


FORM OF ORDER SHEET

Court of _____

Appeal No. 1569/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/09/2024	<p>The appeal of Mst. Nighat Yasmeen presented today by her. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on 21.10.2024. Parcha Peshi given to the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR

CHECK LIST

CASE TITLE:

Mst. Maryam Bibi and other

VERSUS

**Ministry of Interior through Secretary Interior, Govt. of Pakistan,
Islamabad and others**

S#	CONTENTS	Yes	No
1.	This Writ Petition has been presented by Samad Hasnain, Advocate.		
2.	Whether counsel / appellatant / respondent / deponent have signed the requisite document?		
3.	Whether Writ Petition is within time?		
4.	Whether Writ Petition enactment under which the Writ Petition is filed is mentioned?		
5.	Whether enactment under which the Writ Petition is filed is correct?		
6.	Whether affidavit is appended?		
7.	Whether affidavit is duly attested by competent oath commissioner?		
8.	Whether Writ Petition/ annexure are properly paged?		
9.	Whether certificate regarding filing any earlier Writ Petition in the subject, furnished?		
10.	Whether annexures are legible?		
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/ clear?		
13.	Whether copies of Writ Petition is delivered to AG/ DAG?		
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?		
15.	Whether number of referred cases given are correct?		
16.	Whether Writ Petition contains cutting / overwriting?		X
17.	Whether list of books has been provided at the end of the Application?		
18.	Whether case relate to this Court?		
19.	Whether requisite number of spare copies are attached?		
20.	Whether complete spare copy is filed in separate file cover?		
21.	Whether addresses of parties given are completed?		
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 Rule 1974 rule 11, Notice along with copy of Writ Petition and annexure has been sent to respondents? On _____		
26.	Whether copies of comments / replay/ rejoinder submitted? On _____		
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____		

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

Name: **Samad Hasnain, Advocate**

Signature: _____

Dated: 05/04/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. 1569 /2024

Nighat Yasmin
(Appellant)

VERSUS

Govt of KPK etc
(Respondents)

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Dated 23/09/2024

Humble Appellant


Nighat Yasmin
Through Counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1569 /2024

Diary No. 15983

Dated 23-09-2024

Nighat Yasmin daughter of Bashir Ahmad Khan r/o
House#1073-I/E, Qayyum Nawaz Colony, West Circular Road
Dera Ismail Khan. Head Mistress (BPS-17) GGHS Daraban Khurd
Dera Ismail Khan.

(APPELLANT)

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. Chief Secretary Khyber Pakhtunkhwa Peshawar.
3. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.

(RESPONDENTS)

4. **Mst. Asia Gul** Head Mistress GGHS Kirri Shamoza Dera Ismail Khan.

Private Respondent

APPEAL UNDER SECTION 4 OF THE KPK SERVICES
TRIBUNAL ACT, 1974 AGAINST THE POLITICAL
BASED TRANSFER ORDER#SO/(E&SE) 4-
16/2024/POSTING/ TRANSFER/02 DATED
13/06/2024 ISSUED BY RESPONDENT#3 VIDE
WHICH THE APPELLANT IS TRANSFERRED FROM
GGHS DARABAN KHURD DERA ISMAIL KHAN TO
GGHSS KIRRI SHAMOZAI DERA ISMAIL KHAN.

Handwritten signature/initials

PRAYER:-

On acceptance of this service appeal the impugned posting transfer ORDER#SO/(E&SE) 4-16/2024/POSTING/TRANSFER/02 DATED 13/06/2024 Issued by Respondent#3 may kindly be declared as illegal, without jurisdiction, without law full authority and based on mala-fide and political victimization, hence, liable to be cancelled.

Any other relief deemed appropriate in the given circumstances may also be granted to the appellant in the large interest of justice.

Note: Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

Respectfully Sheweth;

Appellant humbly submits and request as under:-

1. That the appellant has been serving the Education Department Dera Ismail Khan as Head Mistress since about 28 years and always performed her duties with zeal, zest and to the entire satisfaction of her superior and did not leave any stone unturned towards her high ups. In this respect service record of appellant is very much evident.
2. That the appellant, during her service tenure, have diligently performed her duties in the far-flung and hard areas of the district. Presently the appellant is serving as Head Mistress at Govt. Girls High School Daraban Khurd District Dera Ismail Khan since May 04 2023 up-till now.
3. That the your good office issued a political bases office/transfer order SO/(E&SE) 4-16/2024/Posting/Transfer/02 Dated 13/06/2024 vide which the appellant is transferred from GGHS Daraban Khurd Dera Ismail Khan to GGHS Kirri

Shamozai Dera Ismail Khan. Copy of transfer order dated 13/06/2024 is annexed as **Annexure-A**.

4. That applicant's service period is 33 years has taken a toll on her health, and applicant is currently suffering from weakness and joint pain due to middle-age issues. Despite my medical condition, applicant received a transfer order to a remote area of the district, which is too difficult for applicant to handle.
5. That the transfer order dated 13/06/2023 is pre-mature, illegal, against service laws and policy, hence, liable to be cancelled. Moreover, the minimum service tenure of a Govt. Employee at one station is three years but the impugned transfer order is issued just after one and half years, hence, on this sole ground the impugned transfer order is liable to be cancelled.
6. That the appellant is an experienced employee in the department and is fit for GGHS Daraban Khurd Dera Ismail Khan but unfortunately the authorities transferred her in GGHS Kirri Shamozai upon the directions of political god fathers, hence, the impugned transfer order is liable to be set aside being political victimization.
7. That the appellant preferred a departmental appeal to the respondent#3 for redressal of her grievances but the same is not decided up-till now. Copy of the departmental appeal is annexed as **Annexure-B**.
8. That the appellant does not have any efficacious remedy, except to invoke the appellate jurisdiction of this Honourable Tribunal, inter alia; the following grounds.

Handwritten signature

GROUNDS:-

- A. That the impugned transfer order dated 13/06/2023 are against the Constitution, Service Laws, Rules, Departmental Policy, and natural justice.
- B. That the impugned transfer orders are issued upon the wishes of political figure are not tenable in the eyes of law. The appellant performed her duties in far-flung Hard Areas of the province, hence, the impugned transfer order is ineffective over the rights of appellant and is liable to be set aside.
- C. That the appellant already served at GHSS Kirri Shamozai about seven years, similarly the private respondent (Asia Gul) had served at GHSS Daraban Khurd about 5 years, but now the respondents issued the impugned transfer order on the wishes of political figures.
- D. That transfer of Govt. Employees can't be made on the interference of political figures which is offensive to the Constitution and the law on the subject because Ministers, MPA's, MNA's and Senators, all are under oath to discharge their duties in accordance with the Constitution and Law.
- E. That as the appellant is a woman and is unable to travel a long distance daily. Beside this the appellant is a household woman and the welfare, pampering/look after of the children/family is being suffered.
- F. That it is humanly impossible for a woman in the milieu of Pakistani society to look after her family and carry out her professional obligations at the same time under such circumstances.
- G. That act of the official respondents is without jurisdiction based on mala fide hence liable to be declares as null and void by this Honourable Court.

H. That Counsel for the appellant may please be allowed to raise additional grounds during the course of arguments.

It is therefore respectfully prayed that On acceptance of this service appeal the impugned posting transfer ORDER#SO/(E&SE) 4-16/2024/POSTING/TRANSFER/02 DATED 13/06/2024 Issued by Respondent#3 may kindly be declared as illegal, without jurisdiction, without law full authority and based on mala-fide and political victimization, hence, liable to be cancelled.

Any other relief deemed appropriate in the given circumstances may also be granted to the appellant in the large interest of justice.

Dated ___/06/2024

Humble Appellant


Nighat Yasmin
Through Counsel


Attiq Ullah Khan
Advocate High Court

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. _____/2024

Nighat Yasmin
(Appellant)

VERSUS

GOVT of KPK etc
(Respondents)

CERTIFICATE

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Court.

Dated ____/06/2024


Appellant

NOTE:

Appeal with annexure along-with required sets thereof are being presented in separate file covers.

Dated ____/06/2024


Appellant's counsel

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. _____/2024

Nighat Yasmin
(Appellant)

VERSUS

GOVT of KPK etc
(Respondents)

AFFIDAVIT

I, **Nighat Yasmin**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following my instructions;
2. That all parawise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated ____/09/2024


Deponent

Identified By:-


Attiq Ullah Khan
Advocate High Court



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

CM No. _____/2024

In service Appeal No. _____/2024

Nighat Yasmin VERSUS Govt. of KPK etc

**APPLICATION FOR INTERIM RELIEF BY SUSPENDING THE
OPERATION OF IMPUGNED POSTING TRANSFER
ORDER#SO/(E&SE) 4-16/2024/POSTING/ TRANSFER/02
DATED 13/06/2024 TILL FINAL DECISION OF THE INSTANT
SERVICE APPEAL.**

Respectfully Sheweth,

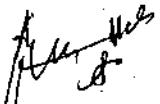
1. That the above titled service appeal is being filed before this Honourable Tribunal and the instant application may kindly be considered as part of it.
2. That the appellant has prima facie case and balance of convenience is also tilts in favour of the appellant.
3. That the respondents are intending to transfer the appellant on political victimization and if the operation of impugned transfer order is not suspended then the appellant will face irreparable loss and instant appeal will become futile.
4. That this honourable tribunal has got vast and ample powers to entertain the application in hand.

It is, therefore, humbly requested that in view of the above submissions, the interim relief may kindly be issued in favour of appellant till the final decision of the instant service appeal.

Dated ___/09/2024

Humble Appellant


Nighat Yasmin
Through Counsel


Attiq Ullah Khan
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

In service Appeal No. _____/2024

Nighat Yasmin
(Appellant)

VERSUS

Govt of KPK etc
(Respondents)

AFFIDAVIT

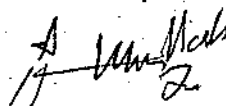
I, **Nighat Yasmin**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying CM petition has been drafted by counsel following my instructions;
2. That all parawise contents of the CM petition are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated ____/09/2024


Deponent

Identified By:-


Attiq Ullah Khan
Advocate High Court

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ATTESTED



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Nighat Yasmin

نہت یاسمین



Father Name
Bashir Ahmad Khan

بشیر احمد خان

Gender Country of Stay

F Pakistan

Identity Number Date of Birth
12101-0899228-0 02.09.1967

Date of Issue Date of Expiry
31.01.2018 31.01.2028



[Handwritten Signature]

Holder's Signature

for order
SSS
officer

ATTESTED - 11

سید احمد نعیم خان، قیوم نواز ٹاؤن، مکان نمبر 11/1073، ذریعہ اسماعیل خان

12101-0299220-0



خان

مستقل پتہ ڈاک سٹاز پر آسانڈ سٹریٹ، تحصیل پروانہ، ضلع

ذریعہ اسماعیل خان



Lawrence K. Mehmood
Secretary General of Pakistan

101941109229
149-88-001643

گمشدہ کارڈ ملنے پر قریبی لیڈ بکس میں ڈال دیں



ANX-A/P-12

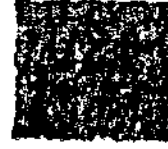
GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: sectionofficers@emell.com

091-0223555

Dated Peshawar the June 12th 2024

NOTIFICATION



NO. SO(S/E)E&SE/D/4-16/2024/Posting/Transfer/02: The following postings/transfers are hereby ordered, with immediate effect

S.No	Name and Designation	From	To
01	Mrs. Asia Gul Headmistress (BS-17)	GGHS Keri Shmozai D.I.Khan	GGHS Daraban Khurd D.I.Khan (Vice Sr No 02)
02	Mrs. Nighat Yasmin Headmistress (BS-17)	GGHS Daraban Khurd D.I.Khan	GGHS Keri Shmozai D.I.Khan (Vice Sr No 01)

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT.

Endat: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Female), D.I.Khan
4. District Accounts Officers, D.I.Khan
5. Director EMIS, E&SE Department for uploading at official website at the earliest
6. PS to Secretary, E&SE Department
7. Officer concerned
8. Office order file


(SHARYANA HALEEM)
SECTION OFFICER (S/F)

ATTESTED



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GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Email: ecell@officerat@gmail.com

091-9223588

Dated Peshawar the May 4th, 2023

NOTIFICATION

NO.SO(S/F)E&SED/4-18/2023/Posting/Transfer: The following postings/transfers are hereby ordered, with immediate effect.

Sr. #	Name/ Designation	From	To	Remarks
1	Mst Nighat Yasmin Headmistress (BS-17)	GGHS Kiril Shamozal D.I Khan	GGHS Darban Khuud D.I Khan	Vice Sr. no. 02
2	Mst Asin Gul Headmistress (BS-17)	GGHS Darban Khuud D.I Khan	GGHS Kiril Shamozal D.I Khan	Vice Sr. No. 01

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Ends: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) concerned.
4. District Account Officer concerned.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department.
8. Officers/Official concerned.
9. Office order file.

ATTESTED


(SHAWANA HALEEM)
SECTION OFFICER (S/F)

ANN-B/P-14

To

The Secretary Education Department,
Khyber Pakhtunkhwa Peshawar.

Subject: DEPARTMENTAL APPEAL / REPRESENTATION
AGAINST THE POLITICAL BASED TRANSFER
ORDER#SO/(E&SE) 4-16/2024/POSTING/
TRANSFER/02 DATED 13/06/2024 ISSUED BY
YOUR GOOD OFFICE VIDE WHICH THE
APPELLANT IS TRANSFERRED FROM GGHS
DARABAN KHURD DERA ISMAIL KHAN TO GGHS
KIRRI SHAMOZAI DERA ISMAIL KHAN.

Respected Sir,

Appellant humbly submits as under,

1. That the appellant has been serving the Education Department Dera Ismail Khan as Head Mistress since about 28 years and always performed her duties with zeal, zest and to the entire satisfaction of her superior and did not leave any stone unturned towards her high up. In this respect service record of appellant is very much evident.
2. That the appellant, during her service tenure, have diligently performed her duties in the far-flung and hard areas of the district. Presently the appellant is serving as Head Mistress at Govt. Girls High School Daraban Khurd District Dera Ismail Khan since May 04 2023 up-till now.
3. That the your good office issued a political bases office/transfer order SO/(E&SE) 4-16/2024/Posting/Transfer/02 Dated 13/06/2024 vide which the appellant is transferred from GGHS Daraban Khurd Dera Ismail Khan to GGHS Kirri Shamozai Dera Ismail Khan. Copy of transfer order dated 13/06/2024 is annexed for ready reference.
4. That applicant's service tenure of 28 years has taken a toll on her health, and she is currently suffering from weakness and joint pain due to middle-age issues. Despite my medical

ANNEXED

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condition, applicant received a transfer order to a remote area of the district, which is too difficult for applicant to handle.

5. That the transfer order dated 13/06/2023 is pre-mature, illegal, against service laws and policy, hence, liable to be cancelled. Moreover, the minimum service tenure of a Govt. Employee at one station is three years but the impugned transfer order is issued just after one and half years, hence, on this sole ground the impugned transfer order is liable to be cancelled.
6. That the appellant is an experienced employee in the department and is fit for GGHS Daraban Khurd Dera Ismail Khan but unfortunately the authorities transferred her in GGHSS Kirri Shamozaï upon the directions of political god fathers, hence, the impugned transfer order is liable to be set aside being political victimization.
7. That as the appellant is a woman and is unable to travel a long distance daily. Beside this the appellant is a household woman and the welfare, pampering/look after of the children/family is being suffered.
8. That your good self has got vast powers to accept the instant Departmental appeal.

It is therefore, humbly requested that the impugned transfer order# SO/(E&SE) 4-16/2024/POSTING/TRANSFER/02 DATED 13/06/2024 may kindly be set aside.


Dated: 14/06/2024

ATTESTED


Nighat Yasmin
Head Mistress (BPS-17)
GGHS Daraban Khurd
Dera Ismail Khan

Contact No: 0344 9367766

H No: 673-1 Orayyum Nawaz Colony
E West Circular Road Dera Ismail Khan

Shipment Information	Client Information	Price Information
Tracking #: DI595460747 	To : SEC EDUCATION DEPTT	Pieces : 1
	Address : PESHAWAR	Charged Wgt : 0.25 (KG)
MTD : ()	Contact : 03 /	Dimension : N/A x N/A x N/A
User : MAIN DIK	From : NIGHAT	Val. Declared : 1.00 Rs
Booking Date/Time : 14 Jun 2024 13:18:52	Address : DERA ISMAIL KHAN	Insurance : 0% 0.00 Rs
Origin : DERA ISMAIL KHAN	Contact : 03459887772	Rate : 460.00 Rs
Destination : PESHAWAR	NTN :	MTD Amount : 0.00 Rs
NTN NO : 2824502-4	CNIC :	VAS : 0.00 Rs
Sales Tax Reg No: N2824502-4		Trade Discount : 0.00 Rs
		10% Fuel Impact Included
		Net Amount : 400.00 Rs
		Sales Tax : 15% 60.00 Rs
		Payable Amount: 460.00 Rs
		Description : ON SHIPPER RISK
		Codes :

You can receive delivery status on your mobile by sending SMS as Track [Consignment#] to 8061.

www.leopardscourier.com

UAN: 111 300 796

Khyber Pakhtunkhwa Bar Council

B.C.No. [] - [] [] [] [] []

RS/-100

0010006

وکالت نامہ



بعدالت جناب حسین بخش خواجہ کے لیے سید محمد علی شاہ

منجانب پیشتر بنا حلولہ حسین بخش خواجہ

دعویٰ یا جرم

تفصیل دعویٰ یا جرم

باعت تحریر آنکہ
مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے بیرونی واسطے و جواہدہی برائے پیشتر یا تصفیہ مقدمہ بمقام سید محمد علی شاہ

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشتر پر خود بذریعہ مختیار خاص رو بروعدالت حاضر ہوتا رہوں گا۔ اور ہر پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گے، اگر پیشتر پر منظر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طرح پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا جتار نہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا درخواست اجرائے ڈگری و نظر ثانی اپیل و ہر قسم درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار و وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر پالیسی یا راضی نامہ فیصلہ بر حلف کرنے، اقبال و دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشتر مقدمہ مذکورہ بیرون از پکھری صدر بیرونی مقدمہ مذکورہ نظر ثانی و اپیل و گمرانی و گمرانی و آمد کی مقدمہ یا منسوخی ڈگری یک طرف یا درخواست حکم امتناع یا ترقی یا گرفتاری قبل از فیصلہ اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا ایلی علیحدہ مختارہ بیرونی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گمرانی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیر قانون کو بھی ہر امر میں وہی ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانب التواء پڑیگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشتر سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کرے اور ایسی صورت میں میرا مطالبہ کسی قسم کا صاحب موصوف کے برخلاف ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے

مورخہ _____ ماہ _____ سنہ 2024

مضمون وکالت نامہ من لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد _____

نگہت یاسمین

محمد علی شاہ

گواہ شاہ

گواہ شاہ

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