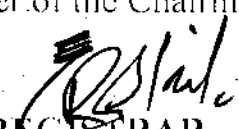


# FORM OF ORDER SHEET

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

**Appeal No.** 1581/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2024	<p>The appeal of Mr. Muhammad Israel presented today by Mr. Shuaib Sulstan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 01.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE PROVINCIAL SERVICES TRIBUNAL**

**PESHAWAR**

=====

Appeal No. 1581/2024

=====

Muhammad Israel

Versus

The Govt. etc

**Application for fixation of titled appeal before the  
principle seat at Peshawar**

**Respectfully sheweth:**

1. That the appellant has filed the instant appeal which is yet to be fixed for hearing.
2. That the case of appellant is urgent in nature in therefore be fixed before the principle seat at Peshawar.
3. That the counsel for the appellant is doing legal practice at Peshawar/Mardan as well as the addresses of main respondent no 01 and 02 are also at Peshawar and the appellant also wants to pursue his case at the principle seat at Peshawar.
4. That it will convenient for the counsel as well as for the appellant to fixed the instant service appeal at Peshawar.

***It is therefore, most humbly prayed that on acceptance of this application, the instant service appeal may kindly be fixed at principle seat at Peshawar.***

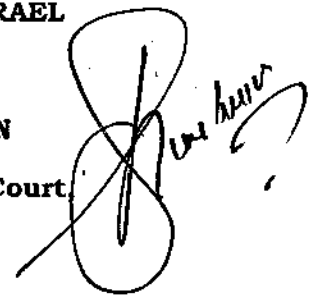
**APPELLANT**

**MUHAMMAD ISRAEL**

**THROUGH**

**SHUAIB SULTAN**

**Advocate High Court.**



**KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR****CHECK LIST**

Muhammad Isreal

Versus

The Govt. etc

S. No	CONTENTS	YES	NO
1	This Petition has been presented by <u>Shuaib Sultan Advocate, Mardan</u>	✓	
2	Whether Counsel/ Appellant/ Respondent 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/ annexure are properly pagged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject furnished?	✓	
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/respondent?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/ overwriting?	✓	
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 is 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/ rejoinder provided to opposite party? On _____		✓

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

Name. Shuaib Sultan Advocate High Court.

Signature. \_\_\_\_\_

**SHUAIB SULTAN**  
 Advocate High Court  
 District Court Mardan

Dated. \_\_\_\_\_

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL****PESHAWAR**Appeal No. 1581 / 2024

Muhammad Isreal ----- VS ----- Secretary Industries and Commerce

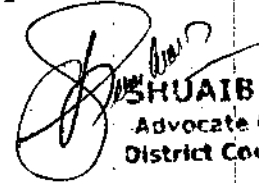
**INDEX**

S. No	Description of Documents	Annexures	Pages
01	Memo of Appeal along with affidavit and Certificate		01 ----- 04-A
02	Transfer Order dated 16-05-2023	A	05
03	Impugned Transfer Order dated 14-05-2024	B	06
04	Departmental Appeal dated 30-05-2024	C	07 ----- 08
05	TCS Receipt Postal No. 7750217, dated 30-05-2024	D	09
06	Appellant wife Credentials & Service Documents	E-1 to E-7	10 ----- 16
07	Wakalat nama		17

Dated: 03-09-2024

**APPELLANT**

Through


**SHUAIB SULTAN**  
 Advocate High Court  
 District Courts Mardan

Shuaib Sultan Advocate High Court

Cell No.0300-5727424

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

158/  
Appeal No. \_\_\_ / 2024

Muhammad Isreal son of Abdur Aziz, Assistant Director Statistics, Office of Deputy Director, Industries Commerce & Trade Malakand Region. resident of Kotka Rehmat Khan, Presently resides at Hasham Khan Colony Mausam Korana Mardan.  
..... **Appellant**

**VERSUS**

- 1- The Government of Khyber through Chief Secretary Peshawar.
  - 2- The Secretary, Industries & Commerce Khyber Pakhtunkhwa Peshawar.
  - 3- Mr. Amjad Ali, Assistant Director Industries/ CPC(OPS) District Bannu.
- ..... **Respondents**

=====

**Appeal under section 4 of the Khyber Pakhtunkhwa Services Tribunal Act 1974, against the transfer order contained in letter No. SO (IND) 8-2/2024/ 4987-95, dated 14.05.2024. Whereby appellant is prematurely, illegally and violating the posting and transfer rules transferred by violating the spouse policy, while the departmental appeal dated 30.05.2024 against the impugned transferred order was un responded till date**

**PRAYER:-**

**On acceptance of the instant appeal the impugned transferred order contained in letter No. SO (IND) 8-2/2024/ 4987-95, dated 14.05.2024, may kindly be cancelled/ set aside and the respondent No. 02 may be directed to post the appellant at Bannu region till the completion of his normal tenure or on Spouse policy the appellant may be transferred on his designated post.**

**Any other consequential relief/ remedy which this Honourable Tribunal may deemed fit and proper under the circumstances of the instant appeal may also be awarded in favour of the appellant.**

=====

Respectfully Sheweth,

**ON FACTS:-**

Brief facts giving rise to the instant appeal are as under:-

- I. That appellant was appointed as Industrial Development Officer on February, 2016 and perform his duty on different stations. On 16-05-2023 he was transferred from Kurram to District Bannu, vide notification No. SO(IND)2-61/2023/1459-74 dated 16.05.2023. **(Copy of the order is annexure "A")**
- II. That while performing his duty as Assistant Director Industries, & Consumer Rights in District Bannu since 16<sup>th</sup> May 2023, the appellant on general complaints from consumers that Mr. Munir Ahmed owner of Abu Bakkar Flour Mills is involved in selling underweight Flour bags. The appellant inspected the Abu Bakar Flour Mill premises and found underweight bags in huge quantity as well as there were no expiry dates mentioned on the said flour bags, the case was put up before the Consumer Protection Court, Bannu.
- III. That owner of the said Abu Bakar Flour Mill being influential person, insert undue pressure on appellant, through Additional Assistant Commissioner Bannu, to withdraw the complaint against him. The appellant refused to do so hence the Additional Assistant Commissioner Bannu along with the concern Abu Bakar Flour Mills owner persuaded Respondent No. 02, for transferring the appellant from District Bannu to some remote area, consequently respondent No.02, transferred the appellant to District Malakand region, vide order SO(IND)8-2/2024/4987-95 dated 14.05.2024. **(Copy of the impugned transfer order is annexure "B")**
- IV. That, appellant preferred departmental appeal/ representation on dated 30-05-2024, to respondent No.01, which was not responded even till date. **(Copies of the Departmental appeal/ representation & TCS Receipt Postal No. 7750217, dated 30-05-2024 are annexure "C & D")**
- V. That the appellant deeply aggrieved of the impugned premature transfer order, being wrong, illegal, political motivated, against the spouse policy. Hence the on the following amongst many other grounds, inter alia.

**GROUNDS:**

1. Because the impugned premature transfer order is against the law, facts norms of natural justice and material on the record, hence not tenable in the eye of law therefore the same is liable to be cancelled/ set aside.
2. Because the appellant has not been treated in accordance with law and rules and as such the respondents has violated Article 4 & 25 of the Constitution of Islamic Republic of Pakistan 1973.
3. Because the impugned transfer order of the appellant baked by obliging the corrupt mafia who are bent upon to keep the appellant away from the scene, exerting political pressure to harass, victimize him and for the sole objective to disturb, torture the appellant and gratify the blue eyed chap, which is evident from the fact that a copy of the impugned transfer Order is forwarded to Deputy Commissioners, Bannu, in order to pacify him.
4. Because the impugned transfer orders is blatant violative of clause I, II, IV & X of the transfer/ posting policy of the Provincial Government of Khyber Pakhtunkhwa.
5. Because the impugned transfer order of the appellant is utter disregard of spouse policy of the service men. The wife of appellant Mst. Rashida Quresh is serving as AFNS, Armed Service Nursing Hospital at CMH Mardan. **(Copy of the appellant's wife credentials are annexure "E-1 to E-7")**
6. Because the impugned order has been issued in arbitrary and mala fide manner, therefore not tenable in the eyes of law.
7. Because the impugned order has not been issued in public interest and public exigencies of service rather to appease corrupt mafia their own self.
8. Because the appellant performed his duty with zeal and zest, to the entire satisfaction of his high ups, the appellant has unblemished service record and no complaint or proper inquiry ever has ever been recorded against him except anonymous proceedings.

9. That the Appellant seeks leave of this august Tribunal to claim further grounds also;

In view of the above narrated facts, the instant appeal may be graciously accepted as prayed for.

Dated: 04-09-2024

**APPELLANT**

**MUHAMMAD ISRAEL**

**THROUGH**

**SHUAIB SULTAN**

**Advocate High Court, At Mardan**

  
**SHUAIB SULTAN**  
Advocate High Cou  
District Courts Mardan

**AFFIDAVIT**

I, Muhammad Isreal son of Abdur Aziz, Assistant Director Industries & Consumer Rights resident of Kotka Rehmat Khan, Presently resides at Hasham Khan Colony Mausam Korana Mardan, do hereby state on solemn affirmation that the contents of the instant Appeal is true, correct to the best of my knowledge and belief and nothing has been concealed in this respect.

**DEPONENT**

M. LUOMAN Advocate  
Oath Commissioner  
No. \_\_\_\_\_ Date \_\_\_\_\_  
Distt Courts Mardan



P/4-A

**BEFORE THE PROVINCIAL SERVICES TRIBUNAL****PESHAWAR**

Appeal No. /2024

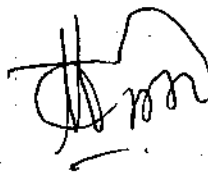
Muhammad Israel

Versus

The Govt. etc

**CERTIFICATE**

I, Muhammad Isreal son of Abdur Aziz, Assistant Director Industries & Consumer Rights resident of Kotka Rehmat Khan, Presently resides at Hasham Khan Colony Mausam Korana Mardan, do hereby state on solemn affirmation that the appellat named above has not filed any appeal or petition in respect of his transfer in any other Court/ Tribunal and even before this Honourable Tribunal.

**DEPONENT**



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**INDUSTRIES, COMMERCE & TECHNICAL**  
**EDUCATION DEPARTMENT**

Dated 16.05.2023

**NOTIFICATION**

No. SO/INDIE-61/2023/459-7. The Competent Authority has been pleased to order posting / transfer of the following officers / officials of Directorate General, Industries & Commerce Khyber Pakhtunkhwa as noted against each, with immediate effect, in the public interest:-

Sr	Name of officer & Designation	From	To
1	Mr. Abdul Ghafar, Assistant Director (BPS-17)	Assistant Director, Industries/ CPC, Battagram	Headquarter office, Peshawar against the vacant post.
2	Mr. Ejaz Khan, Assistant Director (BPS-17)	Assistant Director, Industries/ CPC, North Waziristan	Assistant Director Industries/ CPC, Battagram vice S.No.1
3	Muhammad Israet, Assistant Director (BPS-17) (ACB)	Assistant Director Industries/ CPC, Kurram	Assistant Director Industries/ CPC, Bannu vice S.No.4
4	Mr. Amjad Ali, Assistant (BPS-16)	Assistant Director Industries, CPC, Bannu	Assistant Director Statistics Bannu (OPS) against the vacant post. He is also authorized to hold the charge of the post of Assistant Director Industries, CPC, North Waziristan.
5	Mr. Naveed Malik, Assistant (BPS-16)	Under transfer to Headquarter office, Peshawar	Assistant Director, Industries CPC, Kurram (OPS) vice S.No.3.
6	Mr. Man Zaman, Assistant (BPS-16)	Assistant o/o Assistant Director, Industries CPC, Buner	Assistant Director, Industries/ CPC, Buner (OPS), against the vacant post.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA**  
**Industries, Commerce & Technical Edu: Department**

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Director General, Industries & Commerce Peshawar.
3. Deputy Directors, Industries & Commerce concerned.
4. Officers / officials concerned.
5. District Accounts Officer concerned.
6. P.S to Secretary IC&TE Department, Peshawar.
7. PA to Special Secretary IC&TE Department.
8. PA to Additional Secretary IC&TE Department.
9. PA to Deputy Secretary (Admin) IC&TE Department.

ADMAN ZAMAN 16-5-2023  
SECTION DIRECTOR (ADMIN)



**ATTESTED**

*Better Copy of Annexure - 'A'*

GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE & TECHNICAL  
EDUCATION DEPARTMENT

*Page: "5"***NOTIFICATION**

Dated 16.05.2023

*Attested*

No. SOI(IND) 2-61/2023/1459-74. The concern Authority has been pleased to order Posting/ transfer of the following officers/ officials of Directorate General, Industries & Commerce Khyber Pakhtunkhwa as noted against each, with immediate effect, in the Public interest.



S. No	Name of officer & Designation	From	To
1	Mr. Abdul Ghaffar Assistant Director (BPS-17)	Assistant Director, Industries/CPC Battagram	Headquarter office, Peshawar against the vacant post.
2	Mr. Ijaz Khan Assistant Director (BPS-17)	Assistant Director, Industries/CPC North Waziristan.	Assistant Director Industries/ CPC, Battagram vice S. No 1
3	Muhammad Israel Assistant Director (BPS-17)	Assistant Director, Industries/CPC Kurram.	Assistant Director Industries/ CPC, Bannu vice S. No. 4
4	Mr. Amjad Ali Assistant (BPS-16)	Assistant Director, Industries/CPC Bannu.	Assistant Director Statistics Bannu (OPS) against the vacant post. He is also authorized to hold the charge of the post of Assistant Director Industries, CPC, North Waziristan.
5	Mr. Naveed Malik Assistant (BPS-16)	Under transfer to Head Quarter Office, Peshawar.	Assistant Director Industries CPC Kurram (OPS) vice S. No3.
6	Mr. Mian Zaman Assistant (BPS-16)	Assistant o/o Assistant Director, Industries CPC Buner	Assistant Director Industries/ CPC, Buner (OPS), against the vacant post

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
Industries, Commerce & Technical Edu: Peshawar.

Copy forward for information to the

1. Accountant General; Khyber Pakhtunkhwa.
2. Director General, Industries & Commerce Peshawar.
3. Deputy Directors, Industries & Commerce Concern.
4. Officers / officials concern.
5. District Accounts Officer concern.
6. P.S. to Secretary IC&TE Department.
7. PA to Special Secretary IC&TE Department.
8. PA to Additional Secretary IC&TE Department.
9. PA to Deputy Secretary (Admn) IC&TE Department.

ADNAN KHAN  
SECTION OFFICER (ADMN)

P/6

"B"



GOVERNMENT OF KHYBER PAKHTUNKHWA  
INDUSTRIES, COMMERCE & TECHNICAL  
EDUCATION DEPARTMENT

Attested  
*[Signature]*

Dated: 14<sup>th</sup> May, 2024

NOTIFICATION

No. SO(ND)8-2/2024/4987-95

The Competent Authority has been pleased to order following posting / transfer in the best public interest, with immediate effect: -

S.No	Name & Designation of the Officer / Officials	From	To
01.	Mr. Muhammad Israeel Khan, Assistant Director (BPS-17 a.c.b)	Assistant Director Industries/CPC, District Bannu.	Assistant Director, Statistics (BPS-17), Office of Deputy Director, Industries, Commerce & Trade, Malakand Region.
02.	Mr. Arnejd Ali, Assistant (BPS-16)	Assistant Director, Statistics (OPS), Office of Deputy Director, Industries, Commerce & Trade, Bannu Region.	Assistant Director Industries/CPC (OPS), District Bannu vice Sr. No. 01.  He is also authorized to hold look-after charge of the post of Assistant Director, Statistics (OPS), Office of Deputy Director, Industries, Commerce & Trade, Bannu Region in addition to his own duties till further orders.

Secretary, Industries, Commerce & Technical Education Department

Endst: No. and date even.

Copy forwarded for information to the:-

1. Commissioner, Bannu Division, Bannu.
2. Commissioner, Malakand Division, Saidu Sharif, Swat.
3. Deputy Commissioners, Bannu & Malakand.
4. Director General, Industries & Commerce, Khyber Pakhtunkhwa.
5. District Accounts Officers, Bannu & Malakand.
6. P.S to Special Assistant to Chief Minister, Khyber Pakhtunkhwa on Industries, Commerce & Technical Education.
7. P.S to Secretary, IC&TE Department.
8. Officer concerned.
9. Master File.

*[Handwritten signature]*

*[Handwritten signature]*  
11/05/24

B

P/7

"C"

TO,  
THE CHIEF SECRETARY KHYBER PAKHTUNKHWA,  
PESHAWAR

DEPARTMENTAL APPEAL FROM THE ORDER DATED 14-05-2024 OF  
THE SECRETARY INDUSTRIES, COMMERCE & TECHNICAL  
EDUCATION K.P, PESHAWAR

Respectfully Sheweeth:

1. That the applicant has been transferred by the competent authority from Bannu to Malakand Region vide order dated 14-05-2024. (Copy of Transfer Order is annexed as annexure "A")
2. That being aggrieved from the order of the Secretary Industries, Commerce & Technical Education K.P, Peshawar the applicant file the instant departmental appeal inter alia on the following grounds;

GROUNDS

- A. That the order of the secretary industries, commerce & technical education K.P, Peshawar is against the law and rules hence, untenable.
- B. That the order of the competent authority to the extent of applicant has no value and scope because the transfer order passed by the competent authority is pre-mature in nature whereby just to oblige of his own blue-eyed appointee for unfair means which need reversal/cancelation/withdrawal of impugned transfer order. It is pertinent to mentioned here that on the said impugned order, the candidate who transferred upon the impugned post is below the BPS 17 hence, the impugned transfer order is obviously illegal, unlawful therefore, deserve to be set at naught. The authority has exercised the power colorfully and concealed the real position from the high ups and dragged the applicant but just for nothing just creates agony for the applicant.

ck  
MS

ATTESTED

c

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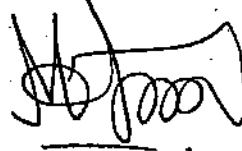
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It is, therefore, most humbly requested that on acceptance of this application, the transfer order dated 14-05-2024 may kindly be set aside/cancel/withdraw for the best interest of justice.

Applicant

**Muhammad Israel (CNIC: 11101-4097785-5)**  
**Assistant Director BPS-17**  
**Industries, Commerce & Technical Education**  
**KP Peshawar.**

Dated: 30.05.2024



cha



~~ATTESTED~~

P/9

"D"

<b>TCS</b> TRUST A LEADER TO DELIVER		Call: (021) 111 123 456		Sales Tax Invoice GST NO. 12-00-9808-002-73	
Consignment: Note No: 708		7750217		Origin	Dest
From (Shipper) M. ISLEUP BANNY		To (Consignee) Chay Security epk		PKR	Weight
BANK CODE		BANK CODE		Tel No	
Accounting COPY		This is a non-refundable consignment subject to our standard terms and conditions.		Collected by TCS - Name Date	
I warrant that all details given herein are true and correct.		Shipper's Signature		Date Time a.m. p.m.	

Attested  
*[Signature]*

*[Signature]*  
Date 15-11-24 Time 10:30 a.m.

SECRETARY  
GOVT. VICE CHIEF  
MARDAN DISTRICT

تاریخ تسلیم شدہ / تاریخ رجسٹریشن  
23 مارچ 2023



Entry Date: 24-Mar-2023  
Issue Date: 03-Apr-2023

تاریخ رجسٹریشن: 24-Mar-2023  
تاریخ اجراء: 03-Apr-2023

Marriage Solemnized/Registered By: Shah Ali Bacha  
Marriage Solemnized/Registered By CNIC No: 16101-8087470-1

تاریخ رجسٹریشن: 19-Mar-2023  
تاریخ اجراء: 03-Apr-2023

<p>Name: Raahda Qurah Nationality: Pakistan CNIC No: 16101-6802442-6 Religion: Islam Age: 16 Day(s) 9 Month(s) 33 Year(s) Marital Status: Unmarried Father's Name: Muhammad Qurah Address: Mardan District: Mardan</p>	<p>Name: راجدہ قرہ قومیت: پاکستانی شناختی نمبر: 16101-6802442-6 مذہب: اسلام عمر: 16 سال 9 ماہ 33 دن زوجہ کی حیثیت: غیر شادی شدہ والد کا نام: محمد قرہ پتہ: ماردان ضلع: ماردان</p>
--	---

Particulars of Bride

<p>Name: Muhammad Iqbal Nationality: Pakistan CNIC No: 11101-4097785-5 Religion: Islam Age: 17 Day(s) 11 Month(s) 35 Year(s) Marital Status: Unmarried Father's Name: Abdul Aziz Address: Kotla Rahmat Khan Village Gama Dera Mardan District: Mardan</p>	<p>Name: محمد اقبال قومیت: پاکستانی شناختی نمبر: 11101-4097785-5 مذہب: اسلام عمر: 17 سال 11 ماہ 35 دن زوجہ کی حیثیت: غیر شادی شدہ والد کا نام: عبدالعزیز پتہ: کوتلا رحمت خان وادی گاما ڈیرا ماردان ضلع: ماردان</p>
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Particulars of Groom

انٹرنیشنل / تازہ / تازہ کی طرف سے  
Marriage Registration Certificate

Form No: 11101/51841  
FORM NO. 11101/51841



Handwritten signature

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P/10



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P/11



"E/II"

Attested  
*[Signature]*

MOST IMED

General Headquarters  
MS Branch MS-D Wing  
Rawalpindi

Tel: 34344

0314/01/04/AFNS - Postings /MS-  
31B-PFPZOLA

11 Mar 2022

To: Med-DMS 4  
AFPGMI-Comdt  
AFPGMI-Nur Wing  
AFPGMI-Trg Wing

Info: Naval Headquarters (Med Dte) Islamabad  
CORO-GP 9  
AFIC- Trg  
AFIC- Afns  
AFIRM-Adm Br  
AFIRM-Matrn Office  
CMH Atd - Dy Comdt  
CMH Atd - CR Section  
CMH Jmr - Main Office  
CMH Jmr - Coy Comdt  
CMH Rwp - Matron  
AFBMTc-Adm Br  
AFBMTc-Dy Comdt  
CMH Lhr - Adm Branch  
CMH Lhr - CR  
CMH Kht - Main Office  
CMH Kht - CR  
CMH Okara - A Branch  
CMH Okara - CR Section  
CMH Pano Aqil - Adm Branch  
CMH Pano Aqil - Matron  
CMH Mdx - Matron Office  
CMH Mdx - Main Office  
CMH Quetta - Matron Office  
CMH Quetta - Adm Br  
CMH Nsr - Dy Comdt  
CMH Nsr - CR  
CMH Min - Adm Office  
CMH Min - Cby Office

MS-23 B  
MS-24 (Sys)

Docu ID: PFPZOLA APPROVED By DMS-31B Maj Shahid Aziz on 11 Mar 2022

Note: Computer Generated Documents Do Not Require Signature.



RESTD

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RESTD

P/12

E/III

General Headquar  
MS Branch  
Rawalpindi  
Tel: GHQ - 3716:  
0314/04/MS-31E

11 Mar

Attested 

(All Concerned)

Subj: Postings, Rvt and Appts - AFNS Offrs (Post Basic Spec Course, Session N  
2021/22)


The COAS is pleased to order for postings, Rvt and appts:-

Ser	No, Rank, Name	From	To	Remarks
a.	JSS-04803 Capt. Shumaila Asif	AFPGMI ex PN	GDNO (CEP) AFIC	(1) In an existing v (2) Rvt to Army.
b.	JSP-04846 Capt Faiza Jabeen	AFPGMI ex CMH Abbottabad	GDNO (F&E) AFIRM	In an existing vac.
c.	JSS-04853 Capt Maryam Tariq	AFPGMI ex CMH Jhelum	GDNO (CGI) AFIC	In an existing vac.
d.	JSS-04868 Capt Mishal Fatima	AFPGMI ex CMH Rawalpindi	GDNO (Onc & BMT) AFBMTc	(1) In an existing (2) Adj at spouse (3) Local Adj. No admissible.
e.	JSP-04885 Capt Khalida Habib	AFPGMI ex AFIC	GDNO (Peri Op & OT) CMH Lahore	(1) In an existing (2) Adj at spouse
f.	JSP-04899 Capt Sana Tariq	AFPGMI ex CMH Kohat	GDNO (CCN) CMH Okara	In an existing vac.
g.	JSP-04905 Capt Rashida Quraishi	AFPGMI ex CMH Pano Aqil	GDNO (F&E) CMH Mardan	In an existing vac.
h.	JSS-04931 Capt Ayesha Adeeba	AFPGMI ex CMH Quetta	GDNO (CCN) CMH Nowshera	In an existing vac.
i.	JSS-04947 Capt Rukhsana Kousar	AFPGMI ex CMH Quetta	GDNO (CCN) CMH Multan	In an existing vac.

Docu ID: 0XPF4DA APPROVED By AMIS Lt Col Yasir Aziz on 11 Mar 2022  
Note: Computer Generated Documents Do Not Require Signature.

RESTD

2<sup>nd</sup> Sheet of MS Branch Posting Order No.0314/ 04/MS-31B/14 dated 11 Mar 2022

2. A/n AFNS offs will mov on termination of Post Basic Spec Course so as to report 28 Mar 22. *Attested* 
3. Copies of cas return (PAFY-1973) will be submitted to GHQ MS Branch (MS-31B, IV & MS-25) and others concerned.
4. Representation against posting / request for rel from svc will only be entertained, on mov to the new sta has been completed and the case is initiated by the new unit / fmn.
5. All HQs will be responsible to further disseminate this posting order (hard copy) to all comd estbs / all concerned.

F.  
(Yasir)

Docu ID: 0XPF40A APPROVED By AFMS Lt Col Yasir Aziz on 11 Mar 2022  
Note: Computer Generated Documents Do Not Require Signature.

RESTD

**CASUALTY RETURN**Sheet No. 1<sup>st</sup> & Last Date: 29 Mar 2022 Submitted by: CMH Mdx /HQ 11 CorpsReturn No. 16/2022Station: Mdx CanttLast Return No. 15/2022

Ser	Rank	Name in Full	PA No with prefix	Regt/ Corps	Date and nature of cas (with auth)
1.	CAPT	RASHIDA QURAISH	JSP-04905	AFNS	<p><b>POSTING IN</b> Posted from AFIGMI Rwp (Ex CMH Pnl) and TOS wef 28 Mar 2022 (FN).</p> <p><b>APPT</b> Appt GDNO (Paeds) wef 28 Mar 2022 (FN).</p> <p><b>PAY &amp; ALLCES</b> Auth to draw fol allces wef 28 Mar 2022 (FN).</p> <p>a. RA @ Rs. 29,777/-pd b. CA @ Rs. 5000/-pm c. IS Alice @ Rs. ¼ per DA</p>

Auth: GHQ, MS Br ltr no. 0314/04/MS-31B/14-0XPF4DA dated 11 Mar 2022

Maj  
For CO  
(Ashfaq Hussain)

Distr: GHQ, MS Branch (MS-31B) Rwp  
GHQ Med Dte, DMS-4 (IS) Rwp  
CORO GHQ Rwp  
HQ Log 11 Corps (Med Branch)  
AFIGMI Rwp  
CMH Pano Aqil  
UA Office  
Accts Office  
Pers File,



خاص شرائط اگر کوئی ہوں

18- آیا شوہر نے طلاق کا حق بھی کو تو نہیں کر لیا ہے  
 اگر کہہ لیا ہے تو کونسی شرائط سے حق ہے؟  
 19- آیا شوہر کے طلاق سے حق کسی جسم کی پابندی لگائی  
 گئی ہے؟  
 20- آیا شادی کے موقع پر ہر دو تان نقد غیرہ سے  
 متعلق کوئی دستاویز جاری کی گئی ہے تاکہ کوئی  
 ہے تو اس کے فقرہ مندرجات۔  
 21- آیا دلہا کے بیاں پہلے سے کوئی ہی موجود ہے تاکہ بچہ تو آپاس  
 لے دوسری شادی کرنے کے لئے مسلم خاندانی قوانین کے تحت کسی  
 1933ء کے تحت ہتھیار میں کوئی کونسل سے اجازت حاصل کر لیا ہے۔  
 21- (الف) آیا دلہا ہارٹو واسے یا طلاق یافتہ؟  
 21- (ب) آیا دلہا کے پاس پہلے سے ہی یا تو موجود ہیں؟  
 اگر دلہا ہارٹو یا طلاق یافتہ ہے تو  
 اس کے بچوں کی تعداد اور نام  
 22- نمبر تاریخ مراسلہ جس کے ذریعے کوئی کونسل نے  
 دلہا کو دوسری شادی کرنے کی اجازت دی ہے۔  
 23- طلاق خاں کا نام اور ولدیت سے ہے۔  
 23- شادی کو درکار جسر کرنے کی تاریخ  
 25- فیس رجسٹریشن جرنل کی گئی۔

ذولہا کے وکیل کے تقرر کے گماہن کے دستخط  
 (1)  
 (2)  
 ذولہن کے وکیل کے تقرر کے گماہن کے دستخط  
 (1)  
 (2)  
 طلاق خاں کے دستخط  
 (1)  
 (2)

ذولہا یا اس کے وکیل کے دستخط  
 (1)  
 (2)  
 شوہر کے گماہن کے دستخط  
 (1)  
 (2)  
 طلاق خاں کے دستخط  
 (1)  
 (2)

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State of Punjab

State of Punjab

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E/VII

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**WAKALAT NAMA**  
**BEFORE KPK SERVICES TRIBUNAL**  
**PESHAWAR**

Appeal No. \_\_\_\_\_ of 2024

on behalf of Appellant

In re:-

Muhammad Isreal

**Appellant**

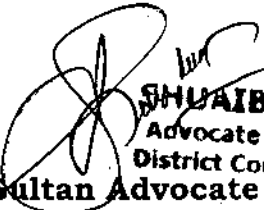
**VERSUS**

Government Of Khyber Pakhtunkhwa Secretary Industries etc **Respondents**

KNOW ALL to whom these present shall come that I/ we Muhammad Isreal, the appellant in the above noted Service Appeal U/S 4 of the KPK Civil Servant Act 1973 do hereby appoint and constitute **Mr. Shuaib Sultan Advocate** Mardan as Counsel in subject proceeding and authorize him to appear, plead etc., compromise, withdraw or refer to arbitration for me/ us, as my/ our Advocate in the above matter, without any liability for his default and with the authority to engage/ appoint any other Advocate/ Counsel at my/ our behalf all sums and amounts payable to deposited on my/ our account in the above noted matter.

IN WITNESS WHEREOF I/ We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this \_\_\_\_\_ day of \_\_\_\_\_ 2024.

**Accepted subject to the terms of the fees.**



**SHUAIB SULTAN**  
Advocate High Court  
District Courts Mardan

**Shuaib Sultan Advocate High Court**

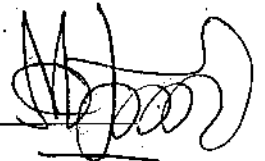
**District Courts Mardan**

**CNIC No. 16102-4969193-3**

**Bar Council, S. No.Bc-10-5973**

**Cell No. 0300-5727424**

**Email. shuaibadv@gmail.com**

Signature of client: 

11101-4097785-5