# FORM OF ORDER SHEET

Course of	•	
Court of		,
· ·		

Appeal No.	2174	<u>/2024</u>

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
: · ·	20/10/2024	
1-	29/10/2024	The appeal of Mr. Amir Iqbal presented today by
		Mr. Muhammad Adeel Butt Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawar on
	· :	31.10.2024. Parcha Peshi given to counsel for the appellant.
		By order of the Chairman
	,	REGISTRAR
	. :	

## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

MMIY Case Title: S# CONTENTS NO This Appeal has been presented by: Whether Counsel/Appellant/Respondent/Deponent have signed 2 the requisite documents? Whether appeal is within time? Whether the enactment under which the appeal is mentioned? Whether the enactment under which the appeal is filed is correct? Whether affidavit is appended? Whether affidavit is duly attested by competent \* Oath Commissioner? Whether appeal/annexures are properly paged? 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? Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? Whether numbers of referred cases given are correct? Whether appeal contains cutting/overwriting? Whether list of books has been provided at the end of the appeal? 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? Whether addresses of parties given are complete? 22 Whether index filed? 23 Whether index is correct? 24 ! Whether Security and Process Fee deposited? On 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-Whether copies of comments/reply/rejoinder submitted? On . 26 Whether copies of comments/reply/rejoinder provided to 27

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

opposite party? On

Name:

Signature: Dated:

# BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In Ref to

Service Appeal No 2) 74 /2024

Amir Iqbal

## versus

# Secretary to Government of Khyber Pakhtunkhwa, & others

# Index

S. No	Description of documents	Annex	Pages
1.	Appeal and Verification		1-4
2	Application for suspension	-	5
3.	Copy of monthly salary slip	A	6
4.	Copy of notification No. SD (Policy) EV AD/1-3/2020 dated 06-08-2020	В	7-8
5.	Copy of impugned letter dated June 06th, 2023	C	9-11
6.	Copy of minutes of meeting dated 06-07-2023	D	12-15
7.	"Copy of letter dated 23.08.2023	E	16-17
8.	Copy of impugned letter dated 07.09.2023	F	18-19
9.	Copy of representation against the said notification and representation made by APTA President	G & H	20-21
10.	Wakalatnama	• .	00
10.	Transiatiania		22

ADVOCATE

## BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In Ref to

Service Appeal No 2174 /2024

Khyber Pakhtukhwa Service Tribunal

Amir Iqbal son of Muhammad Iqbal (CT BPS-16) Phurhala, tehsil and District Haripur

Dated 29 40 124

.....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 Certificated Teacher. Copy of monthly salary account 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:

### GROUNDS:-

- 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 effects 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 or 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 allment 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 employeebut 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.

- E. 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 boing 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 Hon'ble Court.

Depohent

**Appellant** 

Though

Muhammad Muazzam Butt Advocate Supreme Court

Muhammad Adeel Butt Advocate High Court

## BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHUWA

In	Ref	fto

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

Amir Iqbal

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 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 lis. 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) 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 Hon'ble Court.

Deponent

Mahammad Muazzam Butt

Advocate Supreme Court

Muhammad Addel Butt Advocate High Court

Though

Leagth of Service: 26 Years 08 Months 011 Days



Pay Suge? 18

throbining) 00.815.598

Aligibly Salary Statement (September-2024) 7. Dictrict Accounts Office Haripus <sup>4</sup>Dbit. Govt. kP-Provincial

AABOI GAIGIGIAM to sixth AABOI RHEA ME To notinumoin lunusers?

CAIC: 1330731755751 Personnel Number: 00.253620

Bury into Gort, Service: 21,01,1998 Dote of Hath: 20,01,1972

Jungarung helipik (Çrogata) kasarjulyasi

DDO COPE HISTORO DIZERICE EDUCATION OFFICER (NI) MIDDLE SCHOOLS HARITUR Designation: Certificated: Testifica 80007147-DISTRICT GOVERNMENT MIY'RE

(20) GPF Section: 001 Cash Center ક્રિયાના ટ્રસ્ટાના ૧૦૦૬ 🚅 🛫

2405 - कम 298 ज्यादा क्रिक्ट क्रिक्ट Vendor Kumber: -Carr Inversi applied

Tay and Allowance:

Deductions - General

2391 Athue Relict All 2024 25% -- (x) LS1 L1 00.0 ५६६ हरतर प्रयास अवस्थित प्रा ५०७३ ३२% THE PROPERTY IS STUDIES 00,155.65 6,4155,00 THE IDPAY BER VILLER NOTED 2316 Teaching Allowance 2021 . 00 (34) 00 834,6 5166 (श्वाप्ट 8याप अवक का<del>108</del> 00.018 2148 15% August Relict ALE 2013 2 00.585 (२१:५१) ऋडा अणाप (ध्युक्ताच राजा 1219 Convey Allowance 2005 00.0881 00 (x)0'S 1001 House Rent Allowance 45% . 00.087,85 ya9.sin:8 1000 1001100 90 (1 92 E // 3d (1 3ZE [])

१७५ Seale Type: Civil - 1975; 16

\$570998LINEN

नाम 🗷 प्रसंद्रीय द्राज्यम् 🔏 स्टा 00059 (3)() reT sinoad (thit, 3990 Eng Edu. Band KPK WUTTY 00.071. noisprivator PFD 8108. Lead moloronoff 1025 00 0% 15 00 0051 ्र अविश्वक्षा <u> 99 (1 99 î // </u> TOTALLA lawany -

Amilash ba

Taup. Addies:

CONTINARIPUR

00.000,274	(00,000,25	00.000,008	CPP Lam Principal finish	\$08.9
Southed /	aothaibitl 🤲	ातकवात्र विद्यान्त	notign soil	nsoJ
	•		SANIMADA! DUM KURDE - ST	0038030

[6.12[.89 :slds/d/9	Recovered till SEP-2024;	18,442,00	SQ.F&&LS thotagnowill	Herm erable:	10 275 55
kductions - Income Tax	·	-			
	** **				

4 00.CTV,TC.I :(എ) ഭപ്പ ത്ത്വ 🕝 पूर्व क्रिकेश (प्रकार . 00.751,8E. Deductions: (Re.):

BEIL DEIMINATIONAL BANK OF PAKISTAN, 230827 SIAMRA-E-HAZARA SUAHRA-E-HAZARA, ABBOTABAD 119210E80E007580 redumN timox5A Payer Supe; AMIR IQBAL.

Specific gaining O भूगाहरू (ballevA :Ditaj House.

Permutent Address: 11AR

Inchitto on think gained! Domain is: W.V. - Klayber Palabahalawa

. माराज्याः बाहरज्ञ<del>ाति (</del>विद्यायम्) (ब्याप

COVERNMENT DE CHARRY LYREALTH KHONY ESTABLISHMENT DEPARTME (HEGHLATION-WING)

# NOTHICATION

Duled Pushinvar the 06 / 8-12020 Civil Servants Act, 1973 (Khyber Pakhtuliving in abanda harman Act No. XVIII of pakhtuliving in abanda harman Act No. XVIII of Chile Minister of Khyber Pakhtuliving in abanda harman Act No. XVIII of Chile Minister of Khyber Pakhtuliving in abanda harman This parameter of Khyber Pakhulikhwa is pleased to direct that in the Khyber Pakhulikhwa is pleased to direct that in the Khyber Pakhulikhwa is pleased to direct that in the Khyber with the Civil Survents (Apparament: Primetics and Indian Civil Survents (Apparament: Primetics and Indian Civil Survents (Apparament) The Civil Survenia (Appoinment, Primotion and Transfer) Rules, 1989, the Civil Survenia (Appoinment, Primotion and Transfer) Rules, 1989, the Civil Survenia shall be made, namely: Thumber uncodinest shall be made, namely:

In rule 7, Buly-rules (5) shall be defelled.

# KT: NO & EVEN DATE

Capy is forwarded to:-

The Seillor Member Board of Revenue, Khyber Pakhrunkhwa.

The Principal Secretary to Governor Khyber Pekhtunkhwa.

All Divisional Commissioners in Khyber Pakhiunkhwa

The Registrus Peshawar High Court, Peshawar 8. 9.

the Carcusker, Acministration Department. arrange 20, gazette copics.

# GOVERNMENT OF KHYBER PAKHTUNKHWA ESTABLISHMENT DEPARTMENT (REGULATION WING)

## <u>NOTIFICATION</u> 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: \*\*

## <u>AMENDMENT</u>

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

CHIER 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 Tribunai, 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)

ATTES . -

**;** 

*,*•

ų,

. •

ATTESTED

MONTH OF THE PRINCIPLE AS EGOL CL BEET

ر بالمودد (Polloy)

PS to Speak Scentury (Reg), Batabilihnan Örpunnan. PA 10 Additional Scentury (Reg. 13), Batabilihnani Department. PS 10 Dopsiry Scentury (Policy), Batabilihnani Department.

Copy քնդանեն են հիս։՝

Kodzi. Of even in & ilale

(rallog) jamin hill (rallog) જાણોવામુંથ

201.1° ئادەنى

proceeded ogalasi under Khyber-Pokhundhay Civil Servenb (Afficiency & Discipline) Rules, of the competent authority or my to evade promision through different means thail be Panhemare, thase afficerstoffolds who do not comply with pramotion order

civit secret to neeept premotion in every candillon.

The tackle higher responsibility in tast of promotion. Therefore, if is abligatory upon every Viloses of the tend to force promotive to evade positinglians let of show lock of cepacity of to notificeqUean evitored eignit a of galactic yd aleg liviti tol anlieigmet tuari tagrier ifots a university is being to low bid site to delete the training a longitor state of the deletion of

navisten exists to decitie or torgo promotion.

no , such :0505.80,00 bated dolles despertment novilleallon dated OG,08.2020; thus, no (s) small and Angales Pakhinnking Civil Servinks (Appolitiment, Francisco and Tennsles) Sindledue fant atals of has avade beton testions and the CEOC, SO. & Leslah CENSUneminiagnable . Maistered to refer to faut felter Mr. Solftemmy-Mynassinon. Dear Shi

SOPERS CHILDRACE RECYDING HERESTON OF HUR TO IN THE

The Covernment of ISIs her Pakhundriwa.

7.9

No. Still olley) Lee Ann o Store жасупреприяма прауилуния COVERNATIONY OF KILYBRILPAKHTONKIDWA

## Dyernment of Mayber Panatunkhwa ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIAT PESHAWAR

(Pinorio Mo.091-9223587)

No.SO (Primary-M)/E&SED/2-6/2023 Valed Pashaviar the June 25", 2023

Elementary & Secondary Education Department

Khyber Pakhlunkhwa, Peshawar.

Aziz Ullah Khan

President

All Primary Teacher's Association, KP

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

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

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.

Enel: AA

(MUHANMAD ISHAO) SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER IPRIM

WP4442-2023 AZIZULLAH VS GOVT GF FG43

Bjc

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

To

The Director Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar

Aziz Uliah Khan President President Ali Primary Teacher's Association, KP

Subject:

GUIDANCE REGARDING DELETION OF RULE 7(5) IN THE KHYBER PAICHTUNICHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION AND TRANSFER) RULES, 1969.

I am directed to refer to the subject noted above and to enclose here with a letter of Establishment Department letter No. SO (Policy)&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 Department in his office.

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

Encl: AA

(MUHAMMAD ISHAQ) . SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

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

SECTION OFFICER (PRIMARY MALE)

ATTEST

WP4442-2023 AZIZULLAH VS GOVT CP PG43

ALVESTED

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

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

	, , , , , , , , , , , , , , , , , , ,	
5#	NAME	DESIGNATION
1	Mr. Fazal Wahld	Deputy Director Establishment of Directorale Elementary & Secondary Education Department
2	j Mr. Aziz Ulioh .	Provincial President All Primary Teachers - Association Khyber Pokhlunkhwa
3	Mr. Ralagal Ullah	General Secretary AFIA Feshawar
4	Muhammad Ishaq	Secilon Officer (Primary) ELSE Department Civil Secretariot Khyber Pakhtunkhwa Peshawar

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

3. After threadbare discussion it was decided that Directorate at Elementary 2. Secondary Education Department may examine the case properly and submit a self-contained/consolidated case for anward submission to Establishment Department for further necessary action.

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

(Mr. Foral Wahld)
Deputy Director-I
E&SE Department

(Mr. Reloqui Ullah) Géneral Sacreláry APTA Peshawar (Mr Aziz Ullah)
Provincial President
All Primary Teachers Association
Khyber Pakhlunkhvio

(Muhammod Lhaq) Section Officer (Primary-Male) E&SE Department

(Abdullah) Addillonai Secretary (Establishment) EASE Department ATTEST

WP4447-2023 AZIZULLAH VS GOVT CF PG43

ATTESTEU

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

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

5#	NAME I		DESIGNATION	
1.	Mr. Fazal Wahld		Deputy Director Establishment of Directorate Elementary & Secondary Education Department	
2.	Mr. Aziz Ullah		Provincial President Ali Primary Teachers Association: Khyber Pakhtunkhwa	
3.	Mr. Rafaqat Ullah	4	General Secretory APTA Peshawar	
4.	Muhammad Ishaq		Section Officer (Primary) E&SE Department Civil Secretarial Khyber Pakhtunkhwa Poshawar	

- 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 & 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. Fazai Wahld)	• •	· · · · · · · · · · · · · · · · · · ·
Deputy Director-1		·
E&SE Department	•	ATT
Provincial President	•	,
All Primary Teachers Association	·	
Khyber Pakhtunkhwa		
(Mr. Rafaqat Ullah)		
General Secretary APTA		
Peshawar		
(Muhammad Ishaq)		
Section Officer (Primary-Male)	•	•
E&SE Department	*	
•		فيني ١٠٠٧
. 1		•
'-	(Abdullah)	
	(wonnitan)	

ATTESTED

The socion Officer (Primary-Mule). ADWDAZSA: DWANTAITHAT TSOUTH TO STAND TO STAND TO STAND TO STAND TO STAND TO STAND THE CONTRACT OF STAND TO STAND THE CONTRACT OF STAND TO 44[2519-160 :500114

Elomantan & Secondary Education Deportment. Klyyber Pathunkhyva Perhawor.

.csos-so-pd balab 7860.ov.

October 11. 1 am directed to refer to the latter No.50(Primery-M)Bessention of Alscelling PSTY 2023 and the subject clied above and to present brief library about in the background of the case as uniter:

Ignili noliningoft insmirungo Establishment Depurtment folingia in sunyayo Dinff

2 Master Copy.

L'Try to Director Local Directorate. Copy of the above is lo:-

Whitesprod by Haliuxisa esos-sairen

, notinent & Socondory Education Alyber Pokhtunkhun (I-16dalz3) talyvila kraivinh

Elomaniany & Secondary Education

(1-16 dates) individual (1-16 dates)

The doze is sulmitted for pertual and necessory actions please.

provided they suignit their written refund print to conduction of the meeting of Teachers boling hole to may be exempted of implications of the amendment in the rules laid 7(5) liave offected regolively a fluga numbers of Femala Teachers. Thus it is proposed that Aren esked for sulmits and consolidated case. Aren estimains that the deletion of Rules and when the property of Rules.

That, in the Highs of the minuter of meeting doted 6-07-2022, held under the Choicenstally office has

No.5() (irrimate on exactors-trappointmentstate for necessary guidance.

Their the Government of Klyber Pothiumkhwa Establishment Department (Regulation Wing) vida let at Ma.50 (Polley) E&AD/1-1/2020 dated 6-06-2023 categorically stated by their liters extra the provision in decline or forgo promotion. It is obligatory upon avery chalf service with terreint promotion under every condition.

The state with received by this office from your good office vide, letter Wo.50.

The state with received by this office from your good office vide, letter Wo.50.

Trial, youn poly office forwarded the some to the quarter concerned vide letter Vol. 500 (Primary Bullance).

(ii) Now it stobilgoiory upon the civil servant to occept Promotion in every condition.

dolvica Rila 7(1) Imino Civil Servanis (Appointment, pramoiton & Transfer Rules 1989)
vide noillonina HA. No. SOR-VI (E&AD)/1-2/2020 duted 06-08-2020.
That this office couply guidance from your good office in the following words vide letter

-B/c-

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KPK

TO: PESHAWAR
[21-7-1013]

Section Officer (Primary Male).
Elementary & Secondary Education Department.
1494, Peshawar.

Subject: Minutes of Meeting

Dear Sir, g am directed to rife to letter No. (50 Rimany -17) E & SED /5-1/GMill/ Ministes of meeting /PST/2023 dated 10-7-2023 on subject cited above and to present brief history, about background of case as under:

That Government of KP Establishment department (Regulation Wing)

delated rule 7(5) In Civil Servants (Appointment, promotion of Transfer Pulse 1989)

vide notification No. No. SDR-VI(EEAD)1-3/7020 closed 06:08-2070.

· That this office sought guidance from your good office in the following words vide letter No. 6987 defed ob-orrary

(i) Place it is obligatory upon civil scarant to accept promotion.

(ii) It is preregative of civil servant to either accept/turndown the offer of promotion.

• That your good office forwarded the come to questes concerned wide letter No. So (Annough) EGSED/2-2/Appointment (2023 for necessary guidance.

- That the government of KP-ED (Rigulation Wing) vide letter No. So (Policy) EGAD 1-3/2020 dated 6-06-2023 categorically stated that there exists no provision to decline forgo promotion. It is obligatory upon every civil servint to accept ponetion under energy condition.
- That in light of the mainutes of the meeting dated 6-07-202] held uncles the Chairmanship of then. Additional Secretary Establishment at his effice. This office has been asked for submission of consolidated case.

In view of the above, this office is of considered opinions that the deletion of Rules 7(5) have affected negatively a huge members of Female teachers.

The case is "submitted for person and necessary actions please.

Cipy of the cubave to;

1. PA to Director Local Directorate

2. Master Copy

Assistand Director

Elementary & Secondary Education

Khalico Rathbookhuk.

WP4447-2023 AZIZULLAH VS GOVT CF PG43

ATTESTE



## ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIAT PEGHAWAR (Phono No.091-9223587)

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

HUUSKUIG

The Georgiany la Govi, al Khyber Pakhlunkhwa. Establishment & Administration Department. Peshavia

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

I am directed to refer to your letter No. SO(Policy)/ EBAD/ 1-3/2020 dated Geze Su, 067 June 2023 and to state that after deletion of rule 7(5) Khyber Pakhtunkhwa Ovil Servers (Appliphtment, Promotion & Transfer Rules 1989) It has been intimated that those officers/ offices vitro do not comply with promotion order of the competent authority or or to evade promotion through different means shall be proceed under Khyber Pakrounkriva Gvill Servant (Efficiency & Discipline) Rules, 2011.

In this connection it is submitted that in some cases lady teacher of primary ਵਿਸ਼ਾਈ ਅਸੰਗ ਰਾਗੀ such promotions have to face serious inconvience 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 reed care. In such cases, there are negative effects on service delivery.

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

MUHAMMAU ISI SECTION OFFICER (PRIMARY MALE)

Copy Conviorated to the:

1. Olrector ERSE Khyber Pakhtunkhwa. 2. PS to Secretary, EBSE Department Knyber Pakhtunkhwa.

SECTION OFFICER JE

Scanned with ComScanner

WP4442-2023 AZIZULLAH VS GOVT CF PG43

No. 50 (Primary - M) ESSED (2-2)
Appointment - Ruse 2023
Pedraumar Dated 23rd August, 2023.

Τō

The Secretary to Government of Khybo Pakhtunbhura. Establishment and Administration Depostment, Peshowers.

SUBJECT: - Gilldance regarding deletion of Rule 7(5) in the

Circl Servanit (Appointment, Association & Transfer Rules.

1989)

Dear Sir,

9 app directed to refer to your letter No. Softmany

11-3/2020 dated Bt June 2023 and to state that after

deletion of Rule 7(S) Khyber Paktounkhus Civil Servant (Appointment,

Promotion and Transfer Rules 1989) 9t has been intimated that

those officers officials who do not comply with promotion order

of the competent authority or try to evade promotion though

different means shall be proceed under Kryber Pakhtunkhus

Civil Servant (Efficiency and Discipline) Rule 2011.

In this connection it is submitted that in some cases lady teacher of primary level who avail such promotion have to face serious incoverience while they have to perform duties in the remotest stations with no residential/tromsport facilities. Most of them are married with kids and elder father of Mother-in-law who need once. In such cases there are notative effects on service delivery.

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

CEPY forwarded to;

(Muhammad Ishow)
Section Officer (Primary
Male)

1 Director E& SE Khyboo Rekhhorkhura.

2. PS to Secretary, E&SE Department Klocker Att Edward Eagle

ATTESTED ATTESTED



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

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

Subject: -.

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

I am directed to refer to your letter No. SO(Primary-M)/E&SED/2-Dear Sir, 2/Appointment-Rule/2023 dated 23:08:2023 on the subject noted above and to state that necessary guidance has already been tendered to your good office vide this department letter of even No. dated 06.06.2023 (copy enclosed).

Yours faithfully,

# Endst. Of even No & date

Copy forwarded to the:-

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

- B/C-

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

To

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

Subject: -

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

Dear Str.

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

Yours faithfully.

Section Officer (Policy)

## Endst Of even No & date

Copy forwarded to the:-

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

AT TESTEL

Section nicer (Policy)

WP3442-2023 AZIZULLAH VS GOVT CF PG43.

To, Dated: 26-02-2024

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

REPRESENTATION AGAINST THE IMPUGNED NOTIFICATION BEARING NO.SO(POLICY)E&AD/1-312020. 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. 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. 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.

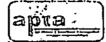
It is, therefore, humbly prayed that on the acceptance of the instant representation; the Notification bearing No. SO (POLICY) E&D/1-3/2020 DATED 06/08/2020, communicated to vide letter dated 06/06/2023, may please be declared and ordered to be struck down being Void, Ultra vires to the Constitution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

**Best Regards** 

Amis Jaybal / Certificated Teacher CT BPS-16

Khiyber Pakhtunkhwa

Azla Müdi Khan 1 27 - 1 Proping to 12540 0 033-0314540 - oztavilah1873@genali.com El namen



آل برائمری ٹیجیرزایسوی ایش (ایٹا) جیبر پخٹو

Hoverme-

بهاب: ميكرله المنزل ي عيندال ايم يمن جير بهوا مَهُابِ اللَّهِ إِرَاكِرِي لِي إِرَاجِوى النَّقَ خِيرٍ يَتُوْلِهَا

مخادث ہے کہ مومٹز ہر ادادے عل اوق الله او کر مرکار کا الام کا خواش اول ہے بروموٹز کا ایک قالون اوا کر ا الآم ک اور ایک اکر می مجدر کے قت ایک والد پروموٹز نے لی ورو ایم اسما باد مال تک پروموٹز لیل لے تلے علے سطاب باد سال تک ہم اس کا پروموٹز میں او عن حق مر ای قالن عل قول دمایت دل کل باد مال دال بات فتح کر دل کل کر اگر ایک طام ایک مال برد و تن شایل ( در دو مرسد مال ال سکا سک لگون اب ایک ونت با ایک الدر لیکیش وا ب

جی کے مطابق اب پر عام پروس ٹن خرد کی کے اگر فیل کی 7 اس کے نقاف الناع لل دراؤے مطابق کاردائی کرتے کا کہ کہا ہے ادا مل ہے آفری لوللیشن بلیای انسانی منول کی کمل نقاف ادا کا ہے کی درد ادالہ ادر پہنوں مان کا فرانین اسانتہ کر انہائی مشاہد کا ناماکرہ بڑے کا

بکے مام مالات کی می زیرو کی پروسر ٹی اور دسمالا میںا کی بادی البال مقبل کی خاند دروی ہے کدک فیرر پھر کا ای بدائق سے داد ال و شدید بید فام ملات ہی ۔ وزیرہ کا بید میں اور الدور بیان میں میں میں میں میں میں میں میں میں ہوئی اسال انڈن کی خلاف ہ کی اور ان میں اور الدور میں اور الدور الدور کی جانب میں کو ان میں میں اور بیان انسال انڈن کی خلاف ہے جہ بدئی ا انہا ہم آپ سے حداد انٹل کرتے ایں کر کر الیویشین کر وائیں تا بہتا یا اس ڈیں زم کر بہر پر اگری اما تذہ کر (Relaxallon) ویا بات اور ان کر

لد کا براس لیے کا بھلے ان اور س بے لیے رہائے

الديدامش د في كل مورت درا إقاده إلا ليابات لكن بدر كان كا بات

ال سليل عن آسيا بلد الدبلد تام (DEO) الله الذكر الك فعلى مراسل بدى كيا باسة عكر الناما على ب عل / ليبل برائرل اما كدر كرا ال المدت الاجرد تک سے بھایا باسکے

کے تک واقعیشن بادکا دوست کا پرائری اسات کا واقع فرور اوج کسٹ کا سلسل شروع ہوہنا ہے۔ ابل ہم یہ فرق دیکتے ہیں کہ آپ سامیان فودی ایکشن لیکر سوب بر کے بہائری اساتاء نسوسا لیمیل پرائری اساتاء کم اس ایک اوری اسات دائیں کے

آل پرائری ٹیجرز ایس ایش نیم پھڑٹوا

WP4442-2023 AZIZULLAH V8 GOVT CF PG43

ق. 5	
55823	پشاور بارایسوسی ایشن ،خسیبر پخستونخواه
الدوكيك: على عمل منهم	PESHAWAR ASSOCIATION AND THE SECOND
باركوس اايسوى ايش نمبر: ( مح 109/5 م	
رابط نم : 0334 9166514	
	بعدالت جناب:
F :	منجانب
ماصر افعال	
	علت تمبر:
بنام گورنهندی ه	مورقہ:
° ( ) "	
	تقانه:
رانکه	باعث تحري
	مقدمه مندرجه عنوان بالامیں اپنی طرف سے واسط
<u> مرکب ہے ۔</u> کودکیل مقرر سزی ربرہا جیگل کھیں ۔ کیا ۔ دی	آن مقام مشر کیا می این این این این این این این این این ای
روان کا کا ل انطبیار جموده بهبیر و یک صاحب تو	كركے اقراركيا جاتا جي آل صاحب موصوف كومقده كائل كا
ن ا قبال دعویٰ اور در خواست از هر تشم کی تصدیق از هر تشم	راضی نامہ کرنے د تقرر تا ہے فیصلہ برحاف د کینے جواب دعوی
l (1 <i>2</i> 7	زرین پردسخط کردنے کا اختیار ہوگا، نیز بصورت عدم چیروگیایا
	وائر كرنے اپيل ترا آن ونظر انى و بيروئ كر ان كار يوگا اور
المناجية المائية المؤلكا اور صاحب	کاروائی کے والے آورو کیل یا مخار قاد قائد اللہ اللہ اللہ اللہ اللہ اللہ اللہ الل
ر اوروان که کام این مرد این منظور و قبول ہوگا مردون مردون کا میں مردون کا م	مقرر شده کو وی جملہ مذکورہ بالا اختیارات حاصل ہوں کے
ے ہوگا گاو کی تا <u>ریخ بی</u> ش مقام دورہ یا حدے	دوران مقدمه میں جوخر چه ہرزجان اتوالے مقدم کے سب
ی مرکزا دیات نامه کھھ دیا تا کہ سندر ہے مرکزا دیات	با هر موتو وکیل صاحب بابند ننه موق کے گئے چیروی مذکوره نگر
	1 1 1 1 2024 : 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
<u>-</u> العــــبد	العــــــــــــــــــــــــــــــــــــ
	- <b>ل</b> - مقام
liver.	tell hy 1
نو ئ: اس وكالت نامه كى فو نو كا بى نا تابل قبول بوگى ـ	