

06th July, 2022

Appellant alongwith his counsel present. Mr. Kabir Ullah Khattak, Additional AG for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Last chance is given. To come up for written reply/comments on 07.09.2022 before S.B.



(Kalim Arshad Khan)
Chairman

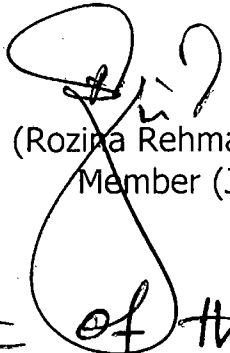
20.12.2021 Appellant present through counsel.

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 07.03.2022 before S.B.


Appellant deposited
Security & Process Fee

25/12/21


(Rozina Rehman)
Member (J)

7-3-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 24⁵/₂₀₂₂


Reader

24.05.2022 Nemo for the parties. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Previous date was changed on the strength of Reader note, therefore notice be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 06.07.2022 before S.B. Notice be also issued to the appellant and his counsel for the date fixed.



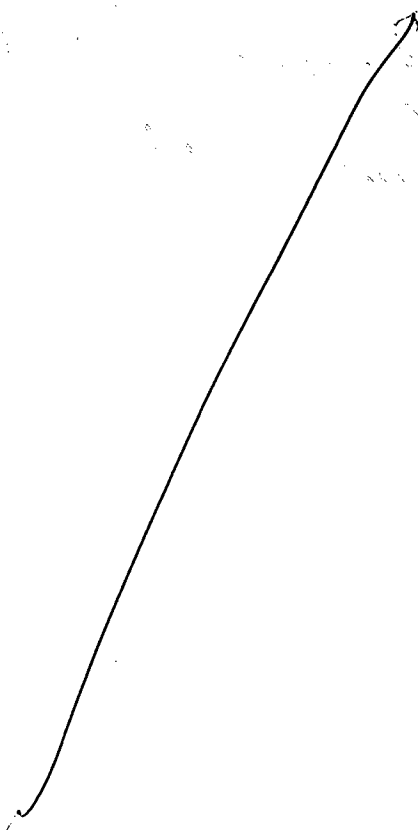

(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7600 /2021

S.No.	Date of order proceedings.	Order or other proceedings with signature of judge
1	2	3
1-	15/10/2021	<p>The appeal of Mr. Hassin Ullah presented today by Mr. Qazi Zaki ud Din 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> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>20/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 7600/2021

Hassin Ullah.....(Appellant)

VERSUS

District Education Officer (M) (DEO) Swat at Gulkada and
others.....(Respondents)

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-8
2.	Affidavit		9
3.	Addresses of the parties		10
4.	Copy of the CNIC	A	11
5.	Copy of the Service Record/Service Book of the appellant	B	12-18
6.	Copy of the application with Form of leave	C	19-20
7.	Copy of the impugned order dated 14/12/2020 with inquiry report	D	21-22
8.	Copies of the order of respondent No. 3 dated 04/10/2021 passed in appeal	E	23
9.	Grounds of appeal with notice	F	24-26
10.	Wakalat Nama		27

Hassin Ullah
Appellant

Through

Dated: 15/10/2021

Qazi Zaki ud Din
Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.
Cell No. 0331-8234060

3/1/21

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. _____/2021

Hassin Ullah S/o Bakht Zamin Khan (the then SPST, (BPS-14) posted at Government Primary School Shangwati, District Swat) R/o Mohallah Bakht Abad, Sichbanr, Roniyal, Tehsil Matta, District Swat.....(Appellant)

VERSUS

1. District Education Officer (M) (DEO) Swat at Gulkada.
2. Sub Divisional District Education Officer (SDEO) (M) Matta District Swat.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, at G.T. Road, Near Hashtnagri, Peshawar.
4. Assistant Director Elementary and Secondary Education (Establishment), Peshawar
5. Assistant Director Elementary and Secondary Education Local Office, Peshawar.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF
THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, AGAINST THE
ORDER AND DECISION DATED 04/10/2021
BEARING NO. 5201/F. NO. 100/ APPEAL
PST (M) GENERAL SWAT BY VIRTUE OF
WHICH APPEAL OF THE APPELLANT
AGAINST THE ORDER OF HIS REMOVAL**

—, 12 1

**FROM SERVICE DATED 14/12/2020 WAS
REJECTED/ DISMISSED.**

Prayer:

This Hon'ble Tribunal may be please to accepted this appeal, the impugned order and decision of respondent No. 3, 4 and 5 as well dated 04/10/2021 rejecting appeal of the appellant against the order dated 14/02/2020 may be set aside and it may be direct to the respondents to reinstate the appellant in his service and to grant him extra ordinary leave without pay that was applied for the appellant.

Any other relief not specifically asked for to which the appellant was found entitled in the circumstances of the case may also be allowed.

Respectfully Sheweth:

- A. That the addresses of the parties given in the heading of this appeal will be sufficient for summoning the parties for appearance before this Hon'ble Tribunal.

— 3! —

B. The brief facts given rise to this appeal are:

1. That the appellant was employed in the Education Department on 06/10/2005 as PTC (BPS-9) Teacher and was posted at Government Primary School Khwar Mandaw, Mian Kalay, Matta, District Swat. (Copy of the CNIC is attached as annexure "A").
2. That the appellant served the department for about 15 years honestly and to the best of his ability as is revealed from his service record of the appellant. (Copy of the Service Record of the appellant is attached as annexure "B").
3. That the appellant applied to respondent No. 1 for the grant of extra ordinary leave without pay w.e.f. 09/03/2020 to 08/03/2023 (1095) days. (Copy of the application is attached as annexure "C").
4. That the appellant was verbally told that leave has been granted so after becoming satisfied the applicant left for abroad and stayed at Karachi.

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5. That the appellant was illegally proceeded against for absence from duty despite the fact that the appellant had already applied for extra ordinary leave without pay to which the appellant was entitled as of right by the reason that the applicant had already completed 15 years service.

6. That inquiry was conducted in the result of which the appellant was awarded punishment by passing the impugned order dated 14/12/2020. (Copy of the impugned order dated 14/12/2020 is attached as annexure "D").

7. That feeling aggrieved of the impugned order of respondent No. 1 the appellant preferred a departmental appeal to respondent No. 3 where appeal of the appellant was rejected. It may be mention here that perusal of the order of respondent No. 3 would reveal that the same order is not a speaking one giving no reason for rejection of appeal. (Copies of the order of respondent No. 3 dated 04/10/2021 and grounds of appeal are attached as annexure "E" & "F").

→ 5 ←

8. That it may be mention here that erroneously the appellant also instituted a Writ Petition No. 860/2020 but the same was not decided by reason of want of jurisdiction of the High Court because the matter was falling within the jurisdiction of the Service Tribunal.

9. That now the appellant has come to this Hon'ble Tribunal challenging the impugned order of respondents No. 1 and 3 on the following grounds inter-alia:

GROUND:

A. That the impugned order of respondent No. 3 maintaining the order of respondent No. 1 and rejecting appeal of the appellant are against law, facts and procedure and as such are not tenable.

B. That perusal of both the impugned orders of respondents No. 1 and 3 would reveal that the same have been passed without referring to any cogent reason or legal and factual provision and the

-16-

appellant was condemned unheard and the orders questioned in this appeal are not speaking orders.

- C. That the appellant had rendered devoted service for about 15 years and thereafter he applied for extraordinary leave without pay to which the appellant was entitled as of right by reason of his length of service, but the appellant was deprived for no reason mentioned in both the impugned orders.
- D. That request of the appellant was impliedly allowed because the application of the appellant would reveal that the same has not been rejected till date but even then the appellant was illegally proceeded against and was awarded major punishment.
- E. That so-called inquiry allegedly conducted has also failed to take into consideration to the fact that application of the appellant for extra ordinary leave without pay was not rejected till date even then the appellant was proceeded against by ignoring this important aspect of the case.
- F. That by no standard of justice and fair play the appellant could be proceeded against under the circumstances when the appellant had rendered

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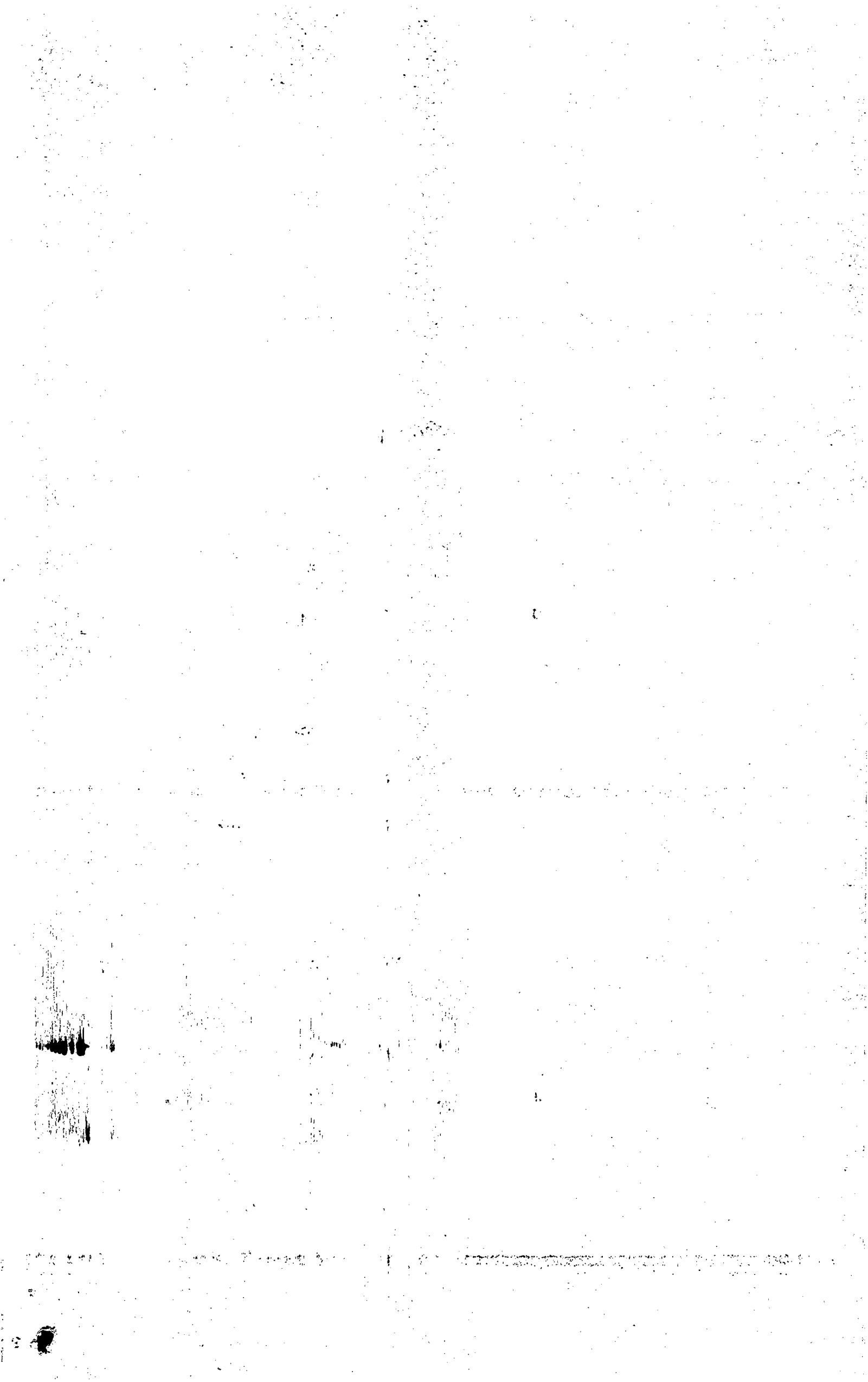
about 15 years service and as such was entitled for the grant of extra ordinary leave without pay to which he was entitled as of right but even then the appellant was illegally proceeding against.


G. That respondent No. 1 was bound under the law to decide application of the appellant for the grant of extra ordinary leave without pay on the basis of long service.

H. That for the grant of extra ordinary leave without pay the criteria laid down in the rules is rendering 7 years service continuously but the appellant had rendered 15 years service continuously was wrongly ignored by the respondents.

I. That the punishment awarded to the appellant is highly excessive because the appellant was not liable to be awarded to him major penalty even then the appellant was punished by imposing harsh punishment on him.

J. That the major penalty also provides for retirement with pension and the appellant was also entitled to the grant of pension that he had earned because he served for 15 years while the Supreme Court has

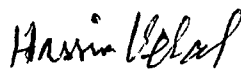




held that a Civil Servant who complete 10 years service become entitled to pension.

It is, therefore, respectfully prayed that this Hon'ble Tribunal may be please to accepted this appeal, the impugned order and decision, of respondent No. 3, 4 and 5 as well dated 04/10/2021 rejecting appeal of the appellant against the order dated 14/02/2020 may be set aside and it may be direct to the respondents to reinstate the appellant in his service and to grant him extra ordinary leave without' pay that was applied for by the appellant.

Any other relief not specifically asked for to which the appellant is found entitled in the circumstances of the case may also be allowed.


Appellant

Through



Dated: 15/10/2021

Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. _____/2021

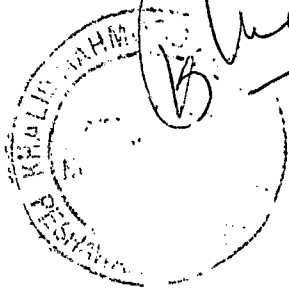
Hassin Ullah.....(Appellant)

VERSUS

District Education Officer (M) (DEO) Swat at Gulkada and
others.....(Respondents)

AFFIDAVIT

I, Hassin Ullah S/o Bakht Zamin Khan (the then SPST, (BPS-14) posted at Government Primary School Shangwati, District Swat) R/o Mohallah Bakht Abad, Sichbanr, Roniyal, Tehsil Matta, District Swat, do hereby solemnly affirm and declare on oath, that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



15-10-21 Hassin Ullah
DEPONENT
CNIC: 15601-1015681-1

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. _____/2021

Hassin Ullah.....(Appellant)

VERSUS

District Education Officer (M) (DEO) Swat at Gulkada and
others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Hassin Ullah S/o Bakht Zamin Khan (the then SPST, (BPS-14) posted at Government Primary School Shangwati, District Swat) R/o Mohallah Bakht Abad, Sichbanr, Roniyal, Tehsil Matta, District Swat.

RESPONDENTS:

1. District Education Officer (M) (DEO) Swat at Gulkada.
2. Sub Divisional District Education Officer (SDEO) (M) Matta District Swat.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, at G.T. Road, Near Hashtnagri, Peshawar.
4. Assistant Director Elementary and Secondary Education (Establishment), Peshawar.
5. Assistant Director Elementary and Secondary Education Local Office, Peshawar.

Hassin Ullah
Appellant

Through

Dated: 15/10/2021

Qazi Zaki ud Din
Qazi Zaki ud Din
Advocate Supreme Court
Of Pakistan.



PAKISTAN National Identity Card

ISLAMIC REPUBLIC OF PAKISTAN

Name
Hassin Ullah



Father Name
Bakht Zamin Khan

حسین اللہ

بخت زمین خان

Gender | Country of Stay
M | Pakistan

Identity Number | Date of Birth
15601-1015681-1 | 13.04.1980

Date of Issue | Date of Expiry
19.02.2026 | 19.02.2030



Handwritten signature

Holder's Signature

10

Annexure A

15601-1015681-1

مرد | طلق سوات

مستحق ہے عملیاتی آبادی ڈانگ خانہ سبکدوشی و سہولت

مرد | طلق سوات

10156120502
116-80 2671-5

مشدودہ ہزار ملنے پر قریبی ایئر بس میں ڈال دیں

Athas test

12

Note:— The entries in this page should be renewed or re-attested at least every five years and the Signatures to Lines 9 and 10 should be dated.

1. Name: HASSINULLAH

2. Race: AFGHAN

3. Residence: VILLAGE RONCAL P.O. SITBAN
TERRITORY OF NATTA DISTRICT SWAT

4. Father's name and residence: BAKHT ZAMIN KHAN (AS ABOVE)

5. Date of birth by Christian era as nearly as can be ascertained: (15-04-1980)
FIFTEENTH APRIL N.H. EIGHTY

6. Exact height by measurement: 5-6"

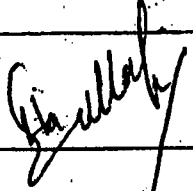
7. Personal marks for identification: A MOLE ON NECK (RT SIDE)

8. Left hand thumb and Finger Impression of (Non-Geopied) Officer.

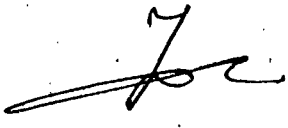
Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

9. Signature of Government Servant: 

10. Signature and Designation of the Head of the Office, or other Attesting Officer: 
By: Distt. Officer, (M)
Primary Swat, SW

Attested


1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 CSR	Pay in substantive post	Additional Pay if officiating	Gr. emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.P.C. at							
<i>Pumps Kharwar - Mandaw</i>	<i>Contract</i>			<i>Rs. 2535/-</i>		<i>6-10-05</i>	<i>Shaukhat</i>
<i>-do-</i>	<i>-do-</i>			<i>Rs. 2535/-</i>		<i>1-12-05</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 2695/-</i>		<i>1-12-06</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>	<i>BPS No. 7 (2440-160-7740)</i>					<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 3100/-</i>		<i>7-1-07</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 3260/-</i>		<i>1-12-07</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 3100/-</i>		<i>1-7-07</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>						<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 3185/-</i>		<i>1-10-07</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 3375/-</i>		<i>1-12-07</i>	<i>Shaukhat</i>
<i>"</i>	<i>"</i>	<i>BPS-9 (3820-230-10720)</i>					<i>Shaukhat</i>
<i>"</i>	<i>"</i>			<i>Rs. 4050/-</i>		<i>1-7-08</i>	<i>Shaukhat</i>
<i>Gmps Ghuzano Cham</i>				<i>Rs. 4280/-</i>		<i>1-12-08</i>	<i>Shaukhat</i>
<i>do</i>		<i>6-10-05</i>					<i>Shaukhat</i>
<i>do</i>		<i>Employee Verified on 26.12.07</i>					<i>Shaukhat</i>
<i>do</i>		<i>Other Receipts</i>					<i>Shaukhat</i>
<i>do</i>		<i>By: District Officer, (P)</i>					<i>Shaukhat</i>
<i>do</i>		<i>Primary Sect.</i>					<i>Shaukhat</i>
				<i>Rs. 4510/-</i>		<i>1-12-09</i>	<i>Shaukhat</i>
				<i>Rs. 4510/-</i>		<i>1-12-09</i>	<i>Shaukhat</i>

Handwritten signature and notes at the bottom of the page.

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Signature of Government Servant	Name and Designation of head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	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 taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government.	Government to which debitabale		
<i>Handwritten signature</i>	<i>Amulom</i> By: <i>[Signature]</i> Pry: Swat	30/11/05	Ann. Incr not allowed	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>Amulom</i> By: D.O. (M) Pry: Swat	30/11/06	Ann. Incr	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/6/07	Scale revised	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/11/07	Ann. Incr	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/11/07	Ann. Incr	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/9/07	Scale upgraded to BPS-9	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/6/08	Scale revised	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/11/08	Ann. Incr	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	30/11/09	Ann. Incr	<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	31-7-00		<i>[Signature]</i> By: D.O. (M) Pry: Swat					
<i>Handwritten signature</i>	<i>[Signature]</i> By: D.O. (M) Pry: Swat	31-7-00	Shifted to Cluster	<i>[Signature]</i> By: D.O. (M) Pry: Swat					

APPOINTMENT

Appointed as PTC Trd Teacher on Contract basis at SNO I Page on 2nd vide DEO Swat Encl no. 6326-28 Dtd 19/9/05 Oppos Khwan mandan.

[Signature]
By: Distt: Officer (M)
Primary Swat.

Corrigendum

Corrigendum regarding Father's Name & Village of S.No. 1 in the office order no- 6326-28 Dated 19-9-05 issued vide Enclst. no. 12508-30 Dated 30-5-2006

Deputy Distt: Officer (M)
Pry: Swat at Gulkada.

7/67
6/6
Pay ballance w.e.f 6/10 to 31/5/06 total Rs 29949/-

less BF 280, 41 EF 352 280
Net Rs 29285/-
emp w.e.f 1-6/06
14/4/07
11/2/07
10/2/07

C.R No. 11/2/07
Drawn difference of pay w.e.f 10/2/07 to 30/6/07 due to ...
Total Rs. 11/2/07

Distt. A/c Officer, SWAT

Attested

[Signature]

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art 37 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
PST at GPS Chaman Chaman	Sub Reg		Rs 4500/-			1/8/10	(Signature)
			Rs 4740/-			1/12/2010	(Signature)
			Rs 4740/-			01/2011	(Signature)
		B-9 (6200-3800-17500)				1/7/2011	(Signature)
			Rs 8100/-			1/12/2011	(Signature)
		B-12 (7000+3500-22000)				1/7/2012	(Signature)
			Rs 8500/-				
Office of the Accountant General Khyber Pakhtun Khwa Peshawar Pay Fixed in the Revised Basic Pay Scales R.B.P.S 2010 w.e.f. 01-07-2007 Pay Fixed @ Rs 3100 w.e.f. 01-07-2007 Adj. 282/- 230/- 1072/- B 9 Pay Fixed @ Rs 4050 w.e.f. 01-07-2008 R.B.P.S 2010 w.e.f. 01-07-2011 Pay Fixed @ Rs 7720/- w.e.f. 01-07-2011 Date of Next Increment is on 01-07-2011							
			Rs 8500/-			1/12/12	(Signature)
			Rs 9000/-			1/12/13	(Signature)
			3100/-			1/7/10	(Signature)

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1	2	3	4	5	6	7	8
Name of post	Whether substantive or temporary and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under A:1 371 C.S.R.	Pay in substantial post	Additional pay to officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
PST. (3/3) Kharwar Mulla	Sub/Per.		3375/- ⁹			1/10/07	(Kharwar Mulla)
PST at Camps Ghuzano - Dehans	do		3565/-			1/12/07	(Kharwar Mulla)
do	do		4280/-			1/2/08	(Kharwar Mulla)
do	do		4510/-			1/12/08	(Kharwar Mulla)
do	do		4740/-			1/12/09	(Kharwar Mulla)
do	do		4970/-			1/12/10	(Kharwar Mulla)
do	do		8100/-			1/7/10	(Kharwar Mulla)
do	do		8480/- ⁹			1/12/11	(Kharwar Mulla)
do	do		9000/- ¹²			1/7/12	(Kharwar Mulla)
do	do		9500/-			1/12/12	(Kharwar Mulla)
do	do		10000/-			1/12/13	(Kharwar Mulla)
do	do		Rs 10500/-			1 ¹² / ₁₄	(Kharwar Mulla)
do	do		B-12 (9655-850-28555)			1 ⁷ / ₁₅	(Kharwar Mulla)
			Rs 13605/-				

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

S.D.E.O
Pry. Sec.

Attested
7

9/15 (11)

9	10	11	12	13	14	15			
Name of Servant	Nature and Designation of the head of the office or other attesting officer in abatement of columns 1 to 8	Date of termination or appointment	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 taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to an recorded punishment or censure, or censure or praise of the Government Servant
						Period	Government to which debitable		
S.D.E.O (M) Pry: Swat	Re-fixed								
S.D.E.O (M) Pry: Swat	30/08	S/R							
S.D.E.O (M) Pry: Swat	30/08	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/09	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/10	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/11	S/R							
S.D.E.O (M) Pry: Swat	30/11	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/12	Scale upgraded to BPS 18							
S.D.E.O (M) Pry: Swat	30/12	Re-fixed							
S.D.E.O (M) Pry: Swat	30/13	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/14	Ann. Mc.							
S.D.E.O (M) Pry: Swat	30/15	S/ Revised							
S.D.E.O (M) Pry: Swat	30/15	Ann. Mc.							

Departmental Pay Fixation in Revised Pay Scale No-12 @ Rs. 7000-500-22000 Upgraded w.e.f 01/07/2012 vide No. SO (P&A) M-18/E&SE/2012 Dated Peshawar 11/07/2012 Pay in existing pay scale No. 9 Rs. 8100 Equal/next Stage in revised Pay Scale Rs. 8500 Pay Fixed on 8-11 With next is Increment on 01/12/2012 Rs. 8500

Dy: Distt: Officer (M) (E&SE) Swat

Service Verified on 11-12-2012 to 30-6-2012 by Roll & other Record of this case

Dy: Distt: Officer (M) Primary Swat

C.R. No. 114 of 8/11/11

12/12

12/12

Rs. 4000

ADP 19/11

T.No. 597 date 1/8

Brown dies of B-1211 w.e.f 1/1/12 to 4697

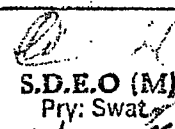
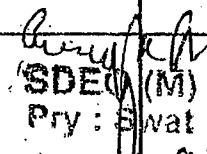
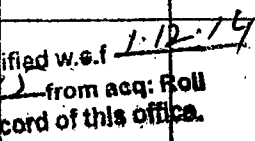
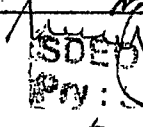
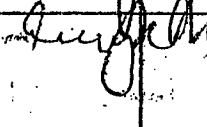
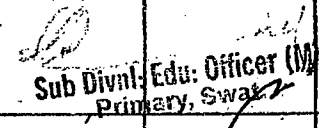
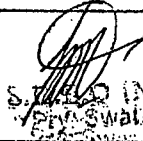
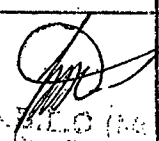
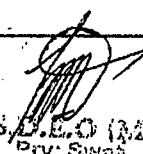
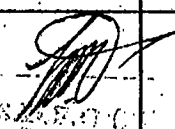
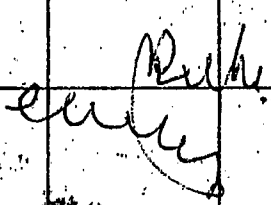
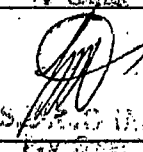
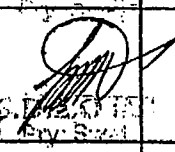
1/6 to 31/8/14

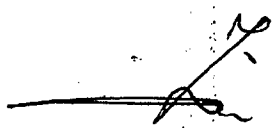
Service Verified w.e.f to 30-6-2012 by Roll & other Record of this case.


Attested

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Leave

9	10	11	12	13	14	15		
Signature of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	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 taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any punishment or censure, or reward or praise of the Government Servant
					Period	Government to which debitable		
 S.D.E.O (M) Pry: Swat	30/6/16	S/Riv	 S.D.E.O (M) Pry: Swat				 Service Verified w.s.f 1.12.14 to 30/11/16 from acq: Roll & other Record of this office.	
 S.D.E.O (M) Pry: Swat	30/11/16	A/me					 Sub Divnl: Edu: Officer (M) Primary: Swat	
 S.D.E.O (M) Pry: Swat	30/6/17	S/R					99 p 50	
<p><u>Notification / Scale / Pension</u></p> <p>Scale: Service No. 51-57-17 of 1987 (B) by Govt. of Punjab, Pakistan. Date: 07-07-17</p>							<p>Token No. 303</p> <p>Date: 13.10.16</p> <p>Amount Rs. 10000</p> <p>Less Zakat Rs. 1000</p> <p>Net 9000</p> <p>Serial No. 98</p> <p>Date: 13/10/16</p> <p>Auditor: AAO DAD</p>	
							<p>Service Verified w.s.f 1.12.2015 To 31.12.2016 from Acq: Roll & other Record of This Office</p> <p>Sub Divnl: Edu Officer (M) Primary Swat</p>	
							<p>Service Verified w.s.f 1.12.2017 To 31.12.2017</p>	
 S.D.E.O (M) Pry: Swat	30/11/2017	A/me						
 S.D.E.O (M) Pry: Swat		Promoted to B-14 Sr. Pst w.e.f. 16/04/2018						

Attested


Name of post	Whether substantive or officiating appointment, or (ii) whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) whether service under Art. 371 C.S.R.	Pay as per substantive post.	Accrual of gratuity & other benefits.	Other conditions of appointment.	Date of appointment.	Signature of Government Servant.
Senior PSI Sps. Sapelewa Swat / for: / sub		B-14 / 15181-1170-50000	24540 /	Office Order	Promoted to the post of Senior PSI	16/04/2018	

~~Attended~~

to Rs. 124800/-
Approved 14/3/18
T. 10512
28/15/18
H B A

16/3/18
27/3/18
31/3/18

560
5/3/18
16/3 to 30/3
14/3/18
14/3/18

Sub Divn. Edu. Officer (M)

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15	Reference to any record of the punishment or censure or reward or grant of the Government Servant
14	Signature of the head of the office or other officiating officer
13	Allocation of period of leave on average pay upto four months for which have salary is debitable to another Government
12	Name of the officer and duration of leave taken
11	Period which is Government which is debitable
10	Reason for termination (such as promotion, transfer, dismissal, etc.)
9	Signature of the officer or other officiating officer
8	Date of termination or appointment
7	Signature of the officer or other officiating officer
6	Signature of the officer or other officiating officer
5	Signature of the officer or other officiating officer
4	Signature of the officer or other officiating officer
3	Signature of the officer or other officiating officer
2	Signature of the officer or other officiating officer
1	Signature of the officer or other officiating officer

Endst. No: 941

dated: 18/12/2020

To:-

District Education officer
(Male) District Swat.

Annexure C

Subject: - APPLICATION FOR EXTRA ORDINARY LEAVE w.e.F 9-03-2020 to 08-03-2023 (1095 DAYS)

R/Sir,

I Mr. Hassin Ullah Post SPST BPS-14 of Govt primary school Shangwati Swat is performing my duties as PST in Education department since to 19-09-2005 date.

I have some domestic problems and therefore, you are requested to grant me leave without pay 09-03-2020 to 08-03-2023(1095 Days)

I shall be very thankful to you for this kindness.

Hassin Ullah
Yours obediently

(Hassin Ullah)

SPST GPS Shangwati

No _____

dated:- _____/_____/2020

Forwarded in original to DEP (M) swat for necessary action please.

Attested

[Signature]

[Signature]
Sub Dir. E. O. Officer (M)
District Swat.



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT.

(16)

21

14-12-20

Annexure D

NOTIFICATION

1. Whereas one Mr: Haseenullah SPST Government Primary School Shangwatai Matta Swat remained absent from duty with effect from 03.03.2020.
2. Whereas as per his application for leave he stated that he is proceeding to Karachi but according to the FIA report he has gone to CANADA by Flight No. BA260 Passport No. BH6806814 Benazir Bhutto International Airport Islamabad on 06.03.2020 without proper NOC/Ex -Pakistan leave from the competent authority.
3. Whereas a call notice as required under the Rules was sent on his home address, but he failed to resume his duties.
4. Whereas as required under E&D Rules a notice mandatory under article 9 of the E&D Rules was also published in "Daily Ajj and Daily Azadi" on 05/11/2020
5. Whereas he was asked in the said notice to resume his duty and explain the reason of absence but he failed.
6. Whereas the District Education Officer (M) Swat being competent authority after having considered the charges and evidences on record against him and found them as proved.

Now, Therefore I Muhammad Riaz, District Education Officer (M) Swat being competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 do hereby impose upon him "the major penalty of **REMOVAL FROM SERVICE**" under 4 (b) (iii) of the ibid Rules with effect from 03/03/2020 in the interest of public service.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst: No: _____/P.F/535/Haseenullah, SPST/DEO/M.

Dated 14/12/2020

Copy forwarded to:

- 1- The Director Elementary & Secondary Education KPK Peshawar.
- 2- The District Comptrollers of Account Swat at Saidu Sharif.
- 3- The District Monitoring Officer Swat.
- 4- The Sub Divisional Education Officer (M) Matta Swat with the direction to serve the order on the accused teacher.
- 5- P.A to District Education Officer (M) Swat the local office.
- 6- Mr. Haseenullah s/o Bakht Zamin Khan r/o Ronyal PST GPS Shangwatai (Registered).

Attested

DISTRICT EDUCATION OFFICER (M)
SWAT

22

12

OFFICE OF THE PRINCIPAL GOVT HIGHER SECONDARY SCHOOL BATAI

KHWAZA KHELA DISTT SWAT

NO 638

DATED 10/06/2020

To

The Distt Education Officer(M)
Swat.

SUBJECT: SUBMISSION OF ENQUIRY REPORT IN R/O HASEENULLAH SPST

Memo,

Reference your office Endst No473-75/P.F/Haseenullah/PST Dated 16/05/2020 an enquiry was conducted whose detail report is outlined as under.

A-METHODOLOGY FOR ENQUIRY: The following methods for enquiry were adopted

- 1-Field visit to, SDEO(M)Office Matta Swat .
- 2-Obtaining informations through interview and Questionnaires.

B-FINDINGS/CONCLUSIONS:After passing through a thorough investigations,The following findings/Conclusions are drawn out

1-Mr.Hassenullah filed an application for grant of 1095 days leave to your honour office on 19 /02/2020 duly forwarded by SDEO(M)Matta.

2- Mr.Hassenullah has sufficient length of service i.e 15 years without any break nor he has availed any leave in his service time making him eligible for grant of leave of any kind.

4- SDEO(M)Matta swat enquired his presence in the country or abroad position stated that he has gone to Karachi along with her mother for her treatment in a hospital(Annex-1)

D-RECOMMENDATIONS/SUGGESTIONS: I being an enquiry officer recommend your ^{honour} office to

1-Grant him 1095 Days leave without pay as his mother is seriously ill and he has to serve her in the hospital.

2-Direct SDEO(M)Matta Swat to immediately stop salary of Mr.Hassenullah SPST.

Attested



Thanks,



PRINCIPAL 10/06/2020
Govt. Higher Secondary School,
Batal Khwaza Khela Distt: Swat



DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. S201 /F. No. 100/Appeal
PST(M)General Swat.

Dated Peshawar the 04/10 /2021.

To

✓
The District Education Officer,
(Male) Swat

Subject: - **APPLICATION FOR DECISION OF DEPARTMENTAL APPEAL IN R/O**
HASEENULLAH EX-SPST GPS SHANGWATAI

Memo:

I am directed to refer to your letter No: 9368 dated 08-08-2021 on the subject noted above and to state that the competent authority has been rejected the appeal in r/o Mr. Haseenullah Ex-SPST GPS Shangwatai under Rules(17)(2)(a) of E&D Rules 2011. The applicant concerned may be informed accordingly.

Endst: No. _____/

Naal
Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar;

Copy forwarded to the:-

1. P.A to Director Elementary and Secondary Education local office.

Assistant Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

To,

16-1-21

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Ameeruse F

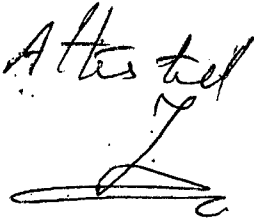
The Director Elementary & Secondary Education Khyber
Pakhtunkhwa at Peshawar Secretariat.

DEPARTMENTAL APPEAL

Sub: Departmental appeal against the impugned notification Endst:
No. 13071-76/P.F/535/Haseenullah/SPST/DEO/M dated 14-
12-2020, whereby the appellant has been removed from his
service illegally, unlawfully against the prevailing rules &
regulations, without any plausible cause.

Respected Sir,
The appellant submits as under;

- 1) That the appellant is a law abiding citizen of Pakistan and was duly appointed vide appointment order dated 06-10-2005, against the post of PTC (BPS-9) in GPS Khwar Mandaw, Mian Kalay, Matta, District Swat. (Copies of CNIC & service book are attached herewith)
- 2) That after appointment the petitioner served Educational Department as FST for 15 years, his entire service he performed his duties wholeheartedly, with full devotion and commitment, with the entire satisfaction of the High-ups and no complainant whatsoever in any shape was made against the appellant.
- 3) That due to some unavoidable circumstances the appellant was under process to go abroad, therefore the appellant moved an application before District Education Officer Swat for grant of extra ordinary leave without pay w.e.f 09-03-2020 to 08-03-2023. (Copies of application along with long live form are attached herewith)

Attested


25

- 4) That the same application was under process and in that very movement the visa of the appellant for abroad to Canada was came, therefore the appellant went abroad.
- 5) That the District Education Officer Swat vide notification Endst No. 3500/P.F/535/Haseenullah/PST/Shangwatai/Swat dated 10-08-2020 initiated an enquiry against the appellant and the Principle Govt: Higher Secondary School, Batal Khwazakhela, District Swat was appointed to enquire the matter and submitted his complete report. (Copy of notification Endst: No. 3500/P.F/353/Haseenullah /PST/Shangwatai/Swat dated 10-08-2020 is attached here with)
- 6) That the Principle Govt: Higher Secondary School, Batal Khwazakhela, District Swat / enquiry officer after thorough investigation filed his report No. 638 dated 10-06-2020 by holding that the appellant served the debarment as PST for a long period of 15 years and is eligible and entitled to be granted the leave of any kind. (Copy of report dated 10-06-2020 is attached herewith)
- 7) That the District Education (Male) Swat vide notification Endst: No 13071-76 dated 14-12-2020 illegally and without cogent reason removed the appellant from his service, which is against the norms of justice and is against the rules and regulations.
- 8) That the removal from service of the appellant is illegal, perverse, discriminatory, whimsical and void ab-initio. Hence the impugned notification is liable to be set-aside.

Attested



9) That against the said factitious removal procedure initiated by the District Education (Male) Swat, the appellants filed a writ petition before the August Peshawar High Court Mingora, Bench / Dar-ul-Qaza Swat just stopped the said illegal procedure and allowed the

grant of extra ordinary leave without pay w.e.f 09-03-2020 to 08-03-2023 (1095) days, for which the appellant was legally entitled under the law, rules & regulation. But in vain. And consequently the appellant was illegally removed from his service against the norms of justice.

- 10) That the appellant is the family head of his family and the only and lonely source of their livelihood and deprivation of him from service effect the other family members of the appellant.

It is therefore, humbly prayed that on acceptance of the instant departmental appeal the impugned notification Endst: No. 13071-76/P.F/535/Haseenullah/SPST/DEO/M dated 14-12-2020 may kindly be declared illegal, unlawful, ultra-vires and void ab-initio and the appellant may graciously be restored/reinstated.

Attest to be
True copy
[Signature]

[Signature]
SHAMSHER ALI
ADVOCATE HIGH COURT
EX-CIVIL JUDGE

No- 670
Dated 21-1-21

Appellant _____
Haseenullah
SPST GPS Shangwati, Matta, Swat

Through Counsel
[Signature]
SHAMSHER ALI KHAN 16-1-21
Advocate High Court
Cell No. 0301-853-4500
Office at: Chenar Hotel, Mingora, Swat.

BEFORE THE SERVICE TRIBUNAL KP AT
PESHAWAT

Haseemullah S/O Bakht Zamin Khan R/O Mohallah Bakht Abad
p. o. ^{Sijban} Sijban, Ronyal Tehsil Matta District Swat.....Petitioner

VERSUS

- 1) Secretary of Education Khyber Pakhtunkhwa at Peshawar
- 2) Director of Education & Secondary Education Kyber Pakhtunkhwa at Peshawar.
- 3) District Education Officer (Male) District Swat.
- 4) SDEO (Male) Matta District Swat.

.....Respondents

Subject :

NOTICE

Dear,

I am going to file a Appeal on behalf of Appellant Mr. Haseenullah, against the action & inaction of the respondents. (Copy of the said Appeal is sent along with this notice for your information please)

Thanks

Appellant
Haseenullah SPST GHC
Shangwati Matta Swat
Through Counsel

Bakht Zamin Khan Advocate
High Court
Cell No. 0347 5095280

A. Husein


نوٹ: اس وکالت نامہ کی نوٹو کالی ناقابل قبول ہوگی۔

Rs. 10/-

46

بار کونسل نمبر: PBC No 2742	TEHSIL BAR ASSOCIATION TBA MATTA SWAT.	TEHSIL BAR ASSOCIATION H	بریل نمبر 17541
بار ایسوسی ایشن نمبر:	تخصیص بار ایسوسی ایشن مٹہ (اپرسوات)		
رابطہ نمبر: 0333 9118717			

بعدالت جناب:

مخاطب: امجد منٹ	دعویٰ/درخواست: سرور حسن امجد
بنام ڈسٹرکٹ ایجوکیشن آفیسر صیغہ طلبہ اور ولیدہ رسالہ ڈسٹریکشن	علت نمبر:
حسین اللہ مجت نرمن رینڈرمنٹ	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ / امر /
ان مقام / سمیت / حور / کیلئے / فاضل / ذی / الدین / و / دیگر / وکیل / کو مقرر کر کے
اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کاروائی کو کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ
کرنے و تقرر ثالث کرنے، دعویٰ جواب دعویٰ، اقبال دعویٰ اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری
یکطرفہ، اجراء پیروی کرنے کا مختار ہوگا۔ نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور
مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کاروائی کیلئے کسی دیگر وکیل یا ایڈووکیٹ قانون کو اپنے ہمراہ یا اپنے بجائے تقریر کا
اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداخت منظور
قبول ہوگا، بدوران مقدمہ جو خرچہ ہر جانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار
ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے،
مقدمہ کسی عدالت میں بعد پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار
نہیں ہوں گے۔

Accepted

Advoeat supreme
Court of Swat

ایڈووکیٹ دستخط:

Hassanullah

المقوم:

"B"

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

No.

Appeal No.....7600..... of 20 21

.....Hassimullah.....Appellant/Petitioner

Versus

Regd D-E-O (M) Swat.....Respondent

Respondent No...1.....

Notice to: —

D-E-O (Male) Swat at
Gul kada.

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.....7/3/22.....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.....29th.....

Day of.....Dec.....20 21

(for Reply)


 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 S.B
PESHAWAR.

No.

Appeal No..... 7600 of 20 21

Hassin ullah Appellant/Petitioner

D.E.O (M) Swat Respondent

Respondent No..... 2

Notice to: —

Sub Divisional Distt: Education
Officer (SDEO) (M) Matla Distt:
Swat.

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..... 7/3/22 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..... 29th

Day of..... Dec 20 21

(for Reply)



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, S.B
PESHAWAR.

No.

Appeal No. 7600 of 20 21
Hassin ullah

Appellant/Petitioner

D-E-O (M) Swat.

Respondent

Respondent No. 3

Director F&SE 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 7/3/20 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.

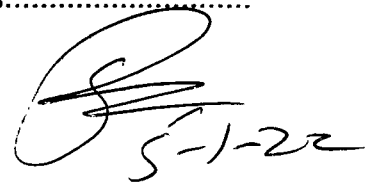
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition 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 29 th

Day of.....20 21

(for Reply)


5-1-22

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, PESHAWAR.

No.

Appeal No. 7600 of 20 21

Hassinullah Appellant/Petitioner

D-E.O. (M) Swat. Respondent

Respondent No. 5

Notice to: —

Assistant Director ERSE KPK
Peshawar.

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 7/3/22 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.

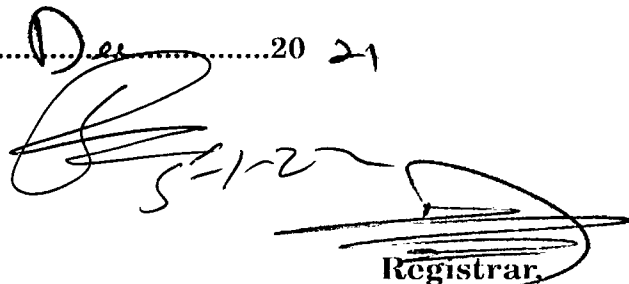
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition 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 29th

Day of Dec 20 21

(for Reply)



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, S.B
PESHAWAR.

No.

Appeal No..... 7600 of 20 21

Hassim ullah Appellant/Petitioner

Versus

D-E-O (M) Swat Respondent

Respondent No. 4

Notice to: — Assistant Director ERSE KPK
Establishment Peshawar.

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..... 7/3/22 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..... 29th.....

Day of..... Dec 20 21

(for Reply)

ST-22

[Signature]
Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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,
PESHAWAR.**

No. *Regd*

SB

Appeal No. *7600* of 20 *21*

Hassim ullah Appellant/Petitioner

Versus

DEO (M) Swat at Gulkada Respondent

Respondent No. *(1)*

Notice to: — *DEO (M) Swat at Gulkada*

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.....*06/07/2022*.....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.....*1st*.....

Day of.....*July*.....20 *22*

For Reply

[Signature]

**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

"B"

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

No.

Regd

Appeal No. of 20 SB

7600

Appellant/Petitioner

Hassim Ullah

Respondent

DEO (M) Swat at Gulkada

Respondent No.

(1)

Notice to: —

DEO (M) Swat at Gulkada

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.....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.....

Day of.....20

July

22

1st

For Reply

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,
PESHAWAR.**

No.

Regd

SD

Appeal No. *7600* of 20*21*

Hassim ullah Appellant/Petitioner

DEO (M) Swat Respondent

Respondent No. *(2)*

Notice to: *Sub Divisional District Education Officer (SDEO)
(M) Matta Swat*

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.....*06.07.2022*.....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.....*1st*.....

Day of.....*July*.....20*22*

(Regd Reply)

[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,
PESHAWAR.

No.

Rgt

Appeal No. of SB
7606

..... Appellant/Petitioner
Hassin verlash

..... Respondent

DEO (M) Swat
Respondent No.

(2)

Notice to: —

Sub Divisional District Education Officer (SDEO)
(M) Matta Swat

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.....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.....

Day of.....20

1st

July

22

(For Reply)

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,
PESHAWAR.**

No.

SD

Appeal No. 7600 of 20 21

Hassan ullah

Appellant/Petitioner

DEO (M) Swat

Respondent

Respondent No. (3)

Notice to: —

Director ESSE KPK Peshawar.

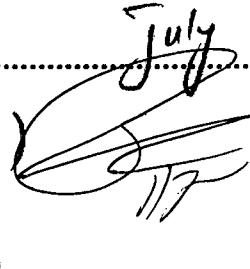
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....08/07/2022.....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.

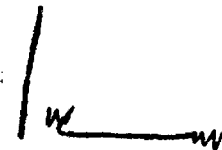
Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition 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 off. re Notice No.....dated.....

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

Day of.....July.....2022.

For Pet'r




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.

Notes: 1. Always quote Case No. While making any correspondence.
2. The hours of attendance in the court are the same as of the High Court except on public and gazetted holidays.

BEZHAWAR
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
REGISTRAR

(Handwritten scribbles)

(Handwritten scribbles)

Day of 2022

Given under my hand and the seal of this Court, at Bezhawar this

of the Notice No. dated

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

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

Notice of any alteration in the date fixed for hearing of this appeal/petition will be

appeal/petition will be heard and decided in your absence.

default of your appearance on the date fixed and in the manner aforementioned, the alongwith any other documents upon which you rely. Please also take notice that in this Court at least seven days before the date of hearing 4 copies of written statement Advocate, duly supported by your power of Attorney. You are, therefore, required to file in the case may be postponed either in person or by authorized representative or by any appeal/petitioner you are at liberty to do so on the date fixed, or any other day to which you may be adjourned. If you wish to urge anything against the order made in the appeal/petition is fixed for hearing before the Tribunal the above case by the petitioner in this Court and notice has been ordered to issue. You are advised that the provisions of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, has been presented/registered for consideration, in

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa

Notice to: *(Handwritten names)*

Respondent No.

(Handwritten number)

Respondent

(Handwritten signature)

Appellant/Petitioner

(Handwritten signature)

Appellant No.

of 2022

No.

BEZHAWAR

JUDICIAL COMPLEX (OGD), KHYBER ROAD

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, BEZHAWAR

(Handwritten mark)

"B"

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

No.

SB

Appeal No. 7600 of 2021

Hassin ullah

Appellant/Petitioner

DEO (M) Swat ^{Versus}

Respondent

Respondent No. CS

Notice to: —

Assistant Director EGSE Local Office Peshawar

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 06/07/2022 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 1st

Day of July 2022

[Signature]

(For Reply)

[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,
PESHAWAR.

No.

SB

Appeal No. 7600 of 20 21

Hassan ullah Appellant/Petitioner

Versus

DEO (M) Swat Respondent

Respondent No. (4)

Notice to: — Assistant Director ESSE Education (Establishment)
Peshawar

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 06/07/2022 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 1st

Day of July 20 22

(For Regy)

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

Note: Always quote Case No. While making any correspondence.
The mode of attendance in the court are the same that of the High Court, except that they are observed normally.

பெசுவாய்
கிழவர் புகழ்புகழுவாய் சேவலை தீர்மானி
பெசுவாய்

(For Ad)

13

Day of 2nd 20 25

Given under my hand and the seal of this Court at Besaway this 12th

of the month of dated

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this

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

appeal/petition will be heard and decided in your absence.
default of your appearance on the date fixed and in the manner aforementioned, the alongwith any other documents upon which you rely. Please also take notice that in this Court at least seven days before the date of hearing 4 copies of written statement advocate, duly supported by your power of Attorney, you are, therefore, required to file in the case may be postponed either in person or by authorized representative or by any appeal/petitioner you are at liberty to do so on the date fixed, or any other day to which you are informed that the said appeal/petition is fixed for hearing before the Tribunal the above case by the petitioner in this Court and notice has been ordered to issue. You are Provisoe Service Tribunal Act, 1974, has been presented/registered for consideration in WHEREAS an appeal/petition under the provision of the Kiyaver Pukhukhuvay

புகழுவாய்

Notice to: --- கிழவர் புகழ்புகழுவாய் சேவலை தீர்மானி (Kiyaver Pukhukhuvay Sevalai Thirumanai)

Respondent No. (1)

DEO (M) Tamil Nadu

Respondent

கிழவர் புகழ்புகழுவாய் சேவலை தீர்மானி

Appellant/Petitioner

Appeal No. 2025 of 20 25

No. 20

பெசுவாய்
JUDICIAL COMPLEX (OGD), KHYVER ROAD,
கிழவர் புகழ்புகழுவாய் சேவலை தீர்மானி, பெசுவாய்

“B”