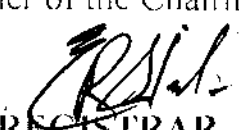


# FORM OF ORDER SHEET

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

**Appeal No.** 1495/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2024	<p>The appeal of Mr. Wajid Ullah Khan resubmitted today by Mr. Inayat Ullah Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

9

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,  
PESHAWAR.

Service Appeal No. 1495 /2024

Wajid Ullah Khan .....Appellant

Versus

Departmental Promotion Committee  
through District and Sessions Judge, Bannu & others  
..... Respondents


APPLICATION FOR HEARING OF THE  
ABOVE TITLED APPEAL AT PRINCIPAL  
SEAT, PESHAWAR.

*Respectfully Sheweth;*

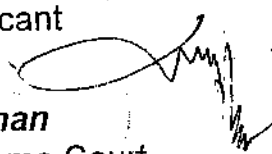
- 1) That the titled appeal is being filed before this Hon'ble Tribunal at principal seat Peshawar.
- 2) That the Appellant has engaged the counsel at principal seat, Peshawar and also paid the agreed fee and cannot afford travelling expenses from Peshawar to Bannu, which may be calculated at Rs.20,000/- to Rs.25,000/- per trip.
- 3) That the counsel for the appellant is practicing at principal seat Peshawar and also frequently appearing before the August Supreme Court of Pakistan, therefore, it is also inconvenient for the counsel to appear in the instant appeal at Bannu on each and every date.

Keeping in view, what has been stated above, it is, therefore, humbly prayed that the titled appeal may kindly be heard at principal seat, Peshawar in the best interest of just and equity.

Dated: 11.09.2024

  
Appellant/ Applicant

Through

  
**Inayat Ullah Khan**  
Advocate Supreme Court  
LL. M (U.K)

The appeal of Mr. Wajidullah Khan received today i.e on 13.09.2024 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

1- Appellate authority has not been arrayed/made a party.

No. 790 /Inst./2024/KPST,

Dt. 13/9 /2024.

*Amatulh*  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Inayat Ullah Khan Adv.  
High Court at Peshawar.

*The objection removed and  
the appellate authority  
has been arrayed as a  
necessary party.*

*Resubmitted after necessary  
correction:*

*Inayat Ullah Khan  
ASC LHM(UK)*

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: ملف - 12-9-24

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	-	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	✓	
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	✓	
26	Whether copies of comments/reply/rejoinder submitted? On	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	✓	

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

Name: Muhammad Yousaf Khan  
 Signature: [Signature]  
 Dated: 12-9-24

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 1495 2024.

Wajid Ullah Khan .....Appellant

Versus


Departmental Promotion Committee  
through District and Sessions Judge, Bannu & others  
..... Respondents

**I N D E X**

S.No.	Description of documents.	Annex:	Pages.
1.	Grounds of appeal.		1-7
2.	Affidavit.		8
3.	Application for fixation of appeal		9
4.	Affidavit.		10
5.	Addresses of the parties.		11
6.	Copy of seniority list of Daftari and Record Lifter (BPS-04)	A	12
7.	Seniority list of Naib Qasid/ Chowkidar/ Mali/ Sweeper (BPS-03)	B	13-15
8.	Copy of order dated 19.12.2022	C	16
9.	Copy of working paper.	C/1	17
10.	Copy of minutes	D	18-19
11.	Copy of relevant Rule-13	E	20
12.	Copies of departmental appeal dated 17.01.2023	F	21-25
13.	Copy of order dated 09.07.2024	G	26-28
14.	Wakalatnama.		29

  
Appellant

Through

  
**Inayat Ullah Khan**  
Advocate Supreme Court  
LL.M (U.K)  
Cell: 0333-9227736

Dated: 11.09.2024

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 1495/2024

**Wajid Ullah Khan S/o Muhammad Riaz Khan**  
 Record lifter (BPS-4) District & Sessions Judge Bannu  
 R/O Darma Khel Post office Nizam Bazar  
 Tehsil and District Bannu.....Appellant

**Versus**

- 1) Departmental Promotion Committee through District and Sessions Judge, Bannu. .
- 2) Zahid Ullah Khan S/o Muhammad Akbar  
 Junior Clerk/ Muharrir (BPS-11) Civil Judge No.12 District Courts Bannu
- 3) Naseer Ullah Khan S/o Gul Raees Khan  
 Junior Clerk/ Muharrir (BPS-11) Civil Judge No.3 District Courts Bannu
- 4) Kashif Khan S/o Muhammad Riaz Khan  
 Junior Clerk/ Muharrir (BPS-11) Civil Judge No.5 District Courts Bannu
- 5) Registrar, Peshawar High Court, Peshawar....**Respondents**

Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order dated 19.12.2022, received by the appellant on 14.01.2023 against which he preferred departmental appeal dated 17.01.2023 which was disposed of Vide order dated 09.07.2024 by the appellate authority received by the appellant on 02.09.2024. Hence presents the instant Service Appeal before this Hon'ble tribunal within 30 days, which is well within time.

Prayer:

On acceptance of this appeal, the impugned order dated 19.12.2022 and order dated 09.07.2024 received by appellant on 02.09.2024. may kindly be set aside and the appellant may please be promoted from the post of **Record Lifter** (BPS-04) to the post of **Junior Clerk** (BPS-11) with effect from 19.12.2022 with all consequential back benefits/ arrears of pay.

***Respectfully Sheweth;***

Brief facts giving rise to the instant Service Appeal are as follow:-

- 1) That the appellant was appointed as Chowkidar on 01.02.2008 having qualification of Matric as evident from seniority list dated 28.11.2022 maintained by the office of District & Session Judge, Bannu.

**(Copy of seniority list of Daftari and Record Lifter (BPS-04) is enclosed as Annexure "A" & seniority list of Naib Qasid/ Chowkidar/ Mali/ Sweeper (BPS-03) is enclosed as Annexure "B")**

- 2) That Zahid Ullah Naib Qasid (BPS-03), Mr. Naseer Ullah Khan Naib Qasid (BPS-03) and Mr. Kashif Khan Naib Qasid (BPS-03) were promoted to the post of Junior Clerk BPS-11 vide impugned order No.4032/DSJ/Bannu dated 19.12.2022, who were placed below than the appellant at Serial No.2, 4 and 5 of the Working Paper prepared for Promotion dated 29.11.2022.

It is pertinent to mention that the working paper prepared for promotion is consisting upon the position of

Daftari/ Record Lifter (BPS-04) and Naib Qasid/ Chokidar/ Mali/ Sweeper (BPS-03).

(Copy of order dated 19.12.2022 is Annex: "C" while working paper is enclosed as Annexure "C/1")

- 3) That meeting of Department Promotion Committee was held on 19.12.2022 in the office of District & Session Judge Bannu being its Chairman and recommended Zahid Ullah Khan, Naib Qasid (BPS-03), Naseer Ullah Khan, Naib Qasid (BPS-03) and Kashif Khan, Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11) in the light of Working Paper prepared for the promotion as referred to in Para No.2 above.

(Copy of minutes are enclosed as Annexure "D")

- 4) That it is pertinent to mention that as per Rule-13 of Subordinate Court Staff Recruitment Rules 2003, 30% Quota is reserved for promotion from amongst the holders of the post of Daftari and Record Lifter with Matric and 3 years service as such.

It is pertinent to make reference to the relevant Rule-13 in verbatim for ready reference:

"Rule-13, Junior Clerk/Nazir (BPS-11),

- ii. Note more than 30% by promotion, from amongst the holders of the posts of Daftari and Record Lifter with matric and three year service as such; and in case no suitable candidate from amongst holders of the posts of Daftari and Record Lifter is available, then from amongst holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier who have passed secondary school Certificate Examination and have at least five years service as such.

Note: For the purpose of promotion, separate common seniority lists of (i) holders of the posts of Daftari and Record Lifter; and (ii) the



holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier shall be maintained with reference to the date of their acquiring the Secondary School Certificate;

**Provided that:**

- A. If two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials and
- B. Where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference to the senior official.

**(Copy of relevant Rule-13 is enclosed as Annexure "E")**

- 5) That it is also important to mention that in the same Departmental Promotion Committee meeting dated 19.12.2022, two Senior Clerks namely Hamayun Khan and Muhammad Ayub Khan were promoted from (BPS-14 to BPS-16) but without any written test. Likewise, Saif Ullah Khan, Sarhad Ali Khan and Irfan Ullah Khan Junior Clerks were promoted from the post of Junior Clerk (BPS-11) to Senior Clerk (BPS-14) but that too without any written test.
- 6) That the appellant preferred departmental appeal dated 17.01.2023 through proper channel to the Hon'ble Registrar, Peshawar High Court, Peshawar and the same was disposed of vide order dated 09.07.2024, received by appellant on 02.09.2024.

**(Copies of departmental appeal dated 17.01.2023 is attached as Annexure "F" while order dated 09.07.2024 is Annexure "G")**

- 7) That feeling aggrieved and dissatisfied with the impugned promotion order dated 19.12.2022 and appellant order dated 09.07.2024, received by appellant on 02.09.2024 and having no other remedy, hence constrained to approach this Hon'ble Tribunal to set aside the order dated 19.12.2022, on the following amongst other grounds:

**GROUND:**

- a) That the impugned promotion order dated 19.12.2022 is against the law, facts on record and **violative of Rule-13 of Subordinate Court Staff Recruitment Rules 2003.**
- b) That the appellant was senior most employee appearing at Serial No.1 of the working paper prepared for promotion by the office of District & Sessions Judge Bannu and was fully qualified and eligible in terms of **Rule-13** to be promoted to the post of Junior Clerk (BPS-11) w.e.f. 19.12.2022.

It is pertinent to mention that the appellant was appointed as Chowkidar on 01.02.2008 having qualification of Matric and promoted to Record Lifter (BPS-04) on 31.03.2022, while Zahid Ullah Khan, Naseer Ullah Khan and Kashif Khan were appointed on 28.10.2010 as Naib Qasid in (BPS-03) and were still working as Naib Qasid (BPS-03) at the time of promotion i.e. on 19.12.2022.

It becomes crystal clear that all the three junior Naib Qasids were given promotion by ignoring the appellant being the senior most is without lawful authority, hence, the promotion order is smacked of malafide and against the mandate of Rule-13, which needs to be set aside outrightly.

- c) That no written test was held in past for promotion from the post of Record Lifter (BPS-04), Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11). Likewise, no written test was held in recent promotions from the post of Junior Clerk (BPS-11) to post of Senior Clerk (BPS-14). Similarly no written test was conducted for promotion from the post of Senior Clerk (BPS-14) to Assistant (BPS-16) which clearly discriminates

the appellant in the garb of written test and to condemn him on such basis is violative of Rule-13 as referred in the above paras.

- d) That recently a Bailiff of the Court was promoted to the post of Naib Nazir (BPS-11) and that too without conducting any written test, therefore ignoring the appellant just on the basis of written test for promotion would be violative of Article 25 of the Constitution of Pakistan. It is also an establish principle of English Jurisprudence that similar policies should be adopted for similarly placed employees to avoid disparity and shun discrimination in its all form and manifestation.
- e) That the appellant having more than 16 years unblemished service at his credit and having excellent ACRs and never ever found involved in any illegal activities or never ever committed misconduct which itself indicates the previous good track record, therefore, having genuine expectations to be promoted from the post of Record Lifter (BPS-04) to the post of Junior Clerk (BPS-11).

Keeping in view what has been state above, it is, therefore, humbly prayed to consider this Service Appeal in its letter and spirit with further prayer to set aside the impugned promotion order No.4032/DSJ/Bannu dated 19.12.2022 and grant promotion to the appellant being the senior most employee appearing at Serial No.1 of the Working paper prepared for promotion by the office of District & Sessions Judge Bannu, from the post of Record Lifter (BPS-04) to the post of Junior Clerk (BPS-11) w.e.f. 19.12.2022 with all consequential back benefits/ arrears of pay.

It is also prayed to declare the appellant senior than private respondents No.2 to 4 being the senior most employee as evident from the seniority list and working paper.

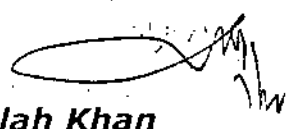
Any other relief to whom appellant found entitle may also be granted.



Appellant  
**Wajid Ullah Khan**

Dated: 11.09.2024

through



**Inayat Ullah Khan**  
Advocate Supreme Court  
LL. M (U.K)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. \_\_\_\_\_/2024

Wajid Ullah Khan .....Appellant

VersusDepartmental Promotion Committee  
through District and Sessions Judge, Bannu & others  
..... RespondentsAFFIDAVIT

I, **Wajid Ullah Khan S/o Muhammad Riaz Khan** Record lifter (BPS-4) District & Sessions Judge Bannu R/O Darma Khel Post office Nizam Bazar Tehsil and District Bannu do hereby affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent

CNIC No.11101-5823214-5

9

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,  
PESHAWAR.

Service Appeal No. \_\_\_\_\_/2024

Wajid Ullah Khan .....Appellant

Versus

Departmental Promotion Committee  
through District and Sessions Judge, Bannu & others  
..... Respondents


APPLICATION FOR HEARING OF THE  
ABOVE TITLED APPEAL AT PRINCIPAL  
SEAT, PESHAWAR.

*Respectfully Sheweth;*

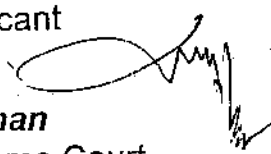
- 1) That the titled appeal is being filed before this Hon'ble Tribunal at principal seat, Peshawar.
- 2) That the Appellant has engaged the counsel at principal seat, Peshawar and also paid the agreed fee and cannot afford travelling expenses from Peshawar to Bannu, which may be calculated at Rs.20,000/- to Rs.25,000/- per trip.
- 3) That the counsel for the appellant is practicing at principal seat Peshawar and also frequently appearing before the August Supreme Court of Pakistan, therefore, it is also inconvenient for the counsel to appear in the instant appeal at Bannu on each and every date.

Keeping in view, what has been stated above, it is, therefore, humbly prayed that the titled appeal may kindly be heard at principal seat, Peshawar in the best interest of just and equity.

Dated: 11.09.2024

  
Appellant/ Applicant

Through

  
**Inayat Ullah Khan**  
Advocate Supreme Court  
LL. M (U.K)

10

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK,  
PESHAWAR.

Service Appeal No. \_\_\_\_\_/2024

Wajid Ullah Khan .....Appellant

Versus

Departmental Promotion Committee  
through District and Sessions Judge, Bannu & others

..... Respondents

AFFIDAVIT

I, **Wajid Ullah Khan S/o Muhammad Riaz Khan** Record lifter (BPS-4) District & Sessions Judge Bannu R/O Darma Khel Post office Nizam Bazar Tehsil and District Bannu do hereby affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
Deponent

CNIC No.11101-5823214-5

11

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. \_\_\_\_\_/2024

**Wajid Ullah Khan** .....Appellant

**Versus**

Departmental Promotion Committee  
through District and Sessions Judge, Bannu & others  
..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

**Wajid Ullah Khan S/o Muhammad Riaz Khan**  
Record lifter (BPS-4) District & Sessions Judge Bannu  
R/O Darma Khel Post office Nizam Bazar  
Tehsil and District Bannu

RESPONDENTS:

- 1) Departmental Promotion Committee through District and Sessions Judge, Bannu.
- 2) Zahid Ullah Khan S/o Muhammad Akbar  
Junior Clerk/ Muharrir (BPS-11) Civil Judge No.12 District Courts Bannu.
- 3) Naseer Ullah Khan S/o Gul Raees Khan  
Junior Clerk/ Muharrir (BPS-11) Civil Judge No.3 District Courts Bannu
- 4) Kashif Khan S/o Muhammad Riaz Khan  
Junior Clerk/ Muharrir (BPS-11) Civil Judge No.5 District Courts Bannu.
- 5) Registrar, Peshawar High Court, Peshawar

Appellant

through

Inayat Ullah Khan  
Advocate Supreme Court  
LL.M (U.K)

Dated: 11.09.2024



TENTATIVE SENIORITY LIST FOR PROMOTION TO THE POST OF JUNIOR CLERK (BPS-11) DISTRICT BANNU AS STENOGRAPHER  
(Daftari & Record Lifter BPS-04)

ANNEXURE A

12

S.No	Name of Official	Academic Qualification	Date of Birth	Date of acquiring SCC	Date of 1st entry in Distt: Judiciary on regular basis	Date of appointment in present position (BPS)	Remarks	Signature
1	Munir Joseph s/o Pouren Masih (Daftari)	Middle	1970	NIL	06.11.2003	20.01.2016 (As Daftari BPS-04)	First appointment as Sweeper on 09.11.2003 and promoted to the post of Daftari (BPS-04) on 20.04.2016	<i>[Signature]</i>
2	Shahal Shah Rukh Msih s/o Pouren Masih (Daftari)	Middle	1979	NIL	01.11.2001	19.10.2019 (As Daftari BPS-04)	First appointment as Sweeper on 01.11.2001 and promoted to the post of Daftari (BPS-04) on 19.10.2019.	<i>[Signature]</i>
3	Wajid Ullah Khan s/o Muhammad Riaz Khan (Record Lifter)	Matric	22.04.1982	2012	01.02.2008	31.03.2023 (As Record Lifter BPS-04)	First appointment as Chowkidar on 01.02.2008 and promoted to the post of Record Lifter (BPS-04) on 31.03.2023.	<i>[Signature]</i>

ATTESTED

17 JAN 2023

Copying Agency -  
Amir Courts House

No. 3501-13

Dated: 28/11/2022

Copies to:- All the Officials concerned.

Note: If any Official has any objection, he should file a representation within a period of 07 days before the undersigned otherwise the subject tentative seniorty list will be followed by final seniorty list.

District & Sessions Judge,  
Bannu

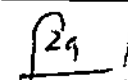
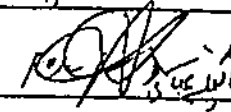
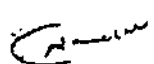

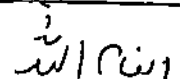
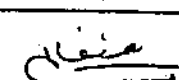
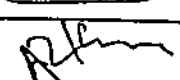
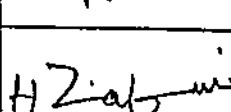

District & Sessions Judge,  
Bannu

*[Signature]*


*[Signature]*  
28.11.22

ANNEXURE B

## TENTATIVE SENIORITY LIST FOR PROMOTION TO THE POST OF JUNIOER CLERK (BPS-11) DISTRICT BANNU AS STOOD ON 17/11/2022.

S.#	Name of Official	Academic Qualification	Date of Birth	Date of acquiring SSC	Date of 1st entry in Distt: Judiciary on regular basis	Date of appointment in present position (BPS )	Remarks	Signature
1	Zahid Ullah Khan s/o Muhammad Akbar (Naib Qasid)	M.A	01.03.1976	1991	28.10.2010			
2	Sheeba Sultana s/o Mir Khajan (Naib Qasid)	Matric	03.06.1981	1999	28.10.2010			
3	Naseer Ullah Khan s/o Gul Rais Khan (Naib Qasid)	M.A	08.09.1985	2001	28.10.2010			
4	Kashif Khan s/o Muhammad Riaz Khan (Naib Qasid)	M.A	04.04.1991	2007	28.10.2010			
5	Inam Ullah Khan s/o Sharif Ullah Khan (Naib Qasid)	Matric	12.04.1983	2008	28.10.2010			
6	Razaq Nawaz s/o Syed Rasool Khan (Mali)	M.A/B.Ed	21.02.1985	2001	12.05.2011			
7	Arab Khan s/o Ayub Khan (Chowkidar)	F.A	02.04.1974	1990	30.01.2012			
8	Hafiz Zafar Ali Khan s/o Zarwali Khan (Chowkidar)	M.A	04.04.1975	1994	30.01.2012			
9	Muhammad Inam Khan s/o Hamayun Khan (Naib Qasid)	Matric	30.03.1994	2011	01.04.2013			

12

  
 [Signature]

ATTESTED.

17 JAN 2023

Copying Agency

14

S.#	Name of Official	Academic Qualification	Date of Birth	Date of acquiring SSC	Date of 1st entry in Distt: Judiciary on regular basis	Date of appointment in present position (BPS...)	Remarks	Signature
10	Naik Sabil Khan s/o Umar Gul (Sweeper)	F.A	06.04.1933	2005	25.07.2013			
11	Sami Ullah Khan s/o Jahangir Khan (Naib Qasid)	M.A	10.09.1994	2010	28.02.2014			
12	Inam Ullah Khan s/o Muhamamad Riaz Zhan (Sweeper)	F.A	13.03.1992	2010	09.03.2017			
13	Inam Ullah Khan s/o Maqbool Muhamamd (Chowkidar)	Matric	20.02.1978	2020	30.01.2012			
14	Muhammad Zaheer s/o Mir Khajan (Sweeper)	MA	09.03.1979	1995	18.10.2021		Appointed as Sweeper under Retired son quota (Estab: of DSJ, Bannu)	
15	Shabnam d/o Ameer Abdullah Shah (Naib Qasid)	MA	04.09.1982	2000	18.10.2021		Appointed as Naib Qasid under Female Quota (Estab: of DSJ, Bannu)	
16	Abil Masih s/o Parvez Masih (Naib Qasid)	Matric	15.01.1995	2011	18.10.2021		Appointed as Naib Qasid under Minority Quota (Estab: of DSJ, Bannu)	
17	Bibi Sawaira w/o Umer Quiaz Khan (Sweeper)	BA	01.04.1987	2003	12.02.2022		Appointed as Sweeper under Female Quota (Estab: of SCJ, Bannu)	
18	Aftab ur Rahman s/o Aziz ur Rahman (Chowkidar)	F.A	21.08.1991	2008	12.02.2022			
19	Shakil Ahmad s/o Bahadar Nawaz Khan (Naib Qasid)	Matric	20.04.1994	2011	12.02.2022		Appointed as Naib Qasid under Retired son Quota (Estab: of SCJ, Bannu)	



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17 JAN 2023

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Lahore

14

14

S.#	Name of Official	Academic Qualification	Date of Birth	Date of acquiring SSC	Date of 1st entry in Distt: Judiciary on regular basis	Date of appointment in present position (BPS...)	Remarks	Signature
20	Muhammad Suleman Khan s/o Muhammad Rafi Khan (Naib Qasid)	BA	10.04.1995	2012	12.02.2022			
21	Amna Bibi w/o Qayum Khan (Naib Qasid)	F.A	25.04.1996	2012	12.02.2022		Appointed as Naib Qasid under Female Quota (Estab: of SC), Bannu	

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11 JAN 2023

Copying Agency  
Lower Courts

51

No. 3514-36

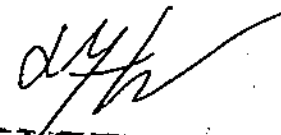
Dated: 28/11/2022

District & Sessions Judge,  
Bannu

Copies to:- All the Officials concerned.

Note:

If any Official has any objection, he should file a representation within a period of 07 days before the undersigned otherwise the subject tentative seniority list will be followed by final seniority list.

  
L. J. S. O. C. U.

District & Sessions Judge,  
Bannu

- 1- Registration No: 518
- 2- Date of Presentation of Application: 11/11/22
- 3- Date of Receipt of the file: 14/11/22
- 4- Date of Preparation of copy: 14/11/22
- 5- Date of Delivery of copy: 14/11/22
- 6- No. of copies/ words: 8
- 7- Ordinary Fee: 8
- 8- Urgent Fee: 8
- 9- Total Fee: 8
- 10- Signature of Copyist: [Signature]



16 ANNEXURE

**DISTRICT JUDICIARY KHYBER PAKHTUNKHWA  
OFFICE OF THE DISTRICT & SESSIONS JUDGE, BANNU**

No. 1032 /DSJ BANNU

DATED AT BANNU THE 19/12/2022

**OFFICE ORDER**

On the recommendations of the Departmental Promotion Committee, in its meeting held on 19.12.2022 vide No. 4014-16 /D&SJ, Bannu, dated 19/12/2022; the following Class-IV employees of Sessions Division, Bannu are hereby promoted to Junior Clerks/Muharrir (BPS-11), with immediate effect.

S.#	Name and Designation	Remarks
1	Zahid Ullah Khan, Naib Qasid (BPS-03)	Promoted to the post of Junior Clerk/Muharrir (BPS-11)
2	Mr. Naseer Ullah Khan, Naib Qasid (BPS-03)	Promoted to the post of Junior Clerk/Muharrir (BPS-11)
3	Mr. Kashif Khan, Naib Qasid (BPS-03)	Promoted to the post of Junior Clerk/Muharrir (BPS-11)

1. They shall remain on probation for a period of one year extendable as provided under the rules.
2. They shall be entitled to regularization at the end of said period unless extended.

(Muzzamil Shah Khattak)  
District & Session Judge,  
Bannu.

Endst: No. 4033-39 /Dated at Bannu the 19 / 12 / 2022.

**Copies Forwarded to:-**

1. The Registrar, Hon'ble Peshawar High Court, Peshawar.
2. The Senior Civil Judge (Admn.), Bannu.
3. The District Accounts Officer, Bannu.
4. The Budget & Account Assistant, Sessions Division, Bannu.
5. The Officials concerned.

(Muzzamil Shah Khattak)  
District & Session Judge,  
Bannu.

**ATTESTED**

05 SEP 2024

Copying Agency  
Lower Courts Bannu

19.12.2022

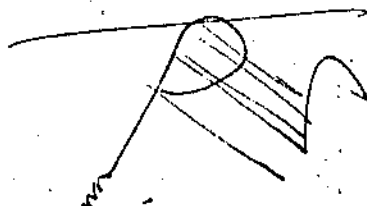
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Lower Courts Bahawalpur

05 SEP 2024

ATTESTED

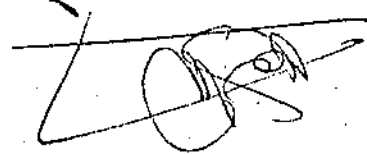
(5)

B & A ASSIST



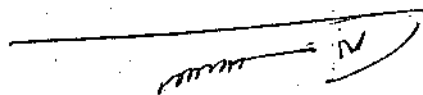
(4)

KASHIF KHAN



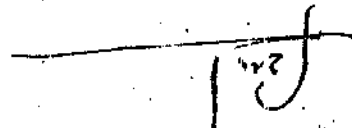
(3)

Naseer Ullah



(2)

Zahid Akram



(1)

SCJ (Admin)



Name of the Establishment : District & Sessions Judge, Bannu.

Promotion to the Post of : Junior Clerk/Muharrir BPS-11

No. of Vacancy-03

To be filled in from amongst Daftari/ Record Lifter (BPS-04) & Naib Qasid/Chowkidar/Mali/Sweeper BPS-03/04

Date: 29.11.2022

ATTESTED

11 JAN 2023

Copying Agency  
Bannu

S.No	Name (in order seniority) of all the holders of the posts from amongst whom the subject post is to be filled in	Present post held	Present post held since	Date of joining the service	First appointment as	Qualification Division				Performance evaluation								
						Metric	F.A	B.A	Others	2019			2020			2021		
										Average	Good	V/good	Average	Good	V/good	Average	Good	V/good
X 1	Wajid Ullah Khan	Record Lifter (BPS-04)	31.03.2022	01.02.2008	Chowkidar	Metric					Good				V/good		Good	
2	Zahid Ullah Khan	Naib Qasid (BPS-03)	28.10.2010	28.10.2010	Naib Qasid				M.A			V/good			V/good		Good	
X 3	Sheeba Sultana	Naib Qasid (BPS-03)	28.10.2010	28.10.2010	Naib Qasid	Metric					Good			Good			Good	
✓ 4	Naseer Ullah Khan	Naib Qasid (BPS-03)	28.10.2010	28.10.2010	Naib Qasid				M.A		Good				V/good		Good	
✓ 5	Kashif Khan	Naib Qasid (BPS-03)	28.10.2010	28.10.2010	Naib Qasid				M.A		27.12.2019 to 31.12.2019	01.01.2019 to 10.06.2019			V/good		Good	
6	Inam Ullah Khan	Naib Qasid (BPS-03)	28.10.2010	28.10.2010	Naib Qasid	Metric					01.09.2019 to 31.12.2019	01.01.2019 to 31.08.2019			V/good		Good	
7	Razaq Nawaz	Mali (BPS-03)	12.05.2011	12.05.2011	Mali				M.A		01.01.2019 to 20.07.2019	27.07.2019 to 31.12.2019		05.06.2020 to 31.12.2020		01.01.2020 to 28.05.2020		Good
8	Arab Khan	Chowkidar (BPS-03)	30.01.2012	30.01.2012	Chowkidar		F.A				01.01.2019 to 31.09.2019	01.10.2019 to 31.12.2019			V/good		Good	
9	Hafiz Zafar Ali Khan	Chowkidar (BPS-03)	30.01.2012	30.01.2012	Chowkidar				M.A		20.07.2019 to 31.12.2019	01.01.2019 to 20.07.2019			Good		Good	

Note: Please fill in the proforma after due verification of all the facts indicated herein.

Prepared By:

*[Signature]*

Checked by:

*[Signature]*

Countersigned By:

*[Signature]*

District & Sessions Judge,  
Bannu.

ANNEXURE

17

9/

1	NAME OF OFFICIAL	RECOMMENDATION
2	NAME OF OFFICIAL	RECOMMENDATION
3	NAME OF OFFICIAL	RECOMMENDATION
4	NAME OF OFFICIAL	RECOMMENDATION

... on the basis of seniority...

... recommended three (3) officials named below for promotion against the vacant position of Senior Clerk (BP2-14) as per working paper (Working Paper Annexure-B)...

... were considered for promotion...

**PROMOTION AGAINST THE POST OF SENIOR CLERK (BP2-14)**

1	NAME OF OFFICIAL	RECOMMENDATION
2	NAME OF OFFICIAL	RECOMMENDATION
3	NAME OF OFFICIAL	RECOMMENDATION

... on the basis of seniority...

... recommended two officials named below for promotion against the vacant position of Assistant (BP2-16) as per working paper (Working Paper Annexure-A)...

... were considered for promotion...

**PROMOTIONS AGAINST THE POST OF ASSISTANTS (BP2-16)**

The proceedings of meeting started with recitation from the Holy Quran

- (Members of the Chairman of DPC B) Mr. ... (Member)
- (Members of the Hon'ble DPC B) Mr. ... (Member)
- District Sessions Judge, Bannu (Chairman)

The meeting started with recitation from the Holy Quran...

... in the establishment of District & Sessions Judge, Bannu...

... against post of Assistant (BP2-16) Senior Clerk (BP2-14) Junior Clerk (BP2-11) and Record Officer...

... Promotion Committee was held to consider the promotion...

(Signature)

Held on 10th December 2023 in the office of the District Sessions Judge, Bannu

Minutes of the Meeting of Departmental Promotion Committee



19

**PROMOTIONS AGAINST THE POST OF JUNIOR CLERKS (BPS-11)**

Nine officials including Record Lifter, Naib Qasid, Chowkidar, Mali & Sweeper (BPS-03 & 04)) were considered for promotion to fill up three (03) vacant posts of Junior Clerk (BPS-11) as per working paper. (Working paper Annexure-C)

As per compliance of PHC letter No. 19657-19706/DSC-DPC/ADMN: dated 09.12.2017 and keeping in view their seniority cum fitness, as mentioned in working paper Annexure-C, a written test was conducted to sift competent from incompetent. As a result of test, Mr. Wajid Ullah Khan at Serial No. 01 and Mrs. Sheeba Sultana at Serial No. 03 of the Working Paper Annexure-C, were dropped and the following three (03) officials were recommended for promotion to the post of Junior Clerk (BPS-11).

S.No	Name of Official	With Effect From
1	Zahid Ullah Khan	Immediately
2	Naseer Ullah Khan	Immediately
3	Kashif Khan	Immediately

**PROMOTION AGAINST THE POST OF RECORD LIFTER (BPS-04)**

As Wajid Ullah Khan, Record Lifter (BPS-4) was dropped from promotion to the post of Junior Clerk (BPS-11); therefore, the post of Record Lifter (BPS-4) remained occupied.

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

**Mr. Tufail Ahmad**

Add: District & Sessions Judge, Karak  
(Nominee of Hon'ble PHC, Peshawar)

**Mr. Shabbir Muhammad Durrani**

Add: District & Sessions Judge-VI, Bannu  
(Nominee of the D&SJ, Bannu)

**(Muzzamil Shah Khattak)**  
District & Sessions Judge, Bannu.  
(Chairman)

Endst: No. 4014-16 /D&SJ, Bannu

Dated: 19/12/2022

Copies forwarded for information to the:

1. The Registrar, Hon'ble Peshawar High Court, Peshawar.
2. All Members of the Committee.
3. Office Record.

**(Muzzamil Shah Khattak)**  
District & Sessions Judge, Bannu.  
(Chairman)

ATTEST

Copying Agency  
Peshawar Courts

ANNEXURE

20

III-Human Resources

I-Ministerial Establishment of District Courts

13	Junior Clerk/Nazir BPS-11 <sup>1</sup>	<p>i. Secondary School Certificate Examination or equivalent qualification from a recognized Board, preference will be given to holders of additional qualifications in Accounts; and</p> <p>ii. a speed of 30 words per minute in typing.</p>	18 - 30 years	<p>i. Not less than 70 percent by initial recruitment; and</p> <p>ii. not more than 30 percent by promotion, from amongst the holders of the posts of Daftari and Record Lifter with Matric and three years' service as such: and in case no suitable candidate from amongst holders of the posts of Daftari and Record Lifter is available, then from amongst holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier who have passed Secondary School Certificate Examination and have at least five years' service as such.</p> <p>Note. For the purpose of promotion, separate common seniority lists of (i) the holders of the posts of Daftari and Record Lifter; and (ii) the holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier shall be maintained with reference to the date of their acquiring the Secondary School Certificate: Provided that:</p> <p>a. if two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials; and</p>
----	--	--	---------------	---

*[Handwritten Signature]*  
**TESTED**

<sup>1</sup> Basic pay scale upgraded vide Notification No. FD/SO(FR)10-22/2014 Dated 20<sup>th</sup> May, 2014

III-Human Resources

I-Ministerial Establishment of District Courts

				b. where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference to the senior official.
14	Junior Clerk/Copyist (BPS-11) <sup>1</sup>	<p>i. Secondary School Certificate Examination or equivalent qualification from a recognized Board; and</p> <p>ii. a speed of 30 words per minute in typing.</p>	18 - 30 years	<p>i. Not less than 70 percent by initial recruitment; and</p> <p>ii. not more than 30 percent by promotion, from amongst the holders of the posts of Daftari and Record Lifter with Matric and three years' service as such; and in case no suitable candidate from amongst holders of the posts of Daftari and Record Lifter is available, then from amongst holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier who have passed Secondary School Certificate Examination and have at least five years' service as such.</p> <p>Note. For the purpose of promotion, separate common seniority lists of (i) the holders of the posts of Daftari and Record Lifter; and (ii) the holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier shall be</p>

<sup>1</sup> Basic pay scale upgraded vide Notification No. FD/SO(FR)/10-22/2014 Dated 20<sup>th</sup> May, 2014

ANNEXURE F

21

To,

**THE HON'BLE REGISTRAR**  
Peshawar High Court,  
Peshawar.

Through Proper Channel

Subject: DEPARTMENTAL APPEAL AGAINST THE  
IMPUGNED ORDER NO. 4032/DSJ/BANNU  
DATED 19/12/2022 RECEIVED BY APPELLANT  
ON 14/01/2023

**PRAYER**

To set aside the impugned order No. 4032/DSJ/Bannu dated 19/12/2022 received on 14/01/2023 and further to grant promotion to the appellant being the senior most employee appearing at Serial No.1 of the Working Paper prepared for promotion by the office of District & Sessions Judge Bannu, amongst Record Lifter (BPS-04), Naib Qasid (BPS-03), with all consequential back benefits.

**Respected Sir,**

Brief facts giving rise to this departmental appeal are as under:

1. That the undersigned was appointed as Chowkidar on 01/02/2008 having qualification of Matric as evident from Seniority List dated 28/11/2022 maintained by the office of District & Sessions Judge, Bannu.  
(Copy of seniority list of Daftari and Record Lifter (BPS-04) is enclosed as Annexure-A & seniority list of Naib Qasid/ Chowkidar /Mali/ Sweeper (BPS-03) is enclosed as Annexure-B)
2. That Zahid Ullah Naib Qasid (BPS-03), Mr. Naseer Ullah Khan Naib Qasid (BPS-03) and Mr. Kashif Khan Naib Qasid (BPS-

22

03) were promoted to the post of Junior Clerk BPS-11 vide impugned order No. 4032/DSJ/Bannu dated 19/12/2022, who are placed below than the undersigned at Serial No. 2, 4 and 5 of the Working Paper prepared for Promotion dated 29/11/2022.

It is pertinent to mention that the Working Paper prepared for Promotion is consisting upon the position of Daftari/Record Lifter (BPS-04) and Naib Qasid /Chowkidar/Mali/ Sweeper (BPS-03).

**(Copy of Working Paper is enclosed as Annexure-C)**

3. That meeting of Departmental Promotion Committee was held on 19/12/2022 in the office of District & Sessions Judge Bannu being its Chairman and recommended Zahid Ullah Khan, Naib Qasid (BPS-03), Naseer Ullah Khan, Naib Qasid (BPS-03) and Kashif Khan, Niab Qasid (BPS-03) to the post of Junior Clerk (BPS-11) in the light of Working Paper prepared for the promotion as referred-to in Para No.2 above.

**(Copy of minutes are enclosed as Annexure-D)**

*[Signature]*  
**ATTESTED**

4. That it is pertinent to mention that as per Rule-13 of Subordinate Court Staff Recruitment Rules 2003, 30 Percent Quota is reserved for promotion from amongst the holders of the post of Daftari and Record Lifter with Matric and 3 years service as such.

It is pertinent to make reference to the relevant Rule-13 in verbatim for ready reference:

\*Rule-13, Junior Clerk/Nazir (BPS-11).

- (i) .....
- (ii). Not more than 30 percent by promotion, from amongst the holders of the posts of Daftari and Record Lifter with Matric and three years service as such; and in case no suitable candidate from amongst holders of the posts of Daftari and Record Lifter is available, then from amongst holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier who have passed Secondary School Certificate Examination and have at least five years service as such.

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Note. For the purpose of promotion, separate common seniority lists of (i) holders of the posts of Daflari and Record Lifter; and (ii) the holders of the posts of Chowkidar, Naib Qasid, Sweeper, Chowkidar-cum-Mali, Mali and Water Carrier shall be maintained with reference to the date of their acquiring the Secondary School Certificate;

Provided that:

- a. if two or more officials have acquired the Secondary School Certificate in the same session, the official having longer service shall rank senior to other officials and
- b. where a senior official does not possess the requisite experience at the time of filling up a vacancy, the official next junior to him possessing the requisite experience shall be promoted in preference to the senior official.


(Copy of relevant Rule-13 is enclosed as Annexure-E)

5. That it is also important to mention that in the same Departmental Promotion Committee meeting dated 19/12/2022, two Senior Clerks namely Hamayun Khan and Muhammad Ayub Khan were promoted from (BPS-14 to BPS-16) but without any written test. Likewise, Saif Ullah Khan, Sarhad Ali Khan and Irfan Ullah Khan Junior Clerks were promoted from the post of Junior Clerk (BPS-11) to Senior Clerk (BPS-14) but that too without any written test.

That feeling aggrieved and dissatisfied with the impugned promotion order dated 19/12/2022 and having no other remedy, hence constrained to approach the Hon'ble Peshawar High Court, Peshawar through proper channel for seeking promotion to the post of Junior Clerk (BPS-11) on the following amongst other grounds:

**Grounds:**

- A. That the impugned promotion order dated 19/12/2022 is against the law, facts on record and violative of Rule-13 of Subordinate Court Staff Recruitment Rules 2003.
- B. That undersigned was senior most employee appearing at Serial No. 1 of the working paper prepared for promotion by the office

  
**ATTACHED**

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of District & Sessions Judge Bannu and was fully qualified and eligible in terms of Rule-13 to be promoted to the post of Junior Clerk (BPS-11).

It is pertinent to mention that the undersigned was appointed as Chowkidar on 01/02/2008 having qualification of Matric and promoted to Record Lifter (BPS-04) on 31/03/2022, while Zahid Ullah Khan, Naseer Ullah Khan and Kashif Khan were appointed on 28/10/2010 as Naib Qasid in (BPS-03) and were still working as Naib Qasid (BPS-03) at the time of promotion i.e. on 19/12/2022.

It becomes crystal clear that all the three juniors Naib Qasids were given promotion by ignoring the undersigned being the senior most, is without lawful authority, hence, the promotion order is smacked of malafide and against the mandate of Rule-13, which need to be set aside out rightly.

- C. That no written test was held in past for promotion from the post of Record Lifter (BPS-04), Naib Qasid (BPS-03) to the post of Junior Clerk (BPS-11). Likewise, no written test was held in recent promotions from the post of Junior Clerk (BPS-11) to post of Senior Clerk (BPS-14). Similarly no written test was conducted for promotion from the post of Senior Clerk (BPS-14) to Assistant (BPS-16) which clearly discriminates the undersigned in terms of the written test and to condemn him on such basis is violative of Rule-13 as referred in the above paras.
- D. That recently a Bailiff of the Court was promoted the post of Naib Nazir (BPS-11) and that too without conducting any written test, therefore ignoring the undersigned just on the basis of written test for promotion would be violative of Article 25 of the Constitution of Pakistan.

*[Handwritten Signature]*  
ATTESTED

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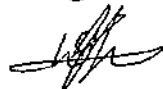
It is also an established principle of English Jurisprudence that similar policies should be adopted for similarly placed employees to avoid disparity and shun discrimination in its all form and manifestation.

- E. That the undersigned having 15 years unblemished service at his credit and having excellent ACRs and never ever found involved in any illegal activities or never ever committed misconduct which itself indicates the previous good track record; therefore, having genuine expectations to be promoted from the post of Record Lifter (BPS-04) to the post of Junior Clerk (BPS-11).

Keeping in view what has been stated above, it is, therefore, humbly prayed to consider this departmental appeal in its letter and spirit with further prayer to set aside the impugned promotion order No. 4032/DSJ/Bannu dated 19/12/2022 received on 14/01/2023 and further to grant promotion to the appellant/undersigned being the senior most employee appearing at Serial No.1 of the Working Paper prepared for promotion by the office of District & Sessions Judge Bannu, amongst Record Lifter (BPS-04), Naib Qasid (BPS-03), with all consequential back benefits.

Any other relief to whom the undersigned found entitle may also be granted.

Undersigned/Appellant



**Wajid Ullah Khan**  
Record Lifter (BPS-04)  
District Courts, Bannu  
Cell# 0335-5970950

Date: 17/01/2023





26

ANNEXURE G



The PESHAWAR HIGH COURT Peshawar

All communications should be addressed to the Registrar Peshawar High Court, Peshawar and not to any official by name.

Exch: 9210149-58 ORG: 0210135 Fax: 9210170

www.peshawarhighcourt.gov.pk info@peshawarhighcourt.gov.pk phcpsn@gmail.com

No. 64.33 / Admn To

Dated 01/08/2024

The District & Sessions Judge, Bannu.

Subject: DEPARTMENTAL APPEAL NO. 03/2023. Wajid Ullah Vs Distt: & Sessions Judge, Bannu.

Dear Sir,

Enclosed please find herewith copy of the order dated 09.07.2024, passed by the Hon'ble Senior Puisne Judge of this Court in the subject departmental appeal for information.

Yours Sincerely

Handwritten signature and stamp: District & Sessions Judge Bannu

(MAMREZ KHAN KHALIL) ADDITIONAL REGISTRAR (ADMN)

Copy to:-

- Mr. Wajid Ullah, Record Lifter Sessions Court Bannu/ Appellant along with copy of the order.

Receipt stamp with handwritten date 02/09/24 and signature

DISTRICT & SESSIONS JUDGE BANNU Receipt No. 91 Date 02-8-2024 For action file Signature

(MAMREZ KHAN KHALIL) ADDITIONAL REGISTRAR (ADMN)

Handwritten notes: 44, Wajid Ullah, Record Lifter, and a stamped word 'TESTED'

1  
27

*Judgment Sheet*

**IN THE PESHAWAR HIGH COURT,  
PESHAWAR  
JUDICIAL DEPARTMENT**

**Departmental Appeal No. 03 of 2023**

**Wajid Ullah  
Vs  
DSJ, Bannu**

\*\*\*\*

**JUDGEMENT**

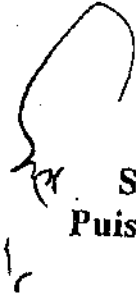
\*\*\*\*

**IJAZ ANWAR. J:** I am hearing this appeal in terms of provisions of the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 as Appellate Authority. After submission of the Departmental Appeal, the period of 90 days has already been elapsed. Besides, the appellant has also approached the Khyber Pakhtunkhwa Service Tribunal, as such it would not be appropriate to interfere with the impugned order when already the Service Tribunal has taken cognizance of the service appeal of the appellant.

*djh*  
**ATTESTED**

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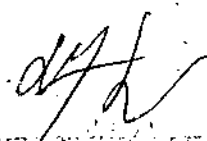
2. In view of the above, this appeal is disposed of without any further proceedings. Appellant be informed accordingly.



Senior  
Puisne Judge

**Announced on;**  
**Dated. 09.07.2024**

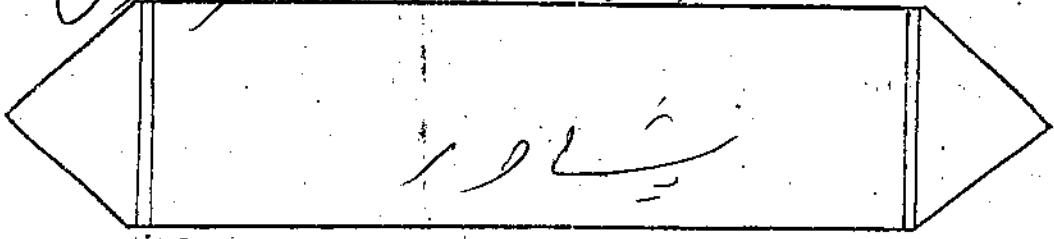
Hon'ble Mr. Justice Ijaz Anwar



ATTEST

(29)

بعد التمسک بن سید محمد شہباز



مورخہ	-----
مقدمہ	-----
دعویٰ	-----
جرم	-----

2 منجانب  
و بعد التمسک بن سید محمد شہباز

صورت

### باعث تحریر آئینہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
Inayatullah Ichan  
آئینہ مقام \_\_\_\_\_ کیلئے (ASC LLM UK)

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا۔ نیز  
دیکھل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائس پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی 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 یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ یا اختیارات حاصل ہوں گے اور اس کا ساختہ  
پر داخست منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانتا تو اے مقدمہ کے سبب سے وہ ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ 20 \_\_\_\_\_

وہ العبد \_\_\_\_\_

کے لئے منظور ہے۔

بمقام

و بعد التمسک بن سید محمد شہباز

Accepted by Inayatullah Ichan  
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