


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **2409/2024**


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2024	<p>The appeal of Mr. Hkhar Khan resubmitted today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 18/11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Iftikhar Khan received today i.e on 25.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-B of the appeal is illegible and incomplete be completed and replaced by legible/better one.
- 2- In every document the name of the appellant should be highlighted.

No. 970 /Inst./2024/KPST,

Dt. 25/10 /2024.


ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mir Zaman Safi Adv.
High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 2409 /2024

IFTIKHAR KHAN

VS


EDUCATION DEPTT:

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S.NO.	DOCUMENTS	ANNEXURE	PAGE
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APPELLANT

THROUGH:


MIR ZAMAN SAFI,
ADVOCATE
Room No. 6-E, 5th Floor,
Rahim Medical Centre,
Hashtnagri, Peshawar
0333-9991564

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 2409 /2024

Mr. Iftikhar Khan, PSHT(R) (BPS-15),
GPS Ghafar Khan Korona, District Nowshera.....APPELLANT

VERSUS

- 1- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (M), District Nowshera.
- 3- The District Account Officer, District Nowshera.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR THE
GRANT PRE-MATURE INCREMENT ON PROMOTION FROM
BPS-14 TO BPS-15 SIMILARLY TO THE OTHER EMPLOYEES
AND AGAINST NO ACTION TAKEN ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN
THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this service appeal the respondents may please be directed to grant pre-mature increment to the appellant upon promotion from BPS-14 to BPS-15 with other back benefits. Any other relief which this august Tribunal deems appropriate may also be granted in favor of the appellant.

W/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:-

- 1- That the appellant was the employee of Elementary & Secondary Education Department and has served the department till his retirement on superannuation (60) years quite efficiently and upto the entire satisfaction of his superiors. Copy of the service book is attached as annexure.....A.
- 2- That during service the appellant was promoted from the post of PST (BPS-12) to the post of SPST (BPS-14) and subsequently promoted from SPST (BPS-14) to the post of PSHT (BPS-15) vide Notification dated 12.04.2013. Copy of the Notification dated 12.04.2013 is attached as annexure.....B.

2

- 3- That it is pertinent to mention that the pay of the appellant had been fixed in BPS-14 and then BPS-15 and as such the appellant also granted pre-mature increment in BPS-14 while pre-mature increment on promotion to BPS-15 has not been granted till date despite of the repeated requests. Copy of the service book is already attached as annexure.....A.
- 4- That the appellant and his other colleagues are fully entitled for double benefits of pre-mature increments upon promotion to the BPS-14 and subsequently to BPS-15 in light of Finance Department letter 19.11.2013 and as such the appellant and his other colleagues time and again requested for the same but the respondents are not willing to grant the said pre-mature increment. Copy of the letter dated 19.11.2013 is attached as annexure.....C.
- 5- That the appellant feeling aggrieved from the inaction of the respondents by not granting/issuing pre-mature increment to the appellant upon promotion to (BPS-15) preferred departmental appeal to the respondent No.1 but no reply has been received so far. Hence the present appeal on the following grounds amongst the others. Copy of the departmental appeal is attached as annexure.....D.

GROUND:

- A- That the inaction of the respondents by not allowing/granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) is against the law, facts, norms of natural justice and materials on the record.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent department acted in arbitrary and malafide manner by not allowing/granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15).
- D- That the appellant is fully entitle for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) in light of the letter dated 19.11.2013 and such violation of the judgment of the Khyber Pakhtunkhwa Service Tribunal, Peshawar in appeal No.770/2016 titled Muhammad Siddique Vs Accountant General, Khyber Pakhtunkhwa & others.
- E- That many colleagues of the appellant in service as well as retired employees have been granted the above mentioned benefits of pre-mature increments, therefore, in light of the judgment of the Apex Court reported in

3

1996 SCMR 1185 the appellant is fully entitled for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) being similarly placed employee.

F- That the inaction of the respondents by not granting pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) is based on discrimination.

G- That the appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for

APPELLANT
Iftikhar Khan
IFTIKHAR KHAN

THROUGH: *Mir Zaman Safi*
MIR ZAMAN SAFI
ADVOCATE

CERTIFICATE:

It is certified that no other earlier appeal was filed between the parties.

Mir Zaman Safi
DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE, PESHAWAR

APPEAL NO. _____ /2024

IFTIKHAR KHAN

VS

EDUCATION DEPTT:

AFFIDAVIT

I, Mir Zaman Safi, Advocate, High Court on the instructions and on behalf of my client, do hereby solemnly affirm that the contents of this **APPEAL** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



MIR ZAMAN SAFI
ADVOCATE

-4/A-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____ /2024

IFTIKHAR KHAN

VS

EDUCATION DEPTT:

APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL

R.SHEWETH:

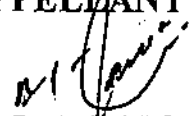
- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That the appeal of the appellant is related to the financial matters, therefore, as per judgment of the Superiors Courts reported in 2021 SCMR 1230 and 2002 PLC (C.S) 1388 limitation in financial matters could not run.
- C- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore, prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT

THROUGH: 
MIR ZAMAN SAFI
ADVOCATE

Training & Skills of Front Government
 Other qualifications
 Degree/Diploma
 Post-drawing
 English print
 Post-instructing
 Other duties
 Roll No.

Position
 English
 Qualification
 Date
 Post Arts
 B. L. or B.A.
 Qualifications
 Let thumb-prints in C. 18656
 3 x 2 (14) 1976

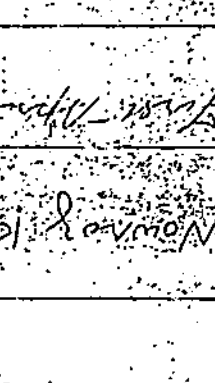
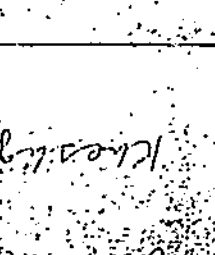
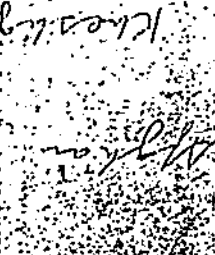

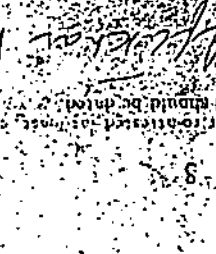
Verification Roll No. 2
 dated
 received back
 in this down in the year 1991
 date of birth 26.3.92 from the university
 number 108186. No. 108186
 P. M. S. A. H. S.

(Not recd in Police Department only)

357

U. S. G. P. D. (14) 1976

11A (5)

<p>1. The applicant's name, age, sex, height, weight, date of birth, and date of entry into the country should be stated. If the applicant is a minor, the date of birth should be stated.</p>	<p>2. Name <i>Alfred K. K...</i></p>	<p>3. Race <i>Algerian</i></p>	<p>4. Residence <i>1171 Kheir El-Bay, New York</i></p>	<p>5. Father's name and residence <i>Novayr K. K...</i></p>	<p>6. Date of birth by Christian era as nearly as can be ascertained <i>First April N.H. sixty one</i> <i>(1-4-1961)</i></p>	<p>7. Exact height by measurement <i>Height marked on left hand side of wrist</i></p>	<p>8. Personal marks for identification None <i>5-6</i></p>	<p>9. Left hand thumb and finger impressions </p>	<p>10. Little finger </p>	<p>11. Ring finger </p>	<p>12. Middle finger </p>	<p>13. Thumb </p>	<p>14. Signature of Government servant <i>gft whal Khan</i></p>	<p>15. Signature and designation of the Head of the Office <i>gft whal Khan</i></p>
--	---	-------------------------------------	---	--	--	--	--	--	--	--	--	--	--	--

⑥

Serial	Date of appointment	Other appointment under the same act	Additional appointment	Pay for additional appointment	Pay in addition to salary	Total pay	Whether additional appointment is permanent or temporary	Name of post
11	2/11/97			Rs. 315/-	Rs. 327/-	12	D.O.	M.S. R. - B. K. S.
12	1/8/97					12	D.O.	
13	12/5/96					12	D.O.	
14	12/5/96					12	D.O.	
15	12/5/96					12	D.O.	
16	12/5/96					12	D.O.	

85-58
12/5/96

83-58
12/5/96

81-58
12/5/96

158/1

158/1

158/1

(7)

with next increment on 1-1-97
 Pay fixed on 27-8-96 as 543 p.m.
 Rs. 560-23-10-20
 (2) Fixed to the effect of
 D. Pay Section No. 7
 Non
 Pay Provision fixed as under

M. M. M.
 S.D.O. (M)
 M.S.R.

M.S. R. - B. K. S. - 39/44-5-95



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA
(Office Phone#0923-9220228, Fax#0923-9220228)

9

No. _____

Dated: _____

RETIREMENT ORDER

Under the provision of Government of Khyber Pakhtunkhwa Finance Department letter no. FD (SR-IV) Vol.II dated. 24-08-1983; sanction is hereby accorded to the grant of Encashment of Leave / Retirement detail given below in respect of the following official.

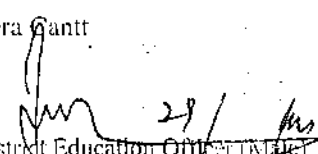
Sr#	Name of Official	Date of Retirement	Date of Birth	D/O 1 st Apptt:	Encashment of LPR	Total service Length Y-M-D	Remarks
01	Mr Nadar Khan Ex Chowkidar GPS Paio Bala Nowshera Cantt P No00133344	01/10/2017	1/1/1958	30/10/1987	365 Days	29/10/29	Retire from Govt. Service on Premature.
2	✓ ^{KHAN} Utikhar Ex PSHT GPS Ghaffar Karoona Nowshera Cantt P No 00135789	01/11/2017	01/4/1961	21/4/1982 22/11/1983	365 Days	35/11/29	Retired on the age of separation on Premature

FAYAZ HUSSAIN,
District Education Officer (Male)
Nowshera

257-60
Encls: No. _____ /DEO (M) NSR/EA-S/File.No.60/Retirement of PST/ Dated Nowshera the 29/11/2017.

Copy of the above is forwarded for information and necessary action to the: -

- 1: Senior District Account Officer, Nowshera.
- 2: Sub Divisional Education Officer (Male), Circle Nowshera Cantt
- 3: ADO Circle concerned
- 4: Official concerned.


District Education Officer (Male)
Nowshera
29/11/2017

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

Promotion SPS B-14 To B-15 HPST

"B"
10

NOTIFICATION

Consequent upon the 2013 and in pursuance of the SO No. SO (B&AM) 18/E&SE/2012 dated 16-07-2012 the posts of HPST B-15 (RS-85) under the existing policy of the Government will be filled with immediate effect and further posts

Recommendation of the Departmental Promotion Committee (DPC) held on 12-2-2012 of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO (FR)/ED/10 dated 11-07-2012 and Finance Department Endorsement No. SO (FR)/ED/10 dated 07-08-2012 plus usual allowances as admissible under the rules on regular basis of Provincial Government in Teaching Cadre on the terms and conditions given below they will be posted in GPS of the District against the newly created HPST BPS

Total Number of Posts	1805
Share of HPST	406
Share of grade	406

S. No.	Name of Teacher	Name	School	DOB	Remarks
1	Hamid Shah	F. Ennillah	GPS DAKISMAIL KHAIL	01/05/1955	Will be adjusted/posted according to the rationalization policy
2	Muhammad Nazir	F. Ennillah	GPS Ghafar Khan Koronja	12/03/1953	DO
3	Shah Jehan	F. Ennillah	Bala GPS	15/07/1955	DO
4	Muhammad Ali	F. Ennillah	Mulib Dindin GPS	19/06/1954	DO
5	Muhammad Ali	F. Ennillah	AKS GPS No. 2	12/03/1955	DO
6	Muhammad Ali	F. Ennillah	Ali Baig GPS No. 3	26/04/1953	DO
7	Shamsul Hameed	F. Ennillah	GPS Mil Way station	17/04/1955	DO
8	Muhammad Sarif	F. Ennillah	Babi Jaleed GPS No. 1	12/04/1955	DO
9	Muhammad Sarif	F. Ennillah	GPS Shagan	25/07/1956	DO
10	Zaman Shah	F. Ennillah	Jain Koronja GMP	10/10/1954	DO
11	Muhammad Gul	F. Ennillah	AKS GPS No. 1	22/04/1956	DO
12	Muhammad Gul	F. Ennillah	Babi Jaleed GPS No. 2	14/04/1957	DO
13	Muhammad Gul	F. Ennillah	Tarabha GPS No. 2	25/12/1955	DO
14	Gulzar Khan	F. Ennillah	GPS Kheshti Bala	15/08/1954	DO
15	Shamsul Hameed	F. Ennillah	GPS Shagan	01/01/1957	DO
16	Muhammad Khan	F. Ennillah	AKS GPS No. 2	15/02/1954	DO
17	Muhammad Khan	F. Ennillah	GPS Shagan	05/12/1953	DO
18	Usman Shah	F. Ennillah	GPS Shagan	01/05/1954	DO
19	Muhammad Khan	F. Ennillah	Dina GPS No. 2	14/10/1953	DO
20	Muhammad Khan	F. Ennillah	GPS Kheshti Mayani No. 1	15/07/1961	DO
21	Muhammad Khan	F. Ennillah	GPS Kheshti Bala	09/02/1961	DO
22	Muhammad Khan	F. Ennillah	GPS 2 Zaka	21/03/1958	DO
23	Muhammad Khan	F. Ennillah	GPS Ghulam Rasool Koronja	07/07/1951	DO
24	Muhammad Khan	F. Ennillah	GPS Shagan Koronja	01/04/1961	DO
25	Muhammad Khan	F. Ennillah	Qasbi GPS No. 1	15/09/1961	DO

No.	Nama Pemilik	Alamat	Tipe GPS	Tanggal	Status
1	02/01/1962	DO
2	08/01/1963	DO
3	13/07/1959	DO
4	18/01/1963	DO
5	18/01/1956	DO
6	02/05/1962	DO
7	18/12/1963	DO
8	28/05/1964	DO
9	01/09/1963	DO
10	09/04/1963	DO
11	01/04/1963	DO
12	07/01/1965	DO
13	01/02/1962	DO
14	25/12/1964	DO
15	15/11/1953	DO
16	01/02/1964	DO
17	15/10/1964	DO
18	25/11/1964	DO
19	12/02/1960	DO
20	15/05/1962	DO
21	18/01/1957	DO
22	06/01/1966	DO
23	07/09/1964	DO
24	01/01/1965	DO
25	10/06/1963	DO
26	FAZA	DO
27	WAFAB	15/02/1957	DO
28	02/07/1964	DO
29	13/12/1963	DO
30	15/05/1962	DO
31	02/10/1959	DO
32	01/11/1962	DO
33	25/12/1963	DO
34	01/06/1958	DO
35	13/09/1959	DO
36	11/09/1967	DO
37	10/06/1964	DO
38	06/04/1967	DO
39	07/01/1962	DO
40	10/02/1967	DO
41	18/11/1966	DO
42	09/10/1958	DO
43	08/01/1962	DO
44	27/03/1962	DO
45	15/03/1962	DO
46	20/01/1956	DO
47	05/09/1958	DO

(11)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT
(REGULATION WING)

NO. FD (SOSR-1) 12-21-2013
Dated Peshawar the: 19-11-2013

To
The Accountant General, Khyber Pakhtunkhwa
Peshawar.

Subject: GUIDANCE REGARDING FIXATION OF PAY IN REGARD DIFFERENCE CATEGORIES OF TEACHERS.

Dear Sir,

I am directed to refer to your letter No. H-24(414)Edu-Comp/2013-14/1991 dated 12-09-2013 on the subject noted above and to state that the view point of AG Office is hereby confirmed/endorsed for further necessary action as desired.

Yours Faithfully,

(Wazir Muhammad Afgar)
SECTION OFFICER (SR-1)



Accountant General Khyber Pakhtunkhwa Peshawar
Phone: 091 921125054

No: H-24(113)Edu: Master/2012-13/ 2067
Copy forwarded for information and compliance to:

DATED 11-2013

1. All DAOs/AOs in Khyber Pakhtunkhwa.
2. HR Lab.
3. Pay Roll 2, 3 & 3 Section (L)
4. CIA Cell.
5. Accounts Officer (Pay Fixation Party)

ACCOUNTS OFFICER (HAD)



Office of the
Accountant General
 Khyber Pakhtunkhwa Peshawar
 Phone: 091 9211250-53

14

No.H-24(414)/Edu/Corr/2013-14/ 99

Dated: 02.09.2013

To,
 The Secretary
 To Govt. of Khyber Pakhtunkhwa,
 Finance Deptt. Peshawar.

Subject: **GUIDANCE REGARDING FIXATION OF PAY IN REGARD
 DIFFERENT CATEGORIES OF TEACHERS.**

Memo:

Kindly refer to the Elementary & Secondary Education Deptt. Notification No.SO(B&A)/-18/E&SE/2012 dated 11.7.2012 duly endorsed by the Finance Deptt. vide NO.SO(FR)/FD/10-22(E)/2010 dated 16.7.2012 regarding up-gradation/re-designation of posts of different categories of teachers.

2. It is added in the above cited notification that "the posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Deptt. by making necessary services rules or amending the existing service rules, if any, for the post". Later on the Elementary & Secondary Education Deptt. framed the rules and circulated amongst all concerned teacher cadre vide Notification No.SO(PF)4-5/SSR/Meeting/2012 dated 13.11.2012 for filling the post. (copy enclosed for ready reference).

3. According to the said rules the Distts. Education Officers granted BPS-12 to the existing PTC teachers & re-designated as PST teachers. Some of them promoted from BPS-12 to BPS-14 having 05 years service re-designated as Sr.PST. While certain of them promoted from BPS-14 to BPS-15 on same day and re-designated as Primary School Head teacher having 10 years service. An example of fixation made by the DEOs is given below:-

Mr.A----- pay on 6.1.2013 as PST (BPS-12) Rs.14500/- PM.
 Promoted as Sr.PST on 7.1.2013 to BPS-14 RS.15320/-PM (Next stage +Premature).
 Then from promoted as PSHT on 7.1.2013 to BPS-15.Rs.16200/-PM (Next stage + premature).

By Director/AD Section/Office regarding No.40

341137
 awarded
 All
 HR L
 Pay R.
 CIA C
 Accou.

2a

17/11/13
17/3/13
15

This office is of the view that the pay on promotion from BPS-14 to BPS-15 is contrary to the instruction issued by the Finance Deptt letter No.F SR-01-8/76-II dated 15.12.1981 as their incumbents not rendered service in P.S-14 for 3 years and therefore their pay has to be fixed directly from BPS-12 to BPS-15 and granted them next stage + premium in BPS-15 instead of BPS-12 to BPS-14 and then from BPS-14 to BPS-15.

5. In view of above if the mode of fixation stated in para 4 above is correct may kindly be confirmed or advised for future processing of the subject issue as the fixation of these employees lying pending in the DAOs.

Encl: As above.

17/11/13
Dy: Accountant General (HAD)

Copy forwarded for information to:

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Deptt. Peshawar with the request also to examine the issue and directed all DEOs not to submit the cases to Audit Offices before confirmation of the view of this office is clarified by the Finance Deptt.
2. All DAOs/AAOs in Khyber Pakhtunkhwa.
3. The Distt. Accounts Officer Swabi with reference to their letter dated 29.7.2013.

17/11/13
Dy: Accountant General (HAD)

To,

The Director,
E&SE Department,
Khyber Pakhtunkhwa, Peshawar.

"D" (16)

Subject: DEPARTMENTAL APPEAL FOR THE GRANT PRE-MATURE INCREMENT ON PROMOTION FROM BPS-14 TO BPS-15 SIMILARLY TO THE OTHER EMPLOYEES WHO HAVE ALREADY BEEN GRANTED THE SAME BENEFIT BY THE DEPARTMENT

Respected Sir,

With due respect it is most humbly stated that the appellant was the employee of your good self department and has served the education department till his retirement on superannuation (60) years quite efficiently and upto the entire satisfaction of his superiors. That during service the appellant was promoted from the post of PST (BPS-12) to the post of SPST (BPS-14) and subsequently promoted from SPST (BPS-14) to the post of PSHT (BPS-15) vide Notification dated 12.04.2013. That it is pertinent to mention that the pay of the appellant had been fixed in BPS-14 and then BPS-15 and such the appellant also granted pre-mature increment in BPS-14 while pre-mature increment on promotion to BPS-15 has not been granted till date despite of the repeated requests. That the appellant and his other colleagues are fully entitled for double benefit upon promotion to the BPS-14 and subsequently to BPS-15 in light of Finance Department letter 19.11.2013 but the department is not willing to grant pre-mature increment to the appellant upon promotion to the post of PSHT (BPS-15) which is clear violation of the letter dated 19.11.2013 and such violation of the judgment of the Khyber Pakhtunkhwa Service Tribunal, Peshawar in appeal No.770/2016 titled Muhammad Siddique Vs Accountant General, Khyber Pakhtunkhwa & others. That many colleagues of the appellant in service as well as retired employees have been granted the above mentioned benefits of pre-mature increments, therefore, in light of the judgment of the Apex Court reported in 1996 SCMR 1185 the appellant is fully entitled for the grant of pre-mature increment upon promotion to the post of PSHT (BPS-15) being similarly placed employee. That the denial for the grant of pre-mature increment upon promotion to BPS-15 is clear violation of Article-4, 25 and 38(e) of the Constitution of Islamic Republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal the appellant may very kindly be granted pre-mature increment upon promotion to BPS-15 in terms of his pension with all other financial benefits.

Dated: 19.06.2024.

G/Khan
APPELLANT

Iftikhar Khan, PSHT(Rtd),
GPS Ghafar Khan Korona, Nowshera

(17) (32)

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2024

Aftikhar Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/we Aftikhar Khan

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___ / ___ /2024

Aftikhar Khan
CLIENT
Mir Zaman Safi
ACCEPTED
MIR ZAMAN SAFI
ADVOCATE

OFFICE:

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