18.05.2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of reply/comments. Granted. To come up for reply/comments as well as preliminary hearing on 22.07.2022 before S.B.

(Mian Muhammad) Member (E) 13.12.2021

Learned counsel for the appellant while arguing the case stated that the appellant was serving as Lab Attendant at GHS Gul Akbar Kali Sherkera and is basically aggrieved of the impugned order dated 29.01.2019 whereby major penalty of "removal from service" was imposed on the appellant. He submitted departmental appeal against the impugned order on 23.6.2021 which was not responded within the statutory period, hence, the instant service appeal filed in Service Tribunal on 06.10.2021. There is a gap of 2-1/2 years between the impugned order passed by the competent authority and departmental appeal submitted there against. Learned counsel for the appellant could neither justify the question of limitation nor there is any application for condonation. It would, therefore, be appropriate to issue pre-admission notice to the respondents to submit their reply/parawise comments and assist the Tribunal. Adjourned. To come up for preliminary hearing on 22.02.2022 before S.B.

(Mian Muhammad) Member(E)

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.

Reader

Form- A

FORM OF ORDER SHEET

Court of_			
	コワム	·	
Case No	1202	/2021	

Muhammad Khattak Advocate may be entered in the Institution R and put up to the Worthy Chairman for proper order please.	S.No.	Date of order proceedings	Order or other proceedings with signature of judge
Muhammad Khattak Advocate may be entered in the Institution R and put up to the Worthy Chairman for proper order please. REGISTRAR This case is entrusted to S. Bench at Peshawar for prelinearing to be put up there on ISINDICHARMAN CHAIRMAN	1	2	3
This case is entrusted to S. Bench at Peshawar for preliphearing to be put up there on 13/12/21. CHAIRMAN	1-	08/10/2021	The appeal of Mr. Qaim Khan resubmitted today by Mr. Noo Muhammad Khattak Advocate may be entered in the Institution Registe
hearing to be put up there on IB) HAIRMAN CHAIRMAN			and put up to the Worthy Chairman for proper order please. REGISTRAR
	2-		This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on $1 \ge 1 \ge 1 \ge 1$.
			CHAIRMAN

The appeal of Mr. Qaim Khan, Ex-Lab Attendant, GHS Gul Akbar Killi, District Peshawar received today i.e. on 06.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Departmental appeal authority is not made respondent, which may made according to the Khyber Pakhtunkhwa Service Rules, 1974.

No. 1979 /S.T.
Dt. 06/10 /2021

REGISTRAR , SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

Rysir,

That respondent No.1 is the appellate anthority and the departmental appeal so filed is supposed to be forwarded to sespondent aso. I writer the K-P. (Appeal) Rules of.

8-10-21

CHECK LIST Case Title: QAIM KHAN V/S EDUCATION DEPTT:

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

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

Name:	Noor Monammad Khattai
Signature:	
Dated:	2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, · PESHAWAR

SERVICE APPEAL NO.

QAIM KHAN

V/S

EDUCATION DEPTT:

INDEX

S.NO	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal		1 – 3
2	Service book	Α	4-18
3	Impugned order dt: 29.01.2016	В	19
4	Departmental appeal	С	20
5	Wakalat Nama	*******	21

_10.2021 Dated:

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK

ADVOCATE

FLATE NO. 04, 2¹¹⁰ FLOOR,

JUMA KHAN PLAZA, NEAR FATA SECRETARIAT, WARSAK ROAD, PESHAWAR

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO/2021	
Mr. Qaim Khan, Ex- Lab Attendant, GHS Gul Akbar Killi, Peshawar.	APPELLANT
VERSUS	; ;
1- The Director E&SE Department, Khyber Peshawar.	Pakhtunkhwa
2- The District Education Officer (M), District Pesh	•
	E KHYBEF
PAKHTUNKHWA SERVICE TRIBUNAL	<u>ACT 1974</u>

PRAYER:

That on acceptance of this appeal the impugned order dated 29.1.2016 may very kindly be set aside and the appellant may kindly be reinstated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

AGAINST THE IMPUGNED ORDER DATED 29.1.2016
WHEREBY THE APPELLANT HAS BEEN REMOVED FROM
SERVICE AND AGAINST NO ACTION TAKEN ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN

THE STAUTORY PERIOD OF NINETY DAYS

R/SHWETH: ON FACTS:

- 1. That appellant is the employee of the respondent Department and was appointed as Laboratory attendant vide order dated 1.1.2004 after fulfilling all the codal formalities required for the post and started performing his duty with full zeal & zest. Copy of the service book is attached as annexure.
- That due to illness the appellant submitted applications for medical leave but the same were not respondents by the respondent No.1. That after gaining health the appellant visited the concerned quarter for arrival/joining of duty but the appellant was handed over with the impugned order dated 29.1.2016 whereby major penalty of removal from service has been imposed on the appellant without fulfilling codal formalities. Copy of the impugned order is attached as annexure

- **3**2
- - 4. That appellant feeling highly aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUNDS:

- A- That impugned order dated 29.1.2016 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department 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 respondents acted in arbitrary and malafide manner while issuing the impugned Removal order dated 29.1.2016.
- D- That, the treatment meted out to the appellant clearly based on discrimination and malafide and as such the respondents violated the Principle of Natural Justice.
- E- That the absence of the appellant was not willful but because of illness, therefore imposition of major penalty vide order dated 29.1.2016 is against the Rule and Law.
- F- That neither notice nor chance of personal hearing has been given by the respondents to appellant before issuing the impugned removal orders dated 11-12-2018 and 11-06-2021.
- G- That even otherwise the penalty imposed upon the appellant is very harsh by removing the appellant from service which does not commensurate with the facts and circumstances of the case of the appellant which is not maintainable in the eye of law.
- H- That the appellant had sufficient service at his credit. During his entire service, the appellant was never earlier been charge sheeted for dereliction of duties. The penalty is therefore very harsh and liable to be set aside on this ground also.

- I- That no show cause notice nor chance of personal hearing has been provided to the appellant before issuance of the impugned order dated 29.1.2016.
 - J- That rule 9 of the E&D rules has not been adopted by the respondents prior to the issuance of the impugned order dated 29.1.2016.
 - K- That no regular inquiry has been conducted prior to the issuance of the impugned order dated 29.1.2016.
 - L- That 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 very graciously be accepted as prayed for, please.

Dated: 1-10-2021

APPELLANT

QAIM KHAN

Through:

NOOR MOHAMMAD KHATTAK

KAMRAN KHAN

ADVOCATES,

High Court, Peshawar

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal

DEPONENT

CERTIFICATE:

or District

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

CERTIFICATION

ANNEXURE A

4



(For use in Police Department only).

Heirs,

I. 2.	
Verification Roll No. dated	received back
Lest thumb im	pression.
Parel Se Examin	ned in
Qualification Pate (Maker Moll Meser)	Qualifications Date 7.
English 968 Jessian Pashtu 1994 Sufferment NY	First Arts B. L. or B. Δ.
Urdual a //cs of the	Pleadership examination
	Training School Final examination
Finger print Maddier	Other qualifications—
Drill instructing	
Court duties	9.
Reserve duties	10.
N.B.—Line to be draw	n under the qualificatio possessed.

Note:—The entries in this page should be renewed or re-attested at least every five years and lines 9 and 10 should be dated. Afghan Africa Race hillage Ali Khel Plo Residence Father's name and residence Date of birth by Christian era as nearly as can be ascertained Exact height by measurement Black Male on Fice left Side. Personal marks for indentification Left hand thumb and Finger impression of (non-gazetted) officer Ring Fingers Little Finger. Fore Finger Middle Finger. Thumb. Signature of Government servant Signature and designation of the Head of the Office, or other Attesting Officer.



-	*	4			(6)		
- Leady -	2	4.	5	-6	1	8	
My, Who or work	Whether substantive or efficiating and whether permanent or comparary (if) whether service counts for ponsion: under Art. 371.	Payin Acsubstantive 1 pust of	editional Pay for friciation	Other mulament falling ander the arms Tay	Date of profitment	Signature of Government Survant	Signatur nation of he office esting of attestatic olumns
		2	500/	0	0.2	V6 66	
			James .		2004		
K	WISED ENT	REVEN	AV,	, .	1		
1 m		Payp	5,30	1-P.	1 WY	10,0) 2wz	
A		,	ji s	,)		1 \660	
		3	100	- / M T	in. 1 02 - 24	4	
7				.0 1			
			(en/	Par Jez.	200	4150	
· · · · · · · · · · · · · · · · · · ·			·				
(d		Ex		· D:1	, 17	26	
· V		3,	1500/	1) Ja	2005	-1(
the region of the property of the second contract and							
· · · · · · · · · · · · · · · · · · ·							
				· · · · · ·			
\		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	- 7 E				

ĺ				e ^m .	, · · · . A	en fr	الاب	. •	y ·
				Jev!	بيسق		Early Par	0 -5	
		· ·		Xer 1	fra	ے ہ	2 Par		(7)
				July 1	, ⁽⁾ [he	May	الليس	
	9	. 10	11	1271	cis		13. 1 C	1140	0 15
,	Signature and		Reason of	, , ,	Nagare	Alloca	ave /	The state of the s	Sept.
	gnation of the head the office or other	Date of termination	termination (such as	Signature of the head of the	r-and dura-	leave	of laverage pay	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Reference to any
;	testing officer in fattestation of	of appoint- ment	promotion, transfer,	office or other attesting Officer	tion of	^ whic	n leave salary is table to another	office of other	or praise of the
-	columns 1 to 8		dismissal, etc.)	ansiding Officer	taken	- debi	overnment	attesting Africer	Government Servant
_	Made	Hali	-	·		Period	Government to which debitable	/	
	v read				,		POIN TMENT		. 0
	Q.	lao lik			Coms	e Eune:	Con the	OPPLOVE 67	The Defution
	7				Selve	- Gren	Committee	the flow	ng class iv
	1				ocal	Comio	Colete on	here by ,	offine
		_				1000	Oct BA	.**	
į.		-				~// <u>/</u>	OCA SA	Ju fu	oryears c
					k	500	P	1, 1	kide
							7	Macr.	l .
	:	,	- TO	There fah	722	Dud	Pess		1550
		had you	lum Bar	Short Make	COLO	100	prote-	Enolsi	
	<u> </u>	and Maste	09) // 0	1313 21	VYY	CL	CCIV De	Cel ALC	weed the
	P' (High Sch	111 32 -	GUI A PONDAY	- /	1	_/	. '	
			14, 2	01-	0/.	2 m	9	Ap	
		11 CHO		-	Hack	Juli-	w	a/14cl	Maly-an
. !		three He		$\eta = \Omega$	end .			Con	is settingly
	Go	n, theb	12 PS	342 50	a kbar	K-132		Gul / . 7/k	as south
	Ģ	M. Fcaha	22 RS	2,1	- 1 : + h	ta ta esta e			
	i.								82 may
		on A/u	Pay	In the.	mart	L-e	Dogan	200	1.9300/
*		'						-1 (Jours our
		1	1				maj.	8/ P	my soft
	100	b h 1	+3/00		ļ <u> </u>		nef e	2/10/1	24 10
	14	Lead Mast	. ·				3/17/0		
	Gove	: High Sc Akbar K	hool	AMIII	MAS		1///	7 O .	
	- Gu	3. Pertius	561	A CPR Sub Cr	0	Otice-		11	
	17				lce Pest	1War.			
	V .			120			Aug Marini	et: Amonns	Comerci
		-	· · ·	13/4/		-	· ## In (No Pieremine	Li. OtiAng
							10.		16/8706
	1				-	-	16/9	,	
						4 .		·	
							·	Tha	dojuho-ad
				· · · · · · · · · · · · · · · · · · ·		ļ <u>.</u>		Head Govi: His	Martel
,- ,-					,	W		Qui Ak	or Killi
1				A. Trining	J.W. qu'ez-	11		J. D. Pu	sbaWaff.
						41		" /	
•				. 100	The same of the				
	No.	•					·		•

	4	
.41	S. Service	
H	A STATE OF	1.6
E.	Copy of	
- 83	A STATE OF	1 .
. W		
1	1	
	A CHARLES	-

		6	O	. /			
White States	2 3 If Officiating,	4	. 5	6	7		9
> Name of Post	Whether state Substantive or officiating and whether permanent or temporary Whether counts for pension under Art. 371	Pay in	Additional Pay for officiating	Other emolument falling - under the term "Pay"	Date of Appointment	Signature of Government Se	Signature and signation of the higher office or oth tuesting officer in attestation of columns 1-to 8
	SP ar		dod	Jey =	500/1		
.:			3500	1. Pm	01 2005	وأطارون	
			The Ye	sil .			
				**************************************			:
				egr			
	Ps 10 (01	A Ken	Pay	1000/	(m)		
//	4		4000/=	? Pm	01-00	16 86	
			d'de	<i>y!</i> (746		
				er .			
: .		12 P					
	or the state of th						
		· ·		•			

									•
		i.			. •		(9)		
	(f) (g) (g)		.··	•	7				•
8	9	10	11	12	· ·		3	14 .	· .
gnature of ment Serv	Signature and signation of the head if the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appoint- ment	Reason of termination , (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and dura- tion of leave taken	Le Alloca leave upto l which debit	tion of period of on average pay four months for teave salary is able to another overnment of Government to	Signature of the head of the office or other attesting officer	Reference to ar recorded punishm or censure, or reason of the Government Serv
				1:3181-10	ا يخ الوا		which debitable	Ci Run Pay	قدره نخ ا
			ر عمر لم رامبول مامبول	ال التي التي التي التي التي التي التي التي	ر کر در کر در در	ئىم زەم	ا فورج الحالو	801/1-22/2	05-08/FD 1
6		Mark Male A							1 05/EDS
		6013		13/11/5/	17 E	(. 1 - 1 P	4.1	Leggi-	1) <u>1) 2 (1)</u>
				(رسايان	3100/	سلو ا	أمركا تنواس	12500/	05.06. 24.00
	200 / 100 /	,			•	02	1000	9) 3300/6	1 6 / C
								That of the	
								Govi; High Si Gul Akoni i 疆,鬼(Yeshay	CHI .
				PROVIS	: / / n D	عن ا		C. P.	4
				of Contra	3 2			Bo1/1-22/	201607/FDX J.M.
			2	م فرزال ۱۱	21/11	12005	0 کا فرن	1/1-22/200	, قرار (المان
		Steel rober		ور الما من الموم	1 / d	ران ط مرا ان	1 1 2 1 a	2017,000	والمرية بو
	. ,	C		اردن کے لیزا	600		S / 62 a	اص مراه الم	ارمن أن توا
·			•	10 1/ 10]	ما ما ت ایر عمول نیر	ان ريم ان ريم و	2 5 9 4 W	w jare V	360 /6 (350)3500/
				CANON /	C.	27/0	/-	Shad Much	13.8
~~			on	916 5	Pa	111	ref	Gove breve Gui vicosi Gui vicosi	rat.
,	- 1					 	0.0		
			,	Pakistan Res	04/125, 1/1/25, 1/1/26.	l Gene Sub-Ol	ai Kan	The second secon	ACO
•		1		91121			<u>. </u>		<u> </u>

(10)

																- -						٠											
				9.5			1	0		1	1			12	2					ţ3			٠.		: 1	4		,	•	15			
va		dusi head oth office	gnat of th or a r io i	ion e of tes tte	and of the fice of ting station	ου οί ι	ermi of ap	e of natio point	n to	Reas ruir (suc rom tran tism et	atic leas otios sfor	n,	Sig the h offic	e or	of toth	the 'er	Nut re a dui tic ni lea tak	u- ud ra- ra f ve	Allo of le p mu le debi	ay ith: i.i.v. t.i.b: Cov	on o on a upto s tor sala le to 'ernn	Vere four whi ry is anot lent	Tot ch	,	ignatur bead office o	of the coth	or .	reco re	elerene orded or cens eward the Ge Ser	punis sure, c or pr.	linier or rise		
							,						<i>:</i>					r	Perio	d.	deb	whic itabl	h le	Ì			. !				,		حربر
	P		·					,			-									1	D ? P	100	in pr	n C	RI	rse	As	3		- 4	(2 1780	RI	3
		•	-	<u> </u>									•	÷								7	-/ /	1	7/8S			-		7/ Nens		*	 ``
		· <u> </u>	: .					<u> </u>																	ice <i>k</i> Doog SistaC	otant Thomps Lad F	A.CC T. A.C. 13153.	TO CE	1901 (1901 (19	مارده ا مربهمیر	إترينة 9	7 7 1	
1		:			<u> </u>			· _				·				· _						*.	10	i /	81	ş. 57	· }.		 , -		,		
<u></u>	というない										· .				•					_ -		D		- -			· 						_
	※ ながら 湯							<u> </u>							•			· • ·			<u> </u>	1) J.	M	0	n o	es.	<u> </u>	7	/ <u></u>	ar) Dra	<u>. 1</u> 1 1	<u>) c</u> Dri	 L
	松下送が後にな				· · ·	_	ļ ļ											·			- /			- 1	10/-		/	1					
			·								-,-						- -			7	ne-		31)	4	r f . 6	28			<u> </u>	n .	· · · · ·		
							- 					•						•	,					A.	esisten Prior ristan	it Ac yal Ac Reyo	7		r Cigi		/ <u>}</u>	// 2 :	フ
	2010			•		, , , , ,														•			P		1, 1,	/ n	8.						
	A series and the series of the	が野田を	٠.			المهاجر يبغ					· ,								-	•		 .		V		<i>,</i> <u></u>							
-	A STATE OF THE STA	1000年			,			,															•	,		<u> </u>				_ * -			
				-										•						× .								- 				, ,	
			3					- J. ii.		-							!							•	1.//		egyr (l	- I	r k	<u>·</u>		•	
1 0 10 444	·							,			,												September 1	Sychtaid.	y de la constant de l	Section 1	282	Lan II	201				

								- AN E
1	2	3	4	5	6	7 ,	, 8 -	
Name of part 10 AS Lills In Many of the Ma	Region founds	If officiating, state (i) Substantivo appointment, or (ii) whether service counts for pendlen under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term! "Pay"	Date of appointment	Signature of Covernment sorvant	Signal Manager Control of the control of the control of the control of columns.
bar to	KEUIS	ed Es	1/14					
7 Williams	603	NOOI	(18	water and the second	4 - 100 - 02 - 02 - 02 - 02 - 02 - 02 - 0	Contract of		
ch		Special street of the street o	1270/	Pm		02004	ر فريان	
de			1925	Z- fm		0/ 12	Jig C	
	38	or o a y	215	0-6	1-410	ra)		
_ 06	V and the second second	District Annual Control Res	2215	1 Sino		01.07	loc C	
	-					, J. 2 4 . S		
	-		2280	X Pm		0/ 12	- vide	
					,			
d			234.	5/2 Pm		0/13	· 1 · 11/2\-'	
· · · · · · · · · · · · · · · · · · ·	gre ^{gor} es.	Pon	0016	267	Taken to the same of the same	1.47		
- du-		Angre of The Control	270	UA PM		0/3	7	THE SET THE SET
do			27	75/-	, _M	0/0	2 2	
		Kr. Stark		// .		<i>V</i> -v	,, 3	

PTW

(12)

- (F)	·							
	9 🛴	10	11	12	13	14	15 .	
	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appoint- ment	Reason of termination (such as promotion, transfer, dismissal, etc),	Signature of the head of the office or other attesting officer	Nature and duration of leave salary is debitable to anoth Government	Signature of the head of the office or other	Reference to any recorded punishment or censure, or reward or praise of the Government Servant,	
					taken Per- Governmen iod to which debitable	·	100	
	Alcert 19te				in Pursuan	e of work	edien of Javic	Note Science
	HEAD A AGAMAHIC Gul Akhar Kill		13n	TLAUTICH TO THE AD MASTER SCIP	Col gulhanity L	as been Pl	5. The combetons cratto Regular noins Class	econgression de la constante d
	Ful Arthur Mil	.A. Peshaar	150	LIKEU! AMILTAN	IV Seriants in	n sies ket of	of Reshausa	
	Shakiy HEAO	ASTER	SIP A	Shod yak HEAD MA	5 1997 Z d 30-07	11-01-2008 0	1 de Lingue 300 D/1-22/2018-09 Afen cy Edic S. 20 02 Emol	The second
† †	John Galleria		way Ken	AS	Mo 7219	Red order	J'wa 02 Emol	g t
	Mudy HEAD Crown	10-6-03 40-5-7-6-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7-7	<u> </u>	HEAD MAS	TER NOTE Annu	al inchema	Daled of 10-10-10-10-10-10-10-10-10-10-10-10-10-1	<u>.</u>
 :	LB	: 3702w	ST MM	2011 A. Sur Valler 1	Element (1.77	of tuhing	
	Thate HEAD GAYY!!	/chillion	1 1 A	FIX R.C. 1978 HEAD MA Govt: High LOULAND MINES	STER	Govi: Gij Akbur Fiz	High PS Chool Kill Lak Peshawar	
	in Alder A	ii ii ii. Too 🗪	e-6	Jes.				
	∜ HEAD	11/16-	ار ۴	n Revers	HEAD MASTER GOVIHIGH SCHOOL GUANIA MASTER Peshower	A yawa	1 209251	
	A Jas	## ## F 22 } V	X=1		J43	011 9/1 5/	1, 28928/_ regulizabil	in
		ASTER		intadio Ju.	HEAD MASTER GOV High School Call Who ME TO Poshuwu	wo of - pay	Wef 1/7/0:	€
	Sill Akbor Killi	T. L. Poskowal	201		J-9	Mrs	n Order Rant General	. •
	Pf.	Wysh-	The Dri	g HEAD!	MASTER (School)	Additi Abar A	coolaint Colored puc (A) Feshawar	Arri
	J. Jan	Fr. Peper	<i>700 /</i> − − − − − − − − − − − − − − − − − −	Julia illi	on this way	A710/09		1

<u> </u>			2	3.		4.	5	6	7	R	9 11	
UA	The day	Wheter tive or and permo	raubstan officiating whether count or aporary	Tofficiatir state (i) substant appointmen (ii) wheth survey con for pension of Art. C. S. R	g. tivo t, or ner.	Pay in baruntive post	Additional Eny for, officiating	Other emolument falling under the	Date of appointmen	Signature Governmen Bervänt	ignature sation of of soffice sting of trestation furnis	idik orij ned orij
e, K	mongoneul	gus	130	C. S. R	1		And And		4		Illims	3.50
Apple Apple and the Apple and				1		285°/	2 /m		0/200	J'are		
			and the second	0 / - Na/		1	20-	Seg	72)			
	-do-			K	,	3420/	Pm		0/0/	g waxib		المريق أو
	: .								1	A		
1 jegenem	<u> </u>			1		35/0	1/2 fm		01-2	20 3600		
		-	<u> </u>		,	2 (12	D		12			
	1/15			 	<i>\$</i>	3600	/= 130/		201	3		Gi
	-11				**************************************	369)	6/	/2		-
	<u></u>			. l.					,	2516	· · ·	
	- Ro	1124	N Pa	1 2, /	(Noo	1/4	Son -	150.0	3300			_
			<u> </u>		A.	6 m/	- In		0/	200		
		X .x .	diago.		. New York	/	, 0		.	72	·# 	
<u> </u>					Rs	6159	- fm	· ·	0/	20/1		
	A STATE OF THE STA					· · ·						

Frank

134 A

(14)

9	10	11	12	·	 1	3.	1.4			•
j.				- 	Lo		14	15		
Signature and malion of the head	D *	Reason of		Nature	Alloca	tion of period of				
soffice or other	Date of	termination	Signature of the	and	leave	on average pay	Signature of the	Reference to an		
sting officer in	termination of appoint-	(such as	head of the	onu-	upto i	our months for	head of the	recorded punishme	•	
destation of	ment	promotion, transfer,	office or other attesting Officer	tion of	which	lcave salary is	office or other	or censure, or rew.		
lumns 1 to 3		dismissal,	ancoung Orned	taken		able to another	attesting officer	Government Serv.		
	,	etc.)		laken		Government to	: .	Soveranem co.	•	
					Period	which debitable		_		
		,				500000				
That the	~~\		Skad 1/ah-	-m)		\cap				
71.221.7	11.6	0.0	. Wear Amer	المراجه المراجع		1.1	'			
HEAD M	ASTEL !	184 Kevis	Y HIN	10 1 to 12	ļ	.				•
 Go d√li∫lain,	າ ວິດງ 208	-	Skrarjah-	92000	ļ	<u> </u>	·			
Gul Albur Killi	R. Peshawar	i .	Gul Ablar Koff (Peshow	់	· lewice	vartued	N. R.	,	
143			. 4 5		/	(+)	7	<i>f</i>		•
		ļ <i>-</i>			1		·	•		
	~		٠,			1-01-5-	1500	11 > 8		
Shad	Cr/Uh - Ci	,	11. 0.	, · · ·	· · · · · ·	0-1-20	57 10 50	11-1000		
			NOUN ICH	1 na		P	0 1			•
	11	. ^	Alwaly w	1. ;	-	trono The	Kay 1/	11. and		•
Let	20-1	And	Alm.		. '			"		
	2 3 2 11		1	1	ļ,	11:		1		
Fris			17 5		(Man re	wra o-	1 /243		-
							/		,	
)					0					
				i	ميد ا	usal.	Mad	and a		1
Made	71.1.		· · · · · · · · · · · · · · · · · · ·	-	 	 	JA G. K.	MM)		
			Shoot Tus		<u> </u>	•	/		` ~~	
BEALA	HALDY EN	11	Original Original	1	-		4	100		
Gover Ju	All SCHOOL	30-1/2	A CHEAL MA	カラバ.			//	/// / ·		
Col (kpa xii	NASTER N School IF.R. Poshovio	2509	A DEAD MA	Renool			,			
F13	ł ·	/	Gul Akbar Killi F.R	Peshawa	4					
r K	ĺ						· .	,		
								1 :		
				١.				dae 1:		
n/8 d.a	15-7	1	13 - 46	17. 1	1 · ·	207	vices Veri	160		
ue.	as -	m) //	a Risans	1 10 h	30	550	V 11005	3 -11/2010 Per Record		
Cold of	MASTER		A NEAD A	III Zin	34		1/12/01	\$ 5/11/2010		
Bul Aldren 1	ligh School	1 2010-	/Gul Akbar Kill	11 0 5 A	107	w.c.f.S	he Pay Bills & Oll	or Record		
S AND WORK WELL	IF F. R. Poslice	417	/con Akbur Aki	IF.K. 1705a	Ji Ay On.] From]	This School C	ffice.		
						· · · · · · · · · · · · · · · · · · ·	1-1-14-0-21-0-51 A			•
5.,		-			/	ļ '	. ,			
10					Mar	1.1				
	The Tech-			0	TVV	OUD	,		•	
منادات	The Burgery	拉 /2 1	# 0	HE	ÁD MA	STED	1/36	/AR		
Grad	HIJAh.So	shows Dr	30	Gov	t. High	School	7:16	Ang Service		
te a la	or Gli FR Po	Shower Ole	18 ca 2001	ont Akin	r Killi En	LESSIAN"	ادا ۱۰۰۰	1 Ly Stranger		
(A81.22.	1 22: 1.534.7 2 måa- 4 m	1	,	1	- TORN \$.11,	T SEARCH WAS	$\int \int V''$	1- Cop		•
\	}		1	"			1 (10)	1 /		•
							1	. /		
		· · · · · · · · · · · · · · · · · · ·	<u> </u>		ļ		<u> </u>	· /	•	
									•	
									,	
	1	و							,	
	An	1 de Sant			1-		Brown Brown	The self and	•	
	Au	bho			1.	int l	Sample of the second se	The Stand		
	AM. HEAD MA	STED			An	who		_		
	HEAD MA	.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	In the same of the	An	Who	W.c.f. 0./	10 31 12		
, ijal	Govt. High	School -	0 11 A.D.			Who ASTER	w.e.f.o.	Is & Other Record		
ciigl	HEAD MA Govt. High	School -	0.11- A-D.	G	vt. Higi	School	w.e.f.o.	10 31 12		
cligh	Govt. High	School -	0.11- A-D.	G	vt. Higi		w.e.f.o.	Is & Other Record		
cligh	Govt. High	School -	0. 11- A-D.	G	vt. Higi	School	w.e.f.o.	Is & Other Record		
cligh	Govt. High	School -	0. 11 A-D.	G	vt. Higi	School	w.e.f.o.	Is & Other Record		
cligh	Govt. High	School -	0 11 A-D.	G	vt. Higi	School	w.e.f.o.	Is & Other Record		(Lá
cligh	Govt. High	School 3	0. 11 A.D.	G	vt. Higi	School	w.e.f.o.l	Ils & Other Record hool Office		A
cligh	Govt. High	School 3	2011	(G)	vt. Higi	School	w.e.f.o.l	Ils & Other Record hool Office	<u></u>	A
cligh	Govt. High	School 3	2011	(G)	ovt. High	School RiPeshawar Master	w.e.f.o/	Ils & Other Record hool Office. AD MASTER Vt. High School	A	
cligh	Govt. High	School 3	2011	(G)	ovt. High	School RiPeshawar MASTER High School	W.e.f. 0.1	Ils & Other Record hool Office		
cligh	Govt. High Alber Killi F.R. HEAD Govt. Hi	School 3	28//	(G)	ovt. High	School RiPeshawar Master	W.e.f. 0.1	Ils & Other Record hool Office. AD MASTER Vt. High School	The state of the s	
clig	Govt. High	School 3	2011	(G)	ovt. High	School RiPeshawar MASTER High School	W.e.f. 0.1	Ils & Other Record hool Office. AD MASTER Vt. High School		

3.	a.,,						la de la deservación dela deservación de la deservación dela deservación de la deservación de la deservación de la dese
	2'	3	- 4	5.	6	7	
<u> </u>	>	If Officiating,	in in the second		:		
	Whether	(i) Substative			Other		Sign
Tama of Duta	Substantive or	appointment or	Pay in	Additional	cmolument	Date of	gnati
lame of Post	officiating and	(ii) whether	substantive Post	Pay for officiating	ialling under the	Appoint	r.f.
	permanent or temporary	service counts.	Post	officiating	term "Pay"	ment	Government Servication
	temporary	under Art. 371 C.S.R.			icin Fay		colui
		C.S.R.					
		·					
,	1			1			
•		of Para	-00	1/3 1	30	12.5 . 1	
	<u> </u>		-(/ - /	4800	-150 -	1.700//	
•							
						The second second	
				1			
				<u> </u>			
			ļ	· · .			
				1.		1/22	
	1=1	- / / / ·	AND SECTION SECTION	1 2		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
		/ C1./3	6300	1 1	17	1 1 100 1	
			1		. '		
						1	
				· .			
	ļ.:		 	<u> </u>].	<u> </u>	
•	:		1.				
					1		
;		1/2	1693	1 / /	1	af Same	
	 	1(1)	1075	1//:/	(V)		1 1 1 1
		1.		6.	1 (6	11-24-5	
			, ,		<u>.</u>		
	-	1.	<u> </u>	ļ.·			
•							
			1			1	
	h.	wed ho	`			j. '	
	1778	AU ON INC	mutare	- Incen	ent or -o	7-2014.	
		· . ·					
2"	·		`·	100			
		Re				. 37	
			660-0/	1/1/1/1/	<u> </u>	0/	
	,	,	1. 6			2019	_
•	1.			,	1.		
•							· . :
	 	'	 				
•							_
	1			,	λ		
•		1/1	トイフ	(ta/ /		10112	
		1/2	1-5/6		1/2		
				¥ · · ·		20/	7
			~		. :		10
•.				1			(2) (1) (2)
·						 	<u> </u>
				X			
	, care		/	<u> </u>			25 (2) (3)
111	400 100		. / '				
1/2/4	10 Mg 4 W		/				<u> </u>
A STATE OF THE STA	I'm week .		/ · .				
Jan 1 Jan	<i>y</i>		1 11	, ·			
	•	1	/	, .			
		<u> </u>			<u> </u>		
, i		•					
	•	i, i	• •				

- 							2	21.		•
				*		C	y			:
- 7				· · · · · · · · · · · · · · · · · · ·	15					_
rc g	Signature and signation of the head the office or other satisfies officer in attestation of	Date of termination of appoint-	Reason of termination (such as promotion, transfer,	Signature of the head of the office or other attesting Officer	Nature and dura- tion of leave	leave upto f which		Signature of the head of the office or other attesting officer	Reference to any recorded punishmen or censure, or reward or praise of the	
13	columns 1 to 8		dismissal, etc.)		taken		overnment Government to which debitable		Government Servan	
							Cervic	- 149,00 Tops	in went	
		1-4126				10	010/12	5 20-11	free	_
# 1 m	HEA Gove	D MASTER High Scho Killist P. Pesk	W/Q:	// HEAD	MAST MAST	ER OCI	The	Py 254	in d	<u></u> .
		in in Marie Ett 21.4		+ Spiritist Hack	inga ser	V VV U	Office.	Jan 18	- 1 mis	
• 1	1,5	HEAD MAS	TER 30	06 Premsus 2014 Me inc	feer Girl	(\$PV)_H	MASTER The School	HEAD GOVER	MASTER igh School	<u>-</u>
	61/	Apia Killiek	PESTY WAL	2814 0 -				Gy dichar Ki	State of the state	<u>-</u>
							(*	i	278/2014 151	
·		JE			STER	Cesi	19ts deris	2014 in 103	105/2014 des	7 Īsa
	Gir Ar	EAD 1915 Out. High So char KilkEn	FER SOLI 30.	GAL High	Schoo R. Peshav					 -
						1 .	7-2014.	in BYS 01	75 04 W. E.	- ∓
				Revised		· 5			MASTER	•
		Gov Hig Gol Akour Killi	h School F. Peshawid	2013	, ,	De.	(-, (-	GoyV Gu! Tikbar1	High School : Divir Pestewar	
	A STATE OF THE STA			7/		2 im		15-, Adi	Nov 7	
				L. C.	10	1-0-	1 2013 To	30-09	Polis .	
				1,	· .		1	Al	tag,	

in.	

Many of the Control of States and States of St	3. 1	2	3	· ,	,				
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015	I'm TO STATE	,,	If Officiating,	4	- 5	6	7	8	
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015	L/ATTENDED ALON	Whether:	State						
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015	Name despois	Officiating and	appointment, or	Paÿ in	Addist : 1	Other			
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015	-C1634 100 1	whether	(II) Whether -	substantive	Pay for	emolument		Signature	
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015	by the left // -	permanent or.	LOT DEDISION		officiating	under the	Appoint-	l of	
B/S 110 of By (6210-195-12060) 2. 8940/- 0/2015		temporary	under Art. 371		, .	term "Pay"	;	Gövernment Ser	vi.
2 8 940/ 0/12 2 2015	191 207 A	7)	C.S.R		-				Ų Į
2 8 940/ 0/12 2 2015	7-2015	1201.3510					-: -		
2 8 940/ 0/12 2 2015	Bleme	1	1				• • •	arže	Ē.
Dr. 37457 Pm	7/2/10	183	(() 110]	191-	19 7 1	X		<u>.</u>	
2, 8745/m			-0-040-	173 -	12060	2	٠		
2, 8745/m							A) /		J
2, 8745/m			,			` . <u>'</u>	2015		
D. 8940/- 01/2 2015					10 2	71.00	D_{-1}		<u>.</u>
				·		(47)	$\frac{1}{N}$		
				· .		/			N.
		• • • • •	·].				
		* ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `					i i		ļ.,
		ľ						<u>·</u>	į.
) (1
				· 10 .	\mathcal{S} ξ	40/1	12	. ,	
	,			/	<u> </u>	1/-	0/		Ē.
						·	-20/5		
				i	· ·				<i>.</i>
			, · ·					- · ·	, T
	,						·		
									ti. Y
				•					
							.		
								<u> </u>	ış.
									麗:
				.		'			15 - 1 15 - 7
							:		
		.			· · · · · ·	·			
		· .				1.			ij,
		, .				·	-		
								here's	ri,
									r).
	•		* .				·	' : · · [).
									4-
					· ·				
	[.					ļ [:]			do.
	·	. 1							,
									į.
].							gra-
					. •		- '		
	.		.						
									
						•			12
				. :			.		Maria Store
			. [.		again's h				
			\\ <u>.</u>				:		orki Dia
			<u> </u>	The state of the s	Fred Street				
				I Kno Sal	. '	. [• .	• !!	· · · · · · · · · · · · · · · · · · ·
			10 10	1	. '				
	•			A					
				•	٠.			-	
									,, ,

(8)

7							,		•	, ,
		10	u	12		·.	13	14	15	
			 -	- 	·		ave			
	. Signatare and designation of the-	Data of	Reason of termination	Signature of	Natu-	નાં વિદા અને વિદા	ye on sverege y opto four		Reference to any	
:vant	head of the office or other attesting	termination i of appoint-	(such as promotion, transfer,	the head of the office or other	dura- tlou	la	ths for which we salary is ble to another	Signiture of the head of the	recorded punishment or censure, or	
20年大学	efficer-in attestation of columns 1 to 8	ment	dismissid,	attesting officer	of . leave taken		avernment.	office or other	reward or praise of the Government Servant.	
			,		í	Period	Covertiment to which	0		
- 2		· · · · · · · · · · · · · · · · · · ·				0	debitable	11/10/10	P	
() ()						صد		7	7	
- 4	·		1			0/-	12-201	3 78	0-11-0019	
	HEAR ME	STER .	4/230	1 HEAD M	 \SIE	k	T 1	a. Po	11 gratother	
\$2500 \$2500	Govi. High	Schoo!	ַר י	GOVE HIS	Squ	المان	Vhu o	25	Canel	
					1		dol	120	3000	
					v			5		•
		 !						HEATT		
	. <	NO						hall Arthur 1/11	The transmiss	
N. S.		ASTER			}					
	Covt. i	Con across	allya Gallya Ganar		† 					
	4.			1		1.0		. 0	. <i>D</i>	•
		01016	e Va	11 1200	· · · · · · · · · · · · · · · · · · ·	7	ervice,	son Floor	10-e-1	
		0								•
	<u> </u>	F0/-	2-20	15 TO		01	72-20	14 7030	-11-2015	
	29-1	\(_ >_	b/ <-	Para.		1	17	D.	Λ <i>(</i>	
200		0		700-	ļ	<i> 1 1</i>	10111 200	s Tay k	coll and	
1	Me	Pos	104	000	an	0,	to 12	e-end	fluit -	
	· · · · · · · · · · · · · · · · · · ·	000					1			
	This		 	100			hou (· · ·	
Ġ.	/M/ > -	- Caraci		JEAN CHICK	01 1164		,			
		14077	FICATIO	3/				77.	14/16phool	
Ì	(i) Libera			use of mon	Line	~P N	is T detect		u Killi F.R. Peshaway	
ļ	M. Jak	Parint	de mit	To Take A	,	7	tal all			,
	——————————————————————————————————————	75 /24	att at	raims Bai	1000	KILA	645 MAG	10(g_1		
- 344.5				KIN Re fish						
}	4h cent	Since.	log 3	And Whe	ees	The	Privarka	l		•
	of The s	shoot La	d been	asked to en	Pla	n L	's Posih	·		1 At the
1				se Part The						
]	The Sand	Maga	Yam les	a Clott &	123 /	Bul	Meder k	Il. Sher he		
No.	CFT And DIA			00 6	1	7	Tot Lis 1	Ty Red be		1
4	S. Lolllast	Vido D.	4 mm	1, 10 Not 16	110	200	Rom	val from	Service	
177.	10 xxx A	Game To	NO S.	14 4 Com	ار ارا امارارارارارارارارارارارارارارارارار		In char	wo withe		
1	يا لا	A 21		V2	1/1	11 4	4	1:		
,	- proposedio	/ Ac The	16-29	Lie long wi	17 fm	x 95	1.hen	Bru PR	HEADMASTER	,
	Wide and	(*VO) }**	14-60	Dalid 29.	-4/-	201	6 14120	. (4	GovicHigh School	
	Key	house						. (iil Akbar k hiri R. Peshayum	• •
				CONTRACTOR OF THE PARTY OF THE						



ANNEXURE D

OFFICE OF THE

AGENCY EDUCATION OFFICER.

FR. PESHAWAR

BLOCK: 8 NEAR INFORMATION DEPTT:

KHYBER ROAD, PESHAWAR, K.P.K

Phone No. 091-9210145

NOTIFICATION:

1. Whereas during the course of monitoring team visit dated: it was pointed out that Mr. Qaiyam Khan Lab Attendant GHS Gul Akbar Killi sherkera had been absent since long.

- 2. And whereas the principal of the school had been asked to explain his position as to why did he not report the willful absence of the said Mr. Qaiyam kHan Lab: Attendant GHS Gul Akbar Killi Sherkera.
- **3. And Whereas** the principal reported that his pay had been stopped vide his No. 694 dated: 09/12/2015.
- 4. And whereas the a show cause notice was served upon Mr. Qaiyam Khan Khan Lab Attendant GHS Gul Akbar Killi Sherkera for his willful absence vide this office No. 2452-74 dated: 02/12/2015 as a first step of requirement of section 9 of KP Govt. Servants (Efficiency and discipline) Rules 2011.
- 5. And whereas the willful absence Mr. Qaiyam Khan Lab Attendant GHS Gul Akbar Killi Sherkera did not show his cause of will full absence.
- 6. And whereas the willfull absence of Mr. Qaiyam Khan Lab: Attendant GHS Gul Akbar Killi Sherkera was published in 2 leading news paper daily Mashriq and daily Ajj dated: 13/01/2016.
- 7. And whereas Mr. Qaiyam Khan Lab: Attendant GHS Gul Akbar Killi Sherkera did neither show cause not appear for personal hearing.
- 8. And whereas the Agency Education officer FR Peshawar in the capacity of the competent authority after completion of all codal formalities laid down in rules ibid is pleased to impose major penalty of "Removal From Service" upon Mr. Qaiyam Khan Lab: Attendant GHS Gul Akbar Killi Sherkera with immediate effect for hi9s long willful absence.

Agency Education Officer FR Peshawar

Endst: No. _____ Dated Peshawar the: $\frac{29-0i-}{2016}$ Copy forwarded to the:-

- 1. Director Education FATA Peshawar.
- 2. Assistant Political Agent FR Peshawar.
- 3. Addl: Accountant General (PR) sub office Peshawar.
- 4. Headmaster GHS Gul Akbar Sherkera with instruction making entries in S/Book of the official concerned.
- 5. AAEO FR Peshawar.
- 6. Superintendent/Accountant.
- 7. EMIS Cell FATA Peshawar.
- 8. Official concerned.

Agency Education Officer FR Peshawar 3

AT ALL





The Director Education, Merged Area Peshawar.

Subject;

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 29.01.2016 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE.

Respected Sir,

It is most humbly stated that I, Qaiyam Khan was appointed as Lab Attendant at GHS Gul Akbar Killi Sherkera Vide Appointment order dated 01-01-2004 on consequences upon the approval of the department selection committee on contract basis for 03 years from 02.01.2004. After my appointment, the competent authority has been placed to regularize the following.

That I have shown my genuine cause in response to the show cause notice of being absent that day and that I was never called for personal hearing neither did I receive any such notice of personal hearing.

That it is also pertinent to mention here that the concerned authority without fulfilling the codal formalities straight away issued the impugned order dated 29.01.2016 and I have been terminated from service. That no opportunity has been provided to me and as such I have been condemned unheard while issuing the impugned order dated 29.01.2016.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 29.01.2016 may very kindly be set aside and I may kindly be re-instated into service with all back benefits.

Dated: 23.06.2021

APPELLANT

QAIYM KHAN

Ex Lab Attendant

GHS, GUL AKBAR KILLI SHERKERA





VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

APPEAL NO:	OF 2021
Qaim Xhan	(APPELLANT)(PLAINTIFF) (PETITIONER)
	VERSUS
Education .	Deportment (RESPONDENT) (DEFENDANT)
	n Khan
KHATTAK Advocate, compromise, withdraw my/our Counsel/Advoc without any liability for engage/appoint any oth I/we authorize the said receive on my/our behavior	Peshawar to appear, plead, act, or refer to arbitration for me/us as ate in the above noted matter, his default and with the authority to er Advocate Counsel on my/our cost. Advocate to deposit, withdraw and alf all sums and amounts payable or count in the above noted matter.
Dated/202	CLIENTS ACCEPTED
	NOOR MUHAMMAD KHATTAK KAMRAN KHAN
	SAID KHAN & Hader All

HAIDER ALI ADVOCATES

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, 2.B PESHAWAR.

No.
Appeal No. 7565 of 2021.
Mr. Qain Klow Appellant/Petitioner
Versus
The Director ELSE Pash: Respondent
Respondent No
Notice to: The Director TEESE Deptt. Kpk Peshawar.
Peshowar.
WHEREAS an appeal/petition under the provision of the Khyber Pakhtu nkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above ease by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on
office Notice Nodateddated.
Given under my hand and the scal of this Court, at Peshawar this
Day of
For Reply) France
Registrar, \(\) \(\overline{\mathcal{K}}\) \(
Continue Con

The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays. Always quote Case No. While making any correspondence.

B23

.

Rogistrar, Khyber Pakhturkhwa Somingan	•	
No. Appeal No	кнув	ER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
Notice to: Notice which to: Notice posted to this address by registered post will be defended to be four correct address, and furth notice posted to: Notice posted to this address by registered post will be defended to: Notice posted to: Notice No. Not	J	UDICIAL COMPLEX (OLD), IN THE PROPERTY OF THE
Notice to: Notice to: WHEREAS an appeal/petition under the provisid the Khyber Pakhtunkhw Province Service Tribunal Act, 1974, has been presented stered for consideration, the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing be fore the Tribunal Act, and the said appeal/petition is fixed hearing be fore the Tribunal Act, and the said appeal/petition is fixed hearing be fore the Tribunal Act, and the case may be postponed either in person or by autised representative or by an appeal/petitioner you are at liberty to do so on the dated, or any other day to which the case may be postponed either in person or by autised representative or by an Advocate, duly supported by your power of Attorney. You, therefore, a required to file this Court at least seven days before the date of hearif copies of written stateme alongwith any other documents upon which you relycase also take notice that default of your appearance on the date fixed and in manner aforementioned, the appeal/petition will be heard and decided in your absence Notice of any alteration in the date fixed for hearif of this appeal/petition will go defined to be our correct address, and furth notice posted to this address by registered post will be demed sufficient for the purpose this appeal/petition. **Repulsed Notice** Copy of appeal is attached. Copy of appeal hashiready been sent to you vide to office Notice No	1	PESHAWAR.
Notice to: Notice	No.	
WHEREAS an appeal/petition under the provisid the Khyb er Pakhtunkhw Province Service Tribunal Act, 1974, has been presentedistered for consideration; the above case by the petitioner in this Court and notice peen ordered do issue. You an hereby informed that the said appeal/petition is fixed hearing be fore the Tribunton. Add Act the said appeal/petition is fixed hearing be fore the Tribunton. Add Act the said appeal/petition is fixed hearing be fore the Tribunton. Add Act the said appeal/petition is fixed hearing be fore the Tribunton. Add Act the said appeal/petition will given to you are at liberty to do so on the dated, or any other day to which the case may be postponed either in person or by autised representative or by an Advocate, duly supported by your power of Attorney. You, therefore, required to file this Court at least seven days before the date of hearif copies of written statement alongwith any other documents upon which you rely case also take notice that default of your appearance on the date fixed and in manner aforementioned, the appeal/petition will be heard and decided in your absence. Notice of any alteration in the date fixed for heart of this appeal/petition will given to you by registered post. You should inform the cristrar of any change in year address given in the appeal/petition will be deemed to be our correct address, and further ordice posted to this address by registered post will be deemed to be ficent for the purpose this appeal/petition. **Registrar** Copy of appeal is attached. Copy of appeal handrendy been sent to you vide to file Notice No		Appeal No
WHEREAS an appeal/petition under the provision the Khybrer Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented stered for consideration; the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing be fore the Tribunal Act, 1974. All the said appeal/petition is fixed hearing be fore the Tribunal Act, 1974. All the said appeal/petition is fixed hearing be fore the Tribunal Act, 1974. All the said appeal/petition is fixed hearing be fore the Tribunal Act, 1974. All the said appeal/petition is fixed hearing be fore the Tribunal Advocate, duly supported by your power of Attorney. You, therefor a required to fite this Court at least seven days before the date of hearif copies of written statemed alongwith any other documents upon which you relycease also take notice that default of your appearance on the date fixed and in manner aforementioned. It appeal/petition will be heard and decided in your absence. Notice of any alteration in the date fixed for heary of this appeal/petition will given to you by registered post. You should inform the distract of any change in your address. If you fail to furnish such address your address hatained in this notice which address given in the appeal/petition will be deemed to bour correct address, and furth notice posted to this address by registered post will be deemed to bour correct address, and furth notice posted to this address by registered post will be deemed to bour correct address, and furth notice posted to this address by registered post will be deemed to bour correct address, and furth notice posted to this address by registered post will be deemed to bour correct address, and furth notice posted to this address by registered post will be deemed to bour correct address, and furth notice posted to this address of the court of the purpose this appeal/petition. Replaced Tribunal Act, 1974, has been presented to the court of the purpose the court of the purpose the p	1	Mr. Cosm. Khou
Notice to: Notice of any alteration in the date fixed for hearing of this iappeal/petition will given to you by registered post. You should inform the distract of any change in you appeal and the such address your adverses hat and in this notice which address given in the appeal/petition will be deemed to be our correct address, and furth notice posted to this address by registered post will be deemed to be our correct address, and furth notice posted to this address by registered post will be deemed to be our correct address, and furth notice posted to this address by registered post will be deemed to be our correct address, and furth notice posted to this address by registered post will be deemed to be our correct address, and furth notice posted to this address by registered post will be deemed to be our correct address, and furth notice posted to this address by registered post will be demed to be our correct address, and furth notice posted to this address by registered post will be demed sufficient for the purpose this appeal/petition. Notice Pakhtty/khwa Serving to the Scripp of the Scripp	[<u>]</u>	
WHEREAS an appeal/petition under the provision the Khybrer Pakhtunkhw Province Service Tribunal Act, 1974, has been presented stered for consideration, in the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing he fore the Tribunal Act, 1974, has been presented stered for consideration, in the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing he fore the Tribunal hereby informed that the said appeal/petition is fixed hearing he fore the Tribunal hereby informed that the said appeal/petition by you are at least seven days before the date of hearing to opies of written statemed alongwith any other documents upon which you rely-ease also take notice that default of your appearance on the date fixed and in (manner laforementioned, the appeal/petition will be heard and decided in your absence) Notice of any alteration in the date fixed for hearg of this appeal/petition will given to you by registered post. You should inform the distract of any change in year address. If you fail to furnish such address your address hatined in this notice which address given in the appeal/petition will be deemed to be our correct address, and furth notice posted to this address by registered post will be demed sufficient for the purpose this appeal/petition. Copy of appeal is attached. Copy of appeal hapdready been sent to you vide to office Notice No		Respondent N
WHEREAS an appeal/petition under the provision the Khybeer Pakhtunkhw Province Service Tribunal Act, 1974, has been presented stered for consideration, in the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing be fore the Tribunkon	Notice to:	ne Dist. Education dice & M)
WHEREAS an appeal/petition under the provision the Khybeer Pakhtunkhw Province Service Tribunal Act, 1974, has been presented stered for consideration, in the above case by the petitioner in this Court and notice been ordered to issue. You an hereby informed that the said appeal/petition is fixed hearing be fore the Tribunkon		Dasth Peshawar.
Given under my hand and the seal of this Court, at Peshawar this. 22 16 Day of Roply) Rogistrar, Khyber Pakhturkhwa Servica 2021	hereby informe to many informe to many informe to many be alongwith any odefault of your appeal/petition of motice of given to you by address. If you fa address given in notice posted to this appeal/petition of this appeal/petition of the posted to the sappeal/petition of the posted to the poste	the Tribunal Act, 1974, has been presented stered for consideration, by the petitioner in this Court and notice been ordered to issue. You are at the said appeal/petition is fixed hearing be fore the Tribundary of the said appeal/petition is fixed hearing be fore the Tribundary of the said appeal stered to so on the dated, or any other day to which postponed either in person or by autised representative or by a supported by your power of Attorney. You, therefore, required to file ast seven days before the date of heariff copies of written statement appearance on the date fixed and in manner aforementioned, will be heard and decided in your absence any alteration in the date fixed for heariff of this appeal/petition will registered post. You should inform the gistrar of any change in your alteration will be deemed to be our correct address, and furt this address by registered post will be demed sufficient for the purposion. Fre-Manusco Notice
Day of Dec 2001 Rogistrar, Khyber Pakhtunkhwa Service 2001	office Notice No	dated
Day of Dec 2001 Rogistrar, Khyber Pakhtunkhwa Service 2001		and the second s
Rogistrar, Khyber Pakhtunkhwa Service 20-12	Day of	•
te: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazatted Univ.	Too Raply)	Roviston
Always quote Case No. While making any correspondence	ote: 1. The hours of a	ttendance in the Arriver Peshawar
, a very marin a first continuo mail a	2. Always quote	Case No. While making any correspondence