

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 1902 of 2024

Mst Nazia Bibi SPST (BPS-16)..... Appellant

Versus

Director Elementary and Secondary Education Peshawar & 02 Others.


..... Respondents

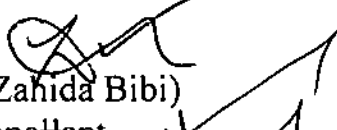
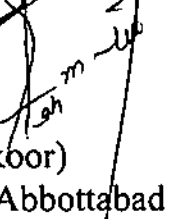
SERVICE APPEAL

PARAWISE COMMENTS/REPLY ON BEHALF
OF PRIVATE RESPONDENT NO. 3.

Sr #	Description	Page No's	Annexure
1.	Comments along with affidavit <i>with Repl'y of applicant</i>	1 to 4	
2.	Copy of certificate of transfer of charge under No 1905-7 dated 01/03/2018	5	"AA"
3.	Copies of Mutual transfer order dated 29/03/2018	6	"BB"
4	Copy of relieving chit of answering respondent no 3	7	"CC"
5	Copy of civil suit + orders thereon	8 to 12	"DD"
6	Copy of bio-data of appellant, issued by Principal	13	"EE"
7	Copy of treatment documents	14 to 17	"FF"
8	Wakalatnama, Special attorney	18 to 20	"GG" + "HH"

Dated 05/11/2024


Through
(Rashid Iqbal Khan Jadoon)
Advocate IBC Islamabad
Attorney Abbottabad.


(Zahida Bibi)
Appellant
Respondent
No 3

(Shahzad Shakoor)
Advocate High Court Abbottabad

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
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..... Respondents

SERVICE APPEAL

PARAWISE COMMENTS/REPLY ON BEHALF

OF PRIVATE RESPONDENT NO. 3.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17651

Dated 06-11-24

Respectfully Sheweth:-

Comments / Reply on behalf of respondents No 3 are submitted as under:-

Preliminary Objections:-

1. That the appellant has no cause of action to file the instant service appeal.
2. That the instant appeal is not maintainable in its present form, as she instituted civil suit no 213/1 of 2024 titled Nazia Bibi Vs Govt of KPK on 16/08/2024 which was dismissed on 02/10/2024.
3. That the appellant has no locus standi to file instant appeal.
4. That the instant service appeal is not maintainable as appellant has not filed his departmental appeal as per law.
5. That the appellant has filed the present appeal just to pressurize the respondents.
6. That the appellant has not come to this Honorable Tribunal with clean hands, hence, not entitled for any relief.
7. That the appellant is estopped to sue due to his own conduct.
8. That the instant appeal is not maintainable due to non-joinder and mis-joinder of necessary parties.

9. That the instant appeal is against the Rules and Policy of the Government.
10. That the appellant has suppressed the material facts from this Honorable Tribunal, Hence, not entitled for any relief and appeal is liable to be dismissed without any further proceedings.

Factual Objections:

1. That the Para No. 1 of the instant service appeal is pertains to record, and official respondents would be in better position to reply this para being competent authority.
2. That Para no 2 of the appeal did not relate to response by the respondent no 3, and official respondents would be in better position to reply this para being competent authority.
3. That the Para No. 3 of the instant service appeal is pertains to record.
4. That in the Para No 4, appellant herself admitted that she remained served in GGHS Kunj with effect from the year 2011 to 2018, as she impugned her transferred order of same school.
5. That the Para No. 4 of the instant service appeal is incorrect, appellant concealed the real factual position, actually respondent no 3 (answering respondent) transferred to GGHS No2 on 29/02/2018 and after only one month, appellant got Mutual transfer with respondent no 3 on 29/03/2018 and respondent no 3 relieved from GGHS No 2 from 30/03/2018, so appellant completed her more then 06 years tenure at the said school and ordinarily she completed her two term tenure, further more both schools GGHS No2 Abbottabad and GGHS Kunj Abbottabad and situated in Abbottabad city and distance between these two schools are hardly 4/5 minutes walking distance, further more she resides PMA Kakul Abbottabad, and she ought to get transfer order to GGHS Kakul. Copies of certificate of transfer of charge under No 1905-7 dated 01/03/2018, and Mutual transfer order dated 29/03/2018 and relieving chit of answering respondent no 3 are annexed as **Annexure AA, BB, CC.**
6. That para no 6 of the instant appeal is incorrect, as there is no political pressure or motivation is involved, and impugned order was issued before

ban, she completed her more than two ordinary term of 06 year tenure, and she herself is trying to serve on her own wishes whims, also trying to employers/department on her own pleasure and caused for creating difficulties to her employers/respondents, she, before instant service appeal instituted civil suit no 213/1 of 2024 titled "Nazia Bibi Vs Govt of KPK" on 16/08/2024 and dismissed on 02/10/2024, she did not obey impugned transfer order till to date, and students of GGHS Kunj are suffering from 29/06/2024. Moreover respondent no 1 & her husband both are Cancer patients and their treatment is going on. Copies of civil suit, bio-data of appellant, issued by Principal and treatment documents are annexed as **Annexure DD, EE, & FF.**

7. That appellant's departmental appeal is not filed as per law, as well as her instant service appeal is not maintainable.
8. That there is no question of discrimination with appellant and she completed her two term of ordinary tenure, and detailed reply is already given in above paras.
9. That there is no factual & legal reason, available in the impugned order from which, appellant aggrieved but real position is that she is creating problems for department and respondent no3(answering department), therefore instant appeal is liable to be dismissed with heavy costs on the following grounds.

Grounds

- a) That ground taken by the appellant is factually and legally incorrect, infact impugned order is legal and she herself is performing illegal dis-abeyance of existing transfer order and thus challenged the authority of competent authority/respondents and liable to be proceeded under E & D Rules.
- b) That ground of appellant is not only incorrect but all illegal and unlawful performance of appellant caused obstacles of learning of children/students, as she did not obey transfer order and is enjoying


frivolous litigation, where against Apex Court by imposing heavy cost totally discouraged.


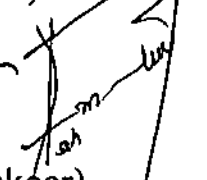
- c) That reply already given in above
- d) That reply already given in above
- e) That reply already given in above

Prayer:

Under the circumstances it is humbly requested that in the light of above referred facts, Service Appeal in hand may please be dismissed with cost.

Dated 05/11/2024

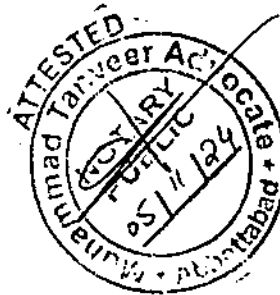
 Through
 (Rashid Iqbal Khan Jadoon)
 Advocate IBC Islamabad
 Attorney Abbottabad.


 (Zahida Bibi)
 Appellant
 respondent
 No 3

 (Shahzad Shakoor)
 Advocate High Court Abbottabad

Abbott Law Chamber
 Office No 6, Ground Floor, Ayub Tanoli lawyer plaza
 Abbottabad. 0333-5025002, 0316-9343818

AFFIDAVIT

I, Zahida Bibi, respondent no 3. do hereby affirm and declare on oath that contents of foregoing comments/reply are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.




 Deponent

Before KPK Service Tribunal Petitioner

Appeal No. 1902 of 2021.

Mst Nargis Bibi Vs KPK Govt.

Service Appeal (transferred)

Reply of Application for suspension of
impugned transfer Order.

Respectfully, Reply of respondent No 3 is
as under.

1) No need to reply

2) Prima facie case did not exist.

3) there is no irreparable loss to Petitioner

4) That balance of convenience is lies in favour
of respondent No 3, as she took charge
and working in G/its No 2, before the
institution of this appeal, thus the
application is now infructuous.

5) That the instant application of
Petitioner is already infructuous before
the institution of appeal.

In the light of above it is requested
that application being infructuous be
dismissed with cost.

Date 5/11/2021

through

Respondent No 3

Counsel.

10/11/21
M/12
H/12

(40)

GOVERNMENT OF KHYBER PAKHTUN KHAWA

CERTIFICATE OF TRANSFER OF CHARGE.

1. Certified that we have on after/forenoon of this day 28/02/2018 after Noon respectively handed over and received charge of this Office of the Principal GHS Malik Pura Abbottabad vide the
2. Particulars of cash and important secret and confidential documents handed over are noted on the reverse:-

Signature of Relievd Sahida Bibi
Govt; Servant. Sahida Bibi
Designation SPEI RPS-16

Station GHS Malik Pura Abbottabad

Signature of Relieving Nadia Noor
Govt; Servant. Nadia Noor
Designation SPEI B-16

Dated 28/2/2018

Endst No 19057
Dated the 1-3 /2018.

1. The District Education Officer Female Abbottabad.
2. The District Account Officer Abbottabad.

Principal
GGHSMalik Pura
Abbottabad
Principal
Govt GHS Higher Secondary
School Abbottabad

[Handwritten signature]

(5)

AA

AA



OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD

PH# NO. 0992-342533 FAX#0992-342314
E-mail: education@abbottabad.gov.pk
No: 2892-7768-II/Transf, Adjst Dated: 29/03/2018.

MUTUAL TRANSFER

In pursuance of Notification No SO (PE)4-5/Meeting/Transfer/Posting dated 17/07/2017 issued by the Government of Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar section 4(iv) & approval of posting/transfer committee the following teachers are hereby transferred/posted against vacant post on their own pay & grade in the school noted against each in the interest of public w.e.f the date of taking over charge.

S#	Name of Teacher	From	To	Remarks
1	Mst: Nazia Bibi, SPET BPS-16,	GGHS Kunj ATD	GGHS No.2 ATD	Vice Sr:No.2
2	Zahida Ashraf, SPET BPS-16	GGHS No.2 ATD	GGHS Kunj ATD	Vice Sr:No.1

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

SA
District Education Officer
(Female) Abbottabad

Copy No. & Date:-

Copy for information to the:-

1. District Account officer Abbottabad.
2. Principal GGHS No.2 Abbottabad.
3. Headmistress GGHS Kunj Abbottabad.
4. Budget & Account officer Local office.
5. Teacher Concerned.
6. Office file.

J. J. J.
Dy District Education Officer
(Female) Abbottabad

cc
CC
7
GOVERNMENT OF KHYBER PAKHTUN KHAWA.

CERTIFICATE OF TRANSFER OF CHARGE

RELEIVING CHIT

In compliance with the order of District Education Officer (F) Under Endott: No. 2892-97 EB-11/Transfer, Adjust Dated Abbottabad the 29-03-2018. Mot. Zahida Ashraf Designation S.PET of this School is here by relived from her duty today 30-03-2018 (A.N) and Directed to report for duty to the Principal Govt: Girls High School Kunj Abbottabad.

[Signature]
PRINCIPAL - Farhat Bashir
GOVT: GIRLS HIGH SCHOOL, NO.2
ABBOTTABAD

ADDRESS

School Name & Address

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15/8/2004

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-10			
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-8			
-7			
-6			
-5	موتور		7
-4	دول		6-5
-3	موتور		4
-2	موتور +	Alphonse D'Ordi	3A-3
-1	موتور		3C-1
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مجلس شورای اسلامی - تهران - ۱۳۵۷

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مجلس شورای اسلامی - تهران - ۱۳۵۷

16/8/57
Fakhreddin Shahrer
Chief Judge - X
Abharabad

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مجلس شورای اسلامی - تهران - ۱۳۵۷

(11)

(1)

(6)

ATTESTED
 17 OCT 2014
 Director
 PUNJAB
 GOVERNMENT
 DISTRICT
 CIVIL SUPPLY
 DEPARTMENT

1. The undersigned is pleased to inform that the
 application for the issue of the license for the
 sale of the goods mentioned in the annexure
 has been considered and found satisfactory.
 The license is hereby issued for a period of
 one year from the date of issue.
 The license fee of Rs. 100/- has been
 received and the receipt is enclosed herewith.
 The license is valid for the sale of the goods
 mentioned in the annexure only.
 The license is issued subject to the conditions
 and regulations of the Department.
 Yours faithfully,
 Director, Punjab Government.

16/8/14
 Farmanah Shahan
 Civil Judge X
 Abbottabad

2. The undersigned is pleased to inform that the
 application for the issue of the license for the
 sale of the goods mentioned in the annexure
 has been considered and found satisfactory.
 The license is hereby issued for a period of
 one year from the date of issue.
 The license fee of Rs. 100/- has been
 received and the receipt is enclosed herewith.
 The license is valid for the sale of the goods
 mentioned in the annexure only.
 The license is issued subject to the conditions
 and regulations of the Department.
 Yours faithfully,
 Director, Punjab Government.

3. The undersigned is pleased to inform that the
 application for the issue of the license for the
 sale of the goods mentioned in the annexure
 has been considered and found satisfactory.
 The license is hereby issued for a period of
 one year from the date of issue.
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 The license is valid for the sale of the goods
 mentioned in the annexure only.
 The license is issued subject to the conditions
 and regulations of the Department.
 Yours faithfully,
 Director, Punjab Government.

4. The undersigned is pleased to inform that the
 application for the issue of the license for the
 sale of the goods mentioned in the annexure
 has been considered and found satisfactory.
 The license is hereby issued for a period of
 one year from the date of issue.
 The license fee of Rs. 100/- has been
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 The license is valid for the sale of the goods
 mentioned in the annexure only.
 The license is issued subject to the conditions
 and regulations of the Department.
 Yours faithfully,
 Director, Punjab Government.

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 received and the receipt is enclosed herewith.
 The license is valid for the sale of the goods
 mentioned in the annexure only.
 The license is issued subject to the conditions
 and regulations of the Department.
 Yours faithfully,
 Director, Punjab Government.

Amir

13/8/24

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Handwritten signature or name.

13/8/24

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Signature: Farhan Shahen, Civil Judge-X, Islamabad.



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13/8/24

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Attested
for
his

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THE COURT OF FARKHANDA SHAHEEN CIVIL JUDGE-X, ABBOTTABAD.

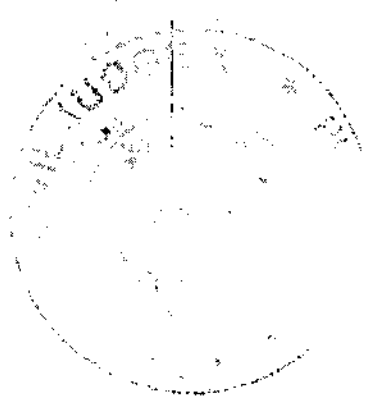
(Signature)

Case No. 213/01

Case Title:- Nazia Bibi Vs Govt of KPK

Serial No of the order or proceedings	Date of order or proceedings	Order of other proceedings with signature if judge or magistrate and that of parties or counsel where necessary.
Order No. 04	02.10.2024	<p>Counsel for the plaintiff and defendant no. 1 to 3 through representative while defendant no. 4 through counsel present.</p> <p>Today the case was fixed for arguments on maintainability of instant suit, however, counsel for the plaintiff moved an application for withdrawal of instant suit, reason mentioned therein.</p> <p>Counsel for the plaintiff stated that on the direction of his client he withdraws the instant suit. To that effect, statement of counsel for the plaintiff is recorded wherein wakaltnama is Ex.PA and same placed on file. Therefore, the application for withdrawal is allowed and the suit in hand is hereby dismissed as withdrawn. Cost shall follow the events.</p> <p>File be consigned to record room after due completion and compilation.</p> <p>Announced 02.10.2024</p> <p style="text-align: right;">(Farkhanda Shaheen) Civil Judge X, Abbottabad</p>

(Signature)
02/10/2024



No. 21316 Date 03.10.24

D. of Presentation Application _____

No of Words _____

Copying Fee _____

Urgent Fee _____

Total _____

Name of Copyest _____

Date of Preparation of Copy 10.10.24

Date of Delivering of Copy 11.10.24

ATTESTED TO BE TRUE COPY
10 OCT 2024

EE

Attended
on

13

(Signature)

OFFICE OF THE PRINCIPAL GGHS NO.02
ABBOTTABAD

S#	Name & Desig:	D.O Birth	D/O 1ST Appointment	D/O Taking over Charge on Present School	D/O Transfer
1	Mst: Nazia Amjad SPET BPS-16	26-01-1968	11-06-1994	29-03-2018	29/06/2024

(Signature)

Principal
Govt. Girls High School No. 2
Abbottabad
PRINCIPAL
GGHS NO.02 ATD

Attested
Fauji
Har

14

FF

FAUJI FOUNDATION HOSPITAL

TRUST CREATED UNDER THE CHARITABLE ENDOWMENTS ACT 1890
FOR THE BENEFIT OF EX-SERVICEMEN AND THEIR FAMILIES



P.O Box No. 145
Jhelum Road
Rawalpindi
Ph: 051-5788150 - 165
Date 8 Apr 22

Ref No: 6207/NORI/Med/205

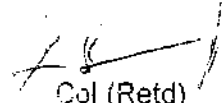
To: Nuclear medicine, Oncology and Radiotherapy Institute (NORI)
G-8/3, Islamabad

Subject: Medical Treatment - Patient Zahida Bibi W/O Ex-7353274 Hav
Muhammad Haroon, (Retd)

1. Patient Zahida Bibi age 47 years Wife of Ex-7353274 Hav Muhammad Haroon (Retd), a case of **Breast Phylodes Tumor** is being referred to your hospital for **Adj (EBRT)** as advised by Dr Fauzia Abdus Samad, Prof of Oncology Fauji Foundation Hospital Rawalpindi.

2. Necessary hospital bill will be paid by this hospital upto Rs 50,000/- (Rupees fifty thousand only). If treatment of the patient is to be continued and additional amount is required, please ask the patient in writing to bring new treatment letter demand by treating doctor.

3. This letter is valid upto 07 Oct 2022. This hospital will not be responsible for payment of treatment bill if the patient is entertained after 07 Oct 2022. Please send this treatment letter (in original) to this hospital alongwith med treatment bill for payment.


Col (Retd)
For Commandant
Dr Muhammad Tariq Chaudhry

Attested
[Signature]

15

3646547

FFH/FRM/067

Fauji Foundation Hospital RAWALPINDI

P.O. BOX - 145
JHELM ROAD
RAWALPINDI
Tel No. 5788150-65

Prescription Slip No : _____

Date 22/11

REFERRAL PROFORMA FOR SPECIALIST OPINION/CONSULTATION

VALID FOR ONE VISIT ONLY
(NOT FOR ADMISSION/TREATMENT)

To: Radiology Dept

Dear Sir,

Patient Name Zahida Bibi age 49 years, sex F
W/O, S/O, D/O Ex No A7353274 Rank Har Name Muhammad Haroon
Home Address : Village: _____ Post Office: _____
Tehsil: _____ District: _____

PTCL Phone No: _____ Mobile Phone No: _____

is being referred to you for favour of CL Mammography

Brief History & investigations

one of 1-sided c. breast on Flup - Annual
Mammography of @ side done in MAY 2024

Kindly send the bill along with this authority letter (in original) to the undersigned for payment.

Thanking you

Yours Sincerely,

Signature and stamp of requesting specialist

[Stamp: Fauji Foundation Hospital, Rawalpindi, Specialist Doctor]

Medical superintendent

SPECIALIST'S OPINION

Specialist's Signature

Attended
/ 15/8/23

16

CMH LAHORE DEPARTMENT OF PATHOLOGY

Department of Immunology


Analytical Immunocytometry Report

Patient's Name:	7353274 P/HAIV MUHAMMAD ALI KHAN
ID Number:	226753
Age:	50 YEARS
Gender:	Male
Referred from:	CMH LAHORE
Date:	15.08.2023
Specimen Type:	Peripheral Blood
Test:	Immunophenotyping for CLL/Lymphoma
Provisional Diagnosis:	
Hematological Opinion:	

Gate: FSC vs SSC; Cluster of mononuclear cells was selected for analysis
 Control: Isotype Control Mouse IgG1/IgG2
 Antibody Panel: CD45FITC+14PE, CD19FITC+CD5PE, CD20FITC+CD23PE, CD3FITC+
 CD22PE, CD7FITC+CD10PE.
 Gated Population: 81%
 Blasts/Atypical Population: CD45(99%), CD19+CD5(83%), CD20+CD23(42%),
 wCD22(90%), CD20(50%),CD7(04%), CD5(05%),CD3(02%).

• **Opinion:**
 This immunophenotyping is Indicative of B-CLL.

Please correlate with morphology and clinical findings.


 Hemid Naveed Tisu
 MBBS, FRCM (A-CLL), FRCR (CLL)
 Consultant Hematologist
 CMH LAHORE

Addressed
F/S

(17)

DEPARTMENT CMH ABBOTTABAD



MISS ZAHIDA	AGE:	YEARS:	GENDER: F
USG (L) Breast	ID NO: 2431	DATE: 19-Jan-2022	

ULTRASOUND: LEFT BREAST

A large heterogeneous lesion with internal cystic areas is noted in the left breast, occupying almost all the outer half of the breast, replacing the breast parenchyma and causing stretching of overlying skin. The lesion is hard on probe pressure, forming a bulge on breast and causing obvious deformity with maximum measurable AP diameter of 7.9cm from skin. It lies in the subcutaneous tissue, anteriorly and abutting pectoralis major muscle posteriorly. However, no nipple retraction is seen. Central areas of vascularity are also appreciated within the lesion on Colour Doppler. Few anechoic cystic structures in linear configuration are also seen at places tapering towards nipple, likely representing dilated ducts. One of them measuring 10.9mm at 3 o'clock position.

Compressed breast parenchyma appears echogenic—secondary to mass effect. Few sub-cm axillary lymph nodes are noted with preserved fatty hilar—reactive lymphadenopathy.

IMPRESSION:

Large, heterogeneous lesion with internal vascularity—outer quadrant, left breast causing bulging deformity—(BIRAD-IV)—Phyllodes tumor (with malignant transformation)

Biopsy and histopathology is advised.

33
18/01/2022
Department of Radiology

S.No. 239912 Mob: 0314-5042826



وکالت نامہ

Name of Advocate Shaukat Shakoor

DBA NO. 784 TBA NO.

BC No. 17 - 7864

R.s.200/=

SAIRA JAVED
Finance Secretary
District Bar Association
Abbotabad

18

94

بعدالت جناب: سر سید سید مجیب / KPIK / ایبٹ آباد

عنوان: نام: حکومت

منجانب: Respondant # 3 نوعیت مقدمہ سر سید ایبٹ آباد

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے دوائے بیرونی وجود ہی پہلے پیشی یا تصفیہ مقدمہ بمقام ایبٹ آباد / ایبٹ آباد کے لیے

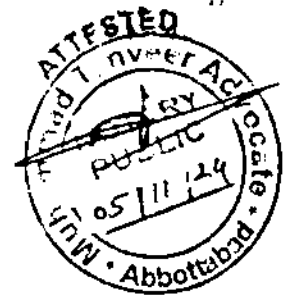
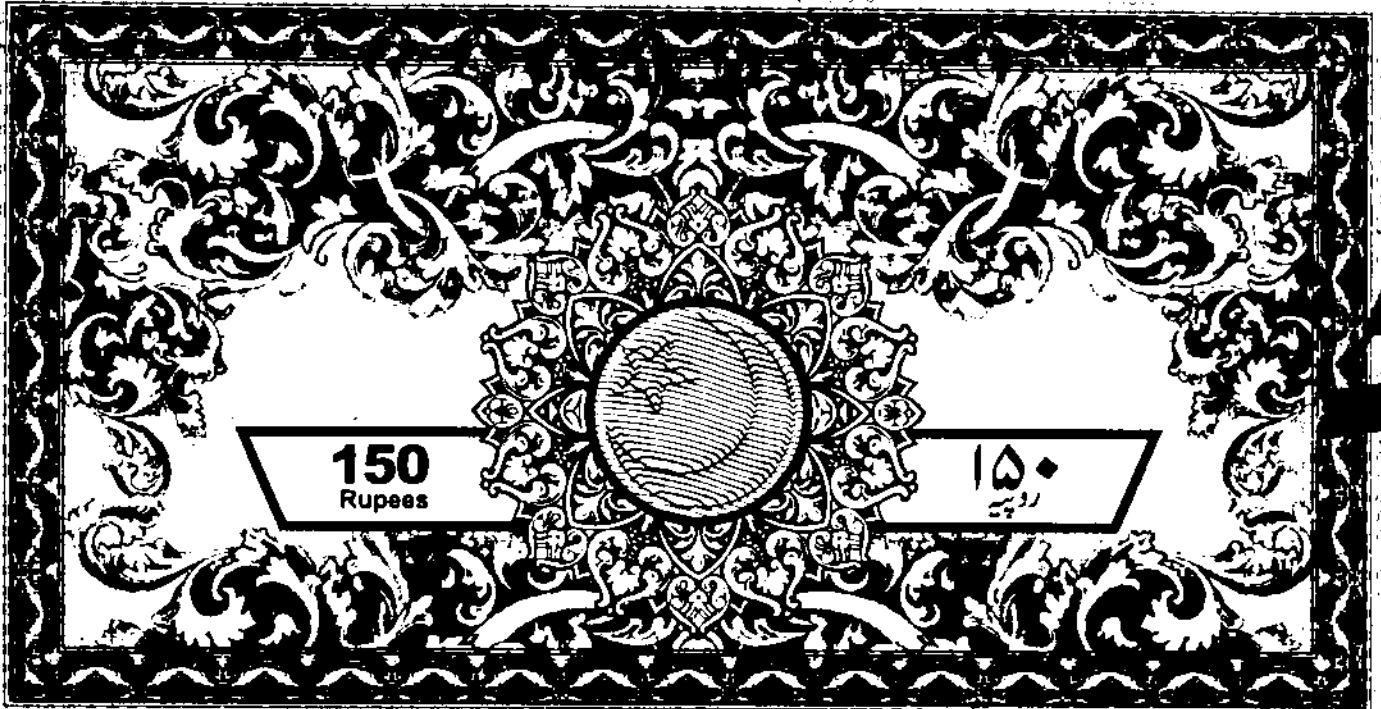
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی جگہ ساعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانے کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کردہ ذات منظور و قبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء کے ذمہ دار نہ ہوں گے اور ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ذمہ داری کے ادا کرنے اور ہر قسم کے اجراء اور سید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر تائید و رضی نامہ و فیصلہ بر حلف کرنے یا قبول دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے میری نجات از پکھری صدر ایبٹ آباد کی مقدمہ یا منسوفی ذمہ داری کی طرف درخواست حکم انتہائی یا قرنی یا گرفتاری یا جرائے ذمہ داری بھی صاحب موصوف کو بشرط ادا ایسی علیحدہ و مختانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت ایبٹ آباد کے دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جات التواڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔ مورخہ: 2024 / 11 / 06 دن ماہ سال مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Handwritten signatures and stamps at the bottom of the document.

Handwritten notes and signatures on the right margin, including 'Respondant # 3' and 'SPET'.



BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 1902 of 2024

Mst Nazia Bibi SPST (BPS-16)..... Appellant

Versus

Director Elementary and Secondary Education Peshawar & 02 Others.

..... Respondents

SERVICE APPEAL

PARAWISE COMMENTS/REPLY ON BEHALF

OF PRIVATE RESPONDENT NO. 3.

POWER OF ATTORNEY

NAME & OTHER PARTICULARS OF ATTORNEY

Mr Rashid Iqbal Khan Jadoon Advocate Islamabad Bar Islamabad, Abbott

Law Chamber Office No 6 Ground Floor, Ayub Tanoli lawyer plaza

Abbottabad. 0333-5025002, 0316-9343818, CNIC No 13101-0944593-9.

Handwritten text in Urdu script, likely a title or header, possibly mentioning 'مستحقان' (Beneficiaries).

Handwritten text in Urdu script, possibly a list or description of items.

13101-4882305-4

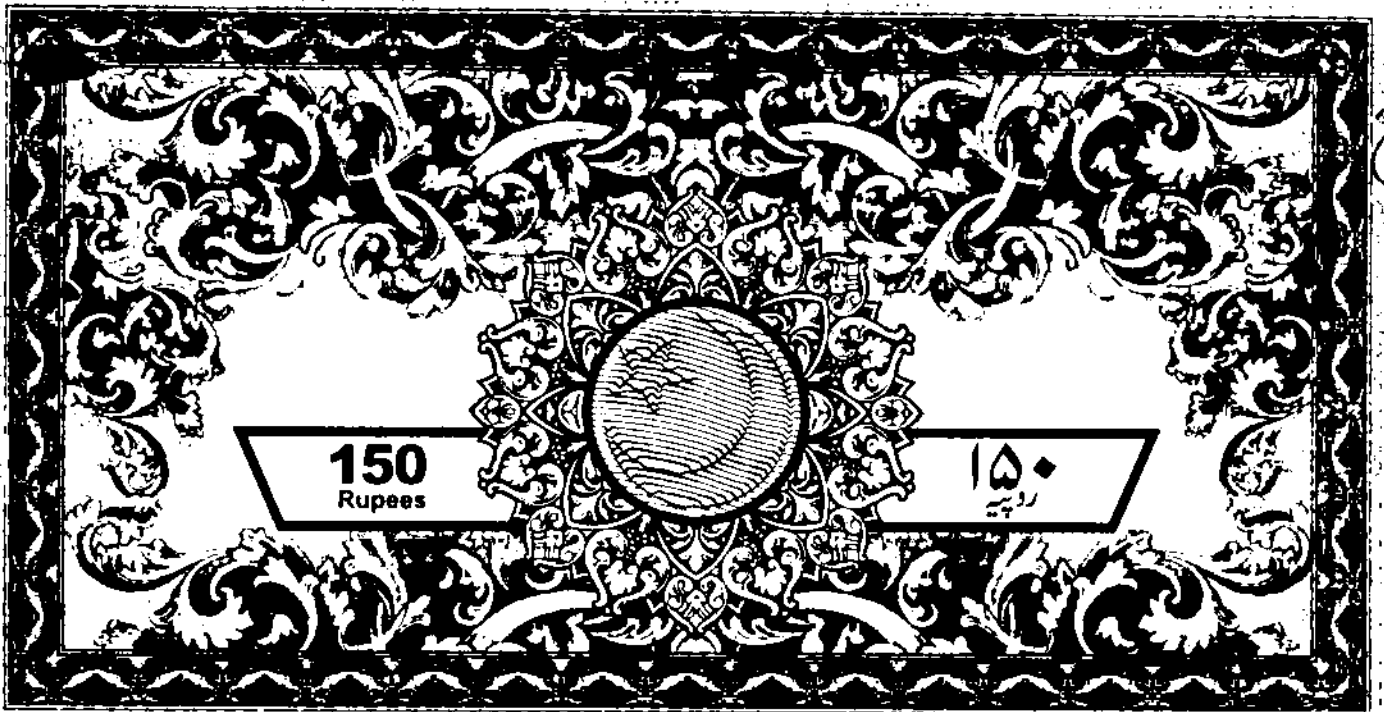
Handwritten text in Urdu script, possibly a date or reference number.

386
02/11/24

M. P.
Stamp Vender Licence No 74
Katchery Abhoyanagar

Handwritten signature or initials.

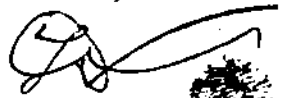
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I, Zahida Bibi D/O Muhammad Ashraf Khan, wife of Muhammad Haroon SPET, GGHS No 2 Abbottabad, deponent, do hereby solemnly affirm and declare on oath that I appoint above named as attorney to act on my behalf to appear, plead for me in the titled case in which the same may be tried or heard and any other proceedings arising out of or connected herewith and he would be competent to exercise all the powers which I myself holds as respondent No 3, he is authorized all powers, to institute case, to submit any kind of application or reply/comments, argue the case, in short, all powers or authority which I am entitled being respondent no 3, would be transferred to above named attorney through instant power of attorney.

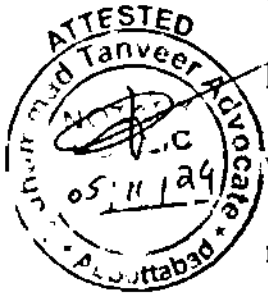
Sworn at Abbottabad Dated this 5th day of November, 2024.

Dated 05/11/2024


 ((Zahida Bibi))
 Respondent No 3

CNIC No 13101-4867305-4

DEPONENT



396
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