the sig lines 9 and 10 should be dated.

1. Name BAHADER KHAN

2. Race ... SWATI ...

3. Residence Village Dahnian P.O. Banchigo
Teh: & Distt: Battagram.



4. Father's name and residence ... ALI GOHER KHAN.



5. Date of birth by Christian era as nearly as can be ascertained (01-04-1963)
1st April N.H. & Sixtythree.

6. Exact height by measurement 5' - 10"

7. Personal marks for identification ... Scar mark on left cheek

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger.  Ring Finger 


Middle Finger  Fore Finger 

Thumb. 

9. Signature of Government servant:

10. Signature and designation of the Head of the Office, or other Attesting Officer.

Prepared by Abdul Kaim


M. A. ...
Distt. Education Officer
Battagram (Mansobra)

31 SE
5
ending
01

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. EMPS		Grade - 1480 - 81 - 2695				30/11/94	[Signature]
Kiargali Unaided EMPS	P.T./Temp		1480	Fixed		5/12/94	[Signature]
Jabna - do -	- do -		1480	Fixed		1/12/95	
			1480			1/12/96	

Attested
27/6/2024
[Signature]

114

114

کورٹ فیس

وکالت نامہ

بعدالت: صاحب سرور سٹریٹ ٹینڈل حسین بختو نچوال پشاور

عنوان: بیاد خان نام گورنمنٹ حسین بختو نچوال

منجانب: بیشمن

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام حسبہ السنہ بن خاں اہلو کدیت کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پلانٹ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوگا۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تا کہ سند رہے۔

بیاد خان
Bhata

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