


FORM OF ORDER SHEET

Court of _____

Appeal No. 1465/2024


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 Mufti Zainul Abideen re-submitted today by Mr. Khyial Muhammad Mohmand 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>

The appeal of Mufti Zain ul Abideen received today i.e on 05.09.2024 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 appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ✓2- Appeal has not been flagged/marked with annexures marks.
- ✓3- Memorandum of appeal is not signed by the appellant.

No. 762 /Inst./2024/KPST,


Dt. 12/9 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Khiyal Muhammad Mohmand Adv.
District Court at Peshawar.

HGH

*note: Re submitted after Removal of
necessary objections*


16/9/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 1465/2024

Mufti Zain Ul Abideen APPELLANT

VERSUS

Director Elementary & Secondary Education, KPK and others RESPONDENTS

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-5
2.	Affidavit		6
3.	Copies of the appointment order dated 22.01.2019 and Charge Report dated 23.01.2019	"A & B"	7-8
4.	Copies of the Transfer Order dated 13.12.2023 and Charge Report dated 01.04.2024	"C & D"	9-10
5.	Copy of the 1 st held in abeyance order dated 04.04.2024	"E"	11
6.	Copies of the application, retain order dated 15.04.2024 and Charge Report dated 15.04.2024	"F, G & H"	12-14
7.	Copy of the 2 nd Held in abeyance order dated 13.05.2024	"I"	15
8.	Copy of the Appeal and Proceedings by AEDO dated 27.05.2024	"J & K"	16-17
9.	Copy of the Resolution	"L"	18
10.	Wakalat Nama		19

Dated: 05.09.2024

Through,

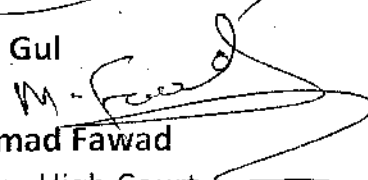
Appellant


Khiyal Muhammad Mohmand

&


Zeeshan Gul

&


Muhammad Fawad

Advocates High Court

①

BEFORE THE HON'BLE SERVICES TRIBUNAL, PESHAWAR

Service Appeal No: 1465/2024

Mufti Zain Ul Abideen S/o Imad ud Din R/o Basti Imad Ud Din, Near
Tablighi Markaz, Pindi Road, Kohat

.....Appellant

VERSUS

1. Director Elementary & Secondary Education, KPK, Peshawar.
2. District Education Officer (Male), Kohat

.....Respondents

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974, AGAINST THE HELD
IN ABEYANCE ORDER/ ENDST NO. 2993-97
TRANSFER FILE / AT/ TT & QARI DATED 13.05.2024
OF THE RESPONDENT NO. 2 BY VIRTUE OF WHICH
THE TRANSFER ORDERS DATED 13.12.2023 AND
DATED 15.04.2024 OF THE APPELLANT HELD IN
ABEYANCE TWICELY.**

PRAYER IN APPEAL:

On acceptance of this appeal, the impugned HELD IN ABEYANCE order dated 13.05.2024 may kindly be set aside and the appellant may please be retained on his own place of duty at GMS, KDA Kohat with further prayer that the proceedings of Departmental appeal which is pending before the

2

respondent No. 1 may kindly be finalized for the best interest of justice.

Respectfully Sheweth;

Brief facts of the case are:

1. The appellant was initially appointed as a AT Arabic Teacher (BPS-15) in the year 2019 and since then performing his duties with zeal and enthusiasm to the best of his ability and no adverse entry has been made against him. (Copies of the appointment order dated 22.01.2019 and Charge Report dated 23.01.2019 **Ann-A & B**).
2. That the appellant from initial appointment after performing his duty was transferred at GMS, KDA, Kohat vide order Endst No. 9611-15 transfer file dated 13.12.2023 with direction that the order be effected from 01.04.2024 passed by the competent authority and the appellant took charge on dated 01.04.2024. (Copies of the Transfer Order dated 13.12.2023 and Charge Report dated 01.04.2024 are **Ann-C & D**).
3. That it is very irksome to note that the appellant's above transfer order dated 13.12.2023 for the first time was held in abeyance by the respondent No. 2 without any cause and reason. (Copy of the 1st held in abeyance order dated 04.04.2024 is **Ann-E**).
4. That the appellant filed an application to the respondent No. 2 against the order dated 03.12.2024 and upon the said application, the respondent No. 2 **retained** the transfer order dated 13.12.2023 through order Endst: No. 2315-21 dated

15.04.2024. (Copies of the application, retain order dated 15.04.2024 and Charge Report dated 15.04.2024 is **Ann-F, G & H**).

5. That the appellant after performing a month's duty, the retain order dated 15.04.2024 for the 2nd time once again held in abeyance by the respondent no. 2 vide order dated 13.05.2024. (Copy of the 2nd Held in abeyance order dated 13.05.2024 is **Ann-I**).
6. That feeling aggrieved, the appellant filed Departmental Appeal before the Respondent No. 1 to set aside the impugned order dated 13.05.2024 and to restore the transfer orders dated 13.12.2023 and 15.04.2024, but the same appeal is still pending before the respondent No. 1, therefore, the appellant seeks the indulgence of this tribunal into the matter *inter-alia* on the following: (Copy of the Appeal and Proceedings by AEDO dated 27.05.2024 are **Ann-J & K**).

GROUND:

- A. The act of respondents in the present scenario of the matter is totally perverse, illegal, void *ab-initio* and is liable to be reviewed judicially.
- B. That the impugned order is illegal and unjust and in violation of the rules and law applicable to the matter.
- C. That the appellant rendered unblemished services in the

4

education department without any involvement in any kind of illegal activities.

- D. That the Parents Teacher Association (PTA) also passed resolution in favour of the appellant which clearly suggests the best performance of the appellant in his field of teaching cadre. (Copy of the Resolution is **Ann-L**).
- E. That respondents department despite these facts made the appellant a rolling stone just to deprive him from his due rights.
- F. That the respondents twice passed the held in abeyance orders are against the principles of natural justice, equity and fair play and is a colorful exercise of powers by respondents/ department.
- G. That the proceedings carried out in the case suffered from gross legal infirmities such as violation of fundamental rights.
- H. That the impugned order suffers from misreading and non-reading of the record.
- I. That It is needless to say that this Hon'ble Tribunal is to exercise discretion powers to control abuse of power in unfairness of the department.
- J. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Court.

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It is, therefore, most respectfully prayed that on acceptance of this appeal, the impugned HELD IN ABEYANCE order dated 13.05.2024 may kindly be set aside and the appellant may please be retained on his own place of duty at GMS, KDA Kohat with further prayer that the proceedings of Departmental appeal which is pending before the respondent No. 1 may kindly be finalized for the best interest of justice.

Any other relief deemed appropriate and not specifically prayed for may also be accorded.

Dated: 05.09.2024

Through,

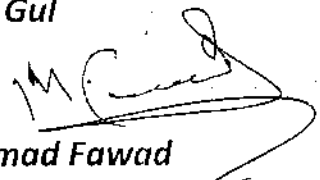
Appellant


Khyal Muhammad Mohmand

&


Zeeshan Gul

&


Muhammad Fawad

Advocates High Court

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

APPEAL NO. _____/2024

Mufti Zain Ul AbideenAPPELLANT

VERSUS

Director Elementary & Secondary Education, KPK and others

.....RESPONDENTS

AFFIDAVIT

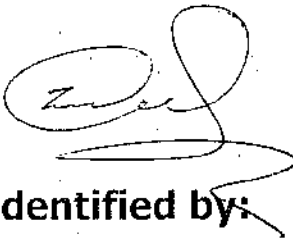
I, *Mufti Zain Ul Abideen S/o Imad ud Din R/o Basti Imad Ud Din, Near Tablighi Markaz, Pindi Road, Kohat*, do hereby solemnly affirm and declare on Oath that the contents of the Appeal are true and correct and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



CNIC No. 14301-3218517-3

Cell No. 0334-8260560



Identified by:

Zeeshan Gul

Advocate High Court, Peshawar



7

Am-A

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

APPOINTMENT ORDER

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Arabic Teacher (AT) School based in BPS-15 (Rs.16120-1330-56020) @ Rs. 16,120/- fixed plus usual allowances as admissible under the rules, on Adhoc/Contract basis (School Based) under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

SH	Name & Father Name	CNIC No.	Score	Address	Name of School where posted	Remarks
1	Zain Ul Abidin S/O Imad Ud Din	14301-3218517-3	113.74	Basti Imad ud Din Near Tableeghi Markaz Pindi Road Kohat	GMS Bamma Kohat	A.V. Post

TERMS & CONDITIONS:

1. NO TA/DA etc is allowed.
2. Charge report should be submitted to all concerned in duplicate.
3. Appointment is purely on Adhoc/Contract/School Based initially for one year.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age.
5. Appointment is subject to the condition that the academic and professional documents, CNIC & Domicile must be verified from the concerned authorities by the DDO (concerned). If he found producing bogus/fake Certificate/ Documents will be reported to the law enforcing agencies for further action.
6. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that his certificates are verified.
8. He should join his post within 15 days of the issuance of this notification. In case of failure to join his post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge he will sign an agreement with the department, otherwise this order will not be valid.
11. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. His service shall be terminated at any time, in case his performance is found unsatisfactory during his contract period. In case of misconduct, he shall be preceded under the rules framed by Govt. from time to time.
13. His appointment is made on School based, He will have to serve at the place of posting, and his service is not transferable to any other station.
14. Before handing over charge once again his documents may be checked if he have not the required qualifications he may not be handed over charge.
15. If the candidate with fake documents / low score has been appointed erroneously, his appointment order will be withdrawn since the day of issuance in the best interest of the entitled/ right position holder candidate(s).

District Education Officer
(Male) Kohat

Endst: No. 653-59 / File AT Apptt 2018

Dated Kohat the 22/01/2019

Copy forwarded for information and necessary action to the:-

1. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer Kohat.
3. DMO (JMU) Kohat.
4. Accountant (Middle Schools) Local Office
5. Principals/Headmasters Concerned.
6. Officials Concerned.
7. Office Copy.

Dy. District Education Officer
(Male) Kohat

22/1/19

ATTESTED

(8)

Ann - B

چارج رپورٹ

No: 272-7

Date: 23-01-2019

میں کسی زین العابدین ولد عماد الدین نے مورخہ 23-01-2019 کو قبل از دوپہر بمطابق آرڈر نمبر 653-591 مورخہ 22-01-2019 اپنے عہدے AT-BPS-15 (عربی ٹیچر) کا چارج گورنمنٹ مڈل سکول بہاں ضلع کوہاٹ کے خالی آسامی کا چارج ازاں تتمیر احمد SSS ہندہ ماسٹر لے لیا۔

چارج گرینڈ:

چارج دہندہ:

دستخط: زین العابدین

دستخط: تتمیر احمد 23/01/2019

نام: زین العابدین

نام و شناختی کارڈ نمبر: 14301-9046221-1

شناختی کارڈ نمبر: 14301-3218517-3

عہدہ: تتمیر احمد

Forwarded to:

ATTESTED

- (1) DEO Office Kohat.
- (2) SDEO Office Kohat.
- (3) Account Office Kohat.
- (4) DMO (IMU) Kohat.

0334 8260 560

(9)

Am - Cⁿ

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

MUTUAL TRANSFER ORDER:


Consequent upon the approval of the competent authority, mutual transfer order of the following AT Teachers are hereby ordered on their own pay and grade in the interest of public service.

S.No	Name & Designation	From	To	Remarks
1	Muhammad Ibrahim AT	GMS KDA Kohat	GMS Bamma Kohat	Vice S#02
2	Zain Ul Abidin AT	GMS Bamma Kohat	GMS KDA Kohat	Vice S#01

The order will be effective w.e.f 01-04-2024.

Note:

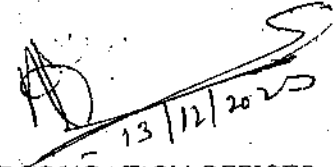
1. No TA/DA is allowed.
2. Charge Report should be submitted to all concerned.



 DISTRICT EDUCATION OFFICER
 (MALE) KOHAT

Endst. No. 9611-15 / Transfer File AT/TT & Qari/Vol. I-2023-24 Dated 13/12 /2023.

Copy to the:

1. District Account Officer Kohat.
2. District Monitoring Officer Kohat.
3. Headmaster /Principal Concerned.
4. Official Concerned.
5. Master Copy.


 13/12/2023
 DY: DISTRICT EDUCATION OFFICER
 (MALE) KOHAT


 ATTESTED

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Am - 5

OFFICE OF THE HEAD MASTER GOVT; MIDDLE SCHOOL KDA KOHAT

CERTIFICATE OF ARRIVAL

Certified that Mr.Zain ul Abidin Arabic Teacher (At) (CNIC# 14301-3218517-3) has been arrived to this school on dated 13/12/2023 vide District Education Officer Endst No.9611-15 the dated 13/12/2023.

As per the orders of District Education Officer(M)kohat Mr Zain ul Abidin taking over charge the April 1st 2024 at Govt; Middle School KDA Kohat.

Zain ul Abidin 13/12/2023
Signature of Zain Ul Abidin (AT)

[Signature] 13/12/2023
HEAD MASTER
Govt. Middle School
KDA Kohat

Govt; Middle School KDA Kohat

[Signature]
ATTESTED

11

Am - E^N

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHAT

OFFICE ORDER

Consequent upon the approval of the competent authority, transfer order issued vide this office letter No.9611-15/Transfer File /AT/TT & Qari Volume-I 2023-24 Dated 13-12-2023 is hereby held in abeyance in the best interest of public.

DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst No. 202-06 / Transfer File / Transfer File /AT/TT & Qari Dated 04/04/2024

Copy of the above is forwarded to the:-

- 7. District Account Office Kohat.
- 8. District Monitoring Office Kohat.
- 9. Principal/ Headmaster Concerned Kohat.
- 10. Official Concerned.
- 11. Office copy.

[Handwritten signature]
04-04-24

DY: DISTRICT EDUCATION OFFICER
(MALE) KOHAT

[Handwritten signature]
TESTED

ATTESTED

[Signature]

0334-8966560

SHAFI JAN
PK-97
MAT

[Signature]

As Per Rec

(AT) *[Signature]*
AT

16/04/2024

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHAT

OFFICE ORDER

Consequent upon approval of the competent authority, the transfer order issued vide this office letter No.9611-15/Transfer file:AT /TT & Q&A dated 13/12/2023 is hereby retained with immediate effect in the best interest of public.

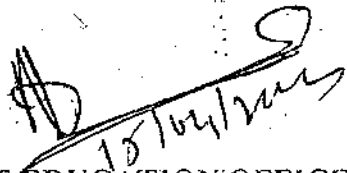
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst No. 2385-21 / Transfer File

Dated 15 / 04 / 2024

Copy of the above is forwarded to the: -

1. District Account Office Kohat.
2. District Monitoring Office Kohat.
3. Principal/Headmaster Concerned.
4. Official Concerned.
5. Local Accountant.
6. Office copy.


DY; DISTRICT EDUCATION OFFICER
(MALE) KOHAT


ATTESTED

14

Am - H ~

Charge Report

It is certified that I Zain Ul Abidin AT (GMS Bamma) Mutual Transfer to Mr. Muhammad Ibrahim (AT GMS KDA) by the Office of the District Education Officer order No 9611-15 dated 13/12/2023.

My Mutual Transfer Order here by Head in abeyance by the District Education Officer kohat through order no. 2202-06 dated. 04/04/2024.

In this connection I have submitted the Appeal / request to the Worthy District Education Officer (M) kohat. My Mutual Transfer head in abeyance Order again restore to the Office of District Education Office order No. 2315-21 dated 15/04/2024 In GMS KDA Kohat. Now I have again taken over charge at GMS KDA Kohat as Arabic Teacher (AT) vide order no. 2315-21 dated. 15/04/2024.

0334 8260560

HEAD MASTER
15/04/2024
Govt; Middle School KDA Kohat

ATTESTED

15

Am - 13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
KOHAT

OFFICE ORDER

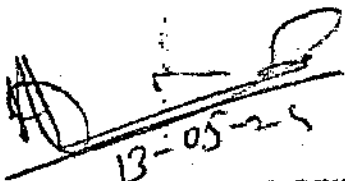
Consequent upon the approval of the competent authority, transfer order issued vide this office Order No.9611-15/Transfer File /AT/TT & Qari Volume-I 2023-24 Dated 13-12-2023 and End No.2315-21/Transfer File /AT/TT & Qari Volume-I 2023-24 Dated 15-04-2024 is hereby held in abeyance in the best interest of public.

DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst No. 2993-97 Transfer File / Transfer File /AT/TT & Qari Dated 13 / 05 / 2024

Copy of the above is forwarded to the:-

1. District Account Office Kohat.
2. District Monitoring Office Kohat.
3. Principal/ Headmaster Concerned Kohat.
4. Official Concerned.
5. Office copy.


13-05-24
DY: DISTRICT EDUCATION OFFICER
(MALE) KOHAT


ATTESTED

محضور جناب ڈائریکٹر لیس صاحبہ، ایلیمینٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور
عنوان: درخواست بمراد باہمی تبادلہ کی بحالی

جناب عالی!

مؤدبانہ گزارش ہے کہ فدوی کا A.T پوسٹ پر باہمی تبادلہ 13-12-2023 کو GMS KDA ہوا تھا۔
ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ کے تحریری ہدایات کی روشنی میں، میں نے یکم اپریل 2024 کو تعلیمی سال پورا ہونے کے
بعد چارج لیا تھا۔ لیکن نامعلوم وجوہات پر میرا آرڈر 14 اپریل 2024 DEO(M) Kohat نے معطل کر دیا تھا۔ میں نے
DEO صاحب کو اس بابت اپیل کی تو 15-04-2024 کو میرا آرڈر بحال ہو گیا۔ لیکن اب پھر 13-05-2024 کو میرا آرڈر
دوبارہ معطل کر دیا گیا ہے۔ مجھے باوثوق ذرائع سے معلوم ہوا کہ احتشام AT، GMS Ali Zai جو کو ایڈ ہاک ٹیچر ہے اس نے
سیاسی دباؤ ڈال کر میرا آرڈر معطل کروایا ہے اور BAN کے بعد اس جگہ پر ٹرانسفر کروانا چاہتا ہے۔

جناب عالیہ! میرا چھٹا سال GMS Bamma پر ہو چکا ہے۔ جہاں پر میں انتہائی تکلیف سے پہنچ کر اپنے
فرائض سرانجام دیتا رہا ہوں۔ اور GMS KDA میں میرا باہمی تبادلہ ہوا تھا۔ اس کام میں نے باقاعدہ Arrival بھی کیا تھا اور
DEO صاحب کے احکامات کے مطابق چارج بھی لیا ہے۔ اور تقریباً ڈیڑھ ماہ سے وہاں پر اپنی خدمات سرانجام دے رہا ہوں لیکن
ایک ایڈ ہاک ٹیچر کے سیاسی دباؤ کی وجہ سے مجھے بار بار پریشان کیا جا رہا ہے جو کہ سکول میٹڈ پالیسی کے خلاف بھی ہے۔
لہذا میری اپیل پر ہمدردانہ غور کرتے ہوئے میرا آرڈر بحال کیا جائے۔

(تمام آرڈرز کی فوٹو کاپیاں لف ہیں)

العارض

آپ کا فرما بردار

زمین العابدین، AT،
گورنمنٹ مڈل سکول KDA کوہاٹ

موبائل: 0334-8260560

کاپی برائے اطلاع:

(1) ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ

ATTESTED

(17)

Am SK 72



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 226 / D.No./16/Deptt/Appeal Against/Estab-1

Dated Peshawar the 27.5 / 2024

To

The District Education Officer
(Male) Kohat.

Subject: APPEAL FOR RESTORATION OF MUTUAL TRANSFER

Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of the appeal lodged by Mr. Zain Ul Abidin AT (BPS-15) GHS KDA Kohat for further necessary action under rules/policy please.

(Encls: Attached)

[Signature]
27/5/2024
Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
o/c

Endst; No. _____

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

[Signature]
27/5/2024
Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
o/c

[Signature]
ATTESTED

o/c

پہلی سی قرارداد

عنوان: مفتی زین العابدین (AM) شیخہ کے آرڈر کے بحال کیا جانے
 ہم جملہ والدین، پہلی سی ممبران متفقہ قرارداد منظور کرنے کے لیے درخواستیں جمع
 ضلع کو باٹ و صوبائی افسران سے مطالبہ کرتے ہیں کہ مفتی زین العابدین کا باہمی
 تبادلہ 13 دسمبر 2020 کو سکول طحا سہو اتفاقاً اور آرڈر کے مطابق مفتی زین العابدین
 نے سکول طحا میں باقاعدہ چارج بھی لیا ہوا ہے۔ لیکن بار بار سیاسی دباؤ کی وجہ سے
 محکمہ تعلیم ضلع کو باٹ ان کا آرڈر معطل کر دیتا ہے۔ مفتی صاحب ایک بہترین معلم ہیں
 اور AT شیخہ میں ہم پہلی سی ممبران اور جملہ والدین سمیت کہیں کہیں اس سکول میں
 پڑھتے ہیں مفتی صاحب سے انتہائی مطہین ہیں۔ ان کا پڑھنا کا طریقہ انتہائی بہترین
 ہے۔ بچوں کے لیے اور ہم والدین مکمل طور پر مطہین ہیں۔ اس لیے بچوں کو اس سکول میں
 مفتی زین العابدین کے باہمی تبادلہ کے آرڈر کو بحال کیا جائے۔

شناختی کارڈ نمبر	نام طالب علم	داخلہ نمبر	والد	نام طالب علم
14301-86900985	محمد شہیر	748	آصف رحمان	محمد آیان
14301-10137067	سید محمد نور شاہ	825	گل رحمن	شیبا یان اللہ
14301-50519897	خیر الدین	813	خلیل الرحمان	محمد زید
14301-98522691	محمد حسن	799	ارشاد خان	فریمنٹل
11201-26164227	جناب محمد عثمان	828	سرفراز	محمد حسین
14301-17548987	جملہ والدین	777	افتخار احمد	محمد حسین
شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر </td></td></td></td>	شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر </td></td></td>	شناختی کارڈ نمبر <td>شناختی کارڈ نمبر <td>شناختی کارڈ نمبر </td></td>	شناختی کارڈ نمبر <td>شناختی کارڈ نمبر </td>	شناختی کارڈ نمبر
14301-50143008	14301-50143008	14301-50143008	14301-50143008	14301-50143008
14301-27456857	14301-27456857	14301-27456857	14301-27456857	14301-27456857
20401-1401601	20401-1401601	20401-1401601	20401-1401601	20401-1401601
14301-97846197	14301-97846197	14301-97846197	14301-97846197	14301-97846197
14301-26072217	14301-26072217	14301-26072217	14301-26072217	14301-26072217
11301-9391868	11301-9391868	11301-9391868	11301-9391868	11301-9391868
CQ 10232525591	CQ 10232525591	CQ 10232525591	CQ 10232525591	CQ 10232525591
14301-87871541	14301-87871541	14301-87871541	14301-87871541	14301-87871541
14301-20011079	14301-20011079	14301-20011079	14301-20011079	14301-20011079
1101-99120285	1101-99120285	1101-99120285	1101-99120285	1101-99120285
12501-47811197	12501-47811197	12501-47811197	12501-47811197	12501-47811197

پہلی سی چیئرمین فیاض محمود
 پہلی سی ممبران:-
 1) حضرت نور شاہ
 2) سردار اللہ
 3) سردار
 4) محمد عثمان
 5) محمد اسحاق خٹک
 اتحاد اہل
 محمد عثمان
 سید اسحاق

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پشاور بار ایسوسی ایشن، خیبر پختونخواہ

ایڈوکیٹ: *[Handwritten Signature]*

PESHAWAR BAR ASSOCIATION



بار کونسل ایسوسی ایشن نمبر:

رابطہ نمبر: 87367-95-0381

بعدالت جناب: *[Handwritten Signature]*

مخانب: <i>[Handwritten Signature]</i>	دعویٰ:
مفتی زین العابدین	علت نمبر:
بنام	مورخہ:
دارلشعریہ ایف ڈی سیکٹر 10/1	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام *[Handwritten Signature]* کے لیے *[Handwritten Signature]* حاصل محمد محمد امجد زین الدین کو ذیل مقررہ کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف 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 یا یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا ساتھ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائزہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا بندہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سہو رہے

المقوم: 8519/2024



مقام: *[Handwritten Signature]*

واہ شد ال: *[Handwritten Signature]*

کے لیے منظور ہے: *[Handwritten Signature]*

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

ایڈووکیٹ مفتی زین العابدین مولہ عماد الدین سکس سٹیٹس کلما رسنی سکریٹریٹ