


FORM OF ORDER SHEET

Court of _____

Appeal No. 1470/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/09/2024	<p>The appeal of Mr. Ihtesham ul Haq presented today by Mr. Sher Hyder Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 27.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

D

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1470 Of 2024

Ihtisham Ul Haq

V E R S U S

**Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department & Others**

**APPLICATION FOR FIXATION OF THE INSTANT
SERVICE APPEAL IN PRINCIPLE SEAT/PESHAWAR OF
THIS HONORABLE TRIBUNAL FOR PRELIMINARY
HEARING.**

Respectfully Sheweth;

1. That the above titled service appeal is pending for adjudication before this Honorable Tribunal at Peshawar; where no date of hearing is fixed.
2. That the applicant and counsel for the applicant also residing/practicing at Peshawar.
3. That there is no legal bar on acceptance of the instant application for the better administration of justice.

It is therefore; humbly request that on acceptance of the instant service appeal may very kindly be fixed for hearing before the principal seat at Peshawar for preliminary hearing.

Appellant

Through

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1470 Of 2024

Ihtisham UI Haq

V E R S U S

Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department & Others

I N D E X

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4.	Copy of CNIC	"A"	8
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Dated; 16-09-2024

Appellant

Through

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)
Cell: 0336-9377022

①

**BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1470 Of 2024

Ihtisham Ul Haq (Chowkidar)
Government Primary School, Mughalandeh, Tehsil and
District Chitral Lower.

.....Appellant

V E R S U S

1. Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department, at Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education Department, at Civil Secretariat Peshawar.
3. District Education Officer (Male) Chitral Lower, Tehsil and District Chitral Lower.
4. Zakir Ullah (Under Transfer Chowkidar), Government Primary School, Mughalandeh, Tehsil and District Chitral Lower.

.....Respondents

**APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974, AGAINST THE ORDER DATED; 31-
05-2024, VIDE WHICH THE APPELLANT HAS BEEN
TRANSFERRED FROM GOVERNMENT PRIMARY
SCHOOL, MUGHALANDEH CHITRAL LOWER TO
GOVERNMENT CENTENNIAL MODEL HIGH SCHOOL
FOR BOYS CHITRAL LOWER.**

P R A Y E R;

**ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL
THE IMPUGNED ORDER OF RESPONDENT NO. 03 DATED;
31-05-2024; MAY PLEASE BE SET-ASIDE AND DECLARED
AS ILLEGAL AND VOID-AB-INITIO.**

Respectfully Sheweth:

Brief facts and grounds giving rise to the instant service appeal are as under;

ON FACTS

1. That the names and addresses of the parties have correctly been given in the head note of the instant service appeal, which are sufficient for the purpose of effecting their proper services and citation etc.
2. That the appellant is law abiding citizen of Islamic Republic of Pakistan and serving the respondents department as Chowkidar.
Copy of CNIC is attached as Annexure "A"
3. That the appellant was appointed as Chowkidar at Government Primary School, Mughalandeh, Tehsil and District Chitral Lower; where he was performing his duties in the respondent's department quite efficiently with zeal and zest.
4. That the SDEO Chitral Lower; submitted report to the respondent No. 03 that the appellant is not taking care of cleanliness of the class rooms and he is involved in cleaning the school from the students, upon this an injury committee was constituted vide order dated; 20-05-2024.
Copy of order Dated; 20-05-2024 is Annexure "B"
5. That the upon the report of the committee the appellant has been transferred from Government Primary School, Mughalandeh, to Government Centennial Model High School for Boys Chital Lower vide Order Dated; 31-05-2024.
Copy of Transfers Order Dated; 31-05-2024 is Annexure "C"
6. That the appellant feeling aggrieved from the impugned notification, submitted Departmental Appeal before the appellate authority on Dated; 08-06-2024 the same has not been responded till date and after expiry the statutory period the instant service appeal on the following grounds;
Copy of Departmental Appeal Dated; 08-06-2024 is Annexure "D"

GROUNDS

- A. **That** the appellant throughout his career has performed his duties honestly, fairly, efficiently and to the satisfaction of his superiors, especially his tenure of service on the subject post was exemplary and outstanding.
- B. **That** the impugned transfer order is in violation of Posting Transfer Policy 2009 and the relevant provisions of civil servant act that a civil servant in serving a lower scale is to be posted at the nearest duty station, but in the present case the appellant has been transferred to a far flung area from his home. This fact speaks volume in respect of malafide on the part of the respondent department.
- C. **That** the impugned order has been passed on the strength of inquiry report dated; 20-05-2024 but it is worth mentioning that the inquiry committee has been constituted on the same date and there is no inquiry report available on case file, this fact alone is enough to establish malafide of the respondents.
- D. **That** the appellant has not been treated in accordance with law, Rules and his rights guaranteed under the law therefore, this conduct of the respondents tantamount to naked violation of the provisions of the Civil Servants laws.
- E. **That** the act of the respondent is discriminatory and transfer order of civil servant made by the respondent irrespective of the consideration of public interest and issuance of such orders without any rhyme or reason is mala fide, arbitrary, against the canon of justice, equity and fair play by the respondents.
- F. **That** the transfer posting order is made contrary to the relevant rules and against the public interest and without allowing the appellant to explain his position, this august Tribunal is empowered to examine such administrative action by applying the principle of judicial review.

- G. That** the impugned order is not backed by any legal or cogent reason and is a classic case of illegal and irregular exercise of power and mis-use of authority.
- H. That** the appellant has not been dealt in accordance to article 4 and 25 of the constitution of Islamic Republic of Pakistan.
- I. That** the appellant has rendered about 16 years exemplary and outstanding service to the department and is qualified committed and entitled to all pending and upcoming promotions.
- J. That** the acts and omission of respondent is against the KPK Civil Servant (Appointment, Promotion and Transfer rules 1989 as well as against the relevant provision of KPK Civil Service act 1973.
- K. That** the instant appeal relates to terms and conditions of civil servant and this honorable tribunal has been vested with statutory power to entertain the matter.
- L. That** patent discrimination and malafide of the respondents is apparent on the face of record. That the respondents violated Article, 4 of the Constitution of Islamic Republic of Pakistan, 1973 with its heading "Rights of Individual to be dealt with in accordance with the Law" it is mandatory for respondents to comply with law and rules in fair, equal and lawful manner as well as prohibitory for them to act in a manner which is not admissible in law/rules; hence their such act with effect to compel the Appellant for retirement is totally void.
- M. That** from very prospect of the Constitution of Islamic Republic of Pakistan, 1973 and policies governing the subject Respondents have no excuse at all to avoid vested rights of the Appellant in matter of performance of service.
- N. That** according to Article, 25 of the Constitution of Islamic Republic of Pakistan, 1973 all citizens are equal before Law and are entitled

to equal protection of Law but the respondents violated this Article of the Constitution.

O. That act of respondents with effect to deny right to service of Appellant and their omission to protect the same is; against Article, 27 of the Constitution of Islamic Republic of Pakistan, 1973 with its heading "Safe Guard against discrimination in services".

P. That the Appellant seeks leave of this Honourable Tribunal to argue/raise additional grounds at the time of arguments.

It is therefore humbly submitted on acceptance of the instant service appeal the impugned Order of Respondent No. 03 Dated; 31-05-2024 may please be set-aside and declared as illegal and void-ab-initio and against the Posting Transfer Policy 2009. Any such relief which this honorable court deems proper and just be granted to the Appellant against the respondents keeping in view the circumstances of the case.

Dated; 16-09-2024


Appellant

Through, 

SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)
Cell: 0336 - 93 77 022

CERTIFICATE:

It is certified that no other service appeal on the same subject has been filed before this Honourable Tribunal.


Counsel

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BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ **Of 2024**

Ihtisham Ul Haq

V E R S U S

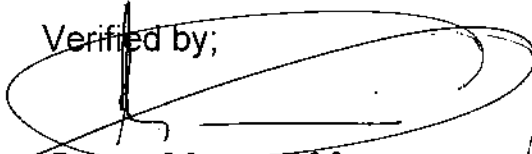
**Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department & Others**

AFFIDAVIT:

I, Ihtisham Ul Haq (Chowkidar) Government Primary School, Mughalandeh, Tehsil and District Chitral Lower, Appellant; do hereby solemnly affirm and declare on Oath that the contents of the accompanying *Service Appeal; Before KCP Services Tribunal* are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honourable Tribunal.


Deponent

Verified by;


SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)


16/04/24

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BEFORE THE BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____ **Of 2024**

Ihtisham UI Haq

V E R S U S

**Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department & Others**

ADDRESSES OF PARTIES

APPELLANT

Ihtisham UI Haq (Chowkidar)
Government Primary School, Mughalandeh, Tehsil and
District Chitral Lower.

RESPONDANTS:

1. Secretary to Government of Khyber Pakhtunkhwa
Elementary and Secondary Education Department, at
Civil Secretariat Peshawar.
2. Director Elementary and Secondary Education
Department, at Civil Secretariat Peshawar.
3. District Education Officer (Male) Chitral Lower, Tehsil and
District Chitral Lower.
4. Zakir Ullah (Under Transfer Chowkidar), Government
Primary School, Mughalandeh, Tehsil and District Chitral
Lower.

Appellant

Through,


SHER HYDER KHAN
ADVOCATE HIGH COURT
LL.B (Hons), LL.M (I-L)

8

کشمورہ کے پیرسٹیجیولیشن ڈاکیومنٹس

Registrar General of Pakistan
Lahore, Pakistan

504481020449



15201-3499410-7

PAKISTAN National Identity Card

Ministry of Interior, Islamabad

Holder's Name: Noor Muhammad Khan

Holder's Signature: [Signature]


Holder's Date of Birth: 21.02.1988

Holder's Date of Issue: 13.03.2017

Holder's Date of Expiry: 13.03.2027

Identity Number: 15201-3499410-7

Country of Issue: Pakistan



8

Annexure

11/11



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

LOWER CHITRAL

Phone: 0943-412627

Email address: deomchitral@gmail.com



"B"

Annexure

9

OFFICE ORDER

The following enquiry Committee is hereby constituted to probe the into the contents of enclosed report submitted by SDEO (Male) Chitral vide No. No.2528/F.No.EB/Explanation/SDEO (M) CTL dated Chitral the 16-05-2024, against Mr. Ihtisham-ul-Haq Chowkidar Govt: Primary School Moghlandeh to submit their report with clear cut recommendation within a week time positively.

- | | |
|---|----------|
| 1. Mr. Sami-ud-Din Principal Govt: High School Broze. | Chairman |
| 2. Mr. Asad Ullah Jan SST (G) Govt: High School Broze | Member |

The committee is directed to conduct in depth inquiry within a week time and submit reports along with clear-cut recommendations under E&D Rules 2011.

All the related documents are enclosed herewith.

(Mahmood Ghaznavi)
District Education Officer
(Male) Chitral

7375-82

Enst: No. _____ E/B (Primary) F.No. E-3 Enquiry

Dated Chitral the 20/5/2024

Copy forwarded for information to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (Male) Lower Chitral.
3. Concerned Chairman and Member (Enquiry Committee).
4. Mr. Ihtisham-ul-Haq Chowkidar Govt: Primary School Moghlandeh.
5. Office File.

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[Signature]
District Education Officer
(Male) Chitral

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OFFICE OF THE
SUB DIVISIONAL EDUCATION OFFICER
(MALE) CHITRAL

No. 2123 /F.No, EB/Explanation/SDEO (M) CTL

Dated Chitral the: 22/04 /2024

To,

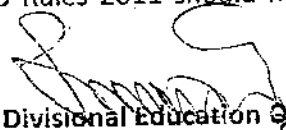
✓
Mr. Ihtisham Ul Haq
Chowkidar GPS Moghlandeh

Subject: **EXPLANATION**

Memo:-

Reference report submitted by the School Leader Moghlandeh Cluster it came to the notice of the undersigned that on 18-04-2024 you were absent from duty while Head Teacher was cleaning himself along with School Students. On query the Head Teacher told the School Leader that you are not cleaning the School and disobey order of the Head Teacher with the argument that cleaning the School building and premises are not your duty.

Therefore, you are hereby directed to explain your position about the above cited allegation within Three days as why disciplinary action under E&D Rules 2011 should not be taken against you, with immediate effect.


Sub Divisional Education Officer
(Male) Chitral

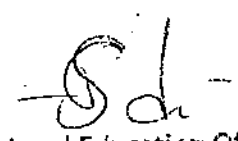
Endst: No. _____ /F.No, EB/Genral/SDEO (M) CTL

Dated: _____ / _____ /2024.

Copy forwarded to the: -

1. District Education Officer (Male) Lower Chitral, for information please.
2. ASDEO Male Garum Chashma Circle.
3. School Leader concerned.
4. Head Teacher GPS Moghiandeh.




Sub Divisional Education Officer
(Male) Chitral



GOVERNMENT OF KHYBER PAKHTUNKHWA

OFFICE OF THE DISTRICT EDUCATION OFFICER

(MALE) LOWER CHITRAL

Phone: 0943-412627 Email address: deomchitral@gmail.com



OFFICE ORDER

As per recommendations of the enquiry committee constituted vide this office order No.7378-82 EB(M)(Primary)F.No.E-3 Enquiry: dated 20-05-2024, the following postings/transfers *under administrative ground* are hereby ordered with immediate effect in the best interest of public.

S.#	Name/Designation	From	To	Remarks
1.	Mr. Ihtisham Ul Haq Chowkidar	GPS Mughalandeh	GCMHS (B) Chitral	Under Administrative ground, V.S.No.2
2.	Mr. Riaz Ahmad Chowkidar	GCMHS (B) Chitral	DEO (M) Local Office	V.S.No.3
3.	Mr. Zakir Ullah Chowkidar	DEO (M) Local Office	GPS Mughalandeh	V.S.No.1

Note:

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

(Mahmood Gbaznavi)
District Education Officer
(Male) Lower Chitral

Endst: No. 8100-09 /EB (M) E-4-voll-II:

Dated 31/05 /2024

Copy forwarded to for information & necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer Lower Chitral.
3. District Monitoring Officer (EMA) Lower Chitral.
4. Principal GCMHS (B) Chitral
5. SDEO (M) Chitral.
6. Enquiry committee concerned.
7. PA to DEO (M) Local Office.
8. DEMIS Local for update.
9. Officials concerned.
10. Office file.

District Education Officer
(Male) Lower Chitral

2020-06-06

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بخدمت عالیہ ڈائریکٹر لیس صاحبہ ایلمنٹری اینڈ سیکنڈری ایجوکیشن صوبہ خیبر پختونخواہ

حکمانہ Representation / اپیل برخلاف آرڈر نمبر 2203 مورخہ 04-05-2024 وٹرانسفر آرڈر نمبر

8100-09/EB(M) E4-Voll-ii محرمہ 31-05-2024 از اس ڈسٹرکٹ ایجوکیشن آفیسر (میل) ضلع چترال لوئر جس

کی رو سے من سائل / اپیلانٹ کو گورنمنٹ پرائمری سکول مغلانہ چترال سے گورنمنٹ سینٹریل ماڈل سکول چترال خاص ٹرانسفر کیا گیا ہے۔

جناب عالیہ!

سائل / اپیلانٹ حسب ذیل عرض رساں ہے۔

- ۱۔ یکہ سال 1986 کو سائل کے خاندان سے بلا معاوضہ زمین لے کر وہاں GPS مغلانہ چترال لوئر تعمیر کیا گیا۔ اور بعد ازاں سکول کی توسیع کے سلسلے میں زمین درکار ہونے پر بھی سائل کے خاندان سے بدوران سال 2001-2002 کو دو بارہ بلا معاوضہ زمین حاصل کی گئی۔ اور بعد ازاں سکول کیلئے واش روم بنانے کے لئے تیسری بار سائل کے خاندان سے بلا معاوضہ زمین حاصل گئی ہیں۔
- ۲۔ سکول تعمیر ہونے کے بعد سائل کے خاندان سے مرحوم مبارک خان ولد وردان خان کی تقرری بطور چوکیدار کی گئی جو کہ اپنی مدت ملازمت بطور چوکیدار مکمل کر کے ریٹائرڈ ہونے پر سائل کی تقرری بطور چوکیدار سال 2008 کو عمل میں لائی گئی۔
- ۳۔ یکہ سال 2008 سے سائل بطور چوکیدار سکول مذکورہ میں بطریق احسن اپنی ذیوی انجام دیتا آ رہا تھا کہ محکمہ ایجوکیشن (میل) ضلع چترال لوئر کے SDEO اور DEO صاحبان اور ہیڈ ٹیچر نے سکول لیڈر سمیر عباس کی بلا جواز طور پر شکایت اور سازش پر سائل سے غیر قانونی و خلاف ضابطہ طور پر چوکیدار کے ڈیوٹی کے ساتھ ساتھ سوچر کا کام بھی لینے کی غرض سے ایک Explanation Order نمبر 2123 مورخہ 22-04-2024 جاری کیے۔ جو کہ درخواست ہذا ہے۔ اور بعد ازاں اسی سلسلے میں ایک غیر قانونی آرڈر نمبر 2203 مورخہ 04-05-2024 کو ج کیے جو کہ ایک درخواست ہذا ہے۔ جس کی رو سے سائل کو سکول ہذا کی صفائی کی بھی احکامات جاری کیے ہیں جو کہ سائل کے کیدر سے بہت کم ہے۔ لہذا آرڈر مذکورہ قابل اعتراض ہے۔
- ۴۔ یکہ DEO و SDEO میل صاحبان چترال لوئر سائل کو گھگ و ہراساں کرنے کی غرض سے پہلے بھی کئی دفعہ سائل کو مختلف امور کا بہانہ بنا کر سائل اپیلانٹ کے خلاف کارروائی کرتے رہے ہیں۔ اور مذکورہ بالا Explanation Order کی بنیاد پر کمیٹی تشکیل دے کر اور مذکورہ کمیٹی کے ذریعے سائل کی کے عذرات کو سنے بغیر ہی سائل کی غیر قانونی ٹرانسفر آرڈر نمبر 82-7378 مورخہ 31-05-2024 جاری کر کے سائل کو G.C.M.H.C. سکول چترال ٹرانسفر کی ہیں جس پر سائل حکام بالا کی احکامات کی بجا آوری کرتے ہوئے مذکورہ سکول میں چارج لی اور اپنی ذیوی انجام دے رہا ہوں۔
- ۵۔ یکہ سکول GPS مغلانہ جو کہ سائل کے گھر کے ساتھ بالکل متصل ہے۔ اور سائل سکول ہذا کی دیکھ بال بھی احسن طریقے سے ادا کرتا آ رہا تھا لیکن حکام بالا کی بدینتی و ذاتی عناد کی وجہ سے سائل کو دوسرے سکول ٹرانسفر کرنے کی وجہ سے سائل اور سائل کے گھر اور خاندان والوں کو بے پردگی کے خدشات بھی لاحق ہیں جو کہ انسانی بنیادی حقوق کی بھی خلاف ورزی ہے حالانکہ سائل کے خاندان سے اراضی حاصل کرتے وقت سائل کے خاندان کے لئے بے پردگی کے خدشات اور بے روزگاری کو مد نظر رکھتے ہوئے کسی دیگر کو مذکورہ سکول میں بطور چوکیدار ٹرانسفر/تقرری نہ کرنے کا محکمہ ایجوکیشن چترال نے سائل کے خاندان کے ساتھ وعدے بھی کیے تھے اور اسی وجہ سے سائل کے خاندان والوں نے سکول کیلئے اراضی دیے تھے۔
- ۶۔ یکہ متذکرہ آرڈر نمبر 2203 مورخہ 04-05-2024 وٹرانسفر آرڈر بدینتی پر مبنی، غیر قانونی، غیر شرعی اور غیر آئینی ہونے کی وجہ سے قابل منسوخ و قابل اعدی ہے۔




اندریں حالات استدعا ہے کہ منظور و Representation / اپیل ہذا ٹرانسفر آرڈر صدرہ 31-05-2024 متذکرہ بالا غیر قانونی غیر آئینی قرار دی جا کر سائل / اپیلانٹ کو گورنمنٹ پرائمری سکول مغلانہ چترال لوئر ہی میں بحیثیت چوکیدار بحال فرمایا جائے۔ نیز دیگر دادرسی جو قرین انصاف ہو بحق سائل / اپیلانٹ صادر فرمائی جائے۔

العارض

اشتہام الحق ولد نور محمد خان

Date: 2-06-2024

چوکیدار گورنمنٹ پرائمری سکول مغلانہ چترال لوئر۔

55083	پشاور بار ایسوسی ایشن، خیبر پختونخوا
Sher Hyder Khan	ایڈووکیٹ
BC-17-7888	بار کونسل ایسوسی ایشن نمبر:
0336-9377022	رابطہ نمبر:
	  

14

بعدالت جناب: خیبر کنٹری کو اسروسز مٹریجنٹل شیاور

Appellant	مخائب:	Service Appeal	دعوی:
احتیام الحق			علت نمبر:
بنام			مورخہ:
حکومت خیبر کیوبا			جرم:
			تھانہ:

بابت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کیلئے شہیر حیدر خان ایڈووکیٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر نمائندگی فیصلہ بر حلف دینے جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی 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 ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا بندتہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المترقوم: 09/09/2024
Attested & Accepted

مقام شیاور

① Kamran Ambar
Advocate

② Sidra Nazir
Advocate

نوٹ: اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔

احتیام الحق ولید نور محمد خان
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