


FORM OF ORDER SHEET

Court of _____

Appeal No. 1467/2024

| 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. Nusrat Begum presented today by Mr. Shah Faisal Nasapi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 26.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p> |

**BEBEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 1467 /2024

Mst. Nusrat Begum.....Appellant

VERSUS

The Secretary E& SE & others.....Respondents

I N D E X

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| 1. | Service Appeal | | 1-7 |
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Appellant
Through


Shah Faisal Nasapi
Advocate
Supreme Court of Pakistan

Dated 16.09.2024

(1)

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

Service Appeal No. 1467 /2024

Mst. Nusrat Begum D/o Muhammad Yousaf (SPST)
G.G.P.S Kuladhand Bala Charsadda.....**Appellant**

V E R S U S

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. District Education Officer (DEO) ^{Female} District Charsadda
3. Secretary Establishment Government of Khyber Pakhtunkhwa, Peshawar
4. Directorate of Secondary & Elementary Education, Peshawar.....**Respondents**

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT, 1974 FOR DECLARATION TO THE
EFFECT THAT IMPUGNED
NOTIFICATION DATED: NO.SO
(POLICY) E & AD/1-3/2020 dated
06.06.2023 AND DELETION OF RULE-7
(5) KP CIVIL SERVANT, APPOINTMENT,
PROMOTION AND TRANSFER RULES IN
THE KP CIVIL SERVANT ACT (AP&T)**

**RULES, 1989, APPOINTMENT,
PROMOTION AND TRANSFER MAY BE
DECLARED AS ILLEGAL, AGAINST THE
LAW.**

Prayer-In-Appeal

**On acceptance of the instant
appeal, the impugned notification
No.SO(Policy)E&AD/1 3/2020 dated:
06.06.2023 may be declared as illegal,
against the law ineffective upon the
rights of the appellant & ordered to be
struck down being void and ultra vires
to the rules and rights of the appellant.**

Respectfully Sheweth:

Short facts, giving rise to present Service Appeal, are
as under:

- 1. That appellant hails to respectable family of District
Charsadda and bonafide citizen of Pakistan, being
qualified was appointed as PTC trained teacher BPS-7
on 20.04.1999. (Copy of appointment order is
annexed as Annexure "A").**

(3)

2. That appellant performed her duties upto the entire satisfaction of their high-up's with full devotion and commitment and with the passage of time she is awarded with BPS-14 and now serving as SPST.
3. That earlier in the year 2019 the respondents proposed the appellant for promotion however appellant forgo her rights of promotion.
4. That the respondents issued a Notification bearing No. SO (Policy) E&AD/1-3/2020 dated: 06.06.2023 with the prayer by directing respondent Directorate Elementary & Secondary Education that rule 7 (5) in KP Civil Servant (AP&T) Rules, 1989 has been deleted vide notification dated:6/8/2020 & therefore no provision exist to declare or forgo promotion and it is obligatory upon every civil servants to accept promotion under every condition.
5. That Directorate of Elementary & Secondary Education KP also wrote letter to the office Establishment & Administrative Department to reconsider the amendment made in KP Civil Servant (AP&T) Rules, 1989 as it had negatively affected a large number of teachers and specially female teachers.
6. That respondents vide letter dated:07.09.2023 directed the Directorate and E&SE Education KP that necessary guidance has already been provided to the

(4)

department and therefore, no provision exists to decline or forgo promotion and those teachers who do not comply with the promotion order of the competent authority or try to evade promotion through different means shall be proceeded under the KP Civil Servant (Efficiency & Discipline) Rules, 2011.

7. That the respondents also issued a letter & directed the appellant with other teachers that those teachers who have submitted their refusal are directed to submit their files for promotion complete in all respect to the office of DEO Charsadda to avail promotion.
8. That appellant is bitterly aggrieved from the letter dated: 06.06.2023, 07.09.2023 05.05.2023 being ill filed Departmental representation but with no result, hence this appeal on the following amongst other grounds:

GROUND S:

- A. That the appellant has not been treated in accordance with law and constitution of Islamic Republic of Pakistan 1973.
- B. That the act of respondents is the violation of fundamental rights guaranteed by the constitution and Article 4, 29 and the impugned notification is clear violation & derogation of the Constitution.

- C.** That the constitution of Pakistan expressly states that no exploitation is to be carried out and the state shall ensure the elimination from all forms of exploitation and the gradual fulfillments of the fundamental principle from each according to his ability to each according to his work, however, the bare perusal of notification and deletion of rules 7 (5) in the KP Civil Servant (Appointment, Promotion & Transfer) rules, 1989 would reveal that the compulsory provision is against the norms of justice.
- D.** That the impugned notification and office order are in transgression of Section 9 of KP Civil Servant Act, 1973 read with Rule 7 of KP APT Rules, 1989.
- E.** That the impugned notification & deletion of Rules 7 (5) in the KP Civil Servant (AP&T) Rules, 1989 is against the principles of policy as the state is responsible to promote social and economic wellbeing of the people.
- F.** That state shall protect the legitimate interest and to protect the family however, the impugned notification and deletion Rule 7 (5) the KP Civil Servant put the female teacher in the great curse

(6)

which is illegal unlawful and against the fundamental rights guaranteed in the Constitution of Pakistan 1973.

- G.** That the female teacher /appellant specifically suffer from the impugned notification at extreme as they cannot avail promotion with transfer in for flunk areas/hard areas therefore, appellant who is ill cannot be compelled to accept compulsory promotion which would not ultimately benefit to them.
- H.** That appellant has already forgo her promotion as she do not desire to avail the promotion, by submitting affidavit.
- I.** That it is settled principle of law and administration of justice that Government functionaries such as the respondents are supposed to act in aid of the people and work towards protecting the fundamental rights of the petitioners rather than infringing upon in a malafide manner.
- J.** That the act of respondents, for initiating the action is illegal, unlawful, fraudulent, malafide prejudicial, discriminatory and without lawful authority.

(7)

K. That any other ground, not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed on acceptance of the instant appeal, the impugned notification No.SO(Policy)E&AD/13/2020 dated:06.06.2023 may be declared as illegal, against the law ineffective upon the rights of the appellant & ordered to be struck down being void and ultra vires to the rules and rights of the appellant and respondents be restrained from forceful promotion of appellant.

Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed in favour of the appellant.

Through

Appellant


Shah Eaisal Nasapi

Advocate

Supreme Court of Pakistan

Dated 16.09.2024

(8)

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

Service Appeal No. _____/2024

Mst. Nusrat Begum.....**Appellant**

VERSUS

The Secretary E& SE & others.....**Respondents**

AFFIDAVIT

I, Mst. Nusrat Begum (SPST) G.G.P.S Kuladhand Bala Charsadda, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

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

Service Appeal No. _____/2024

Mst. Nusrat Begum.....Appellant

VERSUS

The Secretary E& SE & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT:

Mst. Nusrat Begum D/o Muhammad Yousaf (SPST)
G.G.P.S Kuladhand Bala Charsadda

RESPONDENTS

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. District Education Officer (DEO) District Charsadda
3. Secretary Establishment Government of Khyber Pakhtunkhwa, Peshawar
4. Directorate of Secondary & Elementary Education, Peshawar

Through Appellant

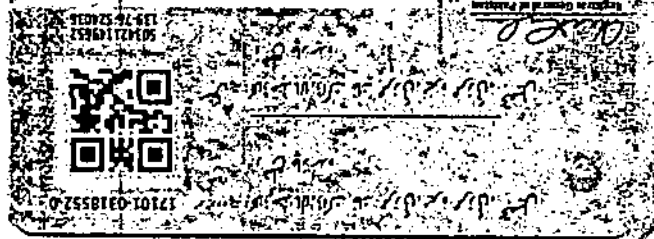

Shah Faisal Nasapi

Advocate

Supreme Court of Pakistan

Dated 16.09.2024

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11

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) CHARSADDA

OFFICE ORDER

As per Notification issued by the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department No. SO(SM)E&SED/7-1/2022/PT/General dated 04-01-2022, the following SST teachers are hereby Transferred/Adjusted to the schools noted against each on their own pay and scales in the interest of Public Service with immediate effect.

| No. | Name | Design | From | To | Remarks |
|-----|-------------------|--------|-----------------------------------|------------------------|-------------------------------|
| 01 | Miss Nusrat Begum | SPST | GGPS Kuladhand Payan Charsadda | GGPS Kuladhand Bala | Medical Ground vacant post |

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

(SURAYYA BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

Ends No.

6623-10

Dated

18/01/22

2022

Copy for information to the:-

1. PS to Secretary Education Govt. of Khyber Pakhtunkhwa Peshawar.
2. PA to Director E&SE Govt. of Khyber Pakhtunkhwa Peshawar.
3. District Accounts Officer Charsadda.
4. District Monitoring Officer Charsadda.
5. SDEO (E) Charsadda/Shabqadri Tungi is directed for necessary arrangement of another teacher.
6. Official Concerned.
7. Office File.

SURAYYA BEGUM 18/01/22
DISTRICT EDUCATION OFFICER
(FEMALE) CHARSADDA

12

| | | | | | | |
|---|--|----------|------|----------------------------|----------|--------------------|
| 26. | Actina Hafum D/O Sherrif Ullah Farid | 18-5-76 | GOFS | Fahri Qilliq | 55-56-95 | Shabqador A.N.C.P. |
| 27. | Parnoz Malik D/C Malik Gul Arzoi Chersadde | 1-5-77 | GOFS | Gul Saif Kohra | 55-56-95 | Rejjar A.V.P. |
| 28. | Shafiqta Paliz D/C Farid Ullah | 15-10-77 | GOFS | Sul Kemar | 55-56-95 | Rejjar A.V.P. |
| 29. | Shazie Noz D/C Habib Gul Ullanzol | 4-2-78 | GOFS | Shahid Noz | 55-56-95 | Rejjar A.V.P. |
| 50X PC / 75X U.C. BATCH-WISE MERIT | | | | | | |
| 30. | Hayab D/C Nimst Ullah Sherqador | 6-6-76 | GOFS | Nimst Ullah Sherqador | 55-56-95 | Shabqador A.N.C.P. |
| 31. | Saima Insa D/O Insa Ullah Rejjar | 1-5-75 | GOFS | Insa Ullah Rejjar | 55-56-95 | Rejjar A.V.P. |
| 32. | Brazie Ashraf D/C Ashraf Khatir Mujat Khatir | 7-3-75 | GOFS | Ashraf Khatir Mujat Khatir | 55-56-95 | Rejjar A.V.P. |
| 33. | Muzira Jaton D/C Zainul Abidin Rejjar | 3-1-74 | GOFS | Zainul Abidin Rejjar | 55-56-95 | Rejjar A.V.P. |
| 34. | Shahzad Momic D/C Momic Ullah Rejjar | 1-7-75 | GOFS | Momic Ullah Rejjar | 55-56-95 | Rejjar A.V.P. |
| 35. | Malla Ullah D/O Malla Ullah Sherqador | 1-1-75 | GOFS | Malla Ullah Sherqador | 55-56-95 | Rejjar A.V.P. |
| 36. | Shabale D/C Mizerud Din Dargoo | 1-5-75 | GOFS | Mizerud Din Dargoo | 55-56-95 | Rejjar A.V.P. |
| 37. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 38. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 39. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 40. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 41. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 42. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 43. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 44. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 45. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 46. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 47. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 48. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 49. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |
| 50. | Muzafar D/O Muzafar Sherqador | 3-1-75 | GOFS | Muzafar Sherqador | 55-56-95 | Rejjar A.V.P. |

6

50X PC / 75X U.C. BATCH-WISE MERIT

51. Muzafar D/O Muzafar Sherqador

52. Muzafar D/O Muzafar Sherqador

53. Muzafar D/O Muzafar Sherqador

54. Muzafar D/O Muzafar Sherqador

55. Muzafar D/O Muzafar Sherqador

56. Muzafar D/O Muzafar Sherqador

57. Muzafar D/O Muzafar Sherqador

58. Muzafar D/O Muzafar Sherqador

59. Muzafar D/O Muzafar Sherqador

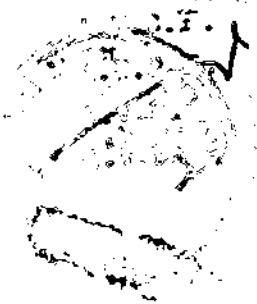
60. Muzafar D/O Muzafar Sherqador

(B)

Subject

| | | | | | | |
|-----|----------------------------|------|-----------|----|-----|----------|
| 26. | Abbas Khan D/O ... | 1948 | GGPS, ... | 35 | ... | A.V.P. |
| 27. | <u>Amir Jabeen</u> D/O ... | 1975 | GGPS, ... | 33 | ... | A.N.C.F. |
| 28. | Farida Janis D/O ... | 1975 | GGPS, ... | 38 | ... | A.N.C.F. |
| 29. | Rosina Asrar D/O ... | 1975 | GGPS, ... | 32 | ... | A.V.P. |
| 30. | Elli Fatima D/O ... | 1975 | GGPS, ... | 39 | ... | A.V.P. |
| 31. | Zamir Gul D/O ... | 1975 | GGPS, ... | 32 | ... | A.V.P. |
| 32. | Shobina D/O ... | 1975 | GGPS, ... | 38 | ... | A.V.P. |
| 33. | Faruq D/O ... | 1975 | GGPS, ... | 32 | ... | A.V.P. |
| 34. | Shagufa Begum D/O ... | 1975 | GGPS, ... | 35 | ... | A.V.P. |
| 35. | Fakhrun Nisa D/O ... | 1975 | GGPS, ... | 35 | ... | A.V.P. |
| 36. | Falira Begum D/O ... | 1975 | GGPS, ... | 32 | ... | A.V.P. |
| 37. | Aysha Begum D/O ... | 1975 | GGPS, ... | 35 | ... | A.V.P. |
| 38. | Safia Mari D/O ... | 1975 | GGPS, ... | 42 | ... | A.V.P. |
| 39. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 25 | ... | A.V.P. |
| 40. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 41. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 42. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 43. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 44. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 45. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 46. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 47. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 48. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 49. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |
| 50. | Zahra Fatima D/O ... | 1975 | GGPS, ... | 31 | ... | A.V.P. |

3



(14)

- Zaria Begum D/O Mohammed Bher Khatun 10-1-50
- Asma D/O Asad Khan 10-1-50
- Sonia Shaheed D/O Shabir Ahmed Khatun 10-1-50
- Shafiq Begum D/O Asad Khan Khatun 10-1-50
- Hafsa Begum D/O Asad Khan Khatun 10-1-50
- Abid Begum D/O Fazil Hameed Khan Khatun 16-6-50
- Hanida Begum I/O Ghazi Ghazi Khan Khatun 12-1-77
- Munira Begum D/O Khatun Khan Amir Alad. 3-1-75
- Navida Begum D/O Fida Mohammed Nazam. 24-6-81
- Zikra Bibi D/O Mohammed Ayub Shaikhan 1-3-79
- Navida Begum D/O Ishaq Ahmed Khan Khatun 4-3-80
- Parkanda D/O Yaqoob Ali Ibrahimi 12-3-77
- Shahnaz Begum D/O S. Noor Ali Shah Ibrahimi 29-7-79
- Asis Bibi D/O Fazil Rukia Halim Zeil 2-3-75
- Zelida Bibi D/O Taj Mohammed Khan Karim 11-3-80
- Bekhtawara Begum D/O Mohammed Sarwar Hakim 6-3-50
- Abid Shaikhan 6-3-50

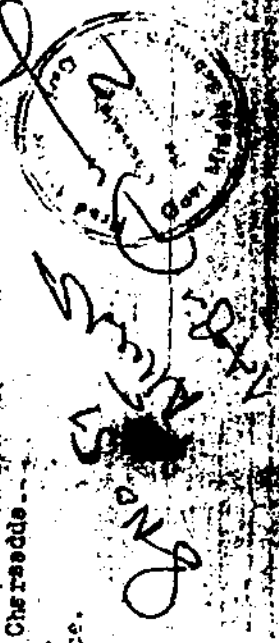
- GCPS, Sahis Korona AC 1098
- GCPS, Aman Alad 43 95-96
- GCPS, Mulyan Khatun 33 1998
- GCPS, Akhona Khatun 37 96-97
- GCPS, Nazam Ghani 37 96-97
- GCPS, Hazer Ghani 37 96-97
- GCPS, Ghani Ghani 33 95-97
- GCPS, Ghani Ghani 39 1998
- GCPS, Ghani Ghani 38 96-97
- GCPS, Ghani Ghani 31 1999
- GCPS, Ghani Ghani 38 96-97
- GCPS, Ghani Ghani 43 1998
- GCPS, Ghani Ghani 30 1998
- GCPS, Ghani Ghani 39 96-97
- GCPS, Ghani Ghani 37 96-97
- GCPS, Ghani Ghani 39 96-97

DISTRICT EDUCATION OFFICER,
(FEMALE) PRIMARY CHARADDATA

1999

- 1/ Appointment/Dated Charaddata 20/01/1999
- 2/ above is forwarded for information & n/a to the
- 3/ Minister for Education
- 4/ to Govt. of NWFP, Education Department Peshawar
- 5/ District Accounts Officer, Charaddata
- 7/ AFO (Accounts) local Office.
- 8-102/ All candidates concerned.

8 NO 5



DISTRICT EDUCATION OFFICER,
(FEMALE) PRIMARY CHARADDATA

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13
P
C

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)**

NOTIFICATION

Dated Peshawar the, 06/8/2020

Policy E&AD/1-1/2020: In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the following further amendment shall be made, namely:

AMENDMENT

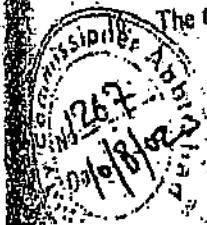
In rule 7, sub-rule (5) shall be deleted.

**CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA**

ENCL: NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department.
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa.
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar, Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All Section Officers in Establishment & Administration Department.
15. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.



ATTESTED

Wardah Latif
**(WARDAH LATIF)
DEPUTY SECRETARY (POLICY)**

Attested

**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(REGULATION WING)**

15A

NOTIFICATION

Dated Peshawar the, 06/8/2020

No: SUB.Policy E&AD/1-3/2020: In exercise of the powers conferred by Section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No.XVIII) the Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 the following further amendment shall be made, namely: of

AMENDMENT

In rule 7, sub-rule (5) shall be deleted.

**CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA**

ENDST: NO & EVEN DATE

Copy is forwarded to:-

1. Additional Chief Secretary, Govt. of Khyber Pakhtunkhwa, Planning & Development Department
2. The Senior Member Board of Revenue, Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. The Principal Secretary to Governor, Khyber Pakhtunkhwa,
5. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
6. All Divisional Commissioners in Khyber Pakhtunkhwa.
7. All Heads of Attached Departments in Khyber Pakhtunkhwa.
8. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
9. All Deputy Commissioners in Khyber Pakhtunkhwa.
10. The Registrar Peshawar High Court, Peshawar.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. All the Section Officers in Establishment & Administration Department
15. The Section Officer (Admn), Administration Department with the request to arrange 20 gazette copies.
16. The caretaker, Administration Department

Sd/-
WARDAH LATIF
DEPUTY SECRETARY (POLICY)

11/11/11
Attested

ATTESTED

21 11 11

Special Officer (Policy)

Special Officer (Policy)

- 1. To Special Security (Reg. Establishment Department)
- 2. To Additional Security (Reg. III, Establishment Department)
- 3. To Deputy Security (Reg. III, Establishment Department)

Copy forwarded to the

487
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Your Ministry,
 Furthermore, those officers who do not comply with promotion order shall revert to accept promotion in every possible manner.
 to include higher responsibilities in case of promotion. Therefore, it is obligatory upon every present those who tend to urge promotion to make post-graduate or those lack of capacity will revert from termination that will gain by holding to a single level position or to The basic rationale behind the deletion of the article is aimed at preventing a provision exists to decline or urge promotion.
 Rules, 1989 under deleted this department notification dated 08.08.2003, thus, no (5) of Rule-7 of Khyber Pakhtunkhwa Civil Services (Appointment, Promotion and Transfer) 2003 dated 13.04.2003 on the subject noted above and to state that Sub-Rule 1 am directed to refer to your letter No. SOP/Security-MPH/2003.

GARANTEE REGARDING PROMOTION OF MR. T. S. IN THE KHYBER PAKHTUNKHWA CIVIL SERVICES (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989

The Government of Khyber Pakhtunkhwa, Ministry & Secondary Education Department.

Dear Sir,

Subject-

GOVERNMENT OF KHYBER PAKHTUNKHWA
 ESTABLISHMENT DEPARTMENT
 No. SOP/Security-MPH/2003
 Dated: 13.04.2003



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MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

A meeting regarding the subject matter was held on 06-07-2023 at 11:00 AM under the Chairmanship of Additional Secretary Establishment in his office. The following attended the meeting

| Sl# | NAME | DESIGNATION |
|-----|-------------------|--|
| 1. | Mr. Fazal Wahid | Deputy Director Establishment of Directorate Elementary & Secondary Education Department |
| 2. | Mr. Aziz Ullah | Provincial President All Primary Teachers Association: Khyber Pakhtunkhwa |
| 3. | Mr. Razaqat Ullah | General Secretary APTA Peshawar |
| 4. | Muhammad Ishaq | Section Officer (Primary) E&SE Department Civil Secretariat Khyber Pakhtunkhwa Peshawar |

2. The meeting started with recitation from The Holy Quran. The chair welcomed the participants. The Deputy Director (Establishment) of Directorate of Elementary & Secondary Education briefed the forum regarding agenda item in detail.

3. After threadbare discussion it was decided that Directorate of Elementary & Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for onward submission to Establishment Department for further necessary action.

The meeting ended with a vote of thanks from the Chair.

(Mr. Fazal Wahid)
Deputy Director-1
E&SE Department

Provincial President
All Primary Teachers Association
Khyber Pakhtunkhwa

(Mr. Razaqat Ullah)
General Secretary APTA
Peshawar

(Muhammad Ishaq)
Section Officer (Primary-Male)
E&SE Department

ATTESTED

(Abdullah)

Additional Secretary (Establishment)

WP4442-2023 AZIZULLAH VS GOVT OF PAK

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

To:

Section Officer (Primary Male),
Elementary & Secondary Education Department,
KPK, Peshawar.

PESHAWAR,
(21-7-2023)

Subject: Minutes of Meeting

Dear Sir, I am directed to refer to letter No. (SO Primary-M) E&SED/5-1/G.M.A./
Minutes of meeting/PST/2023 dated 10-7-2023 on subject cited above and to
present brief history, about background of case as under:

- That Government of KP Establishment department (Regulation Wing) deleted rule 7(S) in Civil Servants (Appointment, promotion, Transfer Rules 1989) vide notification No. No. SDR-VI (E&AD) 1-3/2020 dated 06-08-2020.
- That this office sought guidance from your good office in the following words vide letter No. 6987 dated 06-05-2023
 - (i) Now it is obligatory upon civil servant to accept promotion.
 - (ii) It is prerogative of civil servant to either accept/turndown the offer of promotion.
- That your good office forwarded the same to quarters concerned vide letter No. SO (Primary-M) E&SED/2-2/Appointment/2023 for necessary guidance.
- That the government of KP-ED (Regulation Wing) vide letter No. SO (Policy) E&AD/1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline/forgo promotion. It is obligatory upon every civil servant to accept promotion under every condition.
- That in light of the minutes of the meeting dated 6-07-2023 held under the Chairmanship of Hon. Additional Secretary Establishment at his office. This office has been asked for submission of consolidated case.

In view of the above, this office is of considered opinion that the deletion of Rules 7(S) have affected negatively a huge members of Female teachers.

The case is submitted for perusal and necessary actions please.

Copy of the above to;

1. PA to Director Local Directorate
2. Master Copy

TESTED

Assistant Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa.



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-8223587)

19

73
F

No. SO(Primary-M)E&SED/2-2/Appointment-Rule /2023
Peshawar Dated 23rd August, 2023

The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment & Administration Department,
Peshawar.

SUBJECT: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE CIVIL SERVANT (APPOINTMENT, PROMOTION & TRANSFER RULES 1989).

Dear Sir,

I am directed to refer to your letter No. SO(Policy)/ E&AD/ 1-3/2020 dated 05th June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer Rules 1989) it has been intimated that those officers/ officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be processed under Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

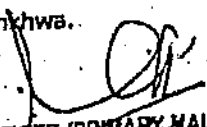
2. In this connection it is submitted that in some cases lady teacher of primary level who avail such promotions have to face serious inconvenience while they have to perform duties in the remotest station with no residential or transport facility. Most of them are married with kids and elder father of mother-in-law who need care. In such cases, there are negative effects on service delivery.

3. In view of the above, the said amendment may be reconsidered to the extent of lady teacher in primary schools.


(MUHAMMAD ISHAQ)
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.


SECTION OFFICER (PRIMARY MALE)
28/8/23

ATTESTED

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)E&AD/1-3/2020
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject: - GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.

Dear Sir,

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-
2/Appointment-Rule/2023 dated 23.08.2023 on the subject noted above and to state that
necessary guidance has already been tendered to your good office vide this department letter of
even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Encls. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

ATTENDED

20

WP4442-2023 AZIZULLAH VS GOVT OF PG43

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
No. SO(Policy)E&AD/1-3/2020
Dated Peshawar the September 07, 2023

To

The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject: - **GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE
KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT,
PROMOTION AND TRANSFER) RULES, 1989.**

Dear Sir.

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2- 2/Appointment-
Rule/2023 dated 23.08.2023 on the subject noted above and to state that necessary
guidance has already been tendered to your good office vide this department letter of even
No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

Section Officer (Policy)

Endst. Of even No & date

Copy forwarded to the:-

1. PS to Special Secretary (Reg), Establishment Department.
2. PA to Additional Secretary (Reg-II), Establishment Department.
3. PS to Deputy Secretary (Policy), Establishment Department.

ALISTED

Section nicer (Policy)

Khyber Pakhtunkhwa

Aziz Ullah Khan
President
033-0414648
Azizullah1973@gmail.com
CF aptakpli



57

APTA House:
Govt. Primary School No.4,
Gulbahar Peshawar City.

آل پرائمری ٹیچرز ایسوسی ایشن (اپٹا) خیبر پختونخوا

مخاطب: میگزنی و سیکٹری ایجوکیشن خیبر پختونخوا
مخاطب: آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا
جناب عالی

گزارش ہے کہ پرموشن ہر ادا سے میں ہوتے ہیں کہ سرکاری ملازم کی خواہش ہوتی ہے پرموشن کا ایک قانون ہوا کرتا ہے کہ جو ملازم ایک اگر کسی
بجوریکے تحت ایک دفعہ پرموشن میں تو وہ پھر آئندہ پانچ سال تک پرموشن نہیں لے سکتے تھے مطلب پانچ سال تک ہر اس کی پرموشن نہیں ہو سکتی تھی
پھر اس قانون میں ترمیمی رعایت دی گئی پانچ سال کی بات ختم کر دی گئی کہ اگر ایک ملازم ایک سال پرموشن نہ لیں تو وہ دوسرے سال لے سکتا ہے
لیکن اب ایک ہفتہ پہلے ایک اور نوٹیفکیشن ہوا ہے

جس کے مطابق اب ہر ملازم پرموشن ضرور لیں گے اگر نہیں لیں گے تو اس کے خلاف ای ڈی ڈی روٹ کے مطابق کارروائی کرنے کا کہا گیا ہے
دراصل یہ آخری نوٹیفکیشن بنیادی انسانی حقوق کی کئی خلاف ورزی ہے سو یہ کی دور دورہ اور پہلی باروں میں خاص کر خواتین امتداد کو انتہائی مشکلات کا
سامنا کرنا پڑے گا

جیکہ عام حالات میں بھی زبردستی پرموشن اور دور دورہ سمیٹا بھی بنیادی انسانی حقوق کی خلاف ورزی ہے کیونکہ خیبر پختونخوا میں بد قسمتی سے خواتین و شہینوں
بھی ہوتی ہے ویسے حالات میں یہ نیا نوٹیفکیشن جو E&SB کی گائیڈ لائنوں کی خلاف ورزی میں کیا گیا ہے جو بد قسمتی اور بنیادی انسانی حقوق کی خلاف ورزی
ہم اس کے خلاف قانونی چارہ جوئی کا حق بھی محفوظ رکھتے ہیں

لہذا ہم آپ سے درخواست کرتے ہیں کہ نوٹیفکیشن کو واپس لیا جائے یا اس میں ترمیم کر کے پرائمری امتداد کو (Relaxation) دیا جائے اور ان کی
زبردستی پرموشن لینے کی بجائے ان کو مرضی سے لینے دیا جائے

اور پرموشن نہ لینے کی صورت میں پانچ سال بائلا لیا جائے لیکن یہ زبردستی نہ کی جائے
اس سلسلے میں آپ جلد از جلد تمام (DEOs) کو ای او کو ایک خصوصی مراسلہ جاری کیا جائے تاکہ اطلاع میں آپ کی ای میل پرائمری امتداد کو ذہنی
البت اور ہر چرنگ سے بھیجا جائے

کیونکہ نوٹیفکیشن جاری ہوتے ہی پرائمری امتداد کو ذہنی طور پر ہارچ کرنے کا سلسلہ شروع ہو چکا ہے
لہذا ہم یہ توقع رکھتے ہیں کہ آپ صاحبان کوئی ایجنٹ لیکر سوچ بزرگے پرائمری امتداد خصوصاً ای میل پرائمری امتداد کو اس ذہنی البت سے نجات دلا سکیں گے

شکریہ

ATTESTED

Handwritten signature and date 08/11/23

عزیز اللہ خان سوہانی صدر
آل پرائمری ٹیچرز ایسوسی ایشن خیبر پختونخوا

23



Office of the District Education Officer Female
District Charsadda

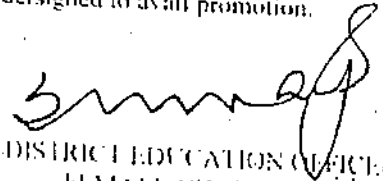
☎ 091-9220486 ✉ emischarsadda.deof@yahoo.com
No. 116/17-21 / Dated 15 / 5 / 2024

To / All the SDEO(s) (Female) in District Charsadda.

Subject: REFUSAL REGARDING PROMOTION

Memo: I am directed to refer to the subject cited above and to state that in light of Govt. of Khyber Pakhtunkhwa, Establishment department Notification No. SO(policy)E&AD/1-3/2020 dated Peshawar the June 06,2023 and verbal direction from the August Directorate of E&SE Khyber Pakhtunkhwa, it is obligatory upon every civil servant to accept promotion in every condition and those civil servants who forgo promotion shall be proceeded against under Khyber Pakhtunkhwa Civil servants (Efficiency & Discipline) Rules, 2011, please.

2. Those teachers who have submitted their refusals, are directed to submit their files for promotion, complete in all respect to the office of the undersigned to avail promotion.


DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

Encls: No.

- Copy forwarded for information to the:-
1. P.A. to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
 2. P.A. to Deputy Commissioner Charsadda.
 3. District Monitoring Officer (EMA) Charsadda.
 4. DEO (Male) Charsadda.
 5. Office File.

Sd-
DISTRICT EDUCATION OFFICER
FEMALE CHARSADDA

CITE


موجودہ ضابطہ سیکرٹری و پبلسٹیٹی اینڈ سٹینڈرڈ ایجوکیشنل ایگزیکیوٹو

عنوان: حکمانہ لٹریل -

ضابطہ سیکریٹری
سائلہ حسب ذیل زاریں کرتی ہے۔ سائلہ نے حکم خدا

میں پروٹوشن نہ لینے کی طرف سے انکوائسٹ لٹریل سے یہ
وہ دنیا حق پروٹوشن forgo کرتی ہے اور پروٹوشن لینے

کلیئر تیار نہیں ہے۔ حکم خدا کے علم صادر کیا ہے جو 6 جولائی
2023 کو جاری شدہ ہے۔ سائلہ نے حکم کو پیلے بھی

درخواست مع بیان حلفیہ ہے کہ وہ پروٹوشن لینے
کلیئر تیار نہ ہے اور waive کرتی ہے۔ چونکہ

حکم / ضابطہ 6/6/23 کے مطابق اور سائلہ کے حقوق کے
تعلق سے۔ جس سے سائلہ کے حقوق کے اٹھانے کا

خبر سے یہ روزانہ حکم کے مطابق کے مطابق
پروٹوشن نہ لینے پر حکم کا زور دینے کا حکم لے لیا گیا

ہنا یہ بھی قانون کے مطابق ہے۔

استدعا ہے کہ حکم جو 6/6/2023 کو جاری کیا گیا ہے
سائلہ کی زاریں و حافی طرف سے سائلہ کے درخواست

براد waive آرت پروٹوشن کو منظور فرمائی جاوے۔
3/6/24

~~Musat~~
مسائلہ
لقدت بیگم

EMERGENCY DEPARTMENT
LADY READING HOSPITAL

25

MEDICAL TEACHING INSTITUTION
SHARAF KHYBER PAKISTAN
Amount Paid : 20
Invoice No: KU2212000207

Invoice Date: 04-DLC 21 09:41:31

Pt No: KU20021704035

Name: Noorai Begum

Sex: Female

Age: 45 Year(s)

District: Chamanada

874

Marital Status: Married
Husband Name: MUHAMMAD YOUSAF

Serial No.

Admission Type: Acute Emergency Department: EMERGENCY

Consultant: DR. ABU HUSSAIN

Counter: EMERGENCY

R

[Handwritten mark]

Admission

Diagnosis:

Next Visit:

Consultant Name:

Signature:

[Faded handwritten text and signatures]

26

Lady Reading Hospital, MTI Peshawar
 Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430, Fax: --
 Email: mfo@lrh.edu.pk, Website: www.lrh.edu.pk
DISCHARGE SUMMARY



Medical Record Number: **K0200021726574**
 Name : **Nusrat Begum**
 Sex : Female
 Age : 45 Year(s)
 Address :
 City : Peshawar , Pakistan
 Person Phone :
 Home Phone :

Admission No : K0221000093934
 Admission Date : 10-NOV-2021 11:24:19
 Admission Status : Emergency
 Discharge No :
 Discharge Date : 14-NOV-2021 13:10:28
 Discharge Status : Improved
 Primary Consultant :
 Admitting Consultant : KHWAJA FAWAD PERVEZ

Diagnosis During This Admission :

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Diagnostic & Therapeutic Procedures Performed :

major no 477
 time 09:30 to 10:30am
 operation: TAH
 surgeon: DR FAWAD (AP)
 asst: dr ayman munir, dr annie (J), dr asma
 indication: unmarried with fibroid uterus
 obstetrician : Dr REhana
 anesthetist : Dr Haseeb under GA
 IOF: multiple fibroids largest measuring 7*7cm on fundus distorting the endometrial cavity
 right sided endometriotic cyst
 bilateral ovaries normal looking with good follicular activity
 procedure:

PATIENT SHIFTED TO OT, PUT IN S/P, C/D, ANESTHETIZED, CATHETERIZED. ABDOMEN OPENED WITH PF INCISION, RECTUS CUT, MUSCLES SEPARATED ABOVE FINDINGS NOTED. TAH DONE BY CLAMPING, CUTTING, LIGATING TUBOOVARIAN, UTERINE AND ROUND LIGAMENT. VAULT CLOSED, HEMOSTASIS SECURED, DRAIN KEPT IN. ABDOMEN CLOSED IN REVERSE ORDER .ASD DONE. SPECIMEN SENT FOR HISTOPATHOLOGY

post op orders
 catheter for 48 days
 drain TFO
 input output record
 inj sulzone 2G IV BD (ATD)
 inj flagyl 100ml IV TDS
 inj tramal + gravinate IV TDS
 inf N/S + D/W+ R/L 3000ml over 24 hrs inj risek 40mg in 100 ml pladex IV OD
 vitals record 4 hourly
 inj transamine 1 gm IV TDS
 Inj clexane 40mg SC BD
 inj risek 40mg i/v od
 specimen sent for histopathology
 no active bleeding at the end.

discharge medication
 tab mixel 400mg 1 od for 5 days
 tab flagyl 400mg 1 tds for 5 dys
 tab pytex 20mg 1 tds for 5 days
 tab RBC F 1 od for 1 month
 tab CDK 1 od for 1 month

Condition at Discharge:
 stable

Followup Instructions:
 patient went into urinary retention, catheterized, catheter to be removed after 10 days

Instructions:

گھر کے لیے علاج
 ان سفارشات کا خیال رکھیں
 ایڈمیشن سے صحتی کریں
 اور ایسے ایسے گھومتے جائیں
 گھر کے لیے علاج
 ٹائیکلے کھولوانے کا ہے
 22 نومبر کو ملا سیں
 لائیں
 بیسٹ سے پی لینی

9

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VIEW: 13-Nov-2021 17:01:11

Clinical Pathology Report

Page: 1 of 1

Dept Ref# : K02CLP21067392
 MRNO : K02-00021726574
 Name : Nusrat Begum
 Age/Sex : 45 Year(s)/Female
 Phone : 92 0335 5836150
 Address : , PESHAWAR - PAKISTAN

Ordered By :
 In-house Consultant : Khwaja Fawad Pervez
 Requested : 13-NOV-2021 15:30:56
 Specimen Received : 13-NOV-2021 15:49:41
 Reported : 13-NOV-2021 15:56:53

SPECIMEN : Urine

Physical Examination :
 Colour : YELLOW
 Appearance : CLEAR

Chemical Examination:

| TEST(s) | RESULT(s) | NORMAL RANGE |
|---------|-----------|--------------|
| Glucose | Nil | Negative |
| Protein | Trace | Negative |

Microscopic Examination:

| | | |
|------------------|-----|----------|
| PLA/WBC | 1-2 | 0-5/HPF |
| RBC | 4-6 | 0-5/HPF |
| Epithelial Cells | + | 0-10/HPF |
| Amorphous Urates | Nil | |
| Crystal | Nil | |

A

Lady Reading Hospital, MTI Peshawar

Lady Reading Hospital, MTI Peshawar. Phone: 091-9211430, Fax: --
 Email: info@lrh.edu.pk, Website: www.lrh.edu.pk

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VIEW: 10-Nov-2021 19:36:17

Clinical Chemistry Report

Page 2 of 2

MRNO : K02-00021726574
 Name : Nusrat Begum
 Age/Sex : 45 Year(s)/Female
 Phone : 92 0335 5836450
 Address : PESHAWAR - PAKISTAN

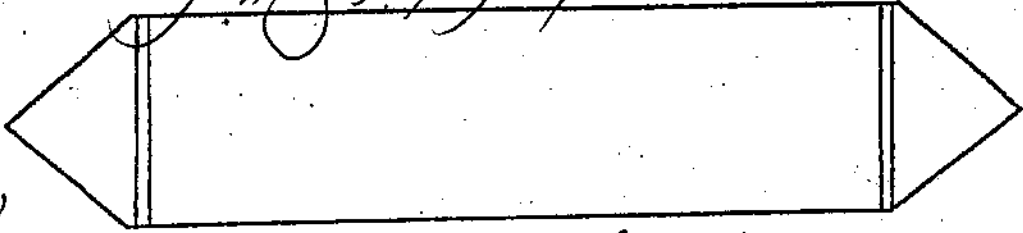
Ordered By : Qudsia Qazi
 In-house Consultant : Khwaja Fawad Pervez
 Report Destination :
 Requested : 10-NOV-2021 17:11:31
 Specimen Received : 10-NOV-2021 17:22:54
 Reported : 10-NOV-2021 18:51:13

Chemistry - I

| TEST(s) | NORMAL | UNIT(s) | K02RCH21257381 | K02RCH21257083 |
|----------------------|-------------|---------|-------------------------|-------------------------|
| | | | 10-NOV-2021 18:51:18 | 10-NOV-2021 13:18:38 |
| SODIUM (Na) | 135 - 150 | mmol/L | 138 | |
| POTASSIUM (K) | 3.5 - 5.1 | mmol/L | 3.96 | |
| CHLORIDE (Cl) | 96 - 112 | mmol/L | 101.9 | |
| BLOOD UREA | 18 - 45 | mg/dL | | 25 |
| GLUCOSE (RANDOM) | 70 - 140 | mg/dL | 131 | |
| TOTAL BILIRUBIN | 0.1 - 1.0 | mg/dL | | 0.35 |
| ALT/GPT | 10 - 50 | U/L | | 19 |
| ALKALINE PHOSPHATASE | 35 - 104 | U/L | | 81 |
| URIC ACID | 2.4 - 5.7 | mg/dL | 6.1 | |
| CREATININE | 0.42 - 1.06 | mg/dL | | 0.8 |

Q

بعدالت سرپرستیوں کی تبدیلی کے حوالہ



موزونہ
مقدمہ
دعوی
جرم

22 مخدوم سائید
بھٹہ

مسماة لقرت بیگم (س) سرپرستی

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
 آن مقام لیسٹور کے لیے شاہ صاحب ناسامی اور
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دگا۔ نیز
 وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعوی اور
 بصورت ڈگری کرنے اجراء اور صولی چیک درو پیہ اور عرضی دعوی اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل گمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
 پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانشین التوائے مقدمہ کے سبب سے وہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سدر ہے۔

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Accept

Shah Farooq Nasam
A.S.C.

بمقام