

Form- A


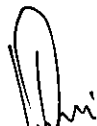
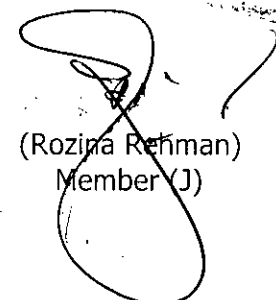
FORM OF ORDER SHEET

Court of _____

Case No.-

15301

/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/12/2020	<p>The appeal of Mst. Musarat Bibi resubmitted today by Mr. Mujeebullah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>23/12/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>23.12.2020</p> <p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 15.01.2021 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

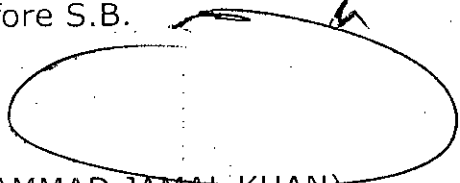
Appellant Deposited Security & Process Fee

4/1/21

15.01.2021

Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondent submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing. Adjourned to 02.02.2021 on which date file to come up for written reply/comments before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

02.02.2021

Counsel for the appellant and Addl. AG for the respondents present.

Requisite reply/comments have not been submitted by the respondents. Learned AAG is required to contact the respondents and furnish reply/comments on 19.02.2021 positively.

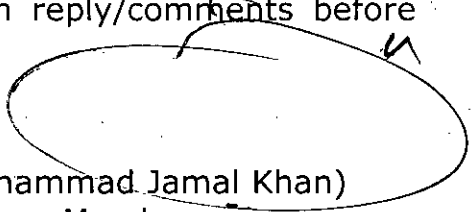

Chairman



19.02.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Neither written reply on behalf of respondent submitted nor representative of the department is present, therefore, learned Additional Advocate General is directed to contact the respondents and furnish written reply/comments on the next date of hearing as a last chance. Adjourned to 25.03.2021 on which date file to come up for written reply/comments before S.B.


(Muhammad Jamal Khan)
Member

25.03.2021

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Addl. AG alongwith Usman ADEO for respondents present.

Reply/comments on behalf of respondents not submitted. Representative of respondent requested for time to submit reply/comments, despite last chance. The appeal is posted to D.B for arguments on 29.04.2021 before D.B.


(Atiq Ur Rehman Wazir)
Member (E)

29.04.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 14.07.2021 for the same as before.


Reader

14.07.2021

Nemo for parties.

Javid Ullah learned Assistant Advocate General present.

Preceding order sheet shows that case was adjourned due to demise of the Worthy Chairman, therefore, both the parties be put on notice for 26.08.2021 with direction to respondents to furnish reply/comments within 10 days in office if the respondents failed to submit reply within stipulated time, then they will have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of written reply/comments shall be deemed struck off.

Adjourned accordingly.

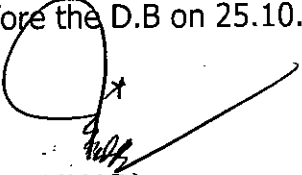

(Rozina Rehman)
Member (J)

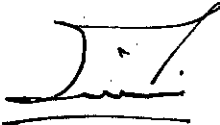

Chairman

26.08.2021

Nemo for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Appellant is absent, therefore, notice be issued to the appellant as well as her counsel. Adjourned. To come up for arguments before the D.B on 25.10.2021.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

25.10.2021

None for the appellant present. Mr. Kabirullah Khattak,
Additional Advocate General for respondents present.

Notices be issued to the appellant and her counsel. Adjourned.
To come up for arguments before the D.B on 28.01.2022.


(MIAN MUHAMMAD)
MEMBER (E)

28.01.2022

Nemo for the appellant. Mr. Riaz Ahmed Paindkhail,
Assistant Advocate General for the respondents present.

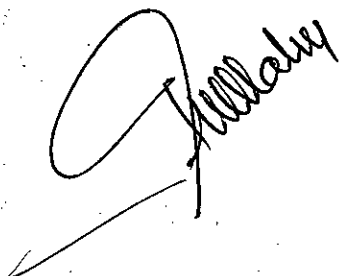
On previous date too, no one was present on behalf of
the appellant, therefore, it was directed that notices be issued
to the appellant and her counsel, however the same have not
been issued, therefore, office is strictly directed to issue
notices for prosecution of the appeal to appellant as well as
her counsel through registered post and to come up for
arguments on 12.05.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member(J)

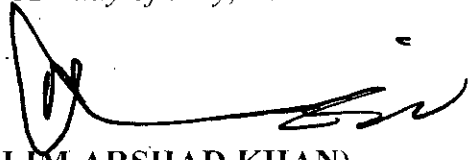


12.05.2022

Learned counsel for the appellant present. Mr. Naseer-ud-din Shah, Assistant Advocate General for the respondents present.

2. Learned counsel for the appellant submits that the grievances of the appellant have been redressed. This appeal has become fruitless. Dispose of accordingly. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 12th day of May, 2022.*



(KALIM ARSHAD KHAN)

Chairman



(FARJEHA PAUL)

Member (E)

The appeal of Mst. Musarat Bibi SPET GGHSS Chakdara District Dir lower received today i.e. on 18.11.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- ② Annexures D and E of the appeal are illegible which may be replaced by legible/better one.

No. 3863 /S.T,

Dt. 20/11 /2020.


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Mujeeb Ullah Adv. Pesh.

*Submitted after
Compliance- Annexure E is only for
Adv. Mujeeb Ullah remarks of DEO office
which is readable.*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 15301 /2020

Mrs. Musarat BiBi SPET (BPS-16)

VERSUS

The Secretary Elementary (E&SE) Department KPK & others


INDEX OF DOCUMENTS

S #	Description of Documents	Annexure	Pages
1	Service appeal		1-3
2	Copies of transfer order dated 30/07/2019	A	4
3	Copy of second transfer order dated 29/10/2019	B	5
4	Copy of judgment dated 11/11/2019	C	6-7
5	Copy of the appellate order dated 25/08/2020	D	8
6	Copy of respondent no.3 remarks dated 14/09/2020	E	9
7	Copies of departmental appeal	F & G	10-11
8	Wakalatnama		

Appellant


Musarat Bibi

Through:


Mujeeb Ullah

Advocate

Khalid & Law Associates

46-C, 2nd Floor, Cantonment

Plaza ; Peshawar Cantt.

03018521721

Email: mujeebdirvi@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 15301 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14973

Dated 18/11/2020

Mrs. Musarat BiBi SPET (BPS-16)
GGHSS Chakdara District Dir Lower.

APPELLANT

VERSUS

- 1- The Secretary Elementary (E&SE) Department Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Dir Lower.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ILLEGAL STOPPAGE OF SALARY OF APPELLANT SINCE JANUARY 2020 AND AGAINST THE INACTION OF RESPONDENT NO.3 BY NOT IMPLEMENTING THE APPELLATE ORDER DATED 25/08/2020.

PRAYER:

That on acceptance of this appeal the respondent no.3 may kindly be directed to release the monthly salaries of appellant w.e.f January 2020 and also implement the appellate order dated 25/08/2020 in letter and spirit. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Respectfully Submitted as:

ON FACTS:

Brief facts giving rise on the present appeal are as under:

Filed to-day
Registrar
18/11/2020

1- That appellant is serving the respondents department as senior physical education teacher and since from her appointment till date she is serving the respondents department quite efficiently and up to the entire satisfaction of her superiors.

2-
Registrar
2/12/2020

2- That during service appellant was transferred from GGHSS Khadagzai to GGHSS Chakdara vide order dated 30/07/2019. That in compliance to the aforementioned transfer order appellant submitted her arrival report and started performing her duty. {Copies of transfer order dated 30/07/2019 is attached as annexure A}

- 3- That it is pertinent to mention here that Respondents astonishingly issued the order dated 29/10/2019 whereby appellant was again transferred prematurely from GHSS Chakdara to GHSS Ramora.
{Copy of second transfer order dated 29/10/2019 is attached as annexure B}
- 4- That feeling aggrieved from the above mentioned transfer order the appellant filed writ petition no.1163-M/2019 before August Peshawar High Court Mingora bench which was converted in to departmental appeal and send it to Respondent no.2 for consideration strictly according to law vide judgment dated 11/11/2019.
{Copy of judgment dated 11/11/2019 is attached as annexure C}
- 5- That after receiving the judgment dated 11/11/2019 respondent no.2 conducted inquiry in to the matter and accepted the appeal of the appellant vides order dated 25/08/2020 whereby respondent no.3 was directed to cancel the transfer order dated 29/09/2019.
{Copy of the appellate order dated 25/08/2020 is attached as annexure D}
- 6- That after receiving the appellate order the appellant submitted the same to respondent no.3 on 14/09/2020 for compliance however respondent no.3 is using delaying tactics on the basis of political pressure and is reluctant to implement the order dated 25/08/2020. That it also worth mentioning that Respondents no.3 straight away refuse to implement the aforementioned order and stated that no copy of the same order has been received to this office.
{Copy of respondent no.3 remarks dated 14/09/2020 is attached as annexure E}
- 7- That it is also worth mentioning that the salary of appellant has also been illegally and without any reason stopped by respondent no.3 since January 2020.
- 8- That feeling aggrieved from illegal stoppage of salary the appellant filed departmental appeal on 09/07/2020 before respondent no.2 both on courier as well as on whatsapp but the same has not been responded within statutory period of ninety days.
{Copies of departmental appeal are attached as annexure F & G}
- 9- That feeling further aggrieved from inaction of respondents by not implementing the appellate order dated 25/08/2020 and not releasing the monthly salary of appellant the appellant preferred the instant appeal on following grounds inter alia.

3

GROUND:

- A- That the inaction of the respondents by not releasing the monthly salaries of the appellant w.e.f. January 2020 till date and not implementing the appellate order dated 25/08/2020 are against the law, facts and norms of natural justice.
- B- That the petitioner has not been treated in accordance with law and rules by the respondent Department 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 not releasing the monthly salaries of the appellant is against the principle of "WORK DONE MUST PAID" and also the violation of Article 11 of the Constitution of Islamic Republic of Pakistan 1973.
- D- That the respondents acted in arbitrary and malafide manner by not implementing the appellate order and illegally stopping the monthly salaries of the appellant w.e.f. January 2020 till date.
- E- That the appellant has been discriminated on the subject noted above and as such the respondents violated the principle of natural justice.
- F- That there is no provision under the law wherein salary of a civil servant could be stopped.
- G- 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 be accepted as prayed for.

Dated: 11.11.2020

Appellant
Musarat Bibi

Through:

Mujeeb Ullah
Advocate
Khalid & Law Associates
46-C, 2nd Floor, Cantonment
Plaza, Peshawar Cantt.
03018521721

Email: mujeebdirvi@gmail.com

Certificate:

Upon the instruction of my client namely Mst Musarat Bibi that no such appeal has been filed or pending before this hon'ble tribunal.

Advocate **Mujeeb Ullah**

ANNEX # 4
Annexure (A)

(4)

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) DIR LOWERS AT TIMERGARA.

OFFICE ORDER

Mst: Musarat BiBi SPET B-16 at GGHSS Khadagzai is hereby transferred to GGHSS Chakdara against vacant post of SPET B-16 on her own pay and grade in the interest of public service with immediate effect.

Note:

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

(NUSRAT BIBI)
DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA

Endst. No. 990-93

Dated Timergara the 30/7/2019.

Copy of the above is forward to:

1. The PS to Advisor to Chief Minister on Elementary and Secondary Education for information regarding Ban Relaxation recorded on the body of the application.
2. The Distt: Account Officer Dir Lower.
3. The principal/Headmistress Concerned.
4. The Official concerned



DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA

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ANNEX 5

Annexure

(B)

(5)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DIR LOWER AT TIMERGARA.

OFFICE ORDER.

In response to the appeal lodged by the applicant to Director Elementary and Secondary Education KP and a letter issued to DEO Female Dir Lower with Subject "Request for Justice Regarding Posting Transfer" on dated: 18-10-2019 vide No. 1533/PE&S-25/Inter Distt: Transfer/Vol-I.

An Appeal lodged to the Deputy Commissioner Dir Lower dated: 09-10-2019 with the subject "Complaint/Appeal" and letter issued by the Deputy Commissioner Dir Lower to DEO Female Dir Lower under vide No. 12063/17/Estt: dated 14-10-2019.

An Inquiry conducted by the DCMA DMO Office with the subject "Pakistan Citizen Portal on Transferred Issue" and report submitted through Deputy Commissioner vide; No. 5059/ADC Dated 21-10-2019.

An inquiry conducted by the SDEO Female Timergara on the basis of different no of complaints received through Pakistan Citizen Portal.

The Transfer order issued vide this office Endst: No.732-35 dated 19-07-2019 in r/o Mst. Parveen SPET B-16 at GGHS Kityari under transferred to GGHS Chakdara is hereby restored with even No. and date.

Consequential Adjustment

SNo	Name of Teacher with Designation	From	To	Remarks
1	Musarrat BiBi SPET	GGHSS Chakdara	GGHS Dara Ramora	A.V.P

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

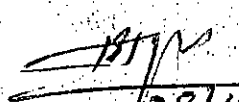
(SHAHEEN BEGUM)
District Education Officer
(F) Dir lower at Timergara

Endst: No. 3486-90

Dated Timergara the 29/10/2019

Copy of the above is forwarded for information to: -

1. The Director Elementary and Secondary Education KP Peshawar.
2. The Deputy Commissioner Dir Lower.
3. The District Account Officer Dir Lower
4. The Principal/HM Concerned.
5. The Teacher concerned.


29/10/19
District Education Officer
(F) Dir lower at Timergara

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JUDGMENT SHEET

PESHAWAR HIGH COURT,
MINGORA BENCH (DAR-UL-QAZA), SWAT
(Judicial Department)

W.P. No. 1163-M/2019

JUDGMENT

Date of hearing:- 11.11.2019

Petitioner:- (Mst. Musarrat Bibi) by
Muhammad Naeem, Advocate.

Respondents:- (Govt. of KPK & others) by Mr.
Wilayat Ali Khan, A.A.G.

WIOAR AHMAD, J.- Petitioner has filed the instant constitutional petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 praying for the following relief:

" It is therefore, most humbly prayed that on acceptance of the instant writ petition the impugned order may please be declared as illegal, null and void and the petitioner may graciously be retained in her position prior to the impugned order.

Any other relief appropriate under the circumstances but not specifically prayed for may also be granted in the interest of justice."

2. The main grievance of the petitioner is in respect of cancellation of the impugned order dated 29.10.2019, vide which she was transferred from GGHS Chakdara Dir Lower to GHSS Dara Ramora Dir Lower. The case was heard at some length, whereafter, the learned counsel for the petitioner requested that he would feel satisfied if the petition in hand is sent to Director Elementary and Secondary Education, Khyber Pakhtunkhwa, respondent No. 2 for sympathetic

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consideration and disposal according to law. The petition in hand is therefore converted into a departmental representation and is ordered to be sent to Director Elementary and Secondary Education, Khyber Pakhtunkhwa (respondent No. 2) for consideration and disposal according to law.

Announced
Dt: 11.11.2019


JUDGE


JUDGE

Office
30/11/2019

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DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR

NOTIFICATION

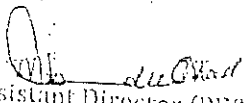
1. WHEREAS, the transfer order in **respect of** Mst. Mussarat Bibi SPET GGHS Chakdara Dir Lower was cancelled and she was adjusted at GGHS Dara Ramora Dir Lower by the DEO (F) Dir Lower vide her office order No. 3486-90 dated 29-10-2019.
2. WHEREAS, the aggrieved Mst. Concerned lodged an appeal dated 06-02-2020 to the Director E&SE Khyber Pakhtunkhwa against the aforesaid cancellation of transfer order issued by the DEO (F) Dir Lower.
3. WHEREAS, her appeal was accepted to review the instant matter, and Mr. Inayat Khan vice Principal BS-18 GGHS No. 1 Havalian Abbottabad was appointed an inquiry officer vide this office Notification No. 595-98 dated 14-02-2020 to probe into the matter and submit report along with clear cut recommendation.
4. WHEREAS, the inquiry Officer visited the DEO (F) Dir Lower office to investigate the **issue** regarding cancellation of transfer order etc.
5. WHEREAS, the inquiry officer in his report and stated that the transfer order issued by **Dys** DEO (the then acting DEO (F) Dir Lower) created the issue, therefore it may **be** cancelled/withdrawn to resolve the issue for ever and further not to waste time of **students**.
6. AND WHEREAS, having examining the inquiry report/other record, the appeal of Mst. **Mussarat** Bibi SPET found justified under the circumstances reviewed by the appellant authority.
7. Now, THEREFORE, **the appellant authority is pleased** to accept the appeal of Mst. Mussarat **Bibi** SPET on the grounds mentioned in para-5 above, therefore as per recommendation **by the** Inquiry Officer, the DEO (F) Dir Lower is directed to cancel the transfer order issued vide **her** office Endst No. 3486-90 dated 29-10-2019 in the best public interest.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst even No. 61-64 /A-25/PF/Mussarat Bibi SPET/Dir Lower Dated Peshawar the 21/2/2020.

Copy of the above is forwarded for information and N/A to:-

1. District Education Officer (Female) Dir Lower for necessary action.
2. District Accounts Officer Dir Lower.
3. Mussarat Bibi SPET appellant.
4. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.


Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR

NOTIFICATION

1. WHEREAS, the transfer order in respect of Mst. Mussarat Bibi SPET GGHS Chaldhra Dir Lower was cancelled and she was adjusted at GGHS Dara Ramora Dir Lower by the DEO (F) Dir Lower vide her office order No. 3486-90 dated 29-10-2019.
2. WHEREAS, the aggrieved Mst. Concerned lodged an appeal dated 06-02-2020 to the Director E&SE Khyber Pakhtunkhwa against the aforesaid cancellation of transfer order issued by the DEO (F) Dir Lower.
3. WHEREAS, her appeal was accepted to review the instant matter, and Mr. Inayat Khan, Principal BS-18 GGHS No. 1 Havallan Abbottabad was appointed an inquiry officer vide this office Notification No. 595-98 dated 14-02-2020 to probe into the matter and submit report along with clear cut recommendation.
4. WHEREAS, the inquiry officer visited the DEO (F) Dir Lower office to investigate the issue regarding cancellation of transfer order etc.
5. WHEREAS, the inquiry officer in his report and stated that the transfer order issued by Dy. DEO (the then acting DEO (F) Dir Lower) created the issue, therefore it may be cancelled/withdrawn to resolve the issue for ever and further not to waste time of students.
6. AND WHEREAS, having examining the inquiry report/other record, the appeal of Mst. Mussarat Bibi SPET found justified under the circumstances reviewed by the appellant authority.
7. Now, THEREFORE, the appellant authority is pleased to accept the appeal of Mst. Mussarat Bibi SPET on the grounds mentioned in para-5 above, therefore as per recommendation by the inquiry officer, the DEO (F) Dir Lower is directed to cancel the transfer order issued vide her office Endst No. 3486-90 dated 29-10-2019 in the best public interest.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst even No. 61-64 /A-25/PI/Mussarat Bibi SPET/Dir Lower Dated Peshawar the 15/2/2020.

Copy of the above is forwarded for information and N/A to:-

1. District Education Officer (Female) Dir Lower for necessary action.
2. District Accounts Officer Dir Lower.
3. Mussarat Bibi SPET appellant.
4. PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.

S/O, This office didn't receive
this letter upto now.

[Signature]
Assistant Director (PR&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

[Signature]
DISTRICT EDUCATION OFFICER
(F) DIR LOWER

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محترم مت جناب وائس ایگزیکٹو صاحب ایگزیکٹو ایڈووکیٹ جنرل

کراچی

بہار پاکستان

آپ کی خدمت میں سید محسن علی نے سید محسن علی کے نام پر ایک دستخط شدہ خط لکھا ہے جس میں ان کا کہنا ہے کہ ان کے پاس ایک زمین ہے جس کا پتلا ہے اور وہ اس زمین کو بیچنا چاہتے ہیں۔ ان کے پاس اس زمین کے بارے میں تمام دستاویزات موجود ہیں۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔

ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔

ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔ ان کا کہنا ہے کہ ان کو اس زمین کو بیچنے کے لئے ایک خریدار مل گیا ہے۔

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محکمات جناب ڈائری جیلز آف ایجوکیشن کے لئے
جناب عالی !

صوبہ ہریانہ گزٹ میں ہے کہ اکتوبر 2019 سے ہریانہ
جیلز سے دو دفعہ ۲۵ ہوجا ہے حالانکہ میں جیلز کی رینٹی
میں جنوری 2020 کو میں نے آپ صاحبان سے اپنے
تیار لے پر ہمہ درانہ طور نے لیا درخواست دی تھی جس پر
ابھی تک کوئی طور نہیں ہوا جبکہ جنوری 2020 سے میری
شکوہ بند ہے حالانکہ ہوس پائلٹان میں کرواتا کی وبار
نے باعد تمام ادارہ ہے اور ہمارے تعلیمی ادارہ بھی
بند ہے لہذا میں بھی تمام لوگوں کی طرح میں بھی اپنی
ڈیوٹی سرعام میں دے پارہی نہیں میری شکوہ (6) چھوڑ
ماہ سے بند ہے جس وجہ سے مجھے سزا دی مشلات نامہ ہے
میں گرانے کے میں میں رہی ہوں اور میرا سوہ بیماری کی وجہ سے باہر ملک
سے گھر آجس آجاتا ہے اور یہاں سے رہتا ہے لہذا آپ صاحبان سے
گزارش ہے کہ میرا ہی کیا میری شکوہ کے گھرنے کا حکم جاری کروائے
اور میری عد فرمائے میں صاحبان کو ہر ای صورتوں و مشورہ ہوگی
عقل زیادہ ادب

العارضہ

سے صرف کوئی S.P.O. کے لئے
نور احمد کوئی ملکوں کے لئے
عقل اور فرمائے ۲۰۲۰ دیر اور

پہلی تابع فرمان

ATTESTED TO
TRUE COPY

بعدالت

Before Khyber Pakhtunkhwa
Service Tribunal

Appellant 2 جناب
Secretary (ExSE) بنا
Deptt KP & others

Ms Musarat Bibi

موزہ
مقدمہ
دعوئی
م

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی کی وجواب وہی وکیل کارروائی متعلقہ

Adv Muzeeb Ullah کے Peshawar

مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار دیا گیا۔ نیز
وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثیت فیصلہ برحلف دیے جواب وہی اور اقبال دعویٰ اور
باصورت ڈگری کرنے اجراء اور اصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی ہر ادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سامانہ
پر واخیز منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکورہ کریں۔ لہذا وکالت نامہ لکھد یا کہ سند ہے۔

Ms Musarat Bibi

13-11-2020
ماہ 20

Attested & Accepted
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