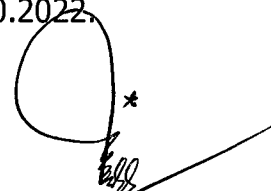


01.09.2022

Learned counsel for the appellant present. Preliminary arguments heard.


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 17.10.2022.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a vertical stroke and a diagonal line extending to the right. A small asterisk is placed above the vertical stroke.

(Mian Muhammad)  
Member (E)

25.05.2022

Learned counsel for the appellant present and requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for preliminary hearing on 16.06.2022 before S.B.


  
(Mian Muhammad)  
Member (E)

16<sup>th</sup> June, 2022

Counsel for the appellant present.

Notice Issued for  
08/08/22

Let pre-admission notice be issued to the other side. To come up for preliminary hearing on 08.08.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

8.8.2022

Due to the Public Holiday the case is Adjourned to 1-9-2022




  
Reader

Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ 15 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	06/01/2022	<p>The appeal of Mr. Zia Ullah Khan resubmitted today by Mr. Yasir Salim 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>	25.02.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>25/02/22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.</p> <p style="text-align: right;"> Reader.</p>


The appeal of Mr. Zia Ullah Khan son of Nawar Khan AT GMS Adam Abad Swabi received today i.e. on 20.12.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Memorandum of appeal may be got signed by the appellant.
- 3- Annexures of the appeal may be attested.
- 4- Annexure-B/I of the appeal is illegible which may be replaced by legible/better one.

No. 2520 /S.T,

Dt. 21/12/2021

Mr. Yasir Salim Adv. Pesh.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

*Resubmitted of the Case* 

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES  
TRIBUNAL, PESHAWAR**

Service Appeal No. 14 /2022

Zia Ullah Khan .....APPELLANT

V/S

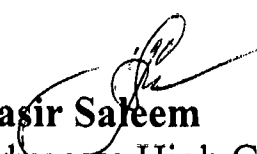
The Secretary to Govt of KPK & others .....RESPONDENTS

**INDEX**

S.No	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-6
2.	Affidavit		
3.	Copy of Appointment Order	A	7-10
4.	Copy of Applications	B&B-1	11-12
5.	Copy of Impugned Order dated 26.01.2021	C	13
6.	Copy of departmental appeal dated 25.03.2021, application for the provision of rejection order dated 30.11.2021 & rejection order dated 01.09.2021	D&E F	14-16
7.	Wakalatnama		17

Appellant

Through:

  
**Yasir Saleem**  
Advocate High Court,  
Peshawar

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021

Zia Ullah Khan S/O Nawar Khan Ex- Arabic Teacher G MS Adam Abad Swabi.

.....APPELLANT

V/S

- 1. The Secretary to Govt. Of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat Peshawar
- 2. The Director, Elementary & Pakhtunkhwa at Peshawar Secondary Education, Khyber Pakhtunkhwa at Peshawar.
- 3. The District Education Officer (Male) Elementary & Secondary Education District Swabi.

.....RESPONDENTS

**SERVICE APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED ORDER NO.03 DATED 26/01/2021 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE WAS IMPOSED UPON THE APPELLANT AGAINST WHICH THE DEPARTMENTAL APPEAL FILED BY THE APPELLANT HAS BEEN REJECTED VIDE OFFICE ORDER DATED 01.09.2021 COMMUNICATED TO THE APPELLANT (UPON HIS REQUEST) ON 30.11.2021.**

**PRAYER:**

By accepting this appeal the impugned orders passed by respondent No. 03 dated 26/01/2021 and rejection order dated 01.09.2021, may please be set aside and consequently the appellant may please be reinstated in his Service with all back benefits.

Respectfully Sheweth.

**FACTS:**

1. That the appellant was initially appointed as Arabic Teacher (Male) BPS-15 way back in the year 2011 after fulfilling all the legal & codal formalities required for the post. *(Copy of Appointment Order is attached as Annexure "A")*
2. That the appellant after receiving the appointment order took charge of his post and started performing his duty with full devotion and commitment and upto the entire satisfaction of his superiors and no complaint whatsoever has been mate against him.
3. That on 29.09.2020 the appellant submitted an application to respondent No 3 for grant of Leave without pay, followed by mentally torturing by respondent No 3 and even compelled to file an application for resignation in order to complete criteria devised by HEC(One year teaching at University Level is mandatory after completion of Ph.D) but unfortunately no order was passed over both the applications. It is worth mention that the both applications were filed as per verbally directed by respondent No. 03. *(Copy of Applications are attached as annexure "B" & "B/1" respectively).*
4. That the respondent No. 3 didn't consider applications filed by the appellant but unfortunately issued a removal letter No 487-91 dated 26-01-2021, with malafide intention during peak time of Corona Pandemic whereby the government had already imposed

Corona Pandemic whereby the government had already imposed statutory sanction on force removal at the time. **(Copy of Impugned Order dated 26.01.2021 is annexure "C")**.

5. That the appellant was in struggled to sanction his two years leave without pay but even then the appellant was kept in dark with respect to the passing of impugned removal order, more so he was not even issued copy of the same.
6. That, after communication of removal order i.e. on 26.02.2021, the appellant, submitted his departmental appeal for reinstatement on 25.03.2021. It is pertinent to mention here that even after his departmental appeal, the appellant was not informed about the outcome of the same, he time and again visited the office of respondent No. 02 however, he was verbally told that his departmental appeal has already been rejected but again the order was not communicated to him. It was upon his written application dated 30.11.2021 when the rejection order was ultimately provided / communicated to the appellant on 30.11.2021. *(Copy of departmental appeal dated 25.03.2021, application for the provision of rejection order dated 30.11.2021 & rejection order dated 01.09.2021 are attached as annexure "D" & "E")*
7. That the appellant, being aggrieved of the impugned order, is constrained to move this Hon'ble Tribunal for following amongst other grounds



**GROUNDS:**

- A. That the impugned order of respondent is illegal and void ab-initio as under Rule 3 (D) of the Khyber Pakhtunkhwa Govt Servants (E & D) Rules-2011. Because the appellant has been performing his duty since 2011 and no single complaint has been made against him even with regard of absenting.
- B. That no regular enquiry was conducted by respondent No. 03 in the case of appellant as neither the plea of appellant was considered nor any opportunity was provided to the appellant to substantiate his stance and thus the impugned order of removal from service has been passed with predetermined mind which necessitated the indulgence of this Hon'ble Tribunal.
- C. That the appellant was told by respondent No 02 that the enquiry report has already strongly recommended his reinstatement so the appellant shall be reinstated in view of these suggestion/recommendation made by enquiry officer/committee which was instituted by respondent No 02 in instant matter.
- D. That all allegations levelled by the respondents are standing in vacuum as no evidence what to speak of legally admissible evidence was available as against the appellant.
- E. That the impugned punishment is prima facie harsh and unreasonable when the same is placed in juxtaposition with the

nature of allegations therefore this Hon'ble Court needs to interfere to pass an appropriate order to meet the ends of justice.

F. That the appellant has not been treated by the respondents in accordance with Law and Rules on the subject noted above and as such respondents violated Article 04 and 25 of the Constitution of Pakistan 1973.

G. That the respondents have erred in law as while issuing the impugned removal order, no chance of personal hearing or personal defence has been provided to the appellant and as such the appellant has been condemned unheard.


H. That by now it is settled law before imposing major penalty upon a civil servant it is mandatory for an authority/ department to hold regular inquiry before imposing major penalty, however in case of appellant no regular inquiry has been conducted and thus through this way the respondents have over step their authority.

I. That it is consistent view of Superior Courts that punishment must commensurate to the magnitude of guilt.

J. That the appellant seek permission to advance other grounds and proofs at the time of hearing.

*It is, therefore, most humbly prayed that by accepting this appeal, the impugned order passed by respondent No. 03 dated 26-01-2021 and the order of respondent No. 02 dated Nil, may please be set aside and consequently the appellant may please be reinstated on his service with all back benefits.*

*Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.*

Appellant  
Through:  
  
**Yasir Saleem**  
Advocate High Court,  
Peshawar

**Certificate:-**

It is certify that no such like Service Appeal has earlier been filed by the Appellant in this Honourable Tribunal.

  
**ADVOCATE.**

6A

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Zia Ullah Khan .....APPELLANT  
V/S

The Secretary to Govt of KPK & others .....RESPONDENTS

**AFFIDAVIT**

I, **Zia Ullah Khan** S/O Nawar Khan Ex- Arabic Teacher G MS Adam Abad Swabi, do hereby solemnly affirm and declare on oath that contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
**DEPONENT**

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) SWABI**  
**APPOINTMENT AGAINST AT (MALE) POSTS.**

Consequent upon the recommendation of the Departmental Selection Committee as contained in the minutes of the meeting held on 02.12.2011 in the office of the DCO, Swabi.

In compliance with Government of the Khyber Pakhtunkhwa Elementary & Secondary Education Department notification having No. SO (PE)4-5/SSRC/Vol-III dated 18.01.2011, Endorsed to all concerned (including all the EDOs "E&SE" in KPK at S.No.12) by the Section Officer Primary on even No. & date and approved by the competent authority, the LDO (E&SE) Swabi is pleased to order the appointments of the following ETEA test qualified Candidates having at least 2<sup>nd</sup> Division in SSC with Shaha-latul Aalamia fil Uloomul Arabia wal Islamia Or 2<sup>nd</sup> Class MA (Arabic) qualification (out of 75% quota) against AT (Male) posts in BPS-15 of (Rs.8500-700-29500) plus usual allowances as admissible under the rules mentioned there-in the appendix at S.No.02 of the notification referred to above in the interest of public service from the date of their taking over charge on the terms and conditions given below:-

S#	Name	Father's Name	Address	Name of school where post	Remarks
1	Noorul Haq	Rizwanul Haq	VPO Pola (G)	GMS Shalman	AVP
2	Zahir Ali	Gul Rahman	VPO Shewa	GHS Permol	AVP
3	Anwar Ali	Hamid Ali	VPO Bamkhe	GMS Top	AVP
4	Sajid Mehmood	Fazal Rahim	VPO Zarobi	GHS Zarobi	AVP
5	Hasaan Ali Shah	Muhammad Shah	VPO Yaqoobi	GHS Thandkor	AVP
6	Irfan Ali	Fazlullah	VPO Shera Ghund	GHS Kotha	AVP
7	Muhammad Uzair	Barkatullah	VPO Kalu Khan	GHS Top	AVP
8	Amin Ali	Muqarab Khan	VPO Tano	GHS Marghuz	AVP
9	Suleman	Atlas Khan	VPO Kalu Khan	GHS Gar Munara	AVP
10	Farukh Sear	Ali Sher	VPO Tordher	GHS Allah Dher	AVP
11	Abdul Ahad	Abdul Latif	VPO Yar Hussan	GMS Zarobi	AVP
12	Sajid Khan	Abdur Rahman	VPO Ulla (G)	GHS Naro Banda	AVP
13	Abdur Rahman	Khan Sher Farooqi	VPO Lahor	GHS Haryan	AVP
14	Rozi Rahman	Rozi Aman	VPO Bamkhel	GHS Baja	AVP
15	Hidayat Ullah	Gul Rahman	VPO Panj Pir	GHS Dodher	AVP
16	Samiul Haq	Abdul Wahid	VPO Mangla Chai (G)	GMS Koiagar (G)	AVP
17	Shah Faisal	Sher Alam Khan	VPO Kaddi	GHS Zaida	AVP
18	Ziaullah Khan	Nawar Khan	VPO Besak (G)	GMS Lyren (G)	AVP
19	Zakirullah	Fazli Ahmad	VPO Jalsa	GMS Kot Gabal (Gadoon)	AVP

**Terms & Conditions:-**

- These appointments are purely temporary and liable to termination without assigning any reason and without any prior notice.
- They will have to produce Health & Age certificate from the Medical Superintendent DHQ Hospital Swabi before taking over charge.
- In case of fresh candidates they should not be handed over charge if their ages are below 18 or above 35 years.
- They must take over charge of the post within 14 days of the issue of this order failing which the appointment will stand automatically cancelled.
- All the original academic/professional certificates/degrees should be verified from the concerned Board/University. If any discrepancy was found at any stage the case will be started under the Rules and legal action will be initiated.
- Verification of documents should be made departmentally before draft of their pay and the concerned DEOs of the schools should send a certificate on the


- 8
8. After completion of verification process and subject to the provision of O.K certificate required in para-6 above, a proper order will be issued by this office for release of their pay against the post occupied by them.
  9. In case of resignation they will have to submit one month prior notice. Otherwise their one month pay will be forfeited to the Government. After tendering resignation, they will not leave their job until the acceptance of their resignation by the competent authority nor shall they be granted any leave.
  10. In case any one of the above appointees deprives of receiving charge due to non-availability of vacant post (in the school indicated against his name) any where in the above mentioned schools the services of junior most on merit in the relevant category will automatically be stood as dispensed with from service.
  11. They will be governed by the service rules framed by the Govt: from time to time.
  12. No TA/DA is allowed to any one.
  13. Charge report should be submitted to all concerned.

(ABDUS SALAM)  
EXECUTIVE DISTRICT OFFICER  
(E&SE)SWABI

Endst:No. 7505-1 /AT (Male) Appt:File/dated Swabi the 21/12/2011.

Copy of the above is forwarded for information and n/action to the:-

1. Hon:able Minister for Elementary & Secondary Education KPK, Peshawar.
2. Secretary to Govt:of KPK Elementary & Secondary Education Department, Peshawar.
3. Director Elementary & Secondary Education KPK, Peshawar.
4. District Coordination Officer, Swabi
5. District Accounts Officer, Swabi.
6. Principals/Lead Masters of concerned schools.
7. District Officer (Male) Local Office.
8. ADO (B&A/Establishment) Local Office.
9. Supdt (Male) Branch Local Office.
10. Dealing Assistant concerned.
11. Candidates concerned.

  
EXECUTIVE DISTRICT OFFICER  
(E&SE)SWABI

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) SWABI**

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15.	Hidayat Ullah	Gul Rahman	VPO Panj Pir	GHS Dodher	AVP
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17.	Shah Faisal	SHER Alam Khan	VPO Kaddi	GHS Zaida	AVP
18.	Ziaullah Khan	Nawar Khan	VPO Besak (G)	GMS Lyren (G)	AVP
19.	Zakirullah	Fazli Ahmad	VPO Jalsai	GMS Kot Gabat (Gadoon)	AVP

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5. All the original academic / professional certificates / degrees should be verified from the concerned Board / University. If any discrepancy was found at any stage of the case will be started (sic) the rules and legal (sic) will be mutated.
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8. After completion of verification process and subject to the provision of O.K certificate required in para 6 above; to prepare order will be issued by this office for release of their pay against the post occupied by them.
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11. They will be governed by the service rules framed by the Govt from time to time.
12. No TA / DA is allowed to any one.
13. Charge report should be submitted to all concerned.

(Abdus Salam)  
Executive District Officer  
(E&SE Swabi)

Endst No. 7505-G/AT(Male) Apptt: File/dated Swabi the 21/12/2011  
Copy of the above is forwarded for information and n/action to the :-

1. Hon;ble Minister for Elementary & Secondary Education KPK, Peshawar
2. Secretary to General KPK Elementary & Secondary Education KPK, Peshawar.
3. Director, Elementary & Secondary Education KPK, Peshawar.
4. District Coordination Officer, Swabi.
5. District Accounts Officer, Swabi.
6. Principals / Head Masters of concerned schools.
7. District Officer (Male) Local Office
8. ADO (B&A)/Establishment) Local Office.
9. Supdt (Male) Branch Local Office
10. Dealing Assistant concerned.
11. Candidates concerned.

Sd/-  
Executive District Officer  
(E&SE Swabi)



To,

Amir Bacha  
29/9/20

The DEO (M)  
Swabi.

Subject:- Application For Leave (without Pay)  
Memo.

With Profound Reverence it is stated that I  
- have some domestic Problems at home. Due to  
it, I cannot perform my duty furthermore  
at school.

Kindly grant me leave without Pay  
for two years w.e.f 01-10-2020 to 30-09-2022.

I shall be very thankful for this kindness

Yours obediently  
Ziaullah Khan (AT)

CNIC: # 42401-2043516-9

Mobile = 0345-9503443

Person No: 00673419

Date:- 29-09-2020

forwarded to DEO(M) Swabi  
for N/A please.  
No 613 dated 29-09-2020

19/9/20  
29/9/20

## بیان حلفی

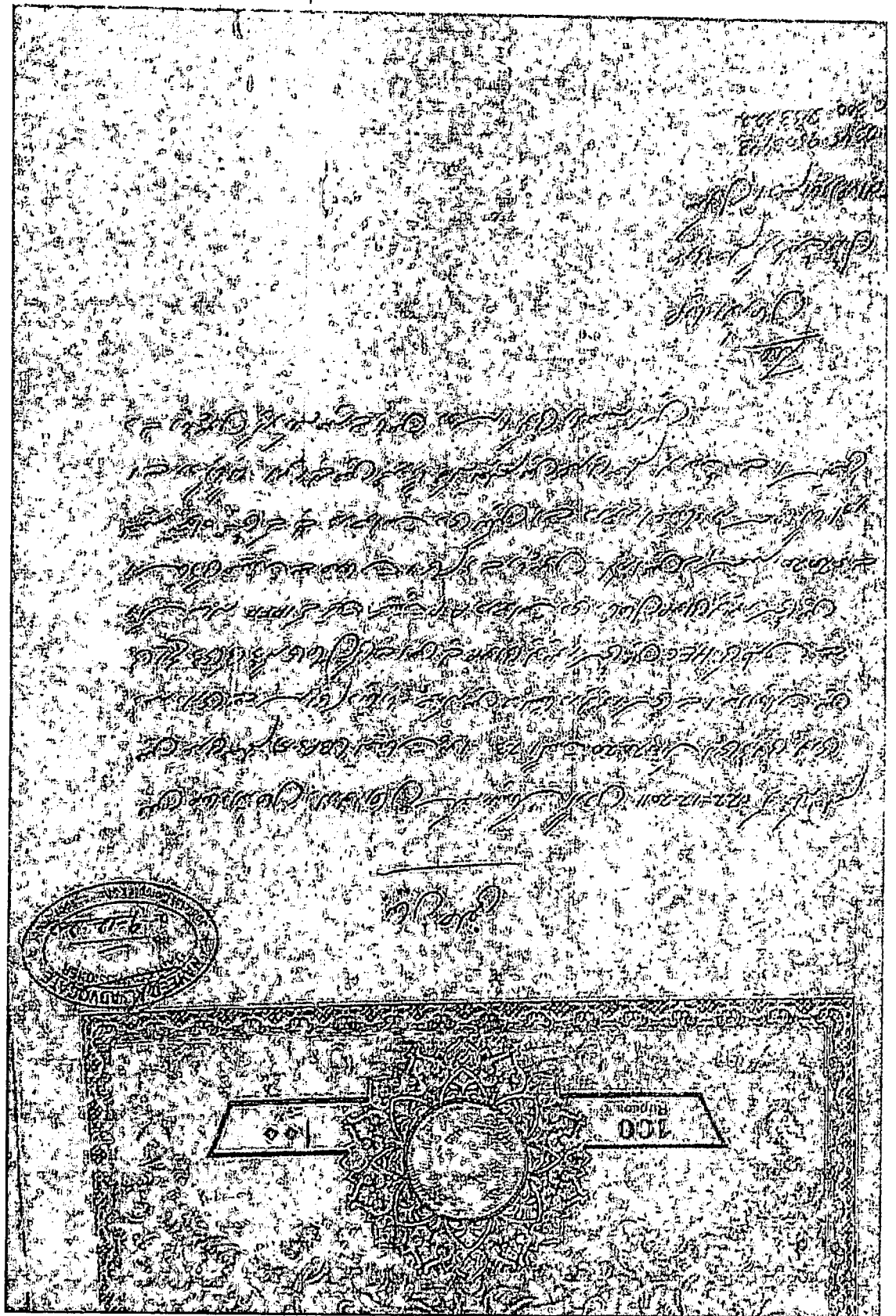
میں صبا اللہ خان ولد نواز خان مسکنہ بسینہ گردن 2011-12-22 کو  
 محکمہ تعلیم میں عربی علم (BPS (15) لینا چاہتا ہوں۔ 23 اگست 2020  
 تک اپنی ڈیوٹی پوری ذمہ داری سے سرانجام دیتا رہا۔  
 چونکہ میں سینار، یونیورسٹی سے اسلامیات میں پی ایچ ڈی کی  
 ڈگری حاصل کی ہے۔ اسلئے پھوٹی یونیورسٹی میں (ایچ ای سی)  
 کی طرف سے ایک سالہ 16FP کے تحت کثیف AIP درخواست  
 دی۔ تا حال پھوٹی یونیورسٹی میں اساتذہ کرام سے خدمات  
 سرانجام دے رہا ہوں۔ لہذا میں نے ستمبر 2020 سے لغتہ گواہ  
 چھٹی کٹیے درخواست دی لیکن اسے درخواست نہ سمجھا گیا۔ 19  
 اسے روک لیا گیا۔ اسلئے میں مجبوراً محکمہ تعلیم میں عربی علم پوسٹ  
 سے استعفیٰ دے رہا ہوں۔ کیونکہ میرے پاس دوسرا کوئی راستہ  
 نہیں۔

صبا اللہ خان

عربی علم ٹیوشن سنٹر

سٹو آف آفیسر پھوٹی

Attested





## District Education Officer (Male) Swabi

PH No. 0938-280239

### NOTIFICATION

WHEREAS Head Master Govt. Middle School Adam Abad Swabi informed this office through a letter No. 614/Dated: 03-10-2020, that Mr. Ziaullah Khan Arabic Teacher of his school is absent from duty w.e.f 23.09.2020 till date without any notice/prior permission.

AND WHEREAS an absence notice was issued to him on home address under registered cover to resume duty within fifteen days vide District Education Office Male Swabi E/No. 7476-78/Dated: 13-10-2020 but he failed to report for duty.

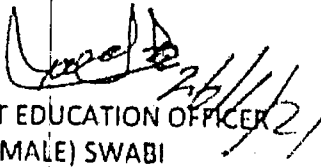
AND WHEREAS absence notice is published in two leading newspapers i.e daily "Express" and daily "Aaj" on dated 09-12-2020 warning him to resume duty within fifteen days but yet again he didn't report for duty at his school.

NOW, THEREFORE, in exercise of the powers conferred under section 4-b (iii) of the Khyber Pakhtunkhwa (Efficiency & Disciplinary) Rules, 2011, the undersigned being the competent authority is pleased to impose the major penalty of removal from service upon Mr. Ziaullah Khan Arabic Teacher of GMS Adam Abad Swabi and resident of VPO Besak (Gadoon) Tehsil Topi District Swabi with immediate effect. The intervening period of his absence from duty is treated as un-authorized absence.

(ZAHID MUHAMMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) SWABI

Endst. No. 427-31 /Dated 26-01- /2021

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Swabi.
3. ADEO (Estab)/B&AO Local Office.
4. Head Master GMS Adam abad Swabi.
5. Mr. Ziaullah Khan S/O Nawar Khan VPO Besak (Gadoon) Topi Swabi.

  
DISTRICT EDUCATION OFFICER  
(MALE) SWABI

بخدمت جناب ڈائریکٹر صاحب ایلیمنٹری ایڈیوکیٹری ایجوکیشن خیر، پتو، خواجہ آباد

عنوان: اہل برائے بحال ملازمت

جناب عالی منوہات گزارش ہے کہ بندہ ضیاء اللہ خان ولد نور خان ساکن بسک گدون (سوالی)، عربی معلم گورنمنٹ ہڈل سکول آدم آباد (سوالی)، 2011ء سے ملکہ تعلیم میں خدمات سرانجام دے رہا تھا کہ اپنا ایک ستمبر 2020ء میں یکے گھر پلو مجبوریوں کی وجہ سے اپنی ڈیوٹی سے غیر حاضر رہا۔ میری بیویوں ایسی تھیں کہ میں ڈیوٹی کو حاضری دینے سے قاصر رہا۔ اس دوران میں نے چھٹی کے لیے درخواست بھی دی لیکن ڈی ای ای او صاحب (سوالی) نے وہ مسترد کر دی۔ پھر ملکہ اکٹارہ گمش رہا۔ دریں اثنا متعلقہ دفتر نے بندہ کی ملازمت معطل کر دی۔ اب آپ صاحبان کی خدمت میں عرض ہے کہ آپ میری ملازمت بحال کر دیں کیونکہ میں ایک غریب گھرانے سے تعلق رکھتا ہوں اور میری واحد ذریعہ معاش ہے۔

میں نوازش ہوگی

تفصیلاً یہاں آباد

آپ کا شاگرد ار ضیاء اللہ خان عربی معلم گورنمنٹ ہڈل سکول آدم آباد (سوالی)

موبائل نمبر: 03459503443 - 03005453322

سماجی کارڈ نمبر: 9-2043516-42401

پوسٹل نمبر: 00673419

1419

ایجوکیشن

ارتقا

بخدمت جناب ڈائریکٹر ایجوکیشن ریفرنڈ سیکٹری ایجوکیشن کراچی کے لئے سعادت

جناب عالی!

موجودہ گزارش لکھائی ہے کہ بیڑہ ضیاء اللہ سالانہ عربی معلم گورنمنٹ وڈل سکول آدم آباد (صوبائی) کو 26 جنوری 2022 کو نوٹری سے درخواست کمر دیا گیا تھا۔ بیڑہ نے 25 مارچ 2022 کو آپ کے پاس رس کے خلاف اپیل برائے بجالی دائر کر دی جس کا کمال بیڑہ کو کوئی جواب جو ارسال نہ ہوا۔ آپ سے درخواست کی جاتی ہے کہ بیڑہ کو اس باب میں صدقہ نقل دی جائے تاکہ کوئی فیصلہ ہوا ہو۔

عین نوادرش ہوگی

ضیاء اللہ

سالانہ عربی معلم صوبائی

42401-2043516-9

0345-9583443

298  
30-11-2022



Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Annex F (16)

No. 111 F.No. Appeal/CI/AT

Dated Peshawar the 1/3/2023

To

The District Education Officer,  
(M) ~~Nowak~~ *Sulaiman*

Subject:-

INQUIRY REPORT

Memo:

I am directed to refer to your letter No.1524 dated 27-07-2019 on the subject cited above and to state that the competent authority has rejected the appeal of Mr. Zia Ullah Khan Ex-AT GMS Adam Abad Swabi.

Improperly.

I am further directed and to ask you to Explain why the case was handle

*Kali*  
Assistant Director Estab (Male)  
E&SE Khyber Pakhtunkhwa




Encl: No. \_\_\_\_\_

Copy of the above is forwarded to the:

PA to Director E&SE Khyber Pakhtunkhwa

Assistant Director Estab (Male)  
E&SE Khyber Pakhtunkhwa



105440			
ایڈویٹ: <u>محمد الہاں لہرو</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: <u>1026</u>			
رابطہ نمبر: <u>0300872206</u>			

بعدالت جناب: روسٹریٹل سٹار

مخائب: <u>الہاں</u>	دعویٰ: <u>روسٹریٹل</u>
علت نمبر: <u>صبا علیہاں بنام سکریٹری (E) و سروس</u>	مورخہ: _____
نام: _____	جرم: _____
	تھانہ: _____

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام سکریٹری کیلئے محمد الہاں لہرو کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ آیا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخنتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: \_\_\_\_\_  
 الع بد \_\_\_\_\_ واہ شد الع بد \_\_\_\_\_  
 مقام کے لیے منظور ہے۔

صبا علیہاں

نوٹ: اسی وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔