


# FORM OF ORDER SHEET

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

**Appeal No.** 1463/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/09/2024	<p>The appeal of Mst. Saimoon presented today by Mr. M.Asif Yousafzai Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

APPEAL NO. 1463 /2024

Saimoon

VS

Education Deptt etc.

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*Saimoon*  
APPELLANT

Saimoon

THROUGH:-

*M. Asif Yousofzai*  
(M. ASIF YOUSAFZAI)  
ASC

*S. Noman Ali Bukhari*  
(S.NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT  
OF PESHAWAR

*Hilal Zubair*  
& (HILAL ZUBAIR)  
ADVOCATE

Room No.FR-08. 4<sup>th</sup> Floor.  
Bilour Plaza Peshawar Cantt:  
Cell # 03339103240

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

APPEAL NO. 1463 /2024

Saimoon, Ex-PST,  
Govt: Girls Primary School Said Ali Mela  
Central Kurram.

(APPELLANT)

VERSUS

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The District Education Officer (E&SE) (Female), Kurram.

(RESPONDENTS)

-----

**APPEAL UNDER SECTION 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974**  
**AGAINST THE ORDER DATED 30.10.2021 WHEREBY**  
**THE APPELLANT WAS REMOVED FROM SERVICE**  
**AND AGAINST THE REJECTION ORDER DATED**  
**26.08.2024 WHEREBY THE DEPARTMENTAL APPEAL**  
**OF THE APPELLANT AGAINST THE REMOVAL FROM**  
**SERVICE ORDER HAS BEEN REJECTED FOR NO**  
**GOOD GROUNDS.**

PRAYER:-

**THAT ON THE ACCEPTANCE OF THIS APPEAL THE**  
**IMPUGNED ORDER DATED 30.10.2021 AND**  
**REJECTION ORDER DATED 26.08.2024 MAY BE SET**  
**ASIDE AND THE APPELLANT MAY BE REINSTATED**  
**INTO SERVICE WITH ALL BACK AND**  
**CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY**  
**WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND**  
**APPROPRIATE THAT MAY ALSO BE AWARDED IN**  
**FAVOUR OF THE APPELLANT.**

(2)

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed as PTC Teacher (BPS-12) on 16.10.2017, the appellant was performing her duties with the entire satisfaction of her superiors and never gave any chance of complaint to their high-ups throughout service career. **Copy of order dated 16.10.2017 is attached as Annex-A**
2. That on 30.10.2021 an order was issued whereby the appellant was removed from service without following the codal formalities of E&D Rules, 2011. **Copy of order dated 30.10.2021 is attached as Annex-B.**
3. That the appellant felt aggrieved from the order dated 30.10.2021, filed a departmental appeal against that on 23.11.2021. **Copy of departmental appeal is attached as Annex-C.**
4. That the appellant filed different applications to the respondents from time to time for deciding her appeal but the same was not responded by the respondent department. The Assistant Director Establishment (Female) E&SE Khyber Pakhtunkhwa issued twice a letter to DEO Khurram for the submission of detail report of the appellant but the same was delayed due to misplacement of record of appellant while shifting the office of the concerned DEO to some other place. **Copy of the application and letters is attached as annexure D.**
5. That finally the respondent department issued rejection order on 26-08-2024 by rejecting the departmental appeal dated 23-11-2021, against the order dated 31-10-2021, with out giving any legal justification. **Copy of the rejection order dated 26-08-2024 is attached as annexure E.**
6. That now the appellant comes to this august Tribunal for the redressal of her grievances on the following grounds amongst others.

**GROUNDS:**

- A) That the impugned orders dated 30.10.2021 and 26-08-2024 are against the law, facts, rules and material on record, therefore liable to be set aside.
- B) That the appellant has been condemned unheard and has not been treated according to law and rules.

- C) That no codal formalities were followed by the department before imposing the penalty which is violation of Article 10-A of the Constitution of the Islamic Republic of Pakistan and also in violation of the Maxim, *Audi alteram partem* which means "listen to the other side", or "let the other side be heard as well", but this was not the case in the instant matter. That according to a reported judgment cited as 2019 CLC 1750 stated that "*Audi alteram partem*" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as, 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC (C.S.) 67, where in clearly stated that the penalty awarded in violation of the maxim "*Audi alteram partem*" is not sustainable in the eye of law.
- D) That no regular inquiry proceedings were conducted before issuing the impugned order which is totally in violation of Article 4, 10A, and 25 of Constitution of Islamic Republic of Pakistan .
- F) That impugned order was based on willful absence, so, for the willful absence procedure as provided in **Rule 9 of the E&D Rules, 2011**, was not followed, which is also clear from the impugned orders. So the impugned order is defective in the eye of law.
- G) That without issuing show cause notice adverse action was taken against the appellant which is the clear violation of rule **Rule-5(a) Read with Rule-7**. Further it is, added that in case where regular inquiry is necessary the **Rule-14(b) of the E&D Rules 2011** should be followed but the same was also not followed which made the whole proceedings illegal and a nullity in the eyes of Law. The same principle was held in the Superior Court's judgments cited as 1987 SCMR 1562, 2019 PLC (C.S.) 811, 2008 PLC (C.S.) 921 and 209 SCMR 605.
- H) That it is, pertinent to mention here that if inquiry was not necessary then the competent authority should follow the **Rule 5(a) of the E&D rules 2011** and to dispense with the inquiry with reasons but the same was also violated, so the impugned order is passed in violation of law and rules, so not tenable in the eye of law.
- I) That no regular inquiry was conducted before imposing major penalty. Imposing punishment without regular inquiry is an illegal and against the law, rules and natural justice. The same principle held in the

(4)

Superior Court's judgments as a declared law, cited as 2010 SCMR 1554, 2016 SCMR 108, 2009 PLC (cs) 19, 2008 SCMR 1369, 2009 SCMR 412, 2007 PLC cs 247 and 2008 PLC cs 1107.

- J) That according to Federal Shariat Court's Judgment cited as PLD 1989 FSC 39 the show cause notice is must before taking any adverse action, non-issuance of show cause notice is against the injunction of Islam. Hence the impugned order is liable to be set-aside.
- K) That the show cause is the demand of natural justice before taking adverse action and necessary for fair trial and also necessary in light of injunction of Quran and Sunnah but show cause was not served to the appellant at appropriate stage (show cause given to the appellant but with the impugned order) which is malafide on the part of the department. So, fair trail denied to the appellant which is also violation of Article 10-A of the Constitution. Further it is added that according to reported judgment cited as 1997 PLD page 617 stated that every action against natural justice treated to be void and unlawful order. The natural justice should be considered as part and parcel according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727. Hence impugned order is liable to be set-aside
- L) That the opportunity of personal hearing and personal defense was also not provided to the appellant which is the violation of Rule 7(d). Thus the whole proceedings taken in violation of law.
- M) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on the acceptance of this appeal the impugned orders may kindly be set aside and the appellant may be reinstated into service with all back and consequential benefits.

5

*Saimoon*  
APPELLANT

Saimoon

THROUGH:-

*M. Asif Yousafzai*  
(M. ASIF YOUSAFZAI)  
ASC

*S. Noman Ali Bukhard*  
(S. NOMAN ALI BUKHARD)  
ADVOCATE HIGH COURT  
OF PESHAWAR

& *Hilal Zubair*  
(HILAL ZUBAIR)  
ADVOCATE

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

APPEAL NO. \_\_\_\_\_/2024

Saimoon

VS

Education Deptt etc.

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.

*Saimoon*  
APPELLANT

Saimoon

THROUGH:-

*A. Youzaf*  
(M. ASIF YOUSAFZAI)  
ASC

*S. Noman Ali Bukhard*  
(S. NOMAN ALI BUKHARD)  
ADVOCATE HIGH COURT  
OF PESHAWAR

& *Hilal Zubair*  
(HILAL ZUBAIR)  
ADVOCATE



7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

APPEAL NO. \_\_\_\_\_/2024

Saimoon

VS

Education Deptt etc.

**AFFIDAVIT**

I, Saimoon Ex-PST, Govt: Girls Primary School Said Ali Mela Central Kurram (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honourable Tribunal.

*Saimoon*  
DEPONENT

Saimoon

IDENTIFIED BY:

(M. ASIF YOUSAFZAI)  
ASC

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A

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**AGENCY EDUCATION OFFICE**  
**LOWER & CENTRAL KURRAM SADDA.**

Dated Peshawar, the 22<sup>nd</sup>, May, 24

**APPOINTMENT ORDER.**

Consequent upon the recommendation of Selection Committee. The following local Candidate are hereby appointed purely on temporary basis against vacant posts of PTC BPS-12 @ Rs. 15520-960-47120) per month plus usual allowances as admissible under the rule with effect from the date of their taking over charge to the schools noted against their names in the interest of public service.

S. No.	Name	Father Name	Post	Name of Schools	Remarks
01.	Saimoon	Altaf Habibi	PTC	GGPS Said Ali Mella	AVP

**TERMS AND CONDITIONS**

1. Charge report should be submitted to all concerned.
2. Appointment of the candidates is made purely on temporary basis and liable to termination at any time without any notice.
3. If a candidate wants to resign his post, he will have to give one month prior notice or his pay for one month will be forfeit in lieu thereof.
4. Their documents, date of birth, CNIC and Domicile certificates should be checked before handing Over charge of the post and attested copies thereof may be kept on record of the school.
5. They should produce their health and age certificates from the agency surgeon concerned.
6. The candidates will have to complete their normal tenure in the said school.
7. They may not be handed over charge if their age is below 18-Years or above 35-Years.
8. No salary may be drawn before the verification of the documents from the quarter concerned.
9. If they failed to report their arrival within 15-days of the issuance of their appointment order, it will be considered as cancelled.

Add: Agency Education Officer  
Lower & Central Kurram Sadda

No. 2425-32/Edu dated 16.10.2017

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Addl: Political Agent Kurram Agency.
4. Head Teacher Concerned.
5. Agency surgeon kurram agency.
6. AAEO Local Office.
7. Officials concerned.
8. Office record.

Add: Agency Education Officer  
Lower & Central Kurram Sadda

Lower & Central Kurram Sadda  
 Add: Agency Education Officer

*[Handwritten signature]*

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Add: Political Agent Kurram Agency.
4. Head teacher concerned.
5. Agency Surgeon Kurram Agency.
6. A&EO Local Office.
7. Officials Concerned.
8. Office record.

Copy for information to the:

No. 2425-32/Edu Dated 16/10/2017

Lower & Central Kurram Sadda  
 Add: Agency Education Officer

1. Appointment of the candidates is made purely on temporary basis and liable to termination at any time without any notice.
2. If a candidate wants to resign his post, he will have to give one-month prior notice or his pay for one month will be forfeit in lieu thereof.
3. Their documents, date of birth, CMC and domestic certificates should be checked before handing over charge at the post and attested copies thereof may be kept on record of the school.
4. They should produce their health and age certificates from the Agency Surgeon concerned.
5. The candidates will have to complete their normal tenure in the said school.
6. They may not be handed over charge if their age is below 18 years or above 35-years.
7. No salary may be drawn before the verification of the documents from the quarter concerned.
8. If they failed to report their arrival within 15-days of the issuance of their appointment order, it will be considered as cancelled.

**Terms & Condition:**

S. No.	Name	Father Name	Post	Name of Schools	Agency/Vacant Post
1	SAYIMON	ALIAF HADIB	PTC	GHS said Ali Mulla	

Agency Education Officer  
 Lower & Central Kurram Sadda  
 FATA Peshawar  
 16/10/2017

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 175



District Education Officer Kurram

No: \_\_\_\_\_ /Edu

Date: \_\_\_\_\_ /2021

Ph No:0926-520674 email: educationsadda@gmail.com

B

9

**NOTIFICATION/WILLFUL ABSENCE REMOVAL FROM SERVICE**

- 1) WHEREAS MISS Samon PST GGPS Said Ali Mela was reported absent from her duty since 17-10-2007
- 2) And whereas the EMA team visited her school on the following dates and pond her absent the date are 05/10/2020 , 12/10/2020 , 20-03-2021 , 15-07-2020-23-08-2021, 08-09-2021
- 3) And whereas Miss Saimon has served the Showcase notice No : 3728-33/Edu Dated 28-11-2019 but the office received no written reply.
- 4) And whereas Miss Saimoon PST was served with another show cause Notice No: 2080-83/Edu date : 07-12-2021 and No written reply was received
- 5) And whereas on 24-09-2021 the DEO Female visited your School and find you absent and proxy Teacher putting Your Signatures on attendance register.
- 6) Whereas the district education office in the capacity was the competent authority after having examined the record and detail further of case on all relevant aspects of the view that the charges of willful unauthorized absent Miss Saimon has been proved and as accused of miss conduct under the rule her willful absence
- 7) Now therefore in exercise of the powers conferred under rules 9 and 4 (b) (iii) of Khyber Pakhtunkhwa Govt Servant ( Efficiency and Discipline ) Rules 2011 , the competent authority the District Education Officer is please to imposed major penalty of removal from service upon Miss Saimon with immediate effect on account of his unauthorized absence.

District Education Officer  
District Kurram

No: \_\_\_\_\_ / Edu Dated : \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Copy for information to the

- 1) Director of Elementary and Secondary Education KPK Peshawar
- 2) Deputy Commissioner District Kurram
- 3) District Monitoring Officer Kurram (EMA)
- 4) District Account Officer Kurram
- 5) Teacher Concerned
- 6) Deputy District Education Officer Female Lower & Central Kurram I
- 7) ASDEOs Concerned
- 8) Office file

District Education Officer  
District Kurram



**NOTIFICATION WILL FULL ABSENCE/REMOVAL FROM SERVICE**

*(Signature)*

1. WHEREAS Miss Salmon PRT GGS SIDAAN KADIA ...
2. And whereas Miss Salmon ...
3. And whereas Miss Salmon ...
4. And whereas Miss Salmon ...
5. And whereas on 24.06.2021 the DCEO Female ...
6. And whereas the District Education Officer ...

*(Signature)*

Noted for reference to the ...

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Noted for reference to the ...

Noted for reference to the ...

Noted for reference to the ...

No. 546-73 /Edic Dated 30 /10 /21

Copy for information to the:

1. Director of Elementary and Secondary Education, P.O. Basti
2. Deputy Commissioner, District Kurram
3. District Inspecting Officer, Kurram (E.M.S.)
4. District Account Officer, Kurram
5. Teacher concerned
6. Deputy District Education Officer, Female Lower & Centre, Basti
7. ASDEOs concerned
8. Office file.

*(Signature)*

District Education Officer

23-11-2021

السلامة  
موضوع: (PST) كارت

بسم الله الرحمن الرحيم

الحمد لله الذي جعلنا من عباده الصالحين  
الذين هم خير خلق الله

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بسم الله الرحمن الرحيم

الحمد لله الذي جعلنا من عباده الصالحين  
الذين هم خير خلق الله

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1854  
Date: 18-7-23  
Directorate of Education  
Muzaffargarh, KPK, Peshawar

Date: 18-7-23  
18/7/23

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**Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

Merged Area Phone: 091/-9330242  
(Pension/RF/DC/B-Fund)

No. 22748/

Dated 02/08/2023

The District Education Officer (Female)  
Kurram

Subject: RE-INSTATEMENT OF SERVICE

I am directed to refer to the subject cited above and to enclose herewith appeal, lodged by Mst. Saimoon PST Govt. Girls Primary School Said Ali Mela Central Kurram and to ask you to submit detailed report at the earliest to this office, so as to proceed further into the matter, please.

Encl : ( A.A)

Assistant Director Estab: (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Endst.No. \_\_\_\_\_

Copy to the:-

P.A to Additional Director (Estab:) Local Directorate.

Assistant Director Estab: (F)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

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APGS Report

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APGS Report

APGS Report

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APGS Report



**Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

Merged Areas Phone# 091/-9330242  
(Panalon/BB&DC/D-Fund)

Dated 11/03/2024

No. 8329

15

To District Education Officer (Female)  
District Kurram

Subject: RE-INSTATEMENT OF SERVICE IN RESPECT OF MST. SAIMOON PST  
GGPS SAID ALI-MELA CENTRAL KURRAM

I am directed to refer to your office letter No. 1328-83 dated 12-06-2024 on the subject cited above and to ask you to attend this office with complete record and inform the teacher concerned accordingly regarding personal hearing on dated 23-07-2024 at 10:00 (AM) to probe into the matter and to dispose of the instant issue as per rules & policy, please.

(Bushra Begum)

Assistant Director Estab: (Female)  
Elementary & Secondary Education  
(Merged Areas) Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_  
Copy to the:-

1. Mst. Saimoon PST GGPS Said All Mela Central Kurram with the direction to attend this office for personal hearing. In case of failure your appeal will be rejected.
2. P.A Additional Director Estab: Local Directorate.

(Bushra Begum)

Assistant Director Estab: (Female)  
Elementary & Secondary Education  
(Merged Areas) Khyber Pakhtunkhwa

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**DIRECTORATE OF E&SE KHYBER PAKHTUNKHWA,  
PESHAWAR**

Dated 04.10.2024

No. 422

To,

The District Education Officer (Female),  
Kurram District.

Subject:

**RE-INSTATEMENT OF SERVICE IN RESPECT OF  
SAIMOON PST GGPS SAID ALI MELA CENTRAL  
KURRM.**

I am directed to refer to this office letter No. 27748 dated 02.08.2023 and to ask you once again to submit detailed report in instant case **WITHOUT FURTHER DELAY** to this office, which is still awaited at your end. In case of non submission of report in this regard you will be personally seized/held responsible for all consequences as the case has already been delayed on behalf of the department.

Assistant Director Estab

Endst No. 423

Copy to the

PA to Additional Director Estab Local Directorate.

Assistant Director Estab

Directorate of Elementary & Secondary Education  
Kijoon Park (Korea)

The Director, Education Office (Korea)

REINSTATEMENT OF SERVICE IN REGISTRY OF MGT. SALMONS LTD  
CORPORATION ALBERTA CENTRAL KIRKMAN

I am pleased to advise you that you have been reinstated in the office of the Director of the Department of Education, Alberta, effective from the date of the receipt of your application. Your name will be included in the next issue of the Register of Mgt. Salmons Ltd. in accordance with the provisions of the Act. You will be notified by letter of the date of reinstatement.

Agreement Director (Korea)  
12/1/2001

Reference No. 1287  
Copy to me

P.A. to Additional Director (Korea)

Agreement Director (Korea)  
12/1/2001

PS to Minister  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

*(Handwritten signature)*

Forwarded Per M/s  
Per Per Public and Private

DEO (F) Kurram

گورنمنٹ پبلک اسکول کورام

گورنمنٹ

الغرض

پھر پورے کر دیں گے۔

ہم آپ سے امید کرتے ہیں کہ اس کے ذریعے ایجنڈا کو آگے بڑھانے میں مدد فرمائیں گے۔  
DEO کے پاس بھیجیں۔ اس کے ساتھ ساتھ اس کے بارے میں بھی رائے دیں گے۔  
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رجسٹرڈ اور نوڈل آفیسر:

پرنسپل گورنمنٹ پبلک اسکول کورام

18

21/8/2004

Dr. M. S. Khan (PST) 44ps

Dr. M. S. Khan

Dr. M. S. Khan

Dr. M. S. Khan

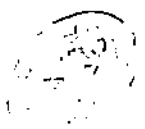
Dr. M. S. Khan

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Dr. M. S. Khan



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**Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar**

Merged Area Phone# 091-9330242  
(PST, SPST, PSHT & Shuhada Package)

E (18)

**NOTIFICATION**

1. WHEREAS, Mst. Saimoon was appointed as PST (BPS-12) and performed her duty at Govt. Girls Primary School Said Ali Mela Central Kurram vide No 2425-32 dated 16-10-2017.
2. AND WHEREAS, she has been removed from service by the District Education Officer (Male) Kurram vide No 566-73 dated 30-10-2021 on the basis of her absence from duty.
3. AND WHEREAS, she submitted her appeal to the Director, E&SE Khyber Pakhtunkhwa, being Appellate Authority, vide Diary No 1884, Dated 18-07-2023, against the Notification No. 566-73, Dated 30-10-2021, issued by the District Education Officer (Female) Kurram.
4. AND WHEREAS, this office asked detail report from the District Education Officer concerned into the appeal vide No. 22748 Dated 02-08-2023, subsequent Reminder-I No. 422 dated 04-01-2024, Final Reminder No. 3308 dated 04-03-2024 and Reminder No. 7138 dated 06-06-2024.
5. AND WHEREAS, the District Education Officer (Female) Kurram submitted her report No. 1382-83 dated 12-06-2024.
6. AND WHEREAS, this office asked District Education Officer (Female) Kurram along with Mst. Saimoon PST Govt. Girls Primary School Said Ali Mela Central Kurram for Personal Hearing vide this office letter No. 8379 dated 11-07-2024, and its meeting held on 24-07-2024.
7. NOW THEREFORE, In exercise of the Powers conferred under Appellate Rules 1986 and Rules 17 of Khyber Pakhtunkhwa, Government Servants (E&D) Rules 2011, the Appellate Authority, Director, Elementary & Secondary Education Khyber Pakhtunkhwa, has been pleased to intact the Notification of District Education Officer (Female) Kurram No 566-73 dated 30-10-2021 in respect of Mst. Saimoon PST Govt. Girls Primary School Said Ali Mela Central Kurram and REJECTED her appeal for re-instatement into service on the basis of its record provided.

1st DA = 23.11.21  
Appeal dt. 18.7.23  
Change of office dt. 1.3.24

(Mrs. Samina Iltaf)  
Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst. No. 1-282-285

Dated 26/8/2024

Copy forwarded to:-

1. District Education Officer (Female) Kurram w/r to her office letter No. 1382-83 dated 12-06-2024.
2. District Education Officer (Male) Kurram w/r to his office order No. 566-73 dated 30-10-2021.
3. Mst. Saimoon PST Govt. Girls Primary School Said Ali Mela Central Kurram.
4. PA to Addl. Director Establishment (E&SE) KPK Peshawar

Assistant Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

26/8/2024

26/8/24

VAKALAT NAMA

19

NO. \_\_\_\_\_ /2023

IN THE COURT OF Sp Service Tribunal Peshawar

Ms. Saymon (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Govt of Sp (Respondent)  
(Defendant)

I/We, Ms. Saymon

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court of Pakistan & Syed Noman Ali Bukhari, Advocate High Court & Hilal Zubair Advocate** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

**AND** to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

**AND** I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

**PROVIDED** always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default; if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated \_\_\_\_\_ /2023

Saymon x. CNIC copy.  
(CLIENT)

ACCEPTED

M. Asif  
(M. ASIF YOUSAFZAI)  
ADVOCATE SUPREME COURT,  
OF PAKISTAN.  
(BC No. 10-7327)

S. Noman  
(S. NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

Hilal  
& Hilal  
HILAL ZUBAIR  
Advocate

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell No. 0302-5548451  
0333-9103240  
0306-5109438  
0310-9503909

- April; order
- Removal order.