


ORDER  
3<sup>rd</sup> Nov. 2023

**Kalim Arshad Khan, Chairman:** Learned counsel for the appellant present and heard.

2. Learned counsel for the appellant states that despite being senior to private respondent No.6, the appellant was deferred from promotion made vide order dated 17.02.2023 against which, he filed appeal on the same date. Learned counsel admits that against the impugned promotion order made on 17.02.2023, the appellant ought to have moved departmental representation before the appellate authority, who is Commissioner in this case but the appellant, inadvertently, has not done that. He requests that this service appeal may be converted into departmental representation and be sent to the Commissioner, Malakand Division, Swat, for decision in accordance with law.

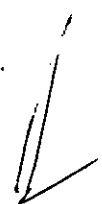
3. In view of the request, the instant service appeal is treated as departmental representation and be sent to the Commissioner Malakand Division (Respondent No.4) for decision in accordance with law, within statutory period, where-after, if the appellant felt himself aggrieved, he may come to the Tribunal and in case he comes to the Tribunal and files fresh appeal, that would be decided on its own merits and subject to all legal objections etc. Consign.

4. *Pronounced in open Court at Peshawar and given under my hand and seal of the Tribunal on this 3<sup>rd</sup> day of November, 2023.*

  
(Kalim Arshad Khan)  
Chairman

13.07.2023

Learned counsel for the appellant present and requested for adjournment on the ground that he has not made preparation of the brief. Adjourned. To come up for preliminary hearing on 03.08.2023 before S.B. Parcha Peshi given to learned counsel for the appellant.



(Muhammad Akbar Khan)  
Member (I)

SCANNED  
KPST  
Peshawar

\*Kamranullah\*

03.08.2023

Nemo for the appellant.

On 21/09/23 appellant was informed telephonically for the date fixed (25/09/23) hearing on 25.09.2023 before S.B.

Notice be issued to the appellant and his counsel to attend the court on the next date. Adjourned. To come up for preliminary hearing on 25.09.2023 before S.B.



(Muhammad Akbar Khan)  
Member (I)

SCANNED  
KPST  
Peshawar

Mohammad

\*Kamranullah\*

25<sup>th</sup> Sept. 2023

01. Nemo for the appellant.

02. Notice be issued to the appellant and his counsel as last chance. To come up for preliminary hearing on 03.11.2023 before the S.B.



(FAREEHA PAUL)  
Member (E)

SCANNED  
KPST  
Peshawar

On 1/11/23, counsel was informed telephonically for the date fixed (03/11/23)

\*Fazle Subhan, P.S\*


01/05.2023

Appellant in person present.

He made a request for adjournment as his counsel is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 08.06.2023 before S.B at Camp Court, Swat. Parcha Peshi given to the appellant.

**SCANNED  
KPST  
Peshawar**

\*Mutazem Shah\*

  
(Rozina Rehman)  
Member (J)  
Camp Court, Swat


08.06.2023

Clerk to counsel for the appellant present.

Lawyers are on strike, therefore, case is adjourned. To come up for preliminary hearing on 05.07.2023 before S.B at camp court Swat. Parcha Peshi given to clerk to counsel for the appellant.

**SCANNED  
KPST  
Peshawar**

\*Kamranullah\*


  
(Muhammad Akbar Khan)  
Member (E)  
Camp Court, Swat

05<sup>th</sup> July, 2023 01. Nemo for the appellant.

02. Notice be issued to the appellant and his counsel as last chance. To come up for preliminary hearing on 07.09.2023 before the S.B at Camp Court, Swat.

**SCANNED  
KPST  
Peshawar**

\*Fazle Subhan, P.S\*



  
(Fareeha Paul)  
Member(E)  
(Camp Court, Swat)

Form-A

FORM OF ORDERSHEET

Court of \_\_\_\_\_

Case No. 542/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	13.03.2023	<p>As per direction of the Worthy Chairman the present appeal is fixed for preliminary hearing and decision on office objections before touring Single Bench at Swat on <u>05-04-23</u>. Counsel for the appellant be informed accordingly.</p> <p style="text-align: right;">                       REGISTRAR                 </p>
5 <sup>th</sup> April, 2023	1.	<p>None for the appellant present.</p> <p>2. Notices be issued to the appellant and his counsel. To come up for preliminary hearing on 04.05.2023 before S.B at camp court Swat. P.P. given to the parties.</p> <p style="text-align: right;">                       (Kalim Arshad Khan)                      Chairman                      Camp Court Swat                 </p>


SCANNED  
KPST  
Peshawar

SCANNED  
KPST  
Peshawar

Objections raised by office are still stand therefore, the appeal in hand is returned again to the counsel for the appellant for completion and resubmission within 15 days.

No. 667 /S.T,


Dt. 24/02 /2023.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Kabeer Imam Adv.  
High Court Peshawar.

*Notes*

The objections raised by your kind office has been removed and final order do is available on page 15. Hence all objections are removed & resubmitted again. Hence to be put up before the bench.

  
10/3/23


*Sir,*

objection of this office and reply of counsel for the appellant is submitted for order please.

*Haide chaw-an.*

*PH + 906*

*at*


*13/12/23*  
  
13-3-23

The appeal of Mr. Shafiq-ur-Rehman Naib Tehsildar -Accountant Dir Upper received today i.e. on 21.02.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Address of respondent no.6 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ② Copy of impugned original order is not attached with the appeal.
- x - ③ Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.
- x - ④ Copy of impugned final/appellate order is not attached with the appeal.
- 5- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.

No. 666 /S.T,


Dt. 23-02 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Kabeer Imam Adv.  
High Court Peshawar.

objections raised by your kind office has been removed as the impugned order of the promotion of the respondent #6 is available on page #13,14, departmental appeal is available on page no 16, ~~there is~~ that no appeal has earlier been filed ~~except~~ except this appeal hence all objection has been removed & submitted again

Kabeer IMAM

  
23/2/23

0346-9085949

PTO

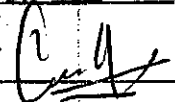
# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

## CHECK LIST

Case Title: Shahid - W - Rehman v/s Govt of KP & others

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly pagged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
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 is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Kabeer Imam  
 Signature:   
 Dated: \_\_\_\_\_

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

In Re S.A 542 /2023

SCANNED  
KPST  
Peshawar

Shafiq -ur -Rehman Naib Tehsil Accuountant ,Dir Upper  
**VERSUS**

Chief Secretary Khyber Pakhtunkhwa Peshawar and  
Others

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<b><i>S#</i></b>	<b><i>Description of Documents</i></b>	<b><i>Annex</i></b>	<b><i>Pages</i></b>
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2.	Application for Suspension		9-10
3.	Affidavit.		11
4.	Addresses of Parties.		12
5.	Copies of the impugned office order dated 2457 dated 16-2-2023 and office order dated 17-2-2023	A - A1	13-14
6.	Copy of impugned notification vide letter#2531 dated 17-2-2023	B	15
7.	COPY OF Seniority List	C	16
8.	Copy of the appeal	D	17
9.	Copy of writ petition date 19-2-2023	E & F	18-30
10.	Other documents		31-32
11.	Wakalatnama		33

Dated: 17-2-2023

*Appellant*

Through

  
**KABEER IMAM**

Advocate High Court  
Peshawar.



L

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

In S.A. 542/2023

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 3699

Dated 21-2-2023

Shafiq -ur -Rehman Naib Tehsil Accuountant ,Dir Upper

-----(*Appellant*)

**VERSUS**

1. Chief Secretary Khyber Pakhtunkhwa Peshawar Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Board of revenue Khyber Pakhtunkhwa through Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
3. Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
4. Commissioner Malakand Division at Saidu Sharif ,Swat
5. Deputy Commissioner Dir Upper .
6. Farhad Ali S/o Sher Bahadar R/o Wari ,Dir Upper

-----(*Respondents*).

**SERVICE APPEAL U/S 04 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT**  
**1974 AGAINST THE IMPUGNED OFFICE**  
**ORDER:2457 DATED UPPER DIR: 16/2/2023**  
**AND OFFICE ORDER DATED 17-2-2023 OF**  
**THE OFFICE OF THE COMMISSIONER**  
**MALAKAND DIVISION SAIDU SHARIF**  
**SWAT, KHYBER PAKHTUNKHWA**  
**PESHAWAR WHEREBY THE DEPARTMENT**  
**PROMOTION COMMITTEE MEETING HAS**  
**APPROVE THE NAME OF THE**  
**RESPONDENT#6 AND THE APPELLANT**  
**WAS NOT BEING CONSIDER FOR**  
**PROMOTION BEING AT THE TOP OF THE**  
**SENIORTY LIST OF PATWARI AND THE**  
**RESPONDENTS BE DIRECTED TO**  
**CONSIDER THE APPELLANT FOR**  
**PROMOTION AS GIRDAWAR/KANANGO**

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

In S.A \_\_\_\_\_/2023

Shafiq –ur –Rehman Naib Tehsil Accountant, Dir Upper

-----(*Appellant*)

**VERSUS**

1. Chief Secretary Khyber Pakhtunkhwa Peshawar Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Board of revenue Khyber Pakhtunkhwa through Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
3. Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
4. Commissioner Malakand Division at Saidu Sharif ,Swat
5. Deputy Commissioner Dir Upper .
6. Farhad Ali S/o Sher Bahadar R/o Wari ,Dir Upper

-----(*Respondents*).

**SERVICE APPEAL U/S 04 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT  
1974 AGAINST THE IMPUGNED OFFICE  
ORDER:2457 DATED UPPER DIR: 16/2/2023  
AND OFFICE ORDER #2531 DATED 17-2-2023  
OF THE OFFICE OF THE DEPUTY  
COMMISSIONER MALAKAND DIVISION  
SAIDU SHARIF SWAT, KHYBER  
PAKHTUNKHWA PESHAWAR WHEREBY  
THE DEPARTMENT PROMOTION  
COMMITTEE MEETING HAS  
APPROVE/APPOINTED THE NAME OF THE  
RESPONDENT#6 VIDE IMPUGNED ORDER  
LETTER #2531 DATED 17-2-2023 BY THE  
RESPONDENT#5 THE APPELLANT WAS  
NOT BEING CONSIDER FOR PROMOTION  
BEING AT THE TOP OF THE SENIORITY  
LIST OF PATWARI AND THE**

RESPONDENTS BE DIRECTED TO  
CONSIDER THE APPELLANT FOR  
PROMOTION AS GIRDAWAR/KANANGO  
BEING ELIIBLE AND PROMOTION ORDER  
#2531 DATED 17-2-2023 OF RESPONDENT#6  
BE DECALRE ILLEGAL AND UNLAWFUL  
AND AGIANST THE POLICY, BE SET-ASIDE  
/SUSPENDED

Respectfully Sheweth

1. That the Appellant is performing his duty as Naib Tehsil Accountant (BPS-5) on 01-10-2010.
2. That the appellant was promoted to the post of Patwari in the Mauza Chukiatan ,District upper Dir.
3. That the Appellant is being subject to persistent acts of discrimination on continuous basis and turned to be into shuttle cocks as without observing the policy of promotion as the appellant is the most senior employèe in the said department and for the last 4 years the departmental examination for the post of kanango was not conducted, as the appellant has passed the said exam but the result of the said is still officially not declared and the meeting of the DPC is going to be conducted without observing the normal period and just to promote their blue eyed the meeting was held in urgency

which is illegal and unlawful .(copy of seniority list annexed)

4. That as the department has going to declared /issued the result within a week and if the said DPC is conducted the fundamental right of the appellant will be violated and the Respondent#5 will promote his near and dear I,e Respondnet#6 which is against law ,unlawful ,illegal and discriminatory and needs to be declared null and void.

5. That this was the background as the Respondent has issued/Called a DPC Meeting just to promote his blue eye ones and issued impugned Notification No. Estt.:2457 dated 16-2-2023, and office order dated 17-2-2023 letter #2531 17-2-2023 which is illegal, discriminatory, void, and unwarranted manner. (Copies of the impugned office order dated 16-2-2023 and office order dated 17-2-2023 and letter#2531 dated 17-2-2023 is annexed as annexure "A ,A1)

6. That besides the above facts the Respondnet#5 has issued a letter dated 2457 dated 16-2-2023 which is against the

fundamental rights and highly discriminatory in nature.

7. That the respondent#5 has issued promotion order of the Respondent#6 vide letter #2531 dated 17-2-2023 which is against the law and be declare illegal and unlawful.(copy of impugned order #2531 dated 17-2-2023 is annexed as B)
8. That the appellant being at the top of the seniority list which is issued by the department but in-spite of this the appellant name was not being consider for promotion.(copy of seniority list is annexed as C)
9. That feeling aggrieved the appellant preferred departmental appeal but till dated the appeal is not being decided which is the violation of the transfer and promotion policy.**(Copy of the departmental appeal is annexed as annexure D)**
10. That regarding the said the appellant filed a writ petition #35-M/2023 Dated 19-1-2023 which was being dismissed being premature and non-maintainable .(copy of order is annexed herewith E#F)

11. That feeling aggrieved and having no other expeditious remedy available, the Appellant approached this Hon'ble Tribunal for recognition, enforcement and acknowledgment of their fundamental rights upon the following grounds inter alia:-

### ***GROUND:***

A. That the Appellant is a naturally born bonafide citizens of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws of the land and discrimination alongwith unfettered exercise of discriminatory powers by an authority or office is always been deplored, deprecated and depreciated by superior Courts of the land.

B. That the illegal orders for promotion of civil servant is always hazardous and injurious to the Potential and capabilities of the such civil servant /Government servant and has always been depreciated and discouraged by the Superior Courts, being always held as

violation to fundamental rights and not solely to the service rights.

C. That the impugned order for calling the DPC by the respondent#4 is highly discriminatory ones and at the same time promoting the junior one instead of the Appellant is illegal and unlawful without any rem and reason and without observing the law on subject while promoting the blue eyed ones is highly discriminatory and void and amount to falling of the bolt from the blue upon the Appellant.

D. That without going in to minute details it would be suffice to mention here that thus only the Appellant were subject to unfettered discrimination and even only on this score the impugned office order to conduct the DPC and order dated 17-2-2023 is void and illegal, unwarranted .

E. That the impugned office order #2531 dated 7-2-2023 is illegal and unlawful and be declare null and void against the law .

F. That the said order #2531 is against the policy of seniority and deprived the appellant from the promotion is also against the fundamental rights of the appellant.

G. That no one can be condemned unheard, nor anyone can be condemned for no wrong.

H. That from every angle and perspective both impugned office orders are illegal, discriminatory, void, unwarranted, vexatious, unlawful and is liable to be cancelled and set aside.

I. That even the appellant authority gives no heed to the departmental appeal and that too without any speaking order and cogent reasons.

J. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned notification NO. Estt.:2457 dated 16-2-2023 and office order dated 17-2-2023 of the office of commissioner Malakand swat and Impugned office order/letter #2531 dated 17-2-2023 may graciously be cancelled and set aside and the appellant be promoted to the post of Kanungo (BPS-11).*



*Any other relief not specifically asked for  
may also graciously be extended in favour of  
the Appellant in the circumstances of the  
case.*

Dated: 17-2-2023

*Appellant*

Through

  
**KABEER IMAM**

Advocate High Court  
Peshawar.

**NOTE:-**

The appellant had initially filed writ petition before the August High Court Peshawar as but that was Dismissed being pre-mature to file the instant appeal before this Hon'ble Tribunals.

  
Advocate.

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

In Re S.A \_\_\_\_\_/2023

Shafiq Ur Rehman

**VERSUS**

Chief Secretary Khyber Pakhtunkhwa Peshawar and  
Others

**AFFIDAVIT**

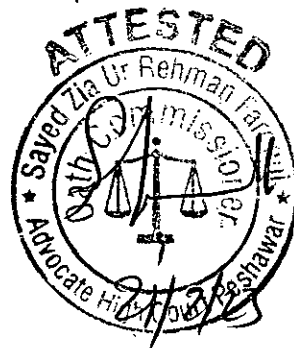
I, Shafiq Ur Rehman Naib Tehsil Accuountant ,Dir Upper , do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*Shafiq Ur Rehman*

**DEPONENT**

Identified By :

*Kabeer Imam*  
**KABEER IMAM**  
Advocate High Court  
Peshawar.



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

In Re C.M No# \_\_\_\_\_ / 2023

In Re S.A \_\_\_\_\_ /2023

Shafiq –ur –Rehman Naib Tehsil Accuountant ,Dir Upper  
**VERSUS**

Chief Secretary Khyber Pakhtunkhwa Peshawar and  
Others

**APPLICATION FOR SUSPENSION OF  
THE IMPUGNED OFFICE ORDER NO. NO.  
Estt.:2531 DATED 17-2-2023 HAS  
PROMOTED THE NAME OF THE  
RESPONDENT#6 BE DECLARE ILLEGAL  
AND UNLAWFUL AND BE SUSPENDED  
TILL THE FINAL DISPOSAL OF THE  
INSTANT APPEAL.**

**RESPECTFULLY SHEWETH,**

1. That the petitioner is filing the accompanying appeal, the contents of which may graciously be considered as integral part and parcel of the instant petition.
2. That prima facie case exist in favour of the Petitioner.
3. That if the impugned notification as mentioned above is not suspended the Petitioner will suffer irreparable loss.
4. That balance of convenience is also lies in favor of Petitioner and his quite sanguine of his success.

5. That in the given circumstances the suspension of operation of the impugned notifications are indispensable.

It is, therefore, most humbly prayed that on acceptance of the instant petition the operation of the impugned office order as mentioned above may kindly be suspended till the final disposal of the accompanying appeal.

Any other relief not specifically asked for may also graciously be extended in favour of the petitioner in the circumstances of the case.

Dated: 17-2-2023

*Appellant / Petitioner*

Through



**KABEER IMAM**

Advocates High Court  
Peshawar

11

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

In Re C.M No# \_\_\_\_\_ / 2023

In Re S.A \_\_\_\_\_ / 2023

Shafiq -ur -Rehman Naib Tehsil Accuountant ,Dir Upper

**VERSUS**

Chief Secretary Khyber Pakhtunkhwa Peshawar and  
Others

**AFFIDAVIT**

I, Shafiq -ur -Rehman Naib Tehsil Accuountant ,Dir Upper, do hereby solemnly affirm and declare that the contents of the Instant application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

*Shafiq -ur -Rehman*

DEPONENT

*Identified By:*

*KABEER IMAM*

Advocate High Court Peshawar



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

In Re S.A \_\_\_\_\_/2023

Shafiq Ur Rehman

**VERSUS**

Chief Secretary Khyber Pakhtunkhwa Peshawar and  
Others

**ADDRESSES OF PARTIES**

**APPELLANT,**

Shafiq Ur Rehman Naib Tehsil Accountant.

**RESPONDENTS:**

1. Chief Secretary Khyber Pakhtunkhwa Peshawar R/o Khyber Pakhtunkhwa at Civil Secretariat Peshawar.
2. Board of revenue Khyber Pakhtunkhwa through Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
3. Senior Member Board of Revenue Khyber Pakhtunkhwa Peshawar.
4. Commissioner Malakand Division at Saidu Sharif ,Swat
5. Deputy Commissioner Dir Upper .
6. Farhad Ali S/o Sher Bahadar R/o Wari ,Dir Upper

Dated: 17/2/2023

*Shafiq Ur Rehman*

Appellant

Through

*Kabeer Imam*  
**KABEER IMAM**

Advocate High Court  
Peshawar.



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13

**OFFICE OF THE,  
DEPUTY COMMISSIONER  
UPPER DIR**

No. 2457

/DC/Est/07(Promotion)

Dated Upper Dir the 16/02/2023

To

The Commissioner,  
Malakand Division Saidu Sharif, Swat.

Subject:-


**DEPARTMENTAL PROMOTION COMMITTEE MEETING.**


Memo:

A meeting of the Departmental Promotion Committee is scheduled to be held on Friday 17/02/2023 at 11:00 A.M in the office of undersigned in which the promotion case of Patwari (BPS-09) to the post of Kanungo (BPS-11) will be discussed.

It is therefore, requested that a representative (member) of your good office may be nominated to attend this office on the date and time fixed for the subject meeting please.

Encl: Working paper.

  
Deputy Commissioner  
Upper Dir

Attest  
  
nd

Off: 0944880394 & 880104 Fax: 0944-881130

Email address ([dcdirupper@gmail.com](mailto:dcdirupper@gmail.com))

A 1/14

**MINUTES OF THE MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE FOR PROMOTION OF PATWARI (BPS-09) TO THE POST OF KANUNGO (BPS-11) OFFICE OF THE DEPUTY COMMISSIONER DIR UPPER.**

In order to discuss and finalize the promotion case of Patwari (BPS-09) to post of Kanungo/Girdawar (BPS-11), as mentioned in the working paper, a meeting of the Departmental Promotion Committee was held on 17-02-2023 at 11:00 A.M in the office of the Deputy Commissioner Upper Dir. The following attended the meeting:-

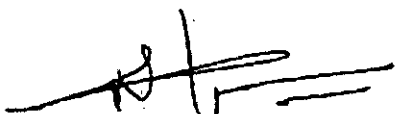
1. Deputy Commissioner Dir Upper.....In chair
2. Add: Deputy Commissioner (G) Dir Upper.....Member
3. Rep: of Commissioner Malakand Division.....Member

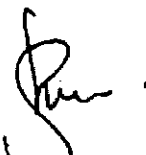
During discussion on working paper, it has come into surface that the Patwari at S. No. 1 of the Senior list namely Mr. Shafiqur Rahman has not yet passed the departmental examination of Kanungo which is one of basic criteria for promotion to the post of Kanungo (BPS-11) while the Patwari/candidate Mr. Farhid Ali Khan at S. No. 2 of the Seniority list fulfill the requisite criteria as required under the Rules, for promotion to the said post.

It was brought into the notice of forum that Mr. Shafiqur Rahman Patwari at S. No. 1 of the seniority list has filed a writ petition before the Peshawar High Court Mingora Bench Darul Qaza Swat seeking interim relief and to stop the DPC process on the grounds that as he is senior most official and his result (rechecking) is also awaited. The Honorable Court vide judgment dated 19/01/2023 decided the said writ petition by dismissing the same on the grounds that the said writ petition is pre-mature and non maintainable. Further the Patwari concerned ~~submitted~~ produced an application before the committee by the taking the plea that he has submitted application for re-checking but the certificate has not so far been issued to him by Director Land Records Khyber Pakhtunkhwa. The committee after hearing the stance of the Patwari concerned came to the conclusion that he has no solid proof (documents etc) to strengthen his plea.

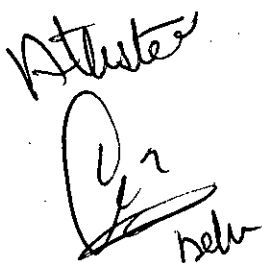
Therefore, after examination of the Rules prescribed for the purpose, synopsis, original ACRs, non-involvement certificates and final seniority list of Patwari (BPS-09) as stood on 31/12/2022 and other service record of the Patwaris included in the panel, the committee unanimously recommended that the promotion case of Mr. Shafiqur Rahman Patwari is differed as he is not eligible for the same while Mr. Farhad Ali Khan next senior Patwari is found eligible in light of documents produced before the committee, hence the committee recommended him for promotion to the posts of Kanungo (BPS-11) on regular basis.

The meeting ended with vote of thanks.

  
Noor-ul-Islam Assistant  
Rep: Commissioner Malakand Division  
(Member)

  
Amir Ali Shah  
Add: Deputy Commissioner (G) Dir Upper  
(Member)

  
Akmal Khan  
Deputy Commissioner Dir Upper  
(Chairman)

  
Attested  
Per  
Date





B@

(15)

**OFFICE OF THE  
DEPUTY COMMISSIONER  
DIR UPPER**

No. 2531

/DC/Estt/07(Promotion)

Dated Upper Dir the 17/02/2023

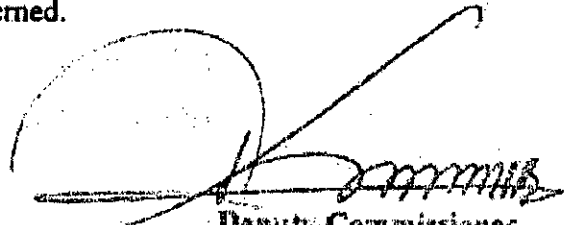
**OFFICE ORDER**

Consequent upon the recommendation of Departmental Promotion Committee meeting held on 17/02/2023; Mr. Farhad Ali Khan Patwari (BPS-09) of this office is hereby promoted as Kanungo (BPS-11) with immediate effect on regular basis:-

His promotion shall be subject to the following terms and conditions:-

**TERMS & CONDITIONS:**

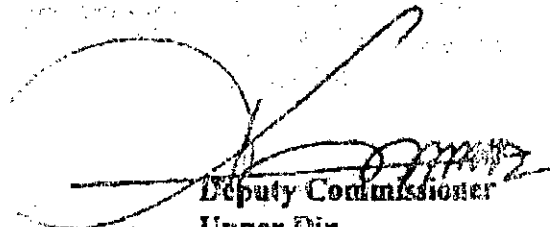
- 1) He will be on probation for a period of one year in terms of Section-6 (2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rules 15 of Khyber Pakhtunkhwa Civil Servant, Khyber Pakhtunkhwa (Appointment, Promotion and Transfer) Rules, 1989.
- 2) He will be governed by such Rules & Regulations/Policy which may be prescribed by the Government from time to time.
- 3) He will be received all benefits of (BPS-11) under the Rules.
- 4) He should take charge of his new post within a week time positively.
- 5) Charge report should be submitted to all concerned.

  
Deputy Commissioner  
Upper Dir

Even No. & Date:-

Copy forwarded to the:-

- 1) Commissioner Malakand Division Saidu Sharif Swat.
- 2) Secretary Board of Revenue Khyber Pakhtunkhwa Peshawar.  
For information please
- 3) District Accounts Officer Dir Upper for information and necessary action.
- 4) Assistant Budget Section local office for necessary action.
- 5) Official concerned for information and necessary action.

  
Deputy Commissioner  
Upper Dir

Off: 0944880394 & 880104 Fax: 0944-881130

Email address (dcdirupper@gmail.com)



UPDATED SENIORITY LIST OF PATWAR (BPS-09) IN RESPECT OF DISTRICT DIR UPPER AS IT STOOD ON 31/12/2022  
 Dated Upper Dir the 10/01/2023

No. 550-53 DC/EST/19

In pursuance of Section 8(1) & (5) of the Civil Servant act, 1973, seniority list of Patwaris (BPS-09) working in the office of the Deputy

Commissioner Upper Dir as it stood on 31/12/2022 is hereby notified for information of all concerned:-

S.#	Name of Official	Designation	Qualification	U/o Birth	Domicle	Date of 1 <sup>st</sup> entry into Govt. Service	Date of appointment as Patwari	Method of appointment	Remarks
01	Shafiq ur Rahman	Patwari	M.A	01/01/1981	Upper Dir	01/10/2010	12/04/2019	-do-	
02	Fatmad Ali Khan	-do-	B.A	01/02/1987	Upper Dir	27/01/2020	27/01/2020	-do-	
03	Fatmad Farooq	-do-	D.A	01/04/1989	Upper Dir	27/01/2020	27/01/2020	-do-	
04	Imdad Farooq	-do-	B.A	01/06/1975	Upper Dir	27/02/2020	18/09/2020	-do-	
05	Umar Farooq	-do-	M.A	27/07/1994	Upper Dir	01/04/2010	18/09/2020	-do-	
06	Taqad Farooq	-do-	F.A+DAE	10/04/1989	Upper Dir	10/02/2010	18/09/2020	-do-	
07	Asif Abbas	-do-	B.A	04/04/1989	Upper Dir	18/09/2020	18/09/2020	-do-	
08	Imdad Ahmad	-do-	B.A	02/01/1986	Upper Dir			-do-	
Tenative seniority for the following									
09	Riaz Ahmad	-do-	B.A	01/01/1986	Upper Dir	15/12/2009	21/10/2022	-do-	
10	Muhammad Idriss	-do-	B.A	03/01/1995	Upper Dir	21/10/2022	-do-	-do-	
11	Shahid Ullah	-do-	M.A	20/01/1992	Upper Dir	-do-	-do-	-do-	
12	Shakel Ahmad	-do-	M.A	01/02/1990	Upper Dir	-do-	-do-	-do-	
	Munawar Shah	-do-	F.sc		Upper Dir				

Attested

Deputy Commissioner  
 Upper Dir

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To  
The Deputy Commissioner,  
Dir Upper.

Subject:- APPLICATION FOR PROMOTION TO THE POST OF KANUNGO.

R/Sir.

With humble submission and due respect I want to draw your kind attention to the following:

- 1) It is submitting that I am working as Patwari since 01/10/2010.
- 2) That I am being a senior one and get to be promoted to the vacant post of Kanungo/Girdwar.
- 3) That due to non passing Kanungo examination, I was not yet considered to be promoted to the post of Kanungo and for the last 4 years Departmental examination of Kanungo was not conducted.
- 4) That on 23/09/2019 DPC recommended my promotion case on ACB to the post but due non availability of the Kanungo Certificate, I was not yet promoted.
- 5) That I have applied so many time for the said once but due to anonymous reason the examination was not conducted for the last four(4) years.
- 6) That now the government issued schedule for the said examination to be held on 17/10/2022.
- 7) That one of my junior colleague submitted application for the promotion to the said post which is against the law.

It is therefore, requested that till my examination DPC for the said post may not be conducted so that my right not be deprived and to avoid legal complication/court case in this regard please.

Dated: 03/10/2022

Attest

Yours obediently,

*[Signature]*

Shafiqur-Rahman Patwari

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Pat up with PPS  
4/10/22  
4-10-2022

11575  
4-10-2022



**BEFORE PESHAWAR HIGH COURT, MINGORA**  
**BENCH/ DAR-UL-QAZA SWAT**

Writ Petition No 35-M of 2023

Shafiq Ur Rahman S/O Ubaid Ur Rahman R/O Souri  
Pao, P.O & Tehsil Dir, District Dir Upper.....**Petitioner**

**VERSUS**

1. Secretary Board of Revenue Khyber Pakhtunkhwa at Peshawar.
2. Commissioner Malakand Division at Saidu Sharif, Swat.
3. Deputy Commissioner Dir Upper.
4. Farhad Ali son of Sher Bahadar resident of Wari, District Dir Upper.

.....Respondents

FILED TODAY

18 JAN 2023

Additional Registrar

**WRIT PETITION UNDER ARTICLE 199**  
**OF THE CONSTITUTION OF ISLAMIC**  
**REPUBLIC OF PAKISTAN, 1973.**

Respectfully Sheweth,

Brief facts giving raise to petitioner to file the instant appeal are as under;

- 1) That the petitioner was initially recruited as Naib Tehsil Accountant (BPS-05) on 01-10-2010.
- 2) That thereafter the petitioner was promoted Patwari and now-adays the petitioner was service in Mauza Chukiatan, District Dir Upper.

- 3) That as per rules, the petitioner was entitled to be held as Girdawar, because the petitioner was placed in the Seniority list in serial No. 1. (Copy of seniority list is attached herewith as Annexure "A").
- 4) That on the basis of said seniority, one number of post as Girdawar vacant and the respondents No.1 to 3 promoted the respondent No. 4 which is the most junior candidate and the respondent department ignored the petitioner, so, the petitioner filed application before the respondents department for his grievances, but the respondents ignored the petitioner and carrying out the promotion proceedings. (Copies of relevant record & application are attached as annexure "B")
- 5) That the petitioner is entitled to be promoted to the post of Girdawar and declared eligible under the relevant rules & policy, but not willing to issue the promotion order of petitioner, so, the petitioner time & again approached to the concerned authority but they are not willing to redress the grievances of the petitioner, so the petitioner has no other remedy except to file the instant petition inter alia on the following grounds.

**GROUND:-**

- a. That the act of the respondents as not consider the petitioner for promotion as unlawful, void-ab-initio, against the spirit of law, furthermore the impugned proceedings is suffering from

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18 JAN 2023

Additional Registrar

illegality & irregularity, hence not tenable in the eyes of law.

- b. That the act of respondents is violative of Article 25 of the constitution as the respondent No. 4 promoted the junior colleagues of petitioner to the propose but in matter of petitioner, so such act of the respondents is highly discriminatory and against the mandate of fundamental rights guaranteed by the constitution.
- c. That the seniority is the continues cause of action which can be agitated at any time so, the petitioner is fit for promotion on the strength of length of service, but the act of respondents toward petitioner is very harsh so, the act of respondents is amount to be contempt on the reasons the respondents have no mandate under the law to ignore the petitioner for the propose promotion.
- d. That the act of departmental authority is unlawful, violative of all norms of justice so, the petitioner entitled to promotion without influence extraneous consideration.
- e. That the act of the respondents is illegal, against law, facts and violative of the fundamental rights of the petitioner.
- f. That as the petitioner was eligible for promotion, because the petitioner place in seniority list is serial No. 1 and the petitioner is the right of

13 JAN 1973

13 JAN 1973

Additional Registrar

promotion, but the respondents department without authority & follow rules are going to promoted the respondent No. 4 which is illegal & unlawful, hence not tenable in the eyes of law.

- g. That the petitioner vested rights have been taken away by the Respondents without lawful authority and the same is against fundamental rights safeguarded under the constitution.
- h. That the petitioner has not been dealt with in accordance with law and rules regulating service of the petitioner.
- i. That the act of the respondents is illegal, against law, facts and violative of the fundamental rights of the petitioner.
- j. That further grounds, with leave of this Honorable Court, would be raised at the time of arguments before this Honorable Court.

**PRAYER**

It is therefore, humbly prayed that, on acceptance of this writ petition:-

- i) That the act of the respondents department may kindly be declared illegal, void-ab-initio, unlawful, illegal and be cancelled.
- ii) That the respondent department may kindly be directed to consider the petitioner for promotion as Girdawar accordance with law, rules and as per seniority.
- iii) That if the respondents issued any promotion impugned order to the other candidate / respondent No. 4 be declared

FILED TODAY

16 JAN 2023



illegal, unlawful & against the rules & policy and may kindly be suspended.

iv) Any other remedy which this august court deems fit and proper in the circumstances may also be very kindly granted.

**INTERIM RELIEF:**

It is further prayed that the impugned promotion proceedings be suspended as well as the respondent No. 3 may be restrained from promotion to the extent of petitioner and one post for girdawar be vacant for the petitioner till the final disposal of the instant writ petition.

Petitioner

Through Counsel



MUHAMMAD NABI  
Advocate, High Court

**CERTIFICATE:**

(As per directions of my client) No such like Writ petition has earlier been filed by the petitioner on the subject matter before this Honorable Court.



Counsel

**LIST OF BOOKS**

1. Constitution Islamic Republic of Pakistan, 1973.
2. Any other law book according to need.



Counsel

FILED TODAY

16 JAN 2023

Additional Registrar

**BEFORE PESHAWAR HIGH COURT, MINGORA**  
**BENCH/ DAR-UL-QAZA SWAT**

W.P No 35 -      M of 2023

Shafiq Ur Rahman .....Petitioner

**VERSUS**

Secretary Board of Revenue & others .....Respondents

**ADDRESSES OF THE PARTIES**

**PETITIONER**

Shafiq Ur Rahman S/O Ubaid Ur Rahman R/O Souri  
Pao, P.O & Tehsil Dir, District Dir Upper

CNIC No:15701-4998508-9

Cell No:0344-9663356

**RESPONDENTS**


1. Secretary Board of Revenue Khyber Pakhtunkhwa at  
Peshawar.
2. Commissioner Malakand Division at Saidu Sharif, Swat.
3. Deputy Commissioner Dir Upper.
4. Farhad Ali son of Sher Bahadar resident of Wari, District  
Dir Upper.

FILED TODAY

13 JAN 2023

Additional Registrar

Petitioner  
Through Counsel

  
MUHAMMAD NABI  
Advocate, High Court

**BEFORE PESHAWAR HIGH COURT, MINGORA  
BENCH/ DAR-UL-QAZA SWAT**

W.P No 3S- M of 2023

Shafiq Ur Rahman .....Petitioner

**VERSUS**

Secretary Board of Revenue & others .....Respondents

**AFFIDAVIT**

I, Shafiq Ur Rahman (petitioner), do hereby solemnly affirm and declare that the contents of the above titled Writ Petition are true and correct to the best of my knowledge and belief.

**DEPONENT**

Identified by

**Muhammad Nabi  
Advocate High Court**

RECEIVED TODAY

16 JAN 2023

Additional Registrar

S.No. 183  
Certified that the above was verified on Solemn affirmation before me on this 16 day of Jan 2023  
by Shafiq ur Rahman  
S/o Shafiq ur Rahman No. 16/11/23  
who was identified by Muhammad Nabi

Who is personally known to me.  
  
Oath Commissioner  
Peshawar High Court  
Mingora Bench/Dar-ul-Qaza, Swat. 16/1/23

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**JUDGMENT SHEET**  
**PESHAWAR HIGH COURT**  
**MINGORA BENCH**  
**(Judicial Department)**

**W.P No. 35-M/2023**  
**With Interim Relief**

**Shafiq-ur-Rahman son of Ubaid-ur-Rahman**  
**(Petitioner)**

vs

**Secretary Board of KPK and others**  
**(Respondents)**

Present: Muhammad Nabi, Advocate for the petitioner.

Respondents are not represented being a motion case.

**Date of hearing: 19.01.2023.**

**JUDGMENT**

**MUHAMMAD IJAZ KHAN, J.-** Through the instant writ petition, petitioner has prayed before this Court for the following relief:-

"It is therefore, humbly prayed that on acceptance of the instant writ petition:-

- i) That the act of the respondents department may kindly be declared illegal, void-ab-initio, unlawful, illegal and be cancelled.
- ii) That the respondent department may kindly be directed to consider the petitioner for promotion as Girdawar accordance with law, rules and as per seniority.
- iii) That if the respondents issued and promotion impugned order to the other candidate/respondent No.4 be declared illegal, unlawful and against the rules and policy and may kindly be suspended.

*Alister*  
*na*  
*2023*

- iv) Any other remedy which this august Court deems fit and proper in the circumstances may also be very kindly granted.


2. Precisely the facts of the case are that petitioner was initially appointed as Naib Tehsil Accountant in BPS-05 on 01.10.2010 and then the petitioner was promoted as *Patwari* and these days he is performing his duty in *Mauza Chukiatan District Dir Upper*. It is further pleaded in the petition that as per the seniority list maintained by the respondents the petitioner is on the top of seniority list and thus he is entitled to be promoted as *Girdawar*. It is further stated that one of the post of the *Girdawar Circle* was lying vacant, however, respondents No. 1 to 3 instead of promoting the petitioner has prepared the working paper of respondent No. 4 namely Farhad Ali, though he is lower on the seniority list than petitioner, therefore, he submitted a departmental appeal to the respondents, however, till filing of the instant petition the same has not been responded, therefore, the petitioner has approached to this Court through the instant petition.

Attest  
[Signature]  
[Signature]

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3. Arguments of learned counsel for the petitioner were heard in detail and the record perused with his able assistance.

4. At the very outset the learned counsel for the petitioner was confronted that admittedly the petitioner is a civil servant and the Departmental Promotion Committee has not yet passed any order effecting his alleged right of promotion, then how at this stage he could approach to this Court for the issuance of the desired relief, his response was that since respondent No. 4 is junior to the petitioner, therefore, his working paper could not be sent and instead respondents are required to send the working paper of the petitioner and as such in view of the above admitted position the petition of the petitioner is pre-mature as yet no order has been passed by the Departmental Promotion Committee or any other authority which is adversely effecting his right of promotion.

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2/23

5. It may be noted that a civil servant cannot claim promotion as a matter of right and it is entirely the prerogative of the provincial government/competent authority to grant

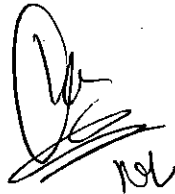
The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author outlines the various methods used to collect and analyze the data. This includes both primary and secondary data collection techniques. The analysis focuses on identifying trends and patterns over time, which is crucial for making informed decisions.

The third part of the report details the challenges encountered during the data collection process. One major issue was the inconsistency in the quality of the data provided by different sources. This was addressed by implementing strict quality control measures and cross-verifying the information.

Finally, the document concludes with a series of recommendations for future data collection efforts. It suggests that regular communication with data providers and the use of more advanced data analysis tools would significantly improve the accuracy and reliability of the results.

promotion to an employee. It is also relevant to mention here that a civil servant cannot claim promotion as a matter of right unless his case is considered by the Departmental Promotion Committee. In other words the civil servant cannot seek the directions of this Court to direct the competent authority to consider a civil servant for promotion, however, if the competent authority initiate the process of promotion and the Departmental Promotion Committee consider the working papers of various employees and thereafter come to the conclusion that an employee is eligible or ineligible or is unfit for promotion, then in such eventuality such a civil servant can approach to a judicial forum for the redressal of his grievance. It is further relevant to be noted that in case where the Departmental Promotion Committee consider an employee and found him as "ineligible for promotion" then such an aggrieved civil servant can approach to the "Service Tribunal", however, if the Departmental Promotion Committee declares a civil servant as "unfit for promotion" then in such eventuality such an aggrieved civil servant could approach to the High Court, but since in the present case it is an admitted position that the petitioner

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has not been considered by the Departmental Promotion Committee till date, therefore, at this stage of the process of promotion the petitioner could neither approach to the Service Tribunal nor to this Court as he is yet to be declared by the Departmental Promotion Committee as eligible or ineligible or unfit for promotion, as the case may be. In the case of Ghulam Abbas vs. Chief Secretary and 2 others reported as 2016 PLC (C.S.) 87, the Hon'ble Apex Court has held that it has not been denied by the petitioner that he was never considered by the Departmental Promotion Committee or the Board for promotion, upon which this could be determined that petitioner was fit to be promoted. The prerequisite to be considered for promotion is the eligibility of the said official and once he crosses this barrier and is considered for promotion, only then the question of fitness would arise. In view of the above, it can safely be held that the case of the petitioner fell within the ambit of determination of eligibility, which for all intents and purposes, is part of terms and conditions of service of a civil servant, therefore, is beyond the powers of judicial review of this Court in view of creation of Administrative Tribunals established

Attest

  
ndr  
2/2/23



under Article 212 of the Constitution for adjudication on the question of terms and conditions of service of a civil servant. Similarly, in the case of Muhammad Azam vs. Muhammad Tufail and others reported as 2011 SCMR 1871, the Hon'ble Apex Court has also held that the question of eligibility relates primarily to the terms and conditions of the service and their applicability to the civil servant concerned, and, therefore, the Tribunal has jurisdiction, and whereas the question of fitness is a subjective evaluation on the basis of objective criteria where substitution for an opinion of the competent authority is not possible by that of a Tribunal or of a Court and, therefore, the Tribunal has no jurisdiction on the question of fitness.

Altaf

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• 21/2/27

6. In view of the above discussion, the instant writ petition is premature as well as non-maintainable, which is hereby dismissed, in limine.

Announced  
Dt: 19.01.2023

dl

JUDGE

21.03

JUDGE

Office  
20/01/2023

3A

**OFFICE OF THE DEPUTY COMMISSIONER/DISTRICT COLLECTOR DIR UPPER**

No. \_\_\_\_\_ /DC/Estt:

Dated Upper Dir the 25 /03/2016

**OFFICE ORDER**

On the recommendation of Secretary to Government of Khyber Pakhtunkhwa Board of Revenue & Estate Department letter No. Estt:VI/DPC/Upper Dir Upper/10200 dated 13/08/2014, Mr. Shafiq-ur-Rahman presently working as Naib Tehsil Accountant (NTA) is hereby appointed/adjusted against the vacant post of Patwari BPS-9) being senior most official in absence of Mr. Manzoor Abbas NTA who is on leave for two year (6200-380-17600) plus usual allowances on temporary basis in the interest of public service.

Deputy Commissioner  
Dir Upper

No. 4/01-2 /DC/Estt:

Dated Upper Dir the 25 /03/2016

- 1) Secretary (Board of Revenue, Revenue & Estate Department Khyber Pakhtunkhwa Peshawar.
- 2) District Accounts Officer Dir Upper  
For information.
- 3) Official concerned.

Deputy Commissioner  
Dir Upper

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21/2/2013

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OFFICE OF THE  
DEPUTY COMMISSIONER  
UPPER DIR

DO Est. & Appnt.

Dated Upper Dir the 11/04/2019

ORDER

On the recommendation of Director Land Records, Board of Revenue & Estate Department Khyber Pakhtunkhwa Peshawar, letter No. Esy: Dir Upper Farhad Ali Khan/2923 dated 11-02-2019, Mr. Farhad Ali Khan presently working as Naib Tehsil Office Kanungo (NTOK) is hereby appointed/adjusted against the vacant post of Patwar BPS-09 (11770-730-33670) plus usual allowances in the interest of public services.

Deputy Commissioner  
Upper Dir

No. 7844-50 / DO Est. & Appnt.

Copy forwarded to the:-

- 1) Commissioner Malakand Division Saido Sharif Swat.
- 2) Director Land Record, Board of Revenue, Revenue & Estate Department Khyber Pakhtunkhwa Peshawar,  
For information please.
- 3) District Officer (F&E) Dir Upper.
- 4) District Account Officer Dir Upper.
- 5) Accountant Local Office.
- 6) Assistant Budget Section of local office.  
For information and necessary action.
- 7) Official concerned for necessary action.

Deputy Commissioner  
Upper Dir

Attest

*[Handwritten signature]*

Dir: 0944881130 & 880191 Fax: 0944-881130

Email address (dc4inupper@gmail.com)

21/2/2019



32


تہمت  
50 روپے  
Kabeer-042 @ Yahoo.Com  
63236  
ایڈویکٹ: کبیر صاحب  
بار کونسل/ ایسوسی ایشن نمبر: BC-14-4780  
رابطہ نمبر: 03469085949



SCANNED  
KF5  
Peshawar

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

لسٹڈ ٹریڈنگ کمپنی، سرخسٹوان خیمہ سٹار  
بعدالت جناب:

Appellant	مخائب:	Promotion	دعویٰ:
			علت نمبر:
			مورخہ:
			جرم:
			تھانہ:

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ  
 آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وہ کیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل باجزوی  
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سبب ساختہ پر داخستہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے



المرقوم:

مستند  
الکھن بیلو سلا  
بدر  
11/11/2023

Attested

نہ اس وکالت نامہ کی ذمہ داری قابل قبول ہوگی۔

Accepted

Handwritten signatures

