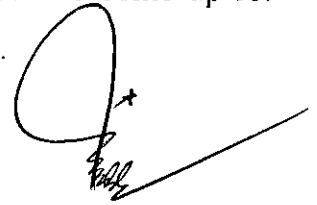


21.06.2022

Mr. Shafiullah, Advocate present and submitted Wakalatnama in favor of appellant, which is placed on file. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Munawar Khan ADEO for respondent No. 2 & 3 present.

Reply/comments on behalf of respondents No. 2 & 3 submitted through office, which are placed on file. Copy of the same is handed over to learned counsel for the appellant. Reply/comments on behalf of respondent No. 1 are still awaited. Learned Additional Advocate General requested for time to submit reply/comments. Adjourned. To come up for reply/comments on 29.07.2022 before S.B.



(Mian Muhammad)
Member (E)

30.11.2021

Counsel for the appellant present. Mr. Kabirullah Khattak,
Addl: AG for respondents present.

Written reply/comments not submitted. Learned AAG seeks
time to contact the respondents for submission of written
reply/comments. Granted. To come up for Written
reply/comments on 24.02. 2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

24.02.2022

Due to retirement of the Worthy Chairman, the
Tribunal is defunct, therefore, case is adjourned to
11.05.2022 for the same as before.


Reader

11.05.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional
Advocate General for respondents present.

Comments not submitted. Last chance is given to
respondents for submission of comments. An application
for rectification/amendment was submitted by the
appellant through counsel. To come up for reply and
arguments on the said application on 21.06.2022 before
S.B. Notice of the said application be served upon
respondents and learned AAG for the date fixed.

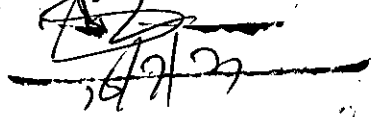

(Rozina Rehman)
Member (J)

12.07.2021

Counsel for the appellant present. Preliminary arguments heard.

If the limitation is computed from the date of basic order of imposition of penalty i.e. removal from service and that from the date of filing of the departmental appeal, the question of bar of limitation is apt to arise but as far as the impugned order dated 06.09.2019 is concerned, it does not disclose about any reference of formal disciplinary proceedings having been conducted before imposition of major penalty. Rather the said order of imposition on its face seems to have been based on mere knowledge of the competent authority and was passed in pursuance of such knowledge about absence of the appellant from duty among two others mentioned in the order. Thus, the impugned order in absence of rebuttal by the respondents appears to be a void order not attracting the bar of limitation. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 30.11.2021 before the D.B.

**Appellant Deposited
Security & Process Fee**



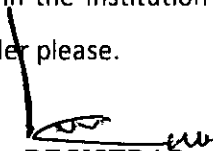



Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2224 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	01/02/2021	<p>The appeal of Mr. Abdul Wakil resubmitted today by Mr. Hidayatullah Khattak 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>2-</p>	05.04.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>05/04/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Junior to counsel for appellant present.</p> <p>Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on <u>12/07/2021</u> before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

The present appeal was submitted on 15.09.2020 which was returned to the counsel for the appellant for completion. Today i.e on 22.12.2020 the counsel for the appellant resubmitted the same without removing the objections. Therefore the same is returned again to the counsel for the appellant for removing the following deficiencies within 15 days.

- 1- ✓ Memorandum of appeal is not signed by the appellant.
- 2- Appeal/annexures are not properly paged according to index.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Annexures of the appeal may be attested.
- 5- Memo of appeal is not signed by the newly engaged counsel.
- 6- Copy of impugned order dated 19.09.2018 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 7- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 4102 /S.T,

Dt. 23/12/2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hidayatullah Khattak Adv. Pesh.

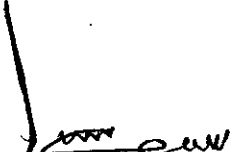
Respected Sir,

Re-submitted after doing the needful.

Thanks
Hidayat
Adv.

Respected Sir,

It is stated that some correction has been made in the opening of memo of appeal, requested to allow the correction allowed.


10/2/2021

The appeal of Mr. Abdul Wakeel Ex-PSHT GPS Almas Stori Khel District Khyber received today i.e. on 15.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Copies of impugned orders dated 19.6.2018 and 06.9.2019 mentioned in the heading of appeal are not attached with the appeal which may be placed on it.
- 3- Five more copies/sets of the appeal along with annexures i.e. complete in respect may also be submitted with the appeal.

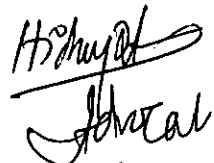
No. 2689 /S.T,


Dt. 17/09 /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Taimur Ali Khan Adv. Peshawar.

Re-submitted for extension of time for the removal of objections mentioned above. 02-10-2020 + till date.


27-10-22
⑩ days time further extended.


27/10/2020, -

Re-submitted with complying and attaching the order dtd 6/9/2019 and the other order dated copy is not available with the 19/6/2018 appellant

P.T.O

Sir, for ~~delay~~ delay in re-submission is
due to counsel typhoid temp and was
confin'd to bed.

Thanks

Hidayat

Arora

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2020

Abdul Wakeel

V/S

Education Deptt:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
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2.	Copy of order dated 06.09.2019	A	4
3.	Copies of departmental and rejection order	B&C	5-6
9.	Wakalat nama	-----	7

THROUGH:

APPELLANT

(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,
&
(ASAD MAHMOOD)
ADVOCATE HIGH COURT

Room No. Fr-8, 4th Floor,
Bilour Plaza, Peshawar Cantt:
Contact No. 03339390916

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2020

Abdul Wakeel Ex_PSHT
GPS Almas Stori Khel, District Khyber.

(APPELLANT)

VERSUS

1. The Secretary (E&SE) Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer, Khyber Tribal District at Jamrud.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 06.09.2019 BY RESPONDENT NO. 3 AND THAT OF RESPONDENT NO. 2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED ON 17.08.2020 AGAINST THE ORDER DATED 06.09.2019, "WHEREIN MAJOR PENALTY OF REMOVAL FROM SERVICE HAS IMPOSED UPON THE APPELLANT FOR GOOD GROUNDS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 17.08.2020 AND 06.09.2019 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATE INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWTH:**FACTS:**

1. That the appellant was working on the post of PSHT and has performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against the appellant.
2. That the appellant become ill due to which he rushed to Hospital and his treatment took some time due to which he compelled to remain absent from his duty.
3. That without conducting inquiry and without adopting proper procedure, the appellant was removed from service vide order 06.09.2019 without serving charge sheet and show cause notice to the appellant. **(Copy of order dated 06.09.2019 is attached as Annexure-A)**
4. That the appellant filed departmental appeal against the removal order which was also rejected on 17.08.2020 without giving any reason. **(Copies of departmental appeal and rejection order are attached as Annexure-B&C)**
6. That now the appellant come to this august tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned order dated 17.08.2020 and 06.09.2019 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That no inquiry was conducted against the appellant and the appellant was removed in slipshod manner which is the violation rules and Superiors Courts judgment.
- C) The authority did not give any reason for dispensing of inquiry which is mandatory under the law.
- D) That no proper procedure was followed before passing the impugned order of removal from service and the appellant was removed from service in slip shod manner.


- E) That no charge sheet was issued to the appellant before imposing major punishment of dismissal from service, which is the violation of law and rules.
- F) That even show cause notice was served to the appellant before passing the impugned order of removal, which is against the norm of justice and fair play.
- G) That the penalty of removal from service is very harsh which is passed in violation of law and, therefore, the same is not sustainable in the eyes of law:
- H) That the appellant has been condemned unheard and has not been treated according to law and rules.
- I) That the appellant did not intentionally absent from his duties but he was ill and as the illness is beyond the control of human, therefore the appellant was compel to remain absent from his duties due his illness.
- J) That the appellant seeks permission to advance others 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,

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


 APPELLANT
 ABDUL WAKEEL

THROUGH:


 (TAIMUR ALI KHAN)
 ADVOCATE HIGH COURT,
 &
 (ASAD MAHMOOD)
 ADVOCATE HIGH COURT

(4)

DISTRICT EDUCATION OFFICE
KHYBER TRIBAL DISTRICT AT JAMRUD
PHONE: 091-5820584 FAX: 091-5820584
No: _____ DATED: _____ / _____ / 2019

DISTRICT EDUCATION OFFICE KHYBER TRIBAL DISTRICT AT JAMRUD.
NOTIFICATION

1. WHEREAS the District Education Officer had come to know that you the following teacher of Tehsil Bara Khyber Tribal District had been absent without any leave sanction and non compliance of the order of the competent authority of this office.

Sr. NO.	Name / Designation	School	Personal Number
1.	Haji Badshah PST.	GPS Farkho Kass Bara	50355762
2.	Hilmand Khan PST	GPS Farkho Kass Bara	50161605
3.	Abdul Wakeel PSHT	GPS Almas Stori Khel	00414701

2. NOW THEREFORE In exercise of the powers conferred under Rules of the Govt of Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) 2011, the competent Authority, District Education Officer Khyber, is pleased to impose a major penalty of "removal from Service" upon the above mentioned teachers of Bara, Khyber Tribal District with immediate effect.

(MUHAMMAD JADOON KHANI)
DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD
Dated 6/9/2019

Encl. No. 9390-96

Copy of the above is forwarded to the:

1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Khyber Tribal District at Peshawar.
3. District Accounts Officer Khyber Tribal District at Jamrud.
4. All ADEOs Local Office.
5. Superintendent / Accountant for entry in his service book.
6. Official concerned.
7. Office Copy.

DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

جناب عالی

مخولہ (بجالی ملازمت

موردبانہ گذارش ہے کہ مندرہ عبدالوکیل PSH.T
 ڈرائسری سکول ستوری خیل میں ڈیوٹی سرانجام دے رہے
 ہیں۔ مندرہ کئی سال ہسپتال میں زیر علاج تھے۔ میں بھی ام
 کی خدمت میں ہسپتال میں تھا جس کی وجہ سے مندر
 سکول سے غیر حاضر رہا۔ مندرہ گھبرانے کا واحد کفیل
 مندرہ کو سکول سے غیر حاضری کے ساتھ در محفل میں
 ہے۔ مندرہ کے لیے سکول سے کبھی غیر حاضر نہیں ^{ہوئے}

اس لیے آپ صاحبان محض بانی کس کے مندرہ کو اپنی ما
 در بحال کسرفہ کے احکامات منایت فرمائیں مشکور فرمائیں
 مندرہ تاحیات آپ صاحبان کو دعا گو رہے گا
 عین گزارش ہوگی
 الحارث

Amal

الکلیات جامع فرمان عبدالوکیل PSH.T گورنمنٹ ڈرائسری سکول
 ستوری خیل پارہ ضلع خیبر

۱۳/۱/۲۰۰۷
 ۱۳/۱/۲۰۰۷
 ۱۳/۱/۲۰۰۷

6

DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA

NOTIFICATION.

1. WHEREAS Mr. Abdul Wakeel Ex-PSHT GPS Almas Stori Khel District Khyber was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of wilful absence from official duty in May 2019.
2. AND WHEREAS, the DEO concerned being competent authority issued absent notice under registered cover vide No. 11973 dated 09.11-2019 and No. 6206 dated 13.05.2019.
3. AND WHEREAS, the DEO Khyber being competent authority fulfilling codal formalities imposed major penalty "Removal" from service" vide Endst: No. 9390-96 dated 06-09-2019.
4. AND WHEREAS, the above named teacher submitted an appeal to this office vide dated 13.09-2019, which was sent to DEO concerned for comments vide this office letter 5340 dated 18-09-2019 who submitted his comments to this office vide No. 11973 dated 09-11-2019.
5. Whereas the inquiry was ordered in light of his appeal but he failed to physically appear before the inquiry officer and subsequently the inquiry officer rendered his appeal for regression.
6. AND WHEREAS, the competent authority, after having considered the facts and evidence on record, is of the view that charges against accused teacher have been proved.
7. NOW THEREFORE, in exercise of powers conferred under Khyber Pakhtunkhwa Servants (Efficiency & Discipline) Rules-2011 the Appellate Authority (Director E&SE) Khyber Pakhtunkhwa is pleased to up hold the penalty and reject the appeal in respect of Mr. Abdul Wakeel Ex- PSHT GPS Almas Stori Khel District Khyber under Rule(17)sub -rule(2)(a) of Khyber Pakhtunkhwa E&D Rules-2011.

DIRECTOR.

Endst: No. 2394-96 F No. E-6/Vol II Khyber. Dated Peshawar the 17/8 2020.

Copy forwarded for information and necessary action to the:-

1. District Education Officer Khyber.
2. Teacher concerned.
3. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
4. Master File.

Deputy Director (Estb :)
Merged Area

17-8-2020

7

WAKALATNAMA (Power Of Attorney)

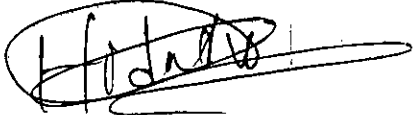
Peshawar High Court PESHAWAR


Abdul Wakeel (Petitioner)

VERSUS

Education Deptt (Respondent)

I/ We, The undersigned (Abdul Wakeel) in the above noted Service Appeal, do hereby appoint **Mr. Hidayat Ullah Khattak** Advocate to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.


Attested & Accepted By.
27-10-2020


Signature of Executants
0332-9398803

Hidayat Ullah Khattak
Advocate High Court, Peshawar
Office 4th Floor F.R 29 Bilour Plaza Saddar Cantt, Peshawar
Cell No.0300-9357757

BEFORE KHYBER PAKHTUNKHA SERVICE TRIBUNAL PESHAWAR.

Appeal No.2224/2021

Abdul Wakeel.....Appellant.

Versus

Director E & SE KP & Others.....Respondents.

Parawise Comments on behalf of Respondent No.2 & 3.

INDEX

S. No	Description of Documents	Annexure	Pages
1	Index	----	1
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4	Authority letter	----	5
5	Copy Inquiry report	A	6
6	Copies of Absents Notes	B & C	7-8
7	Copy of Removal Notification	D	9
8	Copy of rejection of Departmental Appeal	E	10

Dated 20/06/2022

Mumawarkhan A'2,
ADEO litigation

BEFORE KHYBER PAKHTUNKHA SERVICE TRIBUNAL PESHAWAR.

Appeal No.2224/2021

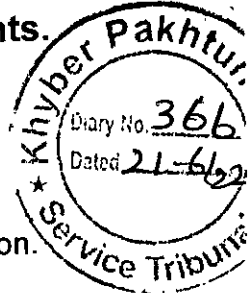
Abdul Wakeel.....Appellant.

Versus

Director E & SE KP & Others.....Respondents.

Parawise Comments on behalf of Respondent No. 2 & 3.

Preliminary objections.



- That the appellant has got no cause of action, locus stand to file the instant Petition.
- That the appellant has concealed material facts from honorable court.
- That appellant has not come to this court with clean hands.
- That the appellant is estopped by her own to bring the present appeal.

ON FACTS.

- 01.** In correct, hence denied. As mentioned in the inquiry report that the appellant was remained absent habitually and not interested in duty (Anx-A) & and petitioner admitted by himself in the para No.2 of the petition that he was absent from his duty without any leave sanction.
- 02.** As admitted by the appellant himself that he was absent from his duty without any prior permeation of his superior.
- 03.** In correct, hence denied. The respondent department followed proper legal procedure and conducted a departmental inquiry (Anx-A). Two absence notices vide Endst No .6206-08 dated 13-05-2019 and 6376-80 dated 24-05-2019(Anx-B & C) were served to the appellant and then the appellant was removed from service for the charges of willful absence from duty (Anx- D).
- 04.** The appellant filed the departmental appeal which was properly examined and found the appellant absent from duties on the basis of which her appeal was regretted Anx-E.

Grounds:

- A.** In correct, hence denied. The respondent department followed proper legal procedure and conducted a departmental inquiry (Anx-A). Two absence notices were served upon the appellant and then the appellant was removed from service (Anx-B & C) under the Khyber Pakhtunkhwa Govt Servants (E & D) Rule 2011, for the charges of willful absence from duty.

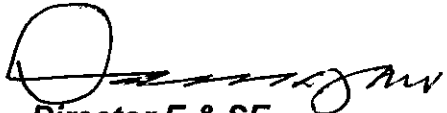
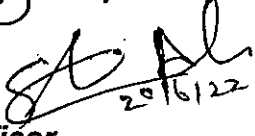
- B. In correct, hence denied. The respondent department followed proper legal procedure and conducted a departmental inquiry (Anx-A).
- C. In correct, hence denied. As mentioned in the inquiry report that the appellant was remained absent habitually and not interested in duty (Anx-A) & and petitioner admitted by himself in the para No.2 of the petition that he was absent from his duty without any leave sanction.
- D. In correct. The respondent department followed proper legal procedure and conducted a departmental inquiry (Anx-A). Two absence notices (Anx B & C) were served upon the appellant and then the appellant was removed from service for the charges of willful absence from duty
- E. Incorrect. Hence denied. As elucidated under Para D above.
- F. Incorrect. Hence denied. As elucidated under Para D above.
- G. Incorrect. Hence denied. Appellant is removed from service after fulfilling of all codal formalities.
- H. Incorrect. Hence denied. The appellant filed the departmental appeal which was properly examined and found the appellant absent from duties on the basis of which her appeal was regretted (Anx-E).
- I. In correct, hence denied. As mentioned in the inquiry report that the appellant was remained absent habitually and not interested in duty (Anx-A) & and petitioner admitted by himself in the para No.2 of the petition that he was absent from his duty without any prior permeation of his superior.
- J. Respondent department also seeks permission to advance other grounds at the time of hearing.

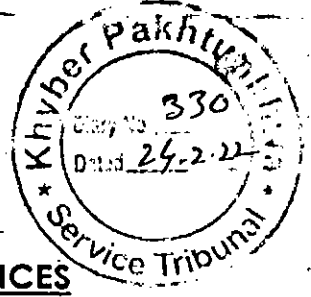
Pray:

It is therefore humbly prayed that the instant appeal being devoid of merits may please be dismissed with cost.

Respondent No. 2

Respondent No. 3


 Director E & SE,
 Khyber Pakhtunkhwa

 District Education Officer
 NMD Khyber
 20/6/22



BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICES

TRIBUNAL, PESHAWAR

Put up to the court with relevant appeal.

C.M No. _____/2022

In the matter of

Service Appeal No 2224/2021

Titled

Abdul Wakeel.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR RECTIFICATION/
AMENDMENT OF CLERICAL MISTAKE IN
ABOVE CAPTIONED APPEAL NO 2224/2021**

Respectfully Sheweth:

1. That the captioned Service Appeal is pending adjudication before this Hon'ble Tribunal
2. That the appellant filed captioned appeal No 2224/2021 in this Hon'ble Tribunal on 16.07.2021 Under Section 4 of Khyber Pakhtunkhwa Service Tribunal Act 1974 against the order of DEO Khyber Tribal District Jamrud dated 06.09.2019 and order of Director (E&SE) Khyber Pakhtunkhwa Peshawar dated 17.08.2020.
3. That the appellant want to bring into your kind notice that the facts and grounds mentioned in the captioned appeal do not tally with the hand written

Reader

24/2/2022

application of the appellate due to clarifica] mistake on Page No.2, Para No.2 and on Page No.3 Para No.1 and F of the appeal. This clarifical mistake could give rise to ambiguity/confusion during court proceedings and may complicate the case.

In view of the above, it is very humbly requested to please direct the concerned staff to rectify/amend the mistake and replace the phrase "**appellant was ill**" with "**appellant's mother was ill**" on **page-2, Para-2** and on **page-3, Para-1 (plaintiff's mother was ill**" in order to avoid any confusion during court proceedings. Also, **in Para-F on page No.3**, it is mentioned that show cause notice was served upon the appellant whereas, no show cause notice has been served and the appellant was removed from service without any prior notice. This statement may also be amended, please. Copy of Appeal and hand written application of the appellant is enclosed with this application for ready reference.

Appellant

Through


Hidayatullah Khattak
Advocate High Court

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 2224/2021

Abdul Wakeel

V/S


Education Deptt.

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3.	Copies of departmental and rejection order	B&C	
4.	Wakalat Nama	-----	

APPELLANT

THROUGH:


(HIDAYAT ULLAH KHATTAK)
ADVOCATE HIGH COURT

Room No. 29, 4th Floor,
Bilour Plaza, Peshawar Cantt.
Contact No. 03009357757

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 2224/2021

Abdul Wakeel Ex-PSHT
GPS Almas Sturi Khel, District Khyber.

(APPELLANT)

VERSUS

1. The Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
2. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
3. The District Education Officer, Khyber Tribal District at Jamrud.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 06-09-2019 BY RESPONDENT NO.3 AND THAT OF RESPONDENT NO. 2 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED ON 17-08-2020 AGAINST THE ORDER DATED 06-09-2019, WHEREIN MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED UPON THE APPELLANT FOR GOOD GROUNDS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 17-08-2020 AND 06-09-2019 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWTH:

FACTS:

1. That the appellant was working on the post of PSHT and has performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against the appellant.
2. That the appellant's mother became ill and appellant rushed to Hospital. The treatment took some time due to which he was compelled to remain absent from his duty.
3. That without conducting inquiry and without adopting proper procedure, the appellant was removed from service vide order 06.09.2019 without serving charge sheet and show cause notice to the appellant. **(Copy of order dated 06.09.2019 is attached as Annexure-A)**
4. That the appellant filed departmental appeal against the removal order which was also rejected on 17.08.2020 without giving any reason. **(Copies of departmental appeal and rejection order are attached as Annexure-B&C)**
5. That now the appellant come to this august tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned order dated 17.08.2020 and 06.09.2019 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That no inquiry was conducted against the appellant and the appellant was removed in slipshod manner which is the violation of rules and superior courts judgement.
- C) The authority did not give any reason for dispensing of inquiry which is mandatory under the law.
- D) That no proper procedure was followed before passing the impugned order of removal from service and the appellant was removed from service in slipshod manner.

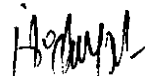
- E) That no charge sheet was issued to the appellant before imposing major punishment of dismissal from service, which is the violation of law and rules.
- F) That even show cause notice was not served to the appellant before passing the impugned order of removal, which is against the norm of justice and fair play.
- G) That the penalty of removal from service is very harsh which is passed in violation of law and, therefore, the same is not sustainable in the eyes of law.
- H) That the appellant has been condemned unheard and has not been treated according to law and rules.
- I) That the appellant did not intentionally absent himself from duty but his mother was ill and as illness is beyond the control of human, therefore appellant was compelled to remain absent from his duty due to the illness of his mother.
- J) 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

THROUGH:



**(HIDAYAT ULLAH KHATTAK)
ADVOCATE HIGH COURT**

Physician

Dr. Iqbal Haider

M.B.B.S (Peshawar), F.C.P.S (Medicine)

Assistant Professor Of Medicine

Medical "A" Ward

Khyber Teaching Hospital Peshawar

Mob: 0311-9021968



هوالتانی

Not valid for court

فزیشن

میڈیکل سپیشلسٹ

ڈاکٹر اقبال حیدر

ایم بی بی ایس (پشاور)، ایف سی پی ایس (میڈیسن)

اسٹنٹ پروفیسر آف میڈیسن

میڈیکل اے وارڈ خیبر ٹیچنگ ہسپتال پشاور

Patient's Name Mas Khan

Age 65 Date 27/8/19

Clinical Record

Rx

fai
ASd
es
EPC

Tosellu

OLE
TP C
BP 140
70

SE
ms

1. KLC Sacf

2. Zentia } in 12/1p
3. Grant }

4. Riscoke 4omg

5. Decadren

Cap Riscoke 40
in 12/1p

tb Motilini

tb Panadol.
22

tb ~~Novidone~~

ایم ای ایس (پشاور)، ایف سی پی ایس (میڈیسن)۔ اسٹنٹ پروفیسر آف میڈیسن، میڈیکل اے وارڈ خیبر ٹیچنگ ہسپتال پشاور۔

محمد فراز: 0314-9180015

کلینک بروز اتوار: نزد خیبر چوک انجیب میڈیکل پلازہ فرنیچر روڈ بالمقابل آفریدی سکول باڑہ خیبر ایجنسی

tb Plagif - 400
1m

To: 690

OUT DOOR PATIENT TICKET

District Kyber Agency CRP No: _____

Facility Name BHU Jambai

Name M/O Abdul Wahid Age: 70yrs Sex: F

Father's /Husband's Name Jamil Khan

27-2-19

Monthly OPD Serial No. 690

Provisional Diagnosis: RA Sub. Hemophlogia.

Date	Clinical Findings / Investigations / Treatment .Referred/Test Findings
<p>4/0 4. Sec Declines ↓ mouth Tumor Bp 160/85</p>	<p>Knon DM 2 HTN</p> <p>Tab Norvis 600 ویدو ویدو</p> <p>Tab Tenamin 1507 ویدو ویدو</p> <p>Tab Macobind 500 ویدو ویدو</p> <p>Need physiotherapy aspenin</p> <p>M. Shh 27-2</p>

M.O. In Charge
B.H.U. Jambai



ACCIDENT & EMERGENCY DEPARTMENT

MEDICAL TEACHING INSTITUTION PESHAWAR, KP

Hayatabad Medical Complex

Serial# 669883

Patient: ACE19711780

MARYAM

65 Yearl Female

Father/Husband: HMC KPA

Date: 09-JUL-19 13:42:30

Invoice #: K01191295612

Receipt# K01191295682

	R _x	Remarks
Presenting Complaints <u>HTN</u>		
Past Medication History BPs 160/80 Hg 140/80 Hg		Rx to Medico 9m. Lasix 60mg w stat 9m. suboxone 20 w stat
Investigations ECG		W. commode 22 9m. Zantac w stat 9m. rospa
Diagnosis		
Plan	Reason For Referral	Stamp & Signature of prescribe S



آصف کلینک اینڈری ہائیڈریشن سنٹر

میڈیکل پریکٹیشنر عادل آفریدی ڈی۔ ایچ (آر ایم، پی)

Name Maryam Age 65 Sex ♀ Date 24/8/019

Clinical Record

Rx

Eye
Pain

cael

11v li 224

ع

♀ RLC - 100ml

Bloody

2 Zenta

Discharge

2 Grat (imp)

O/E

3 Decadron

T/P 100F

3 Riseke 40mg

BP 140

3 Novidate 100ml

80

3 Oxidant (g) 100ml

O/E

علاجی ن 35 - 11

WAD

tb Novidate 500

tb Plazye 4ml

♀ P Riseke 20

Ph:0315-1916466

ایڈریس: مشین ڈھنڈ شلوبر بازہ خیبر ایجنسی

♀ P Spasmodin 22

مدد حسابہ زر (5) - مورخہ ۱۰/۱۱/۲۰۱۷ء

حسابہ مالی

مخالف (بھالی ملازمت)

موردبانہ گذارش ہے کہ مندرہ عبدالوکیل PSHT ڈرائیوری سکول سے مندرہ کی سالانہ معائنہ کی خدمت میں اسکول میں تفریحی علاج تھی۔ میں بھی اس سے مندرہ کو سکول سے غیر حاضر رہا۔ مندرہ گھرانے کا واحد کفیل ہے۔ اس لئے اس لئے آپ صاحبان محضرتی کس کے مندرہ کو اپنی بار در بحال کرنے کے احکامات منابت فرمائیں مشکور فرمائیں۔ مندرہ تاحیات آپ صاحبان کو دعا گو رہے گا

عین گذارش ہوگی
الحاضرین

المخالف من عبدالوکیل PSHT گورنمنٹ ڈرائیوری سکول
ستوری خیل بارہ ضلع خیبر

Handwritten signatures and dates at the bottom of the document.

BEFORE KHYBER PAKHTUNKHA SERVICE TRIBUNAL PESHAWAR.

Appeal No.2224/2021

Abdul Wakeel.....Appellant.

Versus

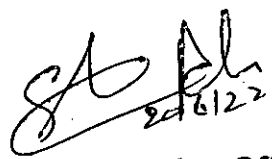
Director E &SE KP & Others.....Respondents.

Parawise Comments on behalf of Respondent No. 2 & 3.

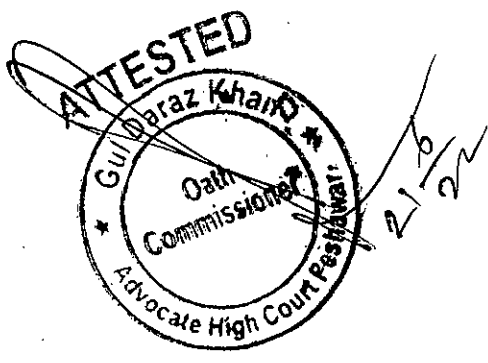
Affidavit

We the respondents do hereby solemnly affirm and declare that the contents of the accompanying para wise comments submitted by the respondent are correct to the best of their knowledge and belief and nothing has been concealed from this honorable court.

Respondent No. 3

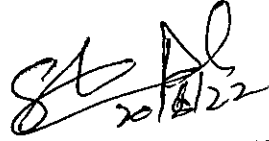


**District Education Officer
NMD Khyber**



Authority Letter

Mr. Munawar Khan /focal Person of (Litigation) District Education Officer Khyber is hereby authorized to submit parawise comments on behalf of the respondent.



20/11/22

**District education Officer
NMD Khyber**

Detailed Report / Comments

P- 6
Amex = A

The detailed report or comments in R/O the following teachers namely

1. Haji Badshah PST GPS tarkhokas,
2. Abdul Wakeel PSHT GPS Almas stori Khel,

Is as under,

1. Mr. Haji Badshah PST of GPS tarkhokas upper bara was redeployed to GPS sambaba Bar Qambar Khel in plain area because the actual school of the said teacher is still non-functional / closed due to military operation in the area. He was performing his duty regularly in GPS sambaba Bar Qambar khel. Meanwhile Colonel Abrar khan contacted Jadoon Khan DEO Khyber to immediately redeploy the teachers of non-functional schools of upper bara to Mastak area BCS schools to perform their duty over there to educate those poor children of the said area, all the teachers obeyed the order of DEO Khyber but Haji Badshah PST did not comply with the order of DEO Khyber. He was informed time and again to perform his duty over there as it is DEO order but he did not do so. Two consecutive absence notice were issued to him vide ENDST NO 9676-79 dated 02/08/2019, ENDST NO 9785-89 dated 16/08/2019 but he did not pay heed to them and remained absent from his duty over there. After all the legal formalities Haji Badshah PST was removed from service vide letter ENDST No 9390-96 dated 06/09/2019.
2. Mr. Abdul Wakeel PSHT GPS Almas Stori khel is not interested in his duty because he always remained absent from his duty at GPS Almas Stori khel and the poor children of that area are suffering a lot due to the absence of (Head Teacher) of the school. He was time and again reported by the locality of the area as well, they were also not satisfied with his duty. He was suspended from his duty on 14/03/2019 as he was not performing his duty. After sometime his suspension order was cancelled on the condition that he will perform his duty honestly and regularly, but again he was found absent from his duty, lastly two absence notice were served upon him vide ENDST NO 6206-08 dated 13/05/2019 and ENDST NO 6376-80 dated 24/05/2019 but he did not respond positively and thus removed from his service vide ENDST NO 9390-96 dated 06/09/2019


DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

C12
ATTESTED



P- 7
Anex = 13

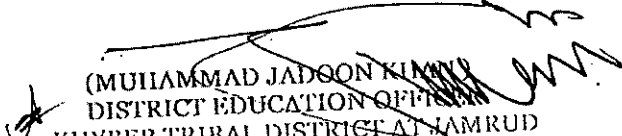
District Education Office
Khyber Tribal District at Jamrud No _____ Dated _____

Phone. 091-5820265 Fax 091-5820265

ABSENT NOTICE.

You: Mr. Abdul Wakeel PST GPS Almas Stori Khel Bara District Khyber are absent from your duty since May 2019 as reported Asstt. District Education Officer Bara District Khyber.

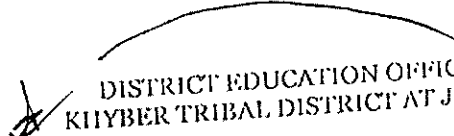
You are hereby directed to explain your position within a week time about your absenteeism, otherwise strict disciplinary action will be taken against you under KPK Government (Efficiency & Disciplinary) rules 2011.


(MUHAMMAD JADOON KINNU)
DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

Endst No. 6206-08 Dated 13/5/2019.

Copy forwarded to the:-

1. Director of (E&S) Education at Peshawar.
2. Agency Accounts Officer Khyber District at Jamrud.
3. Male Accounts Branch AEO Khyber.
4. AAEO (Female) concerned.
5. Official Concerned.


DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

C12
ATTESTED



District Education Office No _____
Khyber Tribal District at Jamrud Dated _____
 Phone. 091-5820265 Fax 091-5820265

ABSENT NOTICE No.2

You:

Mr: Abdul Wakeel PST GPS Almas Stori Khel Bara District Khyber are absent from your duty since May 2019 as reported Asstt: District Education Officer Bara District Khyber.

You are hereby directed to explain your position within a week time about your absenteeism, otherwise strict disciplinary action will be taken against you under KPK Government (Efficiency & Disciplinary) rules 2011.

(MUIHAMMAD JADOON KHAN)
 DISTRICT EDUCATION OFFICER
 KHYBER TRIBAL DISTRICT AT JAMRUD

Endst No. 6376-80 Dated 24 / 5 / 2019.

Copy forwarded to the:-

1. Director of (E&S) Education at Peshawar.
2. Agency Accounts Officer Khyber District at Jamrud.
3. Male Accounts Branch AEO Khyber.
4. AAEO (Female) concerned.
5. Official Concerned.

DISTRICT EDUCATION OFFICER
 KHYBER TRIBAL DISTRICT AT JAMRUD

C12
ATTESTED

DISTRICT EDUCATION OFFICE
 KHYBER TRIBAL DISTRICT AT JAMRUD
 PHONE. 091-5820584 FAX 091-5820584
 No: _____ DATED: _____ / _____ / 2019

P = 9
 Annex = D

DISTRICT EDUCATION OFFICE KHYBER TRIBAL DISTRICT AT JAMRUD.

NOTIFICATION

1. WHEREAS the District Education Officer had come to know that you the following teacher of Bara Khyber Tribal District had been absent without any leave sanction and non compliance of the order of the competent authority of this office.

Sr. NO.	Name / Designation	School	Personal Number
1.	Haji Badshah PST	GPS Tarkho Kass Bara	50355762
2.	Hilmand Khan PST	GPS Tarkho Kass Bara	50161605
3.	Abdul Wakeel PST	GPS Almas Stori Kbel	00114701

2. NOW THEREFORE in exercise of the powers conferred under Rules-4 (b) (iv) of Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) 2011, the competent Authority District Education Officer Khyber, is pleased to impose a major penalty of "removal from service" upon the above mentioned teachers of Bara Khyber Tribal District with immediate effect.

(MUHAMMAD JADOON KHAN)
 DISTRICT EDUCATION OFFICER
 KHYBER TRIBAL DISTRICT AT JAMRUD
 Dated 6/9/ 2019

Enlist: No. 9390-96

- Copy of the above is forwarded to the:
1. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
 2. Deputy Commissioner Khyber Tribal District at Peshawar.
 3. District Accounts Officer Khyber Tribal District at Jamrud.
 4. All ADEOs Local Office.
 5. Superintendent / Accountant for entry in his service book.
 6. Official concerned.
 7. Office Copy.

~~DISTRICT EDUCATION OFFICER
 KHYBER TRIBAL DISTRICT AT JAMRUD~~

(12)
ATTESTED

P = 10
Ames = E

**DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA**

NOTIFICATION.

1. WHEREAS Mr. Abdul Wakeel Ex-PSHT GPS Almas Stori Khel District Khyber was proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of wilful absence from official duty in May 2019.
2. AND WHEREAS, the DEO concerned being competent authority issued absent notice under registered cover vide No. 11973 dated 09.11-2019 and No. 6206 dated 13.05.2019.
3. AND WHEREAS, the DEO Khyber being competent authority fulfilling codal formalities imposed major penalty "Removal" from service" vide Endst: No. 9390-96 dated 06-09-2019.
4. AND WHEREAS, the above named teacher submitted an appeal to this office vide dated 13.09-2019, which was sent to DEO concerned for comments vide this office letter 5340 dated 18-09-2019 who submitted his comments to this office vide No. 11973 dated 09-11-2019.
5. Whereas the inquiry was ordered in light of his appeal but he failed to physically appear before the inquiry officer and subsequently the inquiry officer rendered his appeal for regression
6. AND WHEREAS, the competent authority, after having considered the facts and evidence on record, is of the view that charges against accused teacher have been proved.
7. NOW THEREFORE, in exercise of powers conferred under Khyber Pakhtunkhwa Servants (Efficiency & Discipline) Rules-2011 the Appellate Authority (Director E&SE) Khyber Pakhtunkhwa is pleased to up hold the penalty and reject the appeal in respect of Mr. Abdul Wakeel Ex- PSHT GPS Almas Stori Khel District Khyber under Rule(17)sub -rule(2)(a)of Khyber Pakhtunkhwa E&D Rules-2011.

DIRECTOR.

Endst: No. 2394-96 F No. E-6/Vol II Khyber. Dated Peshawar the 17/8 2020.

Copy forwarded for information and necessary action to the:-

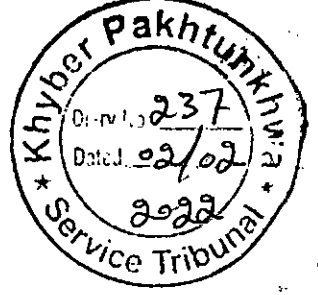
1. District Education Officer Khyber.
2. Teacher concerned.
3. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.
4. Master File.

[Signature]
Deputy Director (Estb :)
Merged Area
17-8-2020

02
ATTESTED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2022
In
Service Appeal No.2224/2021



Abdul Wakeel.....**Appellant**

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
Education & others.....**Respondents**

**APPLICATION FOR FIXATION OF EARLY DATE
OF HEARING IN THE ABOVE CAPTIONED
SERVICE APPEAL.**

Respectfully Sheweth:

1. That the captioned Service Appeal is pending adjuration before this Hon'ble Tribunal which is fixed for 09.03.2022
2. That the appellant is jobless since his removal from service and appellant is the sole bread earner of his family and must likely that his appeal be allowed in his favour.
3. That being service matter and as per judgments of higher forum service matter should be decided expeditiously.

It is, therefore, humbly prayed that on acceptance of this application the date given be expedited and be fixed at the earliest in the best interest of justice.

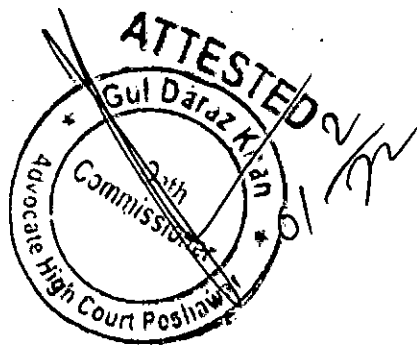
Appellant
Through

Dated: 01.02.2022


Hidayatullah Khattak
Advocate High Court

AFFIDAVIT

As per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

CNIC NO 21201-8880625-1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____/2022

In

Service Appeal No.2224/2021

Abdul Wakeel.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
Education & others.....**Respondents**

**APPLICATION FOR FIXATION OF EARLY DATE
OF HEARING IN THE ABOVE CAPTIONED
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Respectfully Sheweth:

1. That the captioned Service Appeal is pending adjuration before this Hon'ble Tribunal which is fixed for 09.03.2022
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It is, therefore, humbly prayed that on acceptance of this application the date given be expedited and be fixed at the earliest in the best interest of justice.

Appellant

Through

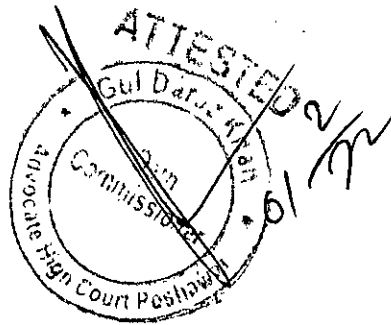
Dated: 01.02.2022


Hidayatullah Khattak
Advocate High Court

AFFIDAVIT

As per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT



CNIC No 21201-8880625-1

"B"

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

No.

Appeal No. 2224 of 2021

Abdul waheed Appellant/Petitioner

Versus

The Secy I & IE KPk Peshawar Respondent

Respondent No. 3

Notice to: —

The Distt Education Officer
Khyber Distt. Jamrud.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case 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 30/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 1/11

Day of Sep 20 21

(For Reply)


 Registrar,

2 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

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

No.

Appeal No. 2224 of 20 21

Abdul Wakeel Appellant/Petitioner

Versus

The Secy: ERSE KPK Peshawar Respondent

Respondent No. 1

The Secretary (ERSE) KPK Peshawar

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case 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 30/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 1st

Day of Sep 20 21

(For Reply)
[Signature]

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

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

No.

Appeal No.....

2224

of 20

21

Abdul Wakeel

Appellant/Petitioner

Versus

The Secy: ERJE KPM Peshawar

Respondent

Respondent No.....

The Director ERJE Deptt.
Peshawar

Notice to: —

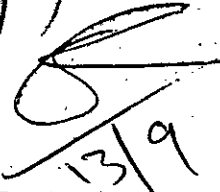
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....30/11/2021.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....11.....

Day of.....Sep.....20.....21.....

(For Reply)

13/9


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.