


FORM OF ORDER SHEET

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

Appeal No. 2072/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2024	<p>The appeal presented today by Mr. Muhammad Muazzam Butt Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

A. No 2572/24  
SIRAJ KHAN  
V/S

Government of KP & others

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ADVOCATE  
M. Muazzam Butt

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

In Ref to

Service Appeal No. **8272** /2024

Siraj Khan Son of Akram Khan, PSHT  
GPS H/Muhammad Noor, Tehsil & District Peshawar

.....Appellant

**VERSUS**

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department, Civil Secretariat Near MPA Hostel, Peshawar

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974 - AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

**PRAYER:**

**ON ACCEPTANCE OF INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION BEARING NO: SO (POLICY) E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO. 2 VIDE LETTER DATED 06/06/2023, MAY BE DECLARED AND ORDERED TO BE STRUCK DOWN BEING VOID AND ULTRA VIRES TO THE CONSTITUTION OF PAKISTAN AND FUNDAMENTAL PRINCIPLES OF NATURAL JUSTICE AND AGAINST THE RIGHTS OF APPELLANT.**

**ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.**

**RESPECTFULLY SHEWETH:**

1. That the Respondents Department appointed the Appellant as Primary School Head Teacher.  
Copy of Appointment letter is annexed as Annexure A

- 2. That as per Khyber Pakhtunkhwa (Appointment/ Promotion/ Transfer) Rules, 1989, as well as in other sister services of the other Provinces and Federation as well, availing of promotion by the employees is always optional and the employees as a matter of right may avail or forego their promotion and the next employee in seniority list is to be promoted.
- 3. That some employees specifically have foregone their promotion as they could not serve in the areas where there is no facility of accommodation and no houses of their elders are available to look after them in far-flung and solitary mountainous hard areas, and as per Section 25 of per KP Civil Servant Act, 1973, rules to the extent of terms and condition is framed by the Chief Minister and such promotion rules are not made applicable with retrospective effect. The rules framed are published in the Gazette notification and part and parcel of KP Civil Servant Appointment, Transfer and Promotion Rules-1989.
- 4. That Government of K.P without following the rules position mentioned in Para 6 above promulgated Notification No. SO (Policy) E&AD/1 3/2020, dated 06/08/2020, communicated to Respondent No.2 vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. The impugned Notification is reproduced as under:-

"Furthermore, those officers/officials who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Khyber Pakhtunkhwa Civil Servants (Efficiency Discipline) Rules, 2011, please".

- 5. That as per notification No. SD (Policy) /EDAD/1- 3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. Copy of Impugned notification No. SD (Policy) EV AD/1- 3/2020 dated 06/08/2020 is attached as Annexure B
- 6. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the respondent No. 1 vide its letter No. SO(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the respondent No 3 (Directorate of Elementary & Secondary Education) that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. Copy of Impugned Letter dated June 06th, 2023 is attached as Annexure C
- 7. That thereafter the meeting was also held in the office of Additional Secretary Establishment on 06-07-2023 in which it was decided to examine the case properly and submit a self-contained/ consolidated case for onward submission to the Establishment Department for further necessary action. Copy of Minutes of Meeting dated 06-07-2023 is attached as Annexure D
- 8. That the Respondent No.3 i.e. Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber

Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. Copy of Letter dated 23-08-2023 is attached as Annexure E

- 9. That the respondent vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the 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 Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011. Copy of Impugned letter dated 07-09-2023 is attached as Annexure F
- 10. That the petitioner feeling aggrieved, filed Representation to the respondents in person, and also approached to respondents through APTA President but the grievances of the appellant have not so far been redressed. Copy of Representation against the said notification is annexed as Annexure G & H
- 11. That feeling aggrieved from the letters dated 06-06-2023 and 07-09-2023 and the deletion of Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989; the petitioners filed this Hence, the instant service appeal is filed on the following grounds:-

**GROUND:-**

- a. That as per various judgments It is established and settled principle that executive notifications cannot be given retrospective effect. A valid Notification which confers rights is always applicable with prospective effect, however, if an amendment notification that adversely affects the interests of the employees or causes disadvantage to the employee is not tenable in the eyes of law. The notification/guidance dated 06/08/2020 06/06/2023 are liable to be set-aside.
- b. That there are no terms and conditions of service mentioned in the appointment order of the appellant wherein, availing of promotion is mandatory. It is further submitted that employees in the past, have foregone their promotion along with their posting. It is submitted that when domestic and other personal issues do not permit the employees/appellant to avail the promotion order and in that case, the employees who foregone their promotion were allowed not to avail the promotion for a period of 04 years and on second refusal the employees were permanently debarred from availing the facility of promotion during their entire service. Hence the employees, himself/herself forebear agonies of foregoing their promotions. As a result, junior to the appellant according to the order of seniority cum fitness are granted promotion to next rank.
- c. That as per Civil Servant laws, promotion is a kind of appointment which is always optional to get promotion or not, hence the impugned notification is void, illegal and against the law and the same to the extent of the appellant is liable to be set-aside.
- d. That it is further submitted that on account of grant of promotion, some employees who are suffering from severe medical ailment or facing acute domestic issues cannot avail promotion with transfer in other areas, therefore, no employee can be compelled to accept the promotion compulsorily which is not beneficial to the employee but if an employee does not avail and get benefit of her promotion it must be optional for the employees as to whether to avail or forego the benefits. Any promotion without willingness of employee is illegal and liable to be setaside.

- c. That non-availing of promotion and foregoing thereof does not cause loss to the government exchequer and in consequence of foregoing promotion, pave way to the next employee in seniority, aspiring for promotion could be promoted.
- f. That the impugned promotion Notification dated 06/08/2020 communicated on 06/06/2023 is perverse, discriminatory, against the law, pungent and is a blunt blow of hammer on the rights of the appellant. It is not out of place to mention here that the appellant are teachers and have to look after their children as well as ailing dependent family members and in these circumstances in the presence of impugned Notification dated 06/08 /2023 communicated on 06/06/23 would not be able to serve in the department and which shall amount to the snatching of bread and butter of the poor employees

It is, therefore, humbly prayed that on the acceptance of the instant Service Appeal; the impugned Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to Respondent No.2 by Respondent NO.1, vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

It is further prayed that no penal action as proposed and envisaged in letter dated 06/06/2023 may be declared as unlawful, illegal and without having any legal effect.

Any other relief, which this honorable Tribunal deems fit and proper in the circumstances of the case, may also be granted to the appellant.

**AFFIDAVIT:**

I, (the appellant) solemnly declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*[Signature]*  
Deponent

Through

*[Signature]*  
Appellant

*[Signature]*  
Muhammad Muazzam Butt  
Advocate Supreme Court

*[Signature]*  
Muhammad Adeel Butt  
Advocate High Court

*[Signature]*  
Bassam Ahmad Siddiqui  
Advocate High Court  
LL.M. Human Rights

-5-

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA**

C.M No \_\_\_\_\_ -P of 2024

In Ref to

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

**STRAT KHAN  
VERSUS**

Secretary to Government of Khyber Pakhtunkhwa, & others

**APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION BEARING NO. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, COMMUNICATED TO RESPONDENT NO.2 BY RESPONDENT NO.1, VIDE LETTER DATED 06/06/2023 TILL THE FINAL DISPOSAL OF CASE IN HAND.**

Respectfully Submitted:-

1. That the instant application may be treated as part and parcel of service appeal of the appellant
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favor of the appellant.
3. That there is likelihood success of the appellant in the lls. And if the notification bearing No. So (Policy) E&D/1-3/2020 Dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 is not suspended the appellant would suffer irreparable loss.
4. That valuable rights of the appellant is involved in the case.

In view of the reasons, it is humbly requested that the notification bearing No. So (Policy) E&D/1-3/2020 dated 06/08/2020, communicated to Respondent No.2 by Respondent No.1, Vide Letter Dated 06/06/2023 may kindly be suspended till the final disposal of the main appeal in hand.

**AFFIDAVIT:**

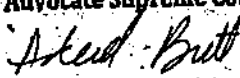
I (the appellant) do hereby solemnly stated on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

  
Deponent


Through

  
Appellant

  
Muhammad Muazzam Butt  
Advocate Supreme Court

  
Muhammad Adeel Butt  
Advocate High Court

6  
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Dist. Govt. KP-Provincial  
District Accounts Office Peshawar Dist.  
Monthly Salary Statement (January-2024)

Personal Information of Mr SIRAJ KHAN d/w/s of AKRAM KHAN  
Personnel Number: 00025243 CNIC: 1730113000767  
Date of Birth: 06.12.1973 Entry into Govt. Service: 10.02.1993

NTN: 0  
Length of Service: 30 Years 11 Months 023 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH

80642235-DISTRICT GOVERNMENT KHYBE

DDO Code: PW6568-District Peshawar

Payroll Section: 003

GPF Section: 001

Cash Center: 43

GPF A/C No: EDU 041791

GPF Interest applied

GPF Balance:

971,627.00 (provisional)

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 15

Pay Stage: 24

Wage type	Amount	Wage type	Amount
0001 Basic Pay	71,440.00	1004 House Rent Allow 45% KP21	8,741.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
1505 Charge Allowance	40.00	2148 15% Adhoc Relief All-2013	888.00
2199 Adhoc Relief Allow @10%	594.00	2316 Teaching Allowance 2021	3,224.00
2341 Dispr: Red All 15% 2022KP	6,807.00	2347 Adhoc Rel Al 15% 22(PS17)	6,807.00
2378 Adhoc Relief All 2023 35%	24,311.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3015 GPF Subscription	-4,290.00	3501 Benevolent Fund	-1,200.00
3609 Income Tax	-3,488.00	3990 Emp. Edu. Fund KPK	-135.00
4004 R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 54,574.38 Recovered till JAN-2024: 23,491.00 Exempted: 13643.53 Recoverable: 17,439.85

Gross Pay (Rs.): 127,208.00 Deductions: (Rs.): -9,713.00 Net Pay: (Rs.): 117,495.00

Payee Name: SIRAJ KHAN

Account Number: 5682

Bank Details: MCB BANK LIMITED, 240311 MATTANI MATTANI,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: SDEO MALE PESHAWAR

City: Peshawar

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: sk2330074@gmail.com

System generated document in accordance with APPM 4.6.12.9(8733/25.01.2024/v3.0)  
All amounts are in Pak Rupees  
Errors & omissions excepted (SERVICES/01.02.2024/19-08:33)

ATTESTED



7

District are hereby appointed in the schools noted against each in HPS-7(No.1095-60-1995) plus usual allowances as admissible under the rules with effect from the dates of their taking over charge in the interest of public service on the following terms and conditions:-

S.No.	Merit No.	Name/Father's name marks in PTC/address	School where appointed	Remarks
1.	1.	PA-I PESHAWAR-I Saeed Ahmad Sheh s/o Noor Ahmad Sheh Yakatoot Peshawar 770/1200	GPS Zargor Abad	Against newly created post.
2.	2.	Mohammad Ijaz s/o Wasir Mohsamed Mohi Gul Redshah Ji Pesh 765/1200	GPS Asia Park	..do..
3.	3.	Sajjad Haider s/o Taj Mohammad Yakatoot Peshawar 749/1200	GPS No.I Wasir Begh	..do..
4.	4.	Raz Mohammad s/o Gul Mohammad GHSS Pesh City 735/1200	GPS No.I Kakshal	..do..
5.	5.	Karim Tabassum s/o Abdul Qayum Yakatoot Pesh. City 711/1200	GPS No.I Kakshal	..do..
6.	6.	Nasir Mahmood s/o Fida Mohammad Yakatoot Pesh City 701/1200	GPS No.I Wasir Begh	..do..
7.	8.	Bafizur Rehman s/o Ghulam Mohammad BUTT Jehangir Pure Pesh 690/1200	GPS No.I Kakshal	..do..
8.	9.	Awif Nawab s/o Nawab Masih Kohati Gate Pesh 670/1200	GPS No.I Kakshal	..do..
9.	10.	Mohammad Asber s/o Ghulam Sebir Yakatoot Pesh 687/1200	GPS No.I Kakshal	..do..
10.	11.	Irfan s/o George Kohati Gate Pesh 666/1200	GPS No.I Wasir Begh	..do..

**ATTESTED**

( see next page )

ATTEST

(see next page)

51	Amjad Ali s/o Hassan Khan Utmar Pagan (FR-7)	GPS Monamaq Alf R1113 (FR-8)
50	B. Zafar Shah s/o B. Nasool Shah (FR-7)	GPS Shahrada Pagan (FR-5)
49	Rehmatullah s/o Zehraullah (FR-4)	GPS Kachian Gul Pagan (FR-5)
48	Hassan Shah s/o Bussah Shah (FR-4)	GPS Hafiana Pagan (FR-6)
47	Chulom Pagan Chahen Mulla Pagan (FR-4) 775/1200	GPS Pagan No. 2 (FR-5)
46	Isah Ullah s/o Khalid Zaid Shirkara (FR-4) 1200	GPS Sherkara No. 1
45	Afroz Ullah s/o Bumshad Khan Londi Aqbon (FR-4) 677/1200	GPS Dardar Pagan
44	Farman Ali s/o Aqbon Khan 678/1200	GPS Wacho Pagan
43	B. Nasool Shah s/o B. Nasool Shah 679/1200	GPS No. 1 Pagan
42	Shahid Khan s/o Liam Khan Ado Zai 702/1200	GPS H. Muhammad Pagan
41	Zehraullah s/o Shahid Khan 777/1200	GPS Sheikh Muhammad
40	Muhammad Roman Niaz Ahmad s/o 778/1200	GPS Sheikh Muhammad
39	Liam Muhammad s/o Said Ullah Khan 779/1200	GPS Surt Zai Pagan
38	Shahid Khan s/o Niaz Muhammad 781/1200	GPS Surt Zai Pagan

Newly created

Against  
newly created  
post.

52. Khurshid s/o  
Munib Gul  
Landi Arbab (PF-4)      GPS Kochian Gul Bela (PF-6)
53. Yasimullah s/o  
Abdullah Jan  
Achar Pesh (PF-4)      GPS Nama Badaber (PF-6) ...do..
54. S. Akter Shah s/o  
Abdur Pauf  
Dalazak Pesh (PF-7)      Mera Peshawar (PF-6).  
GPS ~~Munib Gul Bela (PF-6)~~ ...do..

TERMS AND CONDITIONS

1. The above appointments are purely temporary and liable to termination at any time without assigning any reasons or prior notice. In case any of the above wishes leave the service, he shall have to submit one month prior notice or forfeit one months pay and allowances in leave thereof.
2. In case a teacher fail to take over charge within 15 days of the issue of this order, his appointment will stand cancelled automatically.
3. No TA/DA etc is allowed.
4. No joining time is allowed except what is absolutely necessary for transit.
5. Charge reports should be submitted to all concerned in duplicate.
6. They should produce health and age certificate from the Civil Surgeon, Peshawar within seven days of the taking over charge against PTC post.
7. They should not be handed over charge if the age of a candidate is less than 18 years and exceed 25 years.
8. Pay Scales and service rules are subject to the revision in accordance with the orders passed by the Government from time to time.

Khurshid Ahmad  
District Education Officer (M)  
Primary Peshawar.

Endst. No. 697-755 / Appointment 93 dated Pesh the 4.2. / 93

Copy for information and n/action to the:-

1. Director Primary Education, NWFP, Peshawar.
- 2.
3. Accountant General, NWFP, Peshawar.
4. P/S to the Honorable Minister for Education, NWFP.
5. P/S to the Secretary Education, Govt of NWFP.
6. Sub Divisional Education Officer (M) Peshawar.
6. Candidate concerned.

1110  
4/2/93  
District Education Officer (M)  
Pry: Peshawar

ATTESTED

Annexure - B

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGISTRATION-WING)

NOTIFICATION

Dated Peshawar the 06/08/2020

In exercise of the powers conferred by section 26 of the

Khyber Pakhtunkhwa Act No. XVIII of

1973 (Khyber Pakhtunkhwa Act No. XVIII of

1989, the

Chief Minister of Khyber Pakhtunkhwa is pleased to direct that in the Khyber

Province (Civil Servants (Appointment, Retention 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

LIST NO & GIVEN DATE

Copy 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. The Principal Secretaries in Khyber Pakhtunkhwa.
7. All Divisional Commissioners in Khyber Pakhtunkhwa.
8. All Heads of Attached Departments in Khyber Pakhtunkhwa.
9. All Autonomous/Semi Autonomous Bodies in Khyber Pakhtunkhwa.
10. All Deputy Commissioners in Khyber Pakhtunkhwa.
11. The Registrar, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
12. The Secretary, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
13. The Deputy Director (IT), E&A Department.
14. The Section Officer (Admn), Administration Department.
15. The Section Officer (Admn), Administration Department.
16. The Section Officer (Admn), Administration Department.
17. The Section Officer (Admn), Administration Department.
18. The Section Officer (Admn), Administration Department.
19. The Section Officer (Admn), Administration Department.
20. The Section Officer (Admn), Administration Department.

The Controller, Administration Department, arrange 20 genetic copies.

(WALIDAH LATIF)  
DEPUTY SECRETARY (POLICY)

*Walidah Latif*

ATTESTED

ATTESTED



11

GOVERNMENT OF  
KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(REGULATION WING)

NOTIFICATION  
Dated Peshawar the, 06/08/2020

In exercise of the powers conferred by section 26 of the 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:

AMENDMENT

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

CHIEF SECRETARY  
GOVERNMENT OF THE KHYBER PAKHTUNKHWA

(ANDS): & 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 (Admin), Administration Department with the request to arrange 20 gazette copies.
16. The Caretaker, Administration Department.

(WARDAH LATIF  
DEPUTY SECRETARY (POLICY))

~~ATTESTED~~

~~APPROVED~~

WP 4413-2023 AZIZULAH VS GOVT OF POK

Handwritten notes and signatures at the top of the page.

Special Officer (Policy)

- 1. For Special Secretary (Legal) Establishment Department
- 2. For Additional Secretary (Legal) Establishment Department
- 3. For Deputy Secretary (Legal) Establishment Department

Copy forwarded to the:

Handwritten initials and date: 2/6/23

Special Officer (Policy)

Yours faithfully,

2011, please.

Furthermore, these officers/staffs who do not comply with promotion order of the competent authority or try to evade promotion through different means shall be proceeded against under Kyber Pakhtunkhwa Civil Service (Efficiency & Discipline) Rules.

3. The basic rationale behind the deletion of the said rule is aimed at preventing a provision exists to declare or forgo promotion.

2. The basic rationale behind the deletion of the said rule is aimed at preventing a provision exists to declare or forgo promotion.

1. I am directed to refer to your letter No. SO/14007-M/2022 dated 04.08.2021 in the subject noted above and to state that Sub-rule (5) of Rule-7 of Kyber Pakhtunkhwa Civil Service (Appointment, Promotion and Transfer) Rules, 1987 stands deleted with this department notification dated 04.08.2021 thus, no

For: The Government of Kyber Pakhtunkhwa  
 Secretary & Secretary (General Department)



GOVERNMENT OF KYBER PAKHTUNKHWA  
 ESTABLISHMENT DEPARTMENT  
 No. SO/14007-M/2022  
 Dated Peshawar the 06th June, 2023

6.2

Annexure - C



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223507)

No. SO (Primary-M/E&SED/2-6/2023  
Gazetted Peshawar lno. June 25<sup>th</sup> 2023

To

The Director  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa, Peshawar.

Aziz Ullah Khan  
President  
All Primary Teacher's Association, KP

*[Handwritten Signature]*  
26/6/23

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

I am directed to refer to the subject noted above and to enclose here with  
a letter of Establishment Department letter No. SO (Policy)E&ADM-3/2020 dated  
06 June, 2023 and to state that the subject meeting is to be held on 06 July, 2023 at  
11:00 AM in this department under the Chairmanship of Additional Secretary (Estab)  
E&SE Department in his office.

2. You are, therefore, requested to depute a representative of your  
respective Department to attend the meeting on a date, time & venue as mentioned  
above, please.

Encl: AA

*[Handwritten Signature]*

*[Handwritten Signature]*  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

*[Handwritten Signature]*

*[Handwritten Signature]*  
SECTION OFFICER (PRIMARY MALE)  
26/6/23

**ATTESTED**  
*[Handwritten Signature]*

14  
B/c

No SO (Primary-M)/E&SED/2-6/2023  
Dated Peshawar the June 25<sup>th</sup> 2023

To  
The Director  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar

Aziz Ullah Khan President  
President  
All Primary Teacher's Association, KP

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

I am directed to refer to the subject noted above and to enclose here with a letter of  
Establishment Department letter No. SO (Policy)E&AD/1-3/2020 dated 06 June, 2023 and to state  
that the subject meeting is to be held on 06 July, 2023 at 11:00 AM in this department under the  
Chairmanship of Additional Secretary (Estab) E&SE Department in his office.

2. You are, therefore, requested to depute a representative, of your respective  
Department to attend the meeting on a date, time & venue as mentioned above, please.

Encl: AA

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

(SECTION OFFICER (PRIMARY MALE))

~~ATTESTED~~



MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR. AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(S) 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.

Annexure  
01

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. Rafiq 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 thorough 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-I  
E&SE Department

(Mr. Aziz Ullah)  
Provincial President  
All Primary Teachers Association  
Khyber Pakhtunkhwa

(Mr. Rafiq Ullah)  
General Secretary APTA  
Peshawar

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

(Abdullah)  
Additional Secretary (Establishment)  
E&SE Department

ATTACHED

MINUTES OF THE MEETING REGARDING APPLICATION SUBMITTED BY MR AZIZ ULLAH PROVINCIAL PRESIDENT ALL PRIMARY TEACHERS ASSOCIATION KHYBER PAKHTUNKHWA REGARDING DELETION OF RULE 7(S) 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

\_\_\_\_\_

(Abdullah)

Additional Secretary (Establishment)

**ATTESTED**



No. 8145

Phone: 0312 211 1144

Email: [tebliyat@meb.gov.tr](mailto:tebliyat@meb.gov.tr)

The Section Officer (Primary-High),  
Elementary & Secondary Education Department,  
Kıyber Pahlwan Education

MINUTES OF THE MEETING

Dear Sir,

I am directed to refer to the letter No. 508/Primary-40&5&6&7/11  
G.M.H. dated 10-07-2023 on the subject cited above and to  
present brief history of the case as under:

The Government of Kıyber Pahlwan Education Department (Regulation Wing)  
dated 10-07-2023 in the Civil Service (Appointment, Promotion & Transfer Rules 1947)  
this regulation No. 508-VI (S&AD)/1-2/2020 dated 08-08-2020.  
That this office sought guidance from your good office in the following words vide letter  
No. 6987 dated 26-07-2023.

(i) Now it is obligatory upon the civil servant to accept promotion in every condition,  
(ii) If he/she is not willing to accept promotion or turn down the offer of  
promotion.

That your good office forwarded the same to the quarter concerned vide letter  
No. 50 (Primary-4) 5&6&7/2/1/2023 for necessary guidance.  
That the Government of Kıyber Pahlwan Education Department (Regulation  
Wing) vide letter No. 508-VI (S&AD)/1-2/2020 dated 08-08-2020 categorically stated  
that there shall be no provision to decline or forgo promotion. It is obligatory upon every  
civil servant to accept promotion under every condition.

The same was received by this office from your good office vide letter No. 50  
(Primary-4) 5&6&7/2/1/2023 dated 12-06-2023.  
That, in the light of the minutes of meeting dated 6-07-2023 held under the  
Chairmanship of the Additional Secretary Education at his office this office has  
been asked for resolution of considered case.

In view of the above, this office is of considered opinion that the decision of Rules  
(75) have affected adversely a large number of female teachers. Thus it is proposed that  
Teachers below 175-16 may be exempted of implications of the amendment in this regard  
provided they submit their written request prior to conclusion of the meeting of  
Departmental Promotion Committee.

The case is submitted for perusal and necessary actions please.

Assistant Director (Grade A-1)  
Elementary & Secondary Education  
Kıyber Pahlwan

Copy of the file is as:-

- 1. PA to Director, Local Directorate.
- 2. Master Copy.

Assistant Director (Grade A-1)  
Elementary & Secondary Education  
Kıyber Pahlwan

ATTESTED

W44413-2023 AZIZULHAQ VS GOVT OF POKS

**ALISTED**

WPK443-2023 AZIZULAH VS GOVT OF PKD

Richard Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa

Copy of the above to:  
1. PA to Director Local Directorate  
2. Master Copy

Please -  
The case is submitted for period and necessary action  
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.

consolidated case.  
That in light of the minutes of the meeting dated 6-07-2023  
held under the Chairmanship of Hon. Additional Secretary Education  
at his office. This office has been asked for submission of

no provision to decline for promotion. It is obligatory upon every civil  
servant to accept promotion under any condition.  
That the government of KP-ED (Regulation VIII) vide letter No. SD (Reg) /  
EQAD/1-3/2020 dated 6-06-2023 accordingly stated that there exists

• That your good office forwarded the same to a/upte. concerned  
vide letter No. SD (Promo) / EQSD/1-2/ Appointment/2023 for necessary  
guidance.

• That the office sought guidance from your good office in the following  
vide notification No. Na. SOP-VI (EQAD) 1-3/2020 dated 06-08-2020.  
That the office sought guidance from your good office in the following  
vide letter No. 6983 dated 06-07-2023.

• That Government of KP Establishment department (Regulation VIII) dated  
rule 7(S) in Civil Servant (Appointment, Promotion, Transfer etc 1997)  
present brief history, along background of case as under:  
Minutes of meeting/PT/2023 dated 30-7-2023 on subject cited above and to  
I am directed to refer to letter No. (SD Promog-M) / EQSD/1-3/6/2023

Subject: Minutes of Meeting

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

PSAW/112  
(21-7-2023)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

- B/C -



ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223587)

No. SO(Policy-M)EBSED/2-2/Appointment-Rule-7(2023)  
Peshawar Dated 23<sup>rd</sup> August, 2023

Annexure  
E

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)/EBAD/1-3/2020 dated 06<sup>th</sup> 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 proceed 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 ISMAIL)  
SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. Director EBSE Khyber Pakhtunkhwa.
2. PS to Secretary, EBSE Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (PRIMARY MALE)  
23/8/23

Scanned with CamScanner

WP443-2023 AZIZULLAH VS GOVT OF PK43

~~ATTESTED~~

~~ATTACHED~~

1. Division E&SE Khyber Pakhtunkhwa  
2. PS to Secretary, E&SE Department of Government of Khyber Pakhtunkhwa

(Muhammad Ishaq)  
Section Officer (Army)  
(Muz)

Copy forwarded to:  
In view of above, the said amendment may be reconsidered to the extent of lady teacher in primary schools.  
Effects on service delivery Mother-in-law who need care. In such cases, there are negative Most of them are married with kids and elder father of In the remotest stations with no residential/transport facilities face serious inconvenience while they have to perform duties teacher of primary level who avoid such promotion have to In this connection it is submitted that in some cases lady Civil servant (Efficiency and Discipline) Rule 2011. of the competent authority or try to evade promotion through different means shall be proceed under Khyber Pakhtunkhwa those officers/officials who do not comply with promotion order Promotion and Transfer Rules 1989) it has been intimated that deletion of Rule 7(5) (Khyber Pakhtunkhwa Civil servant (Appointment, 1-3/2020 dated 31 June 2023 and to state that after I am directed to refer to your letter No. 50 (Primary) (P. 024) (E&AD) Dear Sir,

SUBJECT: Guidance regarding deletion of Rule 7(5) in the Civil servant (Appointment, Promotion & Transfer Rules 1989)

The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department, Peshawar.

No. 5 (Primary-M) E&SED / 8-2 / Appointment - Rule / 2023  
Peshawar Dated - 29th August, 2023

- 8/c -

Annexure - F



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(S) 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 23.06.2023 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.

Section Officer (Policy)

21

WM442-7023 AZIZULLAH VS GOVT OF PK

22

- B/C -

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 06.08.2023 (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.

Section Officer (Policy)

WP4442-2023 AZIZULLAH VS GOVT CF P043

  
**ATTESTED**



## Annexure - G

To,

- 1) Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar
- 2) Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Civil Secretariat, Peshawar
- 3) Director Elementary and Secondary Education Department

**Subject: REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-3/2020, DATED 06/08/2020, COMMUNICATED TO SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT VIDE LETTER D06/06/2023, WHEREIN IT WAS STATED THAT SUB RULE 5 OF RULE 7 OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1989 STANDS DELETED**

Sir/ Madam:-

Your Honorable authority promulgated Notification No. SO (Policy) E&AD/1-3/2020, dated 06/08/2020, communicated to Elementary & Secondary Education vide letter dated 06/06/23 wherein it has been made mandatory to the employees to avail the promotion, otherwise, disciplinary action shall be taken against the employees. That, as per notification No. SO (Policy) /E&AD/1-3/2020 dated 06/08/2020, the right of foregoing of promotion was withdrawn and the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) deleted Rule 7(5) in the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 vide notification no SOR-VI (E & AD)/1-2/2020 dated 06-08-2020. That the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar asked for guidance regarding deletion of Rule 7(5) in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 in respect of which the Establishment Department vide its letter No. SO.(Policy) E&AD/1-3/2020 dated Peshawar the June 06th, 2023 directed the Directorate of Elementary & Secondary Education that Rule 7(5) in the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 has been deleted vide notification dated 06-08-2020 and therefore, no provision exists to decline or forgo promotion and it is obligatory upon every civil servant to accept promotion under every condition. That Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa also wrote a letter to the office of Establishment & Administrative Department vide No SO(Primary-M) E&SED/2-2/Appointment Rule/2023 dated 23-08-2023 to reconsider the amendment made in Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 as it had negatively affected a large number of teachers and especially female teachers. In the meanwhile, the department vide its letter dated 07th of September 2023 directed the Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa that necessary guidance has already been provided to the 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 Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.

It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&AD/1-3 1-2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution of Pakistan and against the fundamental principles of natural justice.

Dated 1/04/2024



SIRAT KHAN  
SON OF  
AKRAM KHAN  
PSHT



07.05.2024



1. Learned counsel for the appellant present.
2. Let a pre-admission notice be issued to the respondents through TCS for submission of reply/comment. Appellant is directed to deposit TCS expenses within three days. To come up for reply/comment as well as preliminary hearing on 10.06.2024 before S.B. P.P given to learned counsel for the appellant.
03. Alongwith the service appeal there is an application for suspension of Notification dated 06.06.2023 and letter dated 23.08.2023 till the final disposal of main service appeal. In the meanwhile, no adverse action shall be taken against the appellant till next date of hearing.

Certified to be true copy (Muhammad Akbar Khan)  
Member (I)

*[Handwritten signature]*  
13/5/24

Date of Presentation of Application 10-6-24  
 Number of 1  
 Copies 1  
 Urgent 1  
 Total 1  
 Name of 13-6-24  
 Date of 13-6-24  
 Date of 13-6-24

~~ATTESTED~~

# VAKALAT NAMA

## BEFORE THE SERVICE TRIBUNAL PESHAWAR

SIRAT KHAN  
Versus

Appellant

Government of KP & others

Respondents


I (the Appellant)

do hereby appoint and retain

MUHAMMAD MUAZZAM BUTT ASC. MUHAMMAD ADEEL BUTT AHC  
BASSAM AHMAD SIDDIQUI AHC  
&  
ASSOCIATES OF MUAZZAM LAW FIRM

to act and appear for me in the above Suit and on my behalf to conduct and prosecute (or defend) the same and all proceedings that may be taken in respect of any petition connected with the same or any decree or order passed therein and Applications for review to file and obtain return of documents, and to represent me/us and to take all necessary steps on my/our behalf in the above matter.

I agree to ratify all acts done by the aforesaid Advocate in pursuance of this Authority.



APPELLANT

ACCEPTED

  
MUHAMMAD MUAZZAM BUTT  
Advocate Supreme Court

  
MUHAMMAD ADEEL BUTT  
Advocate High Court

  
BASSAM AHMAD SIDDIQUI  
Advocate High Court