

06th July, 2022

Counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional AG alongwith Muhammad Jan AD for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 08.09.2022 before S.B.



(Kalim Arshad Khan)
Chairman

30.05.2022

Mr. Bilal Ahmad Kakaizai, Advocate for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while addressing his arguments, contended that the appellant's case is based on the judgements of Service Tribunal dated 20.01.2021 delivered in service appeal No. 1014/2019 titled Mst. Ishrat W/o Sher Afghan Khan Ex-SST (General) when 40 other connected cases were also decided vide that single judgement. In Pursuance of the said judgement, service record of the appellant was called for the purpose of enquiry vide letter dated 19.03.2021 and an opportunity of personal hearing was afforded to 19 others including the appellant vide letter dated 02.04.2021 whereafter the impugned notification dated 22.06.2021 was issued by respondent No. 2 and the appointment notification of appellant dated 25.05.2022 was declared as fake/bogus abinitio and disowned by the respondent department. The appellant submitted departmental appeal against the impugned order on 12.07.2021 which was not responded within the statutory period hence the instant service appeal was filed in the Service Tribunal on 22.10.2021. It was further argued that the appellant had been appointed as SST (BS-16) by the respondent department on the recommendation of Public Service Commission through proper procedure adopted for the recruitment. He had valid documents and was rightly appointed by the respondents. Moreover, no regular/proper enquiry has ever been conducted against the appellant and he has been condemned unheard which is against the principles of natural justice and the impugned order is therefore not tenable in the eyes of law, he concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. 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. To come up for reply/comments before the S.B on 06.07.2022.

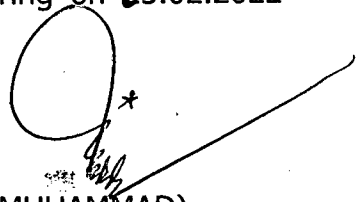
(Mian Muhammad)
Member (E)

Rs-bed-
Appellant Deposited
Security & Process Fee
A. M. H. M. H.
30/6/22

14.12.2021

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment.
Adjourned. To come up for preliminary hearing on 03.02.2022
before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

03.02.2022

The Tribunal is non-functional, therefore, the case is
adjourned to 11.04.2022 before S.B for the same.


Reader

11.04.2022

No one is present on behalf of the appellant. Notice
be issued to the appellant and his counsel for the date
fixed. To come up for preliminary hearing before the S.B
on 30.05.2022.




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7668 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2021	<p>The appeal of Mr. Ahmad Shah resubmitted today by Mr. Bilal Ahmad Kakaizai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>24/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;">D</p>

The appeal of Mr. Ahmad Shah son of Sulaiman Shah Ex-SST District Charsadda received today i.e. on 22.10.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

Appeal is filed by Mr. Ahmad Shah memorandum of appeal is supported with an affidavit by Mr. Gul Tiaz Khan Ex-Driver District Court lakki Marwat the same may be corrected/rectified.

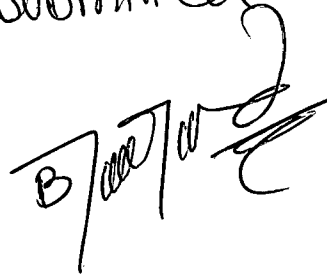
No. 2110 /S.T,

Dt. 22/10 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bilal Ahmad Kakaizai Adv. Pesh.

Resubmitted after required corrections



BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: 7668 / 2021

AHMAD SHAH Vs Government of Khyber Pakhtunkhwa etc.

INDEX

Description of Documents		Pg No:
<i>Memo of Service Appeal</i>		1-6
<i>Affidavit</i>		7
<i>Addresses Sheet</i>		8
<i>Annexure-A</i>	Advertisement.	9-14
<i>Annexure-B</i>	Adjustment Order dated 30.05.2012.	15
<i>Annexure-C</i>	Charge Report.	16
<i>Annexure-D</i>	One of Pay Slip.	17
<i>Annexure-E</i>	Different Posting / Transfer Orders.	18-20
<i>Annexure-F</i>	Educational Documents of the Appellant.	20/A-27
<i>Annexure-G</i>	Judgment of Service Tribunal dated 20.01.2021.	28-34
<i>Annexure-H</i>	Letter dated 9.03.2021.	35
<i>Annexure-J</i>	Letter dated 02.04.2021 for appearance before the Inquiry Officer for alleged Personal Hearing.	36
<i>Annexure-K</i>	Impugned Order dated 22.06.2021.	37
<i>Annexure-L</i>	Departmental Appeal / Representation dated 13.07.2021.	38-41
Wakalatnama		


Appellant,

Through:


BILAL AHMAD KAKAIZAI

(Advocate, Peshawar)

213, Sunehri Masjid Road, Near

HBL Nothia Branch, Peshawar

Cantt. 0300-9020098

(1)

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2021

AHMAD SHAH,
S/o Sulaiman Shah,
Ex-SST (General),
R/o /Village Sheikh Kalli, P.O Agra, Tehsil & District Charsadda.
..... **Appellant**

VERSUS

1. **GOVERNMENT OF KHYBER PAKHTUNKHWA,**
Through Secretary,
Elementary & Secondary Education Department,
Peshawar.
 2. **DIRECTOR,**
Elementary & secondary Education Department,
Government of Khyber Pakhtunkhwa,
Peshawar.
 3. **DISTRICT EDUCATION OFFICER,**
Tehsil Ghalanai, District.
 4. **DISTRICT EDUCATION OFFICER,**
Tehsil Jamrud, District Khyber.
- **Respondents**

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974, AGAINST OFFICE ORDER NO. 10071-77 DATED 22.06.2021, WHEREBY THE APPOINTMENT ORDER DATED 25.05.2012 ISSUED IN FAVOUR OF THE APPELLANT HAS BEEN DECLARED AS FAKE & BOGUS AND THEN DISOWNED BY THE

DEPARTMENT, ALONG WITH THE DIRECTION OF RECOVERY OF SALARIES AND OTHER ALLIED BENEFITS FROM THE APPELLANT.

Prayer: That on acceptance of this Departmental Appeal / Representation: -

1. the Order No. 10071-77 dated 22.06.2021 may please be set aside,

2. the Appointment Order Dated 25.05.2012 issued in favour of the Appellant be declared as genuine and validly issued by the Competent Authority,

In consequence whereof,

3. Appellant be reinstated in service with all back benefits & wages, with such other relief as may deem fit in the circumstances of the case may also be granted.

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

- 1) That, Appellant was inducted into the service against the post of SST in BPS-16, following the recommendation of Khyber Pakhtunkhwa Public Service Commission, where after their services were placed at the disposal of Director Education, FATA vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification No. 3506-13/File No. 2/A-14/SST(F)/PSC/Apptt. dated 25.05.2012, copies of the Advertisement and Adjustment Order dated 30.05.2012 are attached as Annexure A & B.
- 2) That, according to rules, Appellant submitted Medical Fitness Certificate etc followed by Arrival / Charge Report which was also accepted, copy of the Charge Report is attached as Annexure C.

- 3) That, thereafter pay of the Appellant was released after fulfilling all the codal formalities through Accountant General Khyber Pakhtunkhwa, copy of one of Pay Slip is attached as Annexure D.
- 4) That, on different occasions, the services of the Appellant was transferred from one school to another as per requirement and need of the Respondent's Department. It is important to mention here that during the year 2012 onwards, the militancy in the Khyber Agency was at its peak, even than Appellant continued his services, copies of different Posting / Transfer Orders are attached as Annexure E.
- 5) That, during the course of employment, Appellant enhanced his qualification and got M-Phil Allowance by the Department after submission of verified Degrees. It is important to mention here that M-Phil Degree of the Appellant was completed during the period when the activities of the Educational Institutions in FATA were minimized due to militancy and Appellant used to take classes of M-Phil on Saturday and Sunday, copy of the Educational Documents of the Appellant are attached as Annexure F.
- 6) That, on 04.04.2019 and 05.04.2019, the Department disowned certain employees on the allegation of Fake / Bogus Appointment Orders, which was challenged by the said employees before the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar in shape of Service Appeals. It is important to mention here that Appellant was not disowned by the Department in the first instance.
- 7) That, the above stated Service Appeals were accepted on 20.01.2021 by the Honorable Service Tribunal, whereby the Orders of disowning the concerned employees by the Department were set aside, and they were reinstated in service with the direction to the Department to conduct proper enquiry. The Department was further directed to Investigate the issue of allegedly Fake / Bogus Appointment Orders in order to reach to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter the fate of concerned employees be decided in the light of said enquiry. It was also directed by the Honorable Tribunal that the Department should

conclude all the proceedings within 90 days of receipt of the Judgment dated 20.01.2021, copy of the Judgment of Service Tribunal dated 20.01.2021 is attached as Annexure G

- 8) That, it is important to mention here that Appellant was not part and parcel of any Disowning Order, Service Appeal etc. During the pendency of Service Appeal or after the decision of the same, the Appellant was regularly performing his duties in the Department as Teacher, without any complaint from any quarter.
- 9) That, vide Order No. 717 dated 19.03.2021, the Chairman of the Inquiry Committee requisitioned the record of the Appellant, as well, copy of the Letter dated 19.03.2021 is attached as Annexure H.
- 10) That, on 02.04.2021, the Appellant was summoned by the Chairman Inquiry Committee, for appearance, production of mentioned record and personal hearing for 08.04.2021, copy of the Letter dated 02.04.2021 for appearance before the Inquiry Officer for alleged personal hearing is attached as Annexure I.
- 11) That, on 22.06.2021, the Impugned Order was passed against the Appellant, which is neither legal nor proper as the same has been issued to avoid the direction of the Honorable Service Tribunal, Peshawar, copy of the Impugned Order is attached as Annexure K.
- 12) That, on 13.07.2021, as per law applicable, the Appellant submitted his Departmental appeal / Representation to the Respondent No. 1 Office however the Department failed to respond to the Appeal of the Appellant within statutory period, copy of the Departmental Appeal / Representation dated 13.07.2021 is attached as Annexure L, hence this Service Appeal on the following amongst other grounds:

G R O U N D S:

- A. That, the Impugned Order of disowning the Appellant is illegal, unlawful, void and ineffective.

- B. That, same is against the principles of Natural Justice; also.
- C. That, no meaningful or purposeful chance of personal hearing was provided to the Appellant by the Respondent's Department nor was he confronted with any documentary evidence during the course of so-called personal hearing.
- D. That, the Department, in order to save the skin of their beloved employees / Appointing Authority, has made the Appellant guilty of a wrong, done by them.
- E. That, according to dictums laid down by the Honorable Supreme Court of Pakistan, if Appointment has not been processed by the Department, in accordance, with law, than the action, in the first instance, should have been initiated against the Appointing Authority, instead of appointee(s).
- F. That, the action of the Department against the Appellant is otherwise contemptuous of the directions contained in the Judgment of Honorable Service Tribunal, Peshawar dated 20.01.2021.
- G. That, the determined questions regarding completion of enquiry proceedings, against other incumbents, mentioned in the Judgment of the Honorable Service Tribunal, Peshawar were not followed by the Department in letter and spirit of the dictum.
- H. That, before issuance of the Impugned Order, no proper enquiry was conducted nor were the wrong doers who maneuvered all the episode punished.
- I. That, it was also totally ignored that the Appellant was part and parcel of the candidates who applied for the posts in the year 2009 and passed the interview.
- J. That, the actions and inactions of the Department are not in accordance with law and rules hence liable to be set at naught.
- K. That, admittedly no Regular Inquiry was conducted inspite of the fact that Superior Courts had time and again held

6

that disputed questions of facts can only be resolved after conducting Regular Inquiry.

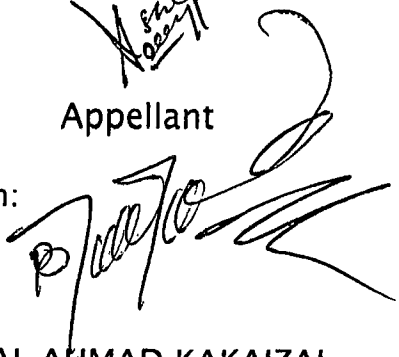
- L. That, wrong done by other, cannot be attributed to the Appellant because nothing erroneous was ever done on part of the Appellant.
- M. That, no meaningful or purposeful personal hearing was given to the Appellant, as enumerated in law of natural justice.

It is, therefore, requested that Appeal, be accepted as prayed for.

Waseem Noor

Appellant

Through:



BILAL AHMAD KAKAIZAI

(Advocate, Peshawar)

7

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2021

AHMAD SHAH Vs Government of Khyber Pakhtunkhwa etc.

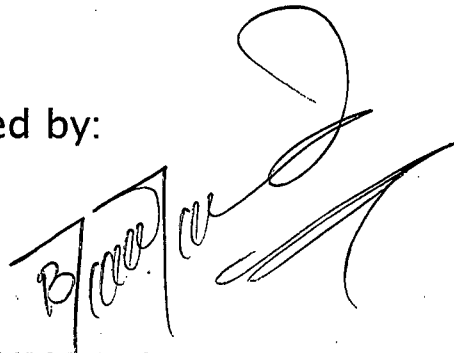
AFFIDAVIT

I, AHMAD SHAH, S/o Sulaiman Shah, Ex-SST (General), R/o /Village Sheikh Kalli, P.O Agra, Tehsil & District Charsadda, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.



Deponent

Identified by:



BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)

8

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No: _____ / 2021

AHMAD SHAH Vs Government of Khyber Pakhtunkhwa etc.

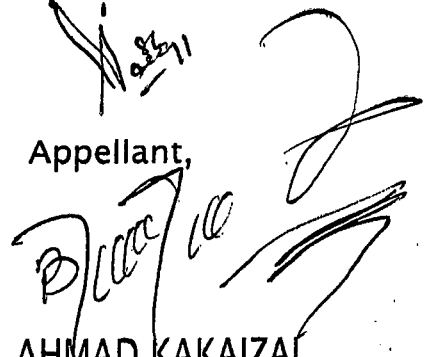
ADDRESSES OF PARTIES.

APPELLANT:

AHMAD SHAH, S/o Sulaiman Shah, Ex-SST (General), R/o /Village Sheikh Kalli, P.O Agra, Tehsil & District Charsadda.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa, Through Secretary, Elementary & Secondary Education Department, Peshawar.
2. Director, Elementary & secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer, Tehsil Ghalanai, District.
4. District Education Officer, Tehsil Jamrud, District Khyber.

Through, 
Appellant,
BILAL AHMAD KAKAIZAI
(Advocate, Peshawar)
213, Sunehri Masjid Road,
Peshawar.
0300-9020098

(9) A

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:
Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). **Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.**

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) . from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators.

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
01	01	01	01	01

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non-availability of candidates possessing the

10

**(S.No. 45) One (01) Post of Head Mistress. For Earth Quake Quota (LE) :
(with out graduaty and pension).**

QUALIFICATION: (a) Master Degree with B.Ed/M.Ed/M.A /M.A (Education) from a recognized University with Five years experience. (NOTE) experience shall be counted from M.A/M.Sc or M.Ed which ever is proper.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION: District Battagram.

(S.No. 46) Four Hundred and Forty Nine (449) Posts of Male S.S in Various Subjects .(with out graduaty and pension).

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Male.

ALLOCATION:

Subject:	No. of Posts	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
Islamiyat	58	14	09	10	10	08	07
History-Cum-Civic	52	13	08	08	09	07	07
English	48	12	08	08	08	06	06
Chemistry	44	11	07	07	07	06	06
Economics	41	10	07	07	07	05	05
Maths	41	11	06	07	07	05	05
Statistics	40	10	06	07	07	05	05
Physics	38	10	07	07	06	04	04
Pak-Study	37	09	06	06	06	05	05
Biology	36	09	06	06	06	05	04
Urdu	14	03	02	02	02	02	03

(S.No. 47) Nine (09) Posts of Male S.S Disabled .(with out graduaty and pension).

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level

(11)

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Male.
ALLOCATION: Merit Quota.

S.No	Subject	No. of Posts	Allocation
01	Islamiyat	01	Merit Quota
02	History-cum-Civics	01	Merit Quota
03	Economics	01	Merit Quota
04	English	01	Merit Quota
05	Statistics	01	Merit Quota
06	Maths	01	Merit Quota
07	Biology	01	Merit Quota
08	Chemistry	01	Merit Quota
09	Physics	01	Merit Quota

(S.No. 48) **Twenty Four (24) Posts of Male S.S (Earth Quake Quota) For Districs Battagram, Mansehra, Shangla, Kohistan, Abbottabad, with out graduaty and pension).**

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Male.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
1.	Islamiyat	03	Merit Quota
2.	Pak: Study	02	Merit Quota
3.	History-Cum-Civics	03	Merit Quota
4.	Economics	02	Merit Quota
5.	English	02	Merit Quota
6.	Statistics	02	Merit Quota
7.	Maths	02	Merit Quota
8.	Biology	02	Merit Quota
9.	Chemistry	02	Merit Quota
10.	Physics	02	Merit Quota
11.	Urdu	02	Merit Quota

(S.No. 49) **Three Hundred and Ninty One (391) Posts of Female S.S in Various Subjects (with out graduaty and pension).**

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

(12)

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

Subject:	No. of Posts	Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
Statistics	50	13	08	09	08	06	06
Pak-Study	48	12	08	08	08	06	06
Islamiyat	44	09	08	08	07	06	06
Economics	44	11	08	07	07	05	06
Maths	43	11	07	07	06	06	06
English	35	09	06	05	05	05	05
Physics	35	09	06	05	05	05	05
Chemistry	31	08	05	05	05	04	04
Biology	29	07	05	05	05	04	03
History-Cum-Civic	27	07	04	05	05	03	03
Home Economics	05	02	01	01	01		

(S.No. 50) Four (04) Posts of Female S.S Disable (with out graduaty and pension).

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
1.	Islamiyat	01	Merit Quota
2.	Pak: Study	01	Merit Quota
3.	Statistics	01	Merit Quota,
4.	Maths	01	Merit Quota

(S.No. 51) Twenty One (21) Posts of Female S.S (Earth Ouake Quota for Districts Battagram, Mansehra, Shangla, Kohistan, Abbottabad, (With out graduaty and Pension)

QUALIFICATION: Master's Degree in the relevant subjects with Bachelor of Education or M.Ed or M.A. Education (industrial Arts or Business Education) fro a recognized University.

NOTE: If no suitable candidate possessing the above qualification is available then a candidate possessing Master's degree in the relevant subject will be considered subject to the condition that such have appointee shall have to acquire the additional qualification of B.Ed. or M.Ed etc as specified above within three years from the date of appointment, failing which has services shall be terminated irrespective of any other

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

S.No	Subject	No. of Posts	Allocation
5.	Islamiyat	02	Merit Quota
6.	Pak: Study	03	Merit Quota
7.	History-Cum-Civics	02	Merit Quota
8.	Economics	02	Merit Quota
9.	English	02	Merit Quota
10.	Statistics	02	Merit Quota
11.	Maths	02	Merit Quota
12.	Biology	02	Merit Quota
13.	Chemistry	02	Merit Quota
14.	Physics	02	Merit Quota

(S.No. 52) **Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
420	280	281	280	210	210

(S.No. 53) **Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) **Ninty Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Manshra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).**

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

14

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION: Merit.

TECHNICAL EDUCATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-18. **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)



FATA SECRETARIAT
DIRECTORATE OF EDUCATION

NO. A-177/EC/EST/GEN/2012

ADJUSTMENT

Consequent upon their appointment as SST in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 3506-13/File No.2/A-14/SST(F)/PSC/Apptt dated 25-5-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Mr. Maqsood Anwar S/O Saqi Muhammad (FR Bahnu) Moh: Palosi Road Rahat Abad Near Peshawar University	GHS Zintara Khyber Agency	Against vacant post
2	Muhammad Naeem S/O Muhammad Saleem (Bajour) Vill: Parao Tehsil Takht Bhai District Mardan	GHS Muhammad Khan Killi Khyber Agency	-do-
3	Mr. Atta Ullah S/O Abdul Jabar (Mohmand) Vill: Kog Pand Dagmula Tehsil Lakarai Mohmand Agency	GHS Kharghali Khyber Agency	-do-
4	Mr. Ahmad Shah S/O Suleman Shah (Mohmand) Vill: Sheikh Kalli PO: Agra Tehsil & District Charsadda	GHS Abdul Ghafoor Khan Killi Khyber Agency	-do-
5	Shakriullah S/O Zargar (Mohmand) Haleemzai Aba Khel PO: Ghalani Tehsil Upper Mohmand	GHS Durina Kor Khyber Agency	-do-

Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. However the Agency Education Officer concerned will verify their documents before release of pay.

(FAZLI MANAN)
DIRECTOR EDUCATION (FATA)

7057-70
Endst: No. _____/A-1/Apptt: of SST (Gen)(PSC) 2012

Dated Pesh: the 30/5 2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
w/r to his Notification cited above.
- 2 Agency Education Officer Khyber Agency at Jamrud
- 3 Agency Accounts Officer Khyber Agency at Jamrud
- 4 Principal/Headmasters concerned
- 5 Candidate concerned
- 6 P.A to D.E FATA

ADDL. DIRECTOR (ESTAB)

GOVERNMENT OF PAKISTAN
 ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA
 DISTRICT
 PAYROLL SYSTEM

PAYMENT ADVICE

Form 001 Month: December 2017

Form No: N0150118 Rucklet:
 Name: AHMAD SHAH
 S.E.I.

Principal Govt. HSS Subh
 Min. Of K.A & M.A & S.F.R
 GPF #:

EPF Interest Free

DEPT CODE

PAYS AND ALLOWANCES:		10 Vocational Temporary	1100035
0001-Basic Pay			28,030.00
1000-House Rent Allowance			1,818.00
1210-Convey Allowance 2005			5,000.00
1528-Unattractive Area Allow			1,500.00
1593-15% Medical Allowance			1,500.00
2148-15% Adhoc Relief All-2017			620.00
2179-Adhoc Relief Allow 10%			426.00
2211-Adhoc Relief All-2016 10%			2,228.00
2224-Adhoc Relief All-2017 10%			2,603.00
Gross Pay and Allowances			43,925.00
DEDUCTIONS:			
IT Payable	959.10	Deducted	160.00
GPF Balance	117,321.00		3,340.00
3701-Benevolent Fund (Exchange)			250.00
3705-R. Ben & Death Comp (Exch)			650.00
Total Deduction			4,400.00
NET AMOUNT PAYABLE			39,525.00

QUALIFYING SERVICE		D.O.B
YRS	MON	
05 Years	07 Months	01.04.1977
	003	Days

FF Gupta:
 NITEC BANK LIMITED CHARSADDA
 115789

(18/E)

DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR

CANCELLATION

The transfer order in respect of Mr. Ahmad Shah SET GHS Ghafoor Khan Killi, Khyber Agency to GHS Loi Shelman, Khyber Agency occurring at S/No.1 as contained in this Directorate order issued under Endst: No. 12102-7/A-12/Ayub Khan SET dated 19/9/2012 is hereby cancelled.

(FAZLI MANAN)
DIRECTOR EDUCATION (FATA)

Endst: No. 12560-64 /A-12/Ayub Khan SET

Dated Pesh: the 2/10/2012

Copy forwarded to the:-

- 1 Agency Education Officer, Khyber Agency at Jamrud w/r to his Endst: No. nil dated 26/9/2012 with the remarks to be careful in submission of transfer proposal to this office.
- 2 Agency Accounts Officer, Khyber Agency at Jamrud
- 3 Headmaster GHS Ghafoor Khan Killi, Khyber Agency
- 4 Headmaster GHS Loi Shelman, Khyber Agency
- 5 P.A to Director Education FATA.


ADPL DIRECTOR (ESTAB)



FATA SECRETARIAT
DIRECTORATE OF EDUCATION

WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

NO. _____ / DATED _____
A-12/ALI KHAN SST

19

MUTUAL TRANSFER

Mutual transfer between Mr. Ali Khan SST GHS Alam Gudar (Bara), Khyber Agency and Mr. Ahmad Shah SST GHS Abdul Ghafoor Khan Killi, Khyber Agency is hereby ordered on their own pay & scale with immediate effect in the interest of public service.

Note:

- 1 Charge report should be submitted to all concerned
- 2 TA/DA etc is not allowed.

DIRECTOR EDUCATION (FATA)

4-109-14
Endst: No. _____ A-12/Ali Khan SST

Dated Pesh: the 14/4 /2014

Copy forwarded to the:-

- 1 Agency Education Officer, Khyber Agency at Jamrud w/r to his No. 2024 dated 8/4/2014
- 2 Agency Accounts Officer, Khyber Agency at Jamrud
- 3 Principal GHS Alam Gudar (Bara), Khyber Agency
- 4 Headmaster GHS Abdul Ghafoor Khan Killi, Khyber Agency
- 5 EMIS Local Directorate
- 6 P/File


ADDL. DIRECTOR (ESTAB)

Anwar

(20)

DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR

TRANSFER

Mr. Ahmad Shah SST GHS Alamgudar Khyber Agency is hereby transferred in his own pay & scale to Govt: High School Subhan khwar Muhmand Agency with effect from the date of his taking over charge as and when the post of vacated by Mr. Akbar khan SET promoted to subject specialist in the interest of public service.

NOTE:-

- 1 Charge report should be submitted to all concerned.
- 2 TA/DA etc is not allowed

10411-17
Endst: No. _____/A-12/Ahmad Shah SST

DIRECTOR, EDUCATION (FATA)

Dated Pesh: the 01/11/2017

Copy forwarded to the:-

- 1 Agency Education Officer Khyber Agency
- 2 Agency Education Officer Muhmand Agency
- 3 Agency Accounts Officer Khyber Agency
- 4 Agency Account Officer Muhmand Agency
- 5 Principal GHS Alam Gudar Khyber Agency
- 6 Principal GHS Subhan Khwar. Mohmand Agency
- 7 PA to DE FATA.


DY: DIRECTOR (ESTAB)

20/A

F

University of Peshawar

(Pakistan)

Session SUPPLEMENTARY 1998

AHMAD SHAH Son/Daughter of GULIMAN SHAH

and a student/private-candidate of GOVT. POST GRADUATE COLLEGE CHARSADA

having passed the prescribed examination held in MARCH 1999

is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in SECOND Division

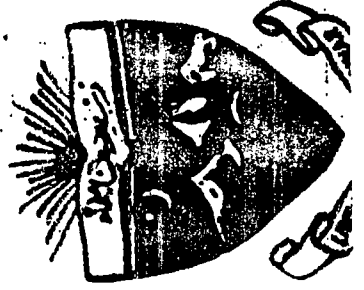
The Examination was taken as whole/in parts

Serial No 0136069

Registration No. 96-CH-460

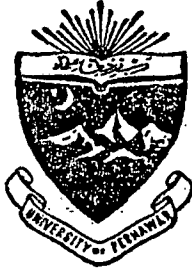
Roll No. 4502

Result declared on MAY 12, 1999



[Signature]
Registrar

Countersigned
[Signature]
Vice-Chancellor



UNIVERSITY OF PESHAWAR
(Pakistan)

Detailed Marks Certificate
Required: Pass Percentage = 40, Aggregate Pass Percentage = 45 %

Bachelor of Education (B.Ed)
Annual Examination, 2005

21

The Candidate appeared from: Charsadda

Roll No. Name: AHMED SHAH
1813 Father's Name: SULEMAN SHAH
Registration No. 96-ch-4669

Division in Theory: 2nd
Division in T.Practice: 1st
Gender: Male Overall Division: 2nd

Papers	Marks Obtained			
	Maximum Marks	In Figures	In Words	
Educational Psychology, Guidance & Counselling	100	54	Fifty Four	
Perspectives of Education & Contemporary Social Issues	100	51	Fifty One	
Curriculum and Instructions	100	70	Seventy Only	
Islamiyat and Islamic Ethics / Islamic History (for Non Muslims)	50	38	Thirty Eight	
School Organization and Classroom Management	50	29	Twenty Nine	
Functional English	50	27	Twenty Seven	
Evaluation Techniques	50	31	Thirty One	
Methods of Teaching - I English	100	55	Fifty Five	
Methods of Teaching - II Urdu	100	49	Forty Nine	
Elective Subject: Foundation of Education	100	51	Fifty One	
Practice of Teaching	200	122	One Hundred and Twenty Two	
Total:		1000	577	Five Hundred and Seventy Seven

Errors & omissions are subject to subsequent rectification.

The Examination was passed as a Whole

Examination Held in July 26 --- Sept 28, 2005
Result Declared on December 22, 2005

Dated:- 24/12/2005

Designed &
Prepared by: Ahmad Jan

No. 021906

Controller of Examinations
University of Peshawar

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

University of Peshawar (Pakistan)

Session ANNUAL 2005

AHMAD SHAH

SON

of

SULTMAN SHAH.

and a student*/ Private Candidate of DISTRICT CHARSADDA

having passed the prescribed Examination held in JULY 2005 is this day

admitted by the University of Peshawar to the Degree of

Bachelor of Education

In SECOND Division in Theory

In FIRST Division in Teaching practice

In SECOND Division in Aggregate

He/She Passed also in FOUNDATION OF EDUCATION as an ELECTIVE subject

The Examination was taken as a whole/in parts*

Serial No. 0022014

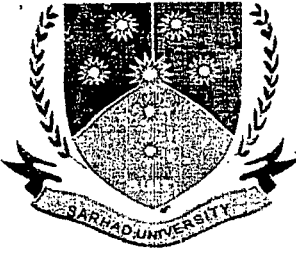
Registration No. 96-CH-4669

Roll No. 1813



[Signature]
Registrar

Countersigned
[Signature]



Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

(23)

Serial Number SUIT-10-PRO-4845

Date issued: July 13, 2010

Provisional Certificate

This is to certify that Mr./ Ms. Ahmad Shah

son/ daughter of Mr. Sulaiman Shah

registration number SUIT-07-02-36055

is a regular student of the Sarhad University of Science and Information Technology,
Peshawar.

Mr./ Ms. Ahmad Shah has completed all the requirements
for the award of Master of Education degree with a
CGPA of 2.63 on a scale of 4.00. He/ She has already been issued a transcript
and degree will be awarded him/her in due course of time on the request of student.

Mr./ Ms. Ahmad Shah bears good moral character and his/ her
conduct during his/ her stay at the University from July 2007 to April 2010
has been Very Good

Director
Distance Education.



University of Peshawar

PAKISTAN

Detailed Marks Certificate

Master of Arts in International-Relations

Final

Annual Examination 2011

District Charsadda



Private

Name: AHMED SHAH
Father's Name: SULIMAN SHAH

Gender: Male Roll No: 32195
Registration No: 96-CH-4669

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Public & International Law-VI	100	43	Forty Three
Politics of International Economics Relations-VII	100	62	Sixty Two
Strategic Studies-VIII	100	50	Fifty Only
Foreign Policy of Iran, China, India and Afghanistan-IX	100	47	Forty Seven
International Politics of South Asia-XI	100	46	Forty Six
Viva Voce	100	55	Fifty Five
Previous 15307:Annual-2010	500	236	Two Hundred and Thirty Six
Final	1100	539	Five Hundred and Thirty Nine

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 13-Jul-2011 to 06-Aug-2011
Result Declared on Wednesday, February 8, 2012
Issue Date: 09-Feb-2012
7:25 pm

(Iftekhar Hussain Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

Computerized by RTC

Chasadda City Area

Registration Number: AUP-13FL-MPHIL-EDU-5706
Issue Date: 4th June 2018



Serial Number: 3676

ABASYN UNIVERSITY
P e s h a w a r - P a k i s t a n

Be it known that

AHMADSHAH SON OF SULAIMAN SHAH

**Having successfully completed all the prescribed courses
of study and having complied with all other requirements**

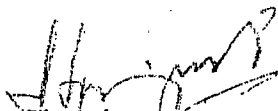
of the University for the Degree of

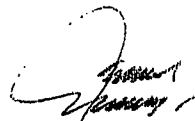
MASTER OF PHILOSOPHY (EDUCATION)

is, today, the 30th of NOVEMBER 2015 admitted to this Degree

and is entitled to all rights and privileges appertaining

to the Degree


Registrar


Vice-Chancellor


Chancellor



ABASYN UNIVERSITY
P e s h a w a r - P a k i s t a n

S. No.
4087

PROVISIONAL CERTIFICATE

Certified that

Ahmadshah S/O Sulaiman Shah

has passed all the prescribed Examinations for the Degree of

MASTER OF PHILOSOPHY (EDUCATION)

under Semester System. The result has been declared on 30th November, 2015

and obtained Cumulative Grade Point Average (CGPA) 3.13/4.00

Univ. Registration No. AUP-13FL-MPHIL-EDU-5706 Session: FL 2013-SG 2015

Date of issue: 4th June, 2018


Controller of Examinations.

(27) (18)

CURRICULUM VITAE

Ahmed Shah

Address: Village Sheikh Kali P.O Agra Miana Tehsil & District Charsadda
Mobile:0307:7172938

JOB OBJECTIVE

To work in an organization that offers a creative, dynamic and challenging working environment & to supplement existing knowledge and refine learned techniques by obtaining a position in highly reputable institution

PERSONAL DETAILS

Father Name : Suleman Shah
Date of Birth : 01-04-1977
Domicile : Charsadda
Nationality : Pakistani
Marital Status : Single
Religion : Islam
N.J.C No : 17101-1655746-3

ACADEMIC QUALIFICATION

Examination	Years	Marks/Obt	Division	Board/University
S.S.C	1994	588/850	1 st	BISE Peshawar
F.Sc	1996	563/1100	2 nd	Federal Board
B.A	1999	281/550	2 nd	University of Peshawar
B.Ed	2005	577/1000	2 nd	University of Peshawar
M.A	2011	536/1100	2 nd	University of Peshawar
M.Ed	2010	2.63/4.00	1 st	Sarhad University
M.phil(Education)	2016	3.2/4.00	1 st	Abasyn University

COMPUTER SKILLS

- Six months Computer Course.

(28) G

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1014/2019



Date of Institution ... 02.08.2019
Date of Decision ... 20.01.2021

Mst. Ishrat W/O Sher Afghan Khan Ex-SST (Gen), R/O Village Fazal Abad,
Tehsil Takht Bhai, District Mardan.

... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary &
Secondary Education, Civil Secretariat Peshawar and two others.

... (Respondents)

Present:

Amin Ur Rehman Yousafzai,
Advocate ... For appellant.

Kabir Ullah Khattak,
Additional Advocate General ... For official respondents.

ROZINA REHMAN ... MEMBER (J)
ATIQU REHMAN WAZIR ... MEMBER (E)

JUDGMENT

ROZINA REHMAN MEMBER: This judgment is intended to dispose of 40
connected service appeals which are:

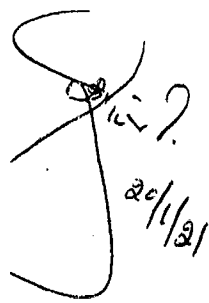
1. Service Appeal No.958/2019
2. Service Appeal No. 959/2019
3. Service Appeal No.960/2019
4. Service Appeal No.961/2019

TESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

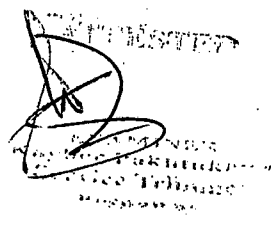
20/1/21

29

- 5. Service Appeal No.962/2019
- 6. Service Appeal No.963/2019
- 7. Service Appeal No.964/2019
- 8. Service Appeal No.965/2019
- 9. Service Appeal No.966/2019
- 10. Service Appeal No.967/2019
- 11. Service Appeal No.968/2019
- 12. Service Appeal No.969/2019
- 13. Service Appeal No.970/2019
- 14. Service Appeal No.971/2019
- 15. Service Appeal No.972/2019
- 16. Service Appeal No.973/2019
- 17. Service Appeal No.974/2019
- 18. Service Appeal No.975/2019
- 19. Service Appeal No.1009/2019
- 20. Service Appeal No.1010/2019
- 21. Service Appeal No.1011/2019
- 22. Service Appeal No.1012/2019
- 23. Service Appeal No.1013/2019
- 24. Service Appeal No.1014/2019
- 25. Service Appeal No.1015/2019
- 26. Service Appeal No.1016/2019
- 27. Service Appeal No.1017/2019
- 28. Service Appeal No.1018/2019
- 29. Service Appeal No.1024/2019
- 30. Service Appeal No.1025/2019
- 31. Service Appeal No.1026/2019



 20/1/21



 THE SECRETARY



32. Service Appeal No.1027/2019
33. Service Appeal No.1028/2019
34. Service Appeal No.1029/2019
35. Service Appeal No.1030/2019
36. Service Appeal No.1031/2019
37. Service Appeal No.1032/2019
38. Service Appeal No.1033/2019
39. Service Appeal No.1041/2019
40. Service Appeal No.1111/20219

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

2. Precisely stated the facts of the case are that the appellants were appointed as SSTs. They were directed to produce service record but failed. After completion of codal formalities, they were removed from service by means of orders dated 04.04.2019 and 05.04.2019. They preferred departmental appeals but the same were not responded to, hence, the present service appeals.

3. Learned counsel for appellants submitted that the appointments were made in accordance with law by following the prescribed procedure which cannot be held fake appointments. That notifications dated 04.04.2019 and 05.04.2019 are against law and facts. That the appellants were not treated in accordance with law and they were not given an opportunity to defend themselves as enshrined in Article 10-A of the Constitution of Islamic Republic of Pakistan 1973. Learned counsel further argued that neither regular inquiry was conducted nor the appellants were served with show cause notices, hence, they all were condemned unheard. That all the appellants being qualified, were properly appointed after due process of law

20/11/21

ARRESTED

(31)

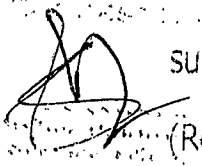
4

and fulfillment of all codal formalities but they were shown out of service with a single stroke of pen without care and caution of its legal consequences which caused grave miscarriage of justice. In order to substantiate his version, reliance has been placed on 2011 SCMR 1581; 2004 SCMR 303; 2016 SCMR 1299 and 2010 PLD SC 483.

4. Conversely learned A.A.G appearing on behalf of respondents, controverted the contentions of learned counsel for appellants by contending that claim of the appellants regarding their appointment is baseless and liable to be rejected as they never applied for the said post nor appeared in any interview, therefore, their appointment was declared fake & bogus and have been disowned by the Department vide notifications dated 04.04.2019 and 05.04.2019. He submitted that they were treated as per law, rules and policy and there is no question of violation of Article 10-A of the Constitution of Islamic Republic of Pakistan 1973, hence stance of the appellants is baseless and liable to be rejected and lastly, he submitted that those appellants who claimed to have been recommended by the Khyber Pakhtunkhwa Public Service Commission, failed to produce any proof of their recommendation by Public Service Commission. Reliance was placed on 2005 SCMR 1814; 2005 SCMR 1040; 2009 SCMR 1492 and 2012 SCMR 673.

5. Before dilating upon the main issue, it merits a mention here that total 40 connected cases are intended to be disposed of through this single judgment. There are three categories of cases; category-I includes five cases of those employees who were appointed on contract basis and subsequently were regularized in service under the KP Employees (Regularization of Service) Act, 2009 and it was on 04.04.2019 when they received notification vide which appointment record in respect of these

J
20/11/21



32

appellants was found bogus, thus, their appointment/adjustment notification dated 11.02.2010 was disowned. Category-II includes those employees who upon recommendation of D.S.C, were appointed as PTC, subsequently applied for SSTs' posts and were selected by the Khyber Pakhtunkhwa Public Service Commission. It was on 04.04.2019 when they received notification vide which appointment record, in respect of these appellants was found bogus, thus, their appointment notification was disowned. Appellants of category-III are those, who were appointed as SSTs on the recommendations of KPPSC and two of them were promoted to the rank of S.S and it was on 04.04.2019 when they received notification vide which appointment record in respect of these appellants was found bogus, thus, their appointment/adjustment notification was disowned.

6. Secondary School Teachers (SST) previously known as S.E.T are usually appointed through Departmental Promotion Committee or through Public Service Commission. As per existing policy, the promotion share is 75% of various Teaching Cadre and 25% is through initial recruitment. Recruitment of SSTs were lastly made through Public Service Commission in 2012 while in the year 2008, SSTs were recruited on Adhoc/Contract Basis and later on, they were regularized. As per respondents there were rumors that various number of SSTs, SETs have been inducted in the system and working in different agencies without adopting the proper recommendation of Public Service Commission or Departmental Promotion Committee. This task was assigned to two Assistant Directors who checked the credentials of all the SSTs and submitted report where-after another Inquiry Committee was constituted and 69 SSTs were declared fake being directly inducted in the system. The Inquiry report was not available on record and it was produced upon the directions of Bench. There is a riddle as to how the

[Handwritten signature]

26/1/21

ATTESTED

[Handwritten signature]

33

respondents came to know without any inquiry after a long period of service by all the appellants that their appointment order is fake. Different documents were produced by the appellants which were placed on file which show that some of the appellants applied for a post published by the Public Service Commission as they produced application forms. Appellant in Service Appeal No.964/2019 Shakir Ullah produced his application form, one Abdul Malik appellant in Service Appeal No.968/2019 also produced Call Letter for Interview from Public Service Commission. Similarly, appellant in Service Appeal No.1010/2019 also produced his Call Letter. Some documents were produced by appellant in Service Appeal No.965/2019 vide which he was directed by the Commission to rectify the deficiencies. Another letter addressed to the Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education vide which recommendations in favor of 21 recommendees was sent and few recommendees are still in service. Another recommendation in favor of three ladies is available on file wherein appellants Mst. Sarwat Jehan and Mst. Tahira Naz are available at Serial No. 1 & 3 whereas Mst. Rabia Shams at Serial No.2 is still in service. Similarly, other documents also show same entries. Record further shows that appellants in Service Appeals No.1027/2019 and 1033/2019 i.e. Mst. Sarwat Jehan and Mst. Seema Mujahid respectively were properly promoted as there was nothing against them. They are qualified and they served the Department for a long period. They drew their salaries and lastly, they were removed by the authority by disowning their service record. As per recommendations of the Inquiry report, 69 SSTs were neither recommended by the Public Service Commission nor promoted/recruited by the Elementary & Secondary Education Khyber Pakhtunkhwa. Their salaries were recommended to be stopped and proceedings under the Khyber


20/1/21




(34)


7


Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 were recommended to be initiated. The competent authority while passing the impugned order did not bother to go through the contents of the inquiry report. The appellants have received salaries for a long period which strengthen their case. The respondents did not irk to conduct proper inquiry as to who issued such orders and who processed and submitted their salaries to the Account Office. The respondents avoided all such mandatory steps and out rightly stopped their salaries by disowning their appointment orders, thus allow the real culprits to stay behind the curtain, knowing the fact that the appellants have now developed a vested right over the posts as they have drawn salaries for a long period against the sanctioned posts. The respondents handled the case carelessly by not reaching to a logical conclusion, hence, left the appellants in a hanging position.

7. In view of the situation, the impugned orders stand set aside and the appellants are reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellants be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

ANNOUNCED.
20.01.2021


(Atiq ur Rehman Wazir)
Member (E)


EXAMINER
Member Pakhtunkhwa
Service Tribunal,
Peshawar


(Rozina Rehman)
Member (J)

OFFICE OF THE PRINCIPAL GOVT SHARIF SITE
NAWAZ CMHS NO.1

PANK

37

No. 717

Dated 18/03/2021

To

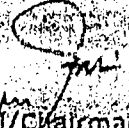
The District Education Officer
Tribal District Mohmand

Subject: PROVISION OF RECORD PERTAINING TO THE INQUIRY.

Memorandum

Reference to this office letter No. 700 Dated: 10-03-2021 and 706 Dated: 11-03-2021 on the subject cited above it is hereby requested that the requisite record as mentioned in the aforesaid letter may also be provided in respect of SSTs/ Ex-SSTs/Petitioners as per detail given below:

S.No	Name	Father Name	Place of Posting
1	Ahmad Shah	Salman Shah	GHS Sulhan Khur Mohmand


Principal/Chairman
Inquiry Committee

Encl: No. _____/ Date: _____/2021

Copy forwarded:

1. PA to Director Elementary and Secondary Education Department KP, Peshawar
2. Additional Director E&SE Department NMD KP, Peshawar.


Principal/Chairman
Inquiry Committee



OFFICE OF THE PRINCIPAL GOVT SHAHEED-SHER NAWAZ

CMHS NO.1

TANK



No. 750

Dated: 02/04/2021.

(36) J

To

The District Education Officer
Tribal District Mohmand

Subject: OPPORTUNITY OF PERSONAL HEARING.

Memo

Reference to the Director E&SE Department Khyber Pakhtunkhwa Peshawar Endst. No. 1911-16/F No E-06/Khyber (KC now) Dated Peshawar the 08-02-2021, the inquiry committee constituted to conduct inquiry against the SSTs inducted in system illegally and unlawfully desires to provide proper opportunity for personal hearing and cross examining the evidences to the accused teachers

You are therefore requested to direct the SST (M/F) working in your District to appear before the inquiry committee at committee room of Directorate of Elementary and Secondary Education Department KP Peshawar as per detail and schedule given below. It is also requested that proper intimation to the concerned teachers may be acknowledged through enclosed formal duly counter signed by your good self and be submitted in original to the undersigned/ Additional Director Estab. NMD E&SE D before 08-04-2021 please

S No.	Name	Father Name	Place of Posting	Date of personal hearing
1	Shakar Ullah	Zargar	GMS Muslim Kor	08-04-2021
2	Zafar Iqbal	Gul Rahman	GMS Ashraf Abad	08-04-2021
3	Abdul Malik	Said Muhammad Shah	GMS Taj Muhammad	08-04-2021
4	Muhammad Farooq	Muhammad Yousaf	GMS Alingar	08-04-2021
5	Hazrat Jan	Akhtar Jan	GMS Gate Wariak	08-04-2021
6	Muhammad Sohail	Ghancha Gul	GMS Bahar Dag	08-04-2021
7	Yar Khan	Ali Rehman	GMS Bahadur Kalay	08-04-2021
8	Zia Ur Rehman	Alla Ur Rehman	GMS Eka Ghund Mohmand	08-04-2021
9	Ahmad Shah	Salman Shah	GMS Subhan Khur	08-04-2021
10	Zubanda Begum	Gul Akbar	GGMS Kuta Trap	08-04-2021
11	Robia Shams	Shams Ur Rehman	GGMS Ghahana	08-04-2021
12	Tanira Naz	Fazal Dayan	GGMS Samad Kor Faiz Muhammad	08-04-2021
13	Hira Shams	Shams Ur Rehman	GGMS Mian Mandi	08-04-2021
14	Bhral	Bahadar Sher	GGMS Kachkool Khwaza	08-04-2021
15	Gisazala Sana	Sana Ullah	GGMS Kashmir Kore	08-04-2021
16	Alia Taj	Taj Ud Din	GGMS Sro Kith	08-04-2021
17	Seema	Ikrum Ud Din	GGMS Sahib Dad Nahaqi	08-04-2021
18	Asma	Muhammad Akbar	GGMS Sabzali Baro Khet	08-04-2021
19	Nizakat	Said Ali Shah	GGMS Shahtam Sali	08-04-2021

You are further requested to direct all the aforementioned teachers to bring the following documents to be submitted to the inquiry committee

- (i) SSC to Last Exam Passed. (ii) Domicile and CNIC. (iii) Recommendation letter of KPSC
- (iv) First appointment order as SST (iv) Charge report. (v) Regularization and promotion order, if any
- (vi) All transfer orders issued time to time during their service tenure

Principal/Chairman
Inquiry Committee

Endst. No. / Dated: / 2021.

Copy forwarded.

- 1 The Director Elementary and Secondary Education Department KP, Peshawar. (with the request to direct the concerned DEOs for strict compliance please)
- 2 The Additional Director Elementary and Secondary Education Department NMD KP, Peshawar. (to make necessary arrangement for the scheduled event)

Principal/Chairman
Inquiry Committee



Op

130

**DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR**

37

NOTIFICATION

1. WHERE AS: one Mr.Ahmad Shah S/O Suleman SAhah who appointed himself as SST (G) in GHS Ghafoor Khan Killi District Khyber, now working at GHS Subhan Khwar District Mohmand vide, Appointment Notification No.3506-13/File No. 2/A-14/SST (M)/PSC/Apptt: dated 25/05/2012 which was not issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, is fake and bogus.
2. And the Competent Authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but he failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHEREAS, an inquiry Committee was constituted by the Competent Authority vide Notification No.778 dated 24/4/2021 which has the entire case record and it has been proved that the said appointment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was found out as fake/bogus.
4. AND WHEREAS, it has come into the notice of the Competent Authority that Mr.Ahmad Shah S/O Suleman Shah, has no legal status of the said appointment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus his appointment Notification No. 3505-13/File No. 2/A-14/SST(M)/PSC/Anptt: dated 25/05/2012 is hereby declared as **fake/bogus** ab initio and subsequently "**disowned**" with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mr.Ahmad Shah S/O Suleman Shah in the best interest of public service.

Director

**Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst: No. 110077-77 dated 27/06 2021.

Copy forwarded with the to the:-

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. District Education Officer Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Education Officer Khyber.
4. District Account Officer District Mohmand.
5. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
6. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.
7. Principal/Head Master concerned.

**Deputy Director (Estab)
Merged Districts**

To

THE HONORABLE SECRETARY,
Elementary & Secondary Education,
Government of Khyber Pakhtunkhwa, Peshawar.

SUBJECT: DEPARTMENTAL APPEAL / REPRESENTATION AGAINST ORDER NO. 10071-77 DATED 22.06.2021, WHEREBY THE APPOINTMENT ORDER DATED 25.05.2012 ISSUED IN FAVOUR OF THE APPELLANT HAS BEEN DECLARED AS FAKE & BOGUS AND THEN DISOWNED BY THE DEPARTMENT, ALONG WITH THE DIRECTION OF RECOVERY OF SALARIES AND OTHER ALLIED BENEFITS FROM THE APPELLANT.

Prayer: That on acceptance of this Departmental Appeal / Representation: -

1. the Order No. 10071-77 dated 22.06.2021 may please be set aside,
2. the Appointment Order Dated 25.05.2012 issued in favour of the Appellant be declared as genuine and validly issued by the Competent Authority,

In consequence whereof,

3. Appellant be reinstated in service with all back benefits & wages, with such other relief as may deem fit in the circumstances of the case may also be granted.

Diary No. 4061
13/7/21

(39)

Respected Sir,

I, AHMAD SHAH S/o Sulaiman Shah, Ex-SST (General), R/o Village Sheikh Kalli, P.O Agra, Tehsil & District Charsadda, submit instant Departmental Appeal / Representation for your honors sympathetic and benevolent considerations, as under:

1. That, Appellant was inducted into the service against the post of SST in BPS-16, following the recommendation of Khyber Pakhtunkhwa Public Service Commission, where after their services were placed at the disposal of Director Education, FATA vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification No. 3506-13/File No. 2/A-14/SST(F)/PSC/Apptt: dated 25.05.2012.
2. That, Director Education, FATA vide Order No. 7057-70/A-1/Apptt of SST (Gen)(PSC) 2012 dated 30.05.2012 adjusted the Appellant at GHS, Abdul Ghafoor Khan Killi, Khyber Agency.
3. That, according to rules, Appellant submitted Medical Fitness Certificate followed by Arrival / Charge Report which was also accepted.
4. That, thereafter pay of the Appellant was released after fulfilling all the codal formalities through Accountant General Khyber Pakhtunkhwa.
5. That, on different occasions, the services of the Appellant was transferred from one school to another as per requirement and need of the Respondent's Department. It is important to mention here that during the year 2012 onwards, the militancy in the Khyber Agency was at its peak, even than Appellant continued his services.
6. That, during the course of employment, Appellant enhanced his qualification and got M-Phil Allowance by the Department after submission of verified Degrees.
7. That, on 04.04.2019 and 05.04.2019, the Department disowned certain employees on the allegation of Fake / Bogus Appointment Orders, which was challenged by the said employees before the Honorable Khyber Pakhtunkhwa Service

(4)

Tribunal, Peshawar in shape of Service Appeals. It is important to mention here that Appellant was not disowned by the Department in the first instance.

8. That, the above stated Service Appeals were accepted on 20.01.2021 by the Honorable Service Tribunal, whereby the Orders of disowning the concerned employees by the Department were set aside, and they were reinstated in service with the direction to the Department to conduct proper enquiry. The Department was further directed to investigate the issue of allegedly Fake / Bogus Appointment Orders in order to reach to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter the fate of concerned employees be decided in the light of said enquiry. It was also directed by the Honorable Tribunal that the Department should conclude all the proceedings within 90 days of receipt of the Judgment dated 20.01.2021.
9. That, it is important to mention here that Appellant was not part and parcel of any Disowning Order, Service Appeal etc. During the pendency of Service Appeal or after the decision of the same, the Appellant was regularly performing his duties in the Department as Teacher, without any complaint from any quarter.
10. That, vide Order No. 717 dated 19.03.2021, the Chairman of the Inquiry Committee requisitioned the record of the Appellant, as well.
11. That, on 02.04.2021, the Appellant was summoned by the Chairman Inquiry Committee, for appearance, production of mentioned record and personal hearing for 08.04.2021.
12. That, on 22.06.2021, the subject mentioned Order was passed against the Appellant, which is neither legal nor proper as the same has been issued to avoid the direction of the Honorable Service Tribunal, Peshawar.
13. That, no meaningful or purposeful chance of personal hearing was provided to the Appellant by the Department nor was he confronted with any documentary evidence during the course of so-called personal hearing.


(41)

14. That, subject mentioned Order is against the principles of Natural Justice.
15. That, the Department, in order to save the skin of their beloved employees / Appointing Authority, has made the Appellant guilty of any wrong, done by them.
16. That, according to dictums laid down by the Honorable Supreme Court of Pakistan, if Appointment has not been processed by the Department, in accordance, with law, than the action, in the first instance, should have been initiated against the Appointing Authority, instead of appointee(s).
17. That, the action of the Department against the Appellant is otherwise contemptuous of the directions contained in the Judgment of Honorable Service Tribunal, Peshawar.
18. That, the determined question regarding completion of enquiry proceedings against other incumbents mentioned in the Judgment of the Honorable Service Tribunal, Peshawar was not followed by the Department.

It is, therefore, requested that subject Appeal be accepted as prayed for.

Thanking you,

Yours Faithfully


12/7/2021

(AHMAD SHAH)
S/o Sulaiman Shah,
Ex-SST (General),
R/o /Village Sheikh Kalli, P.O
Agra, Tehsil & District Charsadda.

“A”

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

No. *Resd*

APPEAL No..... *7668* of *2021* ^{*SB*}

Ahmad Shah

Appellant/Petitioner

Versus

Through Secy EGSE department, KPK, Peshawar

RESPONDENT(S)

✓
Notice to Appellant/Petitioner *Ahmad Shah s/o Suleiman Shah*
Ex - SSI (General) R/o Village Sheikh Kalli
P.O. Azra, Tehsil & District Chausadda

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *30/05/2022* at *9:00 am*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"B"

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

No.

Regd

Appeal No. 7668 of 20 21
Armed Shah Appellant/Petitioner
Versus

Through Sey Ezzie Peshawar Respondent
Respondent No. (3)

Notice to: — DEO Tehsil Ghalanai,

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.....16th
Day of.....June.....20 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.

Recd
S

SB

Appeal No. 7568 of 20 22

Akmal Shah

Appellant/Petitioner

Through Secy ^{Versus} E&SE Peshawar

Respondent

Respondent No. C4

Notice to: —

DEO Tehsil Janard, District Khyber

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 16th Day of June 20 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.

5 Always quote case no. while making any correspondence.
1 The notice of appearance in the court at the same time of the high court shall be deemed to have been served on the parties.

БЕШВАВЪ
КЪРГӨР ПАКТИОНУКУМЪ СЕРВИС ТРИБУНАЛ
БЕШВАВЪ

10.11.14

Day of 10 NOV 2014

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

office Notice No. 127 dated

127

Copy of appeal is attached. Copy of appeal ~~is attached~~ to ~~you~~ ~~the~~ ~~this~~ appeal petition.

Notice posted to this address by registered post will be deemed sufficient for the purposes 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 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 presence. Defiance of your appearance on the date fixed and in the manner aforementioned shall constitute 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 statements, advocates, 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 the appellant petitioner you are at liberty to do so on the date fixed or any other day to which you may wish to adjourn. If you wish to adjourn you must apply to the Registrar before the date fixed for hearing and you must pay the costs of adjournment. The above case by the petitioner in this Court and notice has been ordered to issue. You are Province Service Tribunal Act, 1974, has been presented/registered for consideration in

WHEREAS an appeal petition under the provision of the Кыргыз Республикасы

Notice to: 127 11 NOV 2014

Respondent No. 127

Respondent 127

Appellant/Petitioner 127

Appeal No. 127 of 2014

No.

БЕШВАВЪ
ЮДИЦИАЛЪ КОМПЛЕКС (ОГОЛДОНУКУМЪ БОУД)
КЪРГӨР ПАКТИОНУКУМЪ СЕРВИС ТРИБУНАЛ, БЕШВАВЪ

“B”

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

No.

SB

Appeal No. 7668 of 20 21

Atiqul Shah

Appellant/Petitioner

Through Secy ESSE Versus

Respondent

U U

Respondent No. (2)

Notice to: — Director ESSE Govt of KP 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 16/07/2022 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~~

16/7

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

Day of June 20 22

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,
PESHAWAR.

No.

SB

Appeal No. 7668 of 20 22

Muhammad Shah Appellant/Petitioner

Through Secy EGSE Department Peshawar Respondent
Respondent No. (1)

Notice to: — Govt of KPK through Secy EGSE Department Peshawar
27/6

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 appellatant/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 16 Day of June 20 22

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.