

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 1465/2018

Date of Institution ... 07.12.2018

Date of Decision ... 21.02.2019

Muhammad Saleem Khan, Ex-Assistant (BPS-16) Establishment
Department, Khyber Pakhtunkhwa Peshawar. ... (Appellant)

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary,
Peshawar and two others. ... (Respondents)

Present.

Mr. Muhammad Kamran Khan,
Advocate. ... For appellant

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

The appellant is aggrieved from the order of respondent No. 1
passed on 15.6.2015, whereby, he was removed from service. He is also
aggrieved of the fact that his departmental appeal was declined on
30.05.2018.

2. I have heard learned counsel for the appellant who mainly
contended that during the proceedings against the appellant no notice was

served upon him although his whereabouts were known to the respondents who were also aware of the fact that the appellant was in Saudi Arabia at the relevant time. It was also argued that ex-parte action was taken against the appellant which was nullity in the eyes of law, therefore, the order of his removal from service was not sustainable.

3. The record is depictive of the fact that in his departmental appeal the appellant had candidly noted that his extraordinary leave was not extended beyond the year 2014. It was also noted therein that he came to know about his removal from service in the year 2015. On the other hand, the appellant was proceeded against on account of absence from duty from 02.02.2015. During the course of proceedings he was sent notices at his home address and, subsequently, in the newspapers in accordance with the procedure required under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. Due to his failure to join the duty, the impugned order was passed on 15.6.2015. The appellant thereafter, submitted a departmental appeal with considerable delay which was followed by two applications dated 29.07.2016 and 06.09.2017. The said applications, as per the summary prepared for the Chief Minister Khyber Pakhtunkhwa on account of his appeal for reinstatement in service, were mere repetition of the departmental appeal. The same, therefore, were not considered worth credence. The appellant, in the ordinary course, could have approached this Tribunal after lapse of statutory period provided for the purpose, which was not done so.

4. In view of the above facts and also the admission of appellant regarding remaining away from Pakistan during the relevant period would suffice to counter the argument regarding proceedings having been taken by the respondents at the back of appellant. The respondents appear to have proceeded in accordance with law, therefore, the impugned orders are not exceptionable.

As a sequel, the appeal in hand is considered bereft of merits warranting its admission for regular hearing. The same is, therefore, dismissed in limine.

File be consigned to the record room.




(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
21.02.2019

17.1.2019

Counsel for the appellant requests for adjournment in order to further prepare the brief.

Adjourned to 21.02.2019 before S.B.



Chairman

9/1/2019
S.B.




21/2/2019

21/2/2019

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1465/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/12/2018	<p>The appeal of Mr. Muhammad Saleem Khan presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 2/12/18</p>
2-	13/12/2018.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/01/2019.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
14.1.2019		<p>Mr. Mir Zaman Safi, Advocate for Mr. Noor Muhammad Khattak, Advocate for appellant present.</p> <p>Requests for adjournment as learned senior counsel for the appellant is indisposed. Adjourned to 17.01.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p>

*P. 14
This Bench*

BEFORE THE KHYBER PAKHTUNKWHA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1465 /2018

MUHAMMAD SALEEM

VS

GOVT: OF KP

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 3.
2	Condonation application	4.
3.	Orders	A & B	5- 6.
4.	order	C	7.
5.	Extension orders	D, E & F	8- 10.
6.	Impugned order	G	11.
7.	Departmental appeal	H	12- 13.
8.	Summary	I	14.
9.	Vakalat nama	15.

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK,
ADVOCATE

Flat No. 3, Upper Floor,
Islamia Club Building,
Khyber Bazar, Peshawar
0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1465 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1735

Dated 07-12-2018

Mr. Muhammad Saleem Khan, Ex: Assistant (BPS-16),
Establishment Department, Civil Secretariat,
Khyber Pakhtunkhwa, Peshawar.....

APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Principal Secretary to Chief Minister Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Establishment Department, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 15.06.2015 COMMUNICATED TO THE APPELLANT ON 16.5.2018 WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the impugned order dated 15.06.2015 communicated to the appellant on 16.5.2018 may very kindly be set aside and the respondents may be directed to re-instated the appellant into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor to the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was inducted/appointed as Assistant in the respondent Department vide order dated 02.04.1992 and vide subsequent order dated 14.4.1992 the appellant was directed to report in the education Department as Assistant (BPS-11) w.e.f 11.4.1992. That in response of the order dated 14.4.1992 the appellant submitted his arrival report and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copies of the orders are attached as annexure..... **A & B.**
- 2- That during service the appellant was selected as English Teacher under the Ministry of Education, Kingdom of Saudi Arabia through Overseas Employment Corporation, Islamabad and consequently the appellant was relieved from duty for deputation w.e.f 15th

Filed to-day
Registrar
7/12/18.

September, 2002 enabling him to take his new assignment vide order dated 14.09.2002. Copy of the order is attached as annexure **C.**

3- That during service the deputation period was extended from time to time and lastly the deputation period was extended for further three years w.e.f. 2.2.2012 vide order dated 20.3.2012. That before expiry of the said period the appellant requested for further extension of his deputation period but no reply was received from the concerned quarter resultantly the appellant returned to Pakistan and submitted his arrival report but in response the appellant was handed over the impugned order dated 15.6.2015 communicated to the appellant on 16.5.2018. Copies of the extension orders and impugned order are attached as annexure..... **D, E, F & G.**

4- That appellant feeling aggrieved from the impugned order dated 15.06.2015 communicated to the appellant on 16.5.2018 filed Departmental appeal before the appellate authority but the same has not been replied. Copies of the Departmental appeal and summary are attached as annexure..... **H & I.**

5- That appellant feeling aggrieved and having no other remedy filed the instant appeal on the following grounds.

GROUND:

- A- That the impugned order dated 15.06.2015 issued by the respondent No.2 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no charge sheet and statement of allegations has been served on the appellant before issuing the impugned order dated 15.06.2015.
- D- That no show cause notice has been issued to the appellant by the respondents before issuing the impugned order dated 15.06.2015.
- E- That no publication has whatsoever been made by the respondents prior to the impugned order which is necessary as per Rule-9 of (Efficiency and Discipline) Rules 2011.
- F- That the impugned order dated 15.06.2015 is a void order on the score that the said order has been issued by the incompetent authority, therefore, the same is not tenable and liable to be set aside.

G- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned un heard.

H- That no regular inquiry has been conducted in the matter of the appellant which is as per Supreme Court judgments is necessary in punitive action against the civil servant.

I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 5.12.2018


APPELLANT
MUHAMMAD SALEEM KHAN

THROUGH:
NOOR MOHAMMAD KHATTAK
&


MUHAMMAD MAAZ MADNI
ADVOCATES

BEFORE THE KHYBER PAKHTUNKWHA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2018

MUHAMMAD SALEEM

VS

GOVT: OF KP

APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND'S OF APPLICATION:

A- That, valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.

B- That it has been the consistent view of the Superior Courts that case should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

Dated: 05.12.2018.

APPELLANT


MUHAMMAD SALEEM

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

REG: IMMEDIATE.

GOVERNMENT OF N.W.F.P.
SERVICES & GENERAL ADMINISTRATION
DEPARTMENT.

(SERVICES WING)

NO.SOS-IV(S&GAD)222/90-91.
Dated Peshawar the 2nd April, 1992.

Offer of appointment.

Mr. Muhammad Jalal is offered a post of Assistant in the Basic Scale Ps. 1275-86-2565 (B.11) with usual allowance as admissible under the rules.

2. His employment in the Secretariat is purely temporary and his services are liable to be terminated without assigning any reason at 14 day's notice or on the payment of 14 day's salary in lieu of the notice.
3. He has to join duty at his own expense.
4. In case he wishes to resign at any time, 14 day's notice will be necessary or in lieu thereof 14 day's pay will be forfeited.
5. He shall produce a medical certificate of fitness from Medical Superintendent, Civil Hospital, Peshawar before reporting himself for duty in the Secretariat, as required under the rules.
6. He will be governed by such rules and orders relating to leave, travelling allowance, medical attendance pay etc., as may be allowed by Government for the category of Government Servants to which he belongs.
7. If he accepts the post on these conditions, he should report for duty to the undersigned within 14 day's of the receipt of this letter and produce original certificates in connection with his qualifications, domicile and age.

(NAEEM ANJUM)
~~SECTION OFFICER (SERVICES-IV)~~
TELE NO. 76358 - 70210.

To

Mr. Muhammad Jalal S/O Muhammad Umar,
C/O Jebanzeb Sup. House, Shop No. 2462,
Bazar Islambad, Peshawar City.

ATTESTED

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Rasmi
24/02

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GOVERNMENT OF N.W.F.P.
SERVICES AND GENERAL ADMINISTRATION
DEPARTMENT.

(SERVICES WING)

SUBJECT:- APPOINTMENT AS ASSISTANT.

Will the Section Officer(General), Government of NWFP,
Education Department _____ kindly refer to the subject
noted above?

2. Formal orders of appointment in respect of
Mr. Mohammad Saleem who has been selected as Assistant
(B.11) will be issued in due course of time. Meanwhile he has
been directed to report for duty in Education Department
with effect from 11.4.1992(F.N.).

3. A copy of his charge report may please be sent to
this Department.

4. His Medical Fitness Certificate(in duplicate) is
attached herewith, receipt of which may please be acknowledged.

(NAEEM ANJUM)
SECTION OFFICER(SERVICES-IV)

The Section Officer(General),
Government of N.W.F.P.,
_____ Department.

U.O.NO.SCS.IV(S&GAD)2(222)/90, dated Peshawar the 14.4.1992.

ATTESTED



GOVERNMENT OF NWFP
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

6
C-7

Dated Peshawar, the 14th September, 2002.

ORDER

NO.SO (E-IV) E&AD/ 2(214)/92. Consequent upon his selection as English Teacher under the Ministry of Education, Kingdom of Saudi Arabia through Overseas Employment Corporation, Islamabad, Mr. Muhammad Saleem Khan, Assistant is hereby relieved of his duties in Civil Secretariat NWFP, with effect from 15th September, 2002 enabling him to take his new assignment.

SECRETARY ESTABLISHMENT

Endst. No. and Dated even

Copy of the above is forwarded to :-

1. The Accountant General, NWFP, Peshawar.
2. The Section Officer (Admn) Administration Department, NWFP.
3. The Section Officer (Secret) Establishment Department, NWFP.
4. The Estate Officer, Administration Department, NWFP.
- 5.- Official concerned.

Am
25/9/2002

9c


Section Officer (Establishment-IV)

ATTESTED



GOVERNMENT OF NWFP
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)



Dated Peshawar, the 3rd July, 2006

D-8

ORDER


NO. SOE-IV (E&AD) 2(214)92.- Consequent upon renewal of contract period of Mr. Muhammad Saleem Khan, Assistant by the Ministry of Education, Kingdom of Saudi Arabia for the academic year 1426-1427 A.H, the deputation period of Mr. Muhammad Saleem Khan, Assistant, presently working with Ministry of Education, Kingdom of Saudi Arabia is extended for a period of one year (i.e from 15.9.2005 to 14.9.2006)

SECRETARY ESTABLISHMENT

Endst. No. & date even

Coy forwarded to:-

1. The Manager of Teachers Affairs, Ministry of Education, General Directorate of Education, Riyadh, (Teachers Affairs Requirements Unit, Kindom of Saudi Arabia.
2. The Accountant General, NWFP, Peshawar.
3. The Section officer (Admn) Administration Department.
4. The Section Officer (E) Excise & Taxation Department.
5. Official concerned.


(ABDUL WAHEED)
SECTION OFFICER (E.IV)

ATTESTED





GOVERNMENT OF NWFP
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)
Dated Peshawar the 1st Feburary, 2008



ORDER.

NO. SOE-IV(E&AD)2(214)/92- Sanction is hereby accorded to the grant of two years leave (on half pay) with effect from 01.02.2008 in favour of Mr. Muhammad Saleem Khan, Assistant Establishment Department.

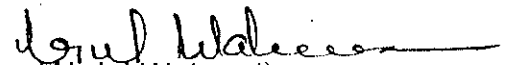
2. Certified that the official concerned shall resume his duty at the same post and station after expiry of his leave.

SECRETARY ESTABLISHMENT


Endst. No. & date even.

Copy forwarded to:-

1. The Accountant General, NWFP, Peshawar.
2. The Section Officer (Admn), Administration Department.
3. The official concerned.


(Abdul Waheed)
Section Officer (E-IV)

ATTESTED





F-10

(10)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)**

Dated Peshawar, the 20.03.2012.

ORDER.

NO. SOE-IV(E&AD)2(214)/1992:- Sanction is hereby accorded to the grant of ~~three~~ years Extra Ordinary leave (without pay) with effect from 02.02.2012 in favour of Muhammad Saleem Khan, Assistant (BS-14), Establishment Department.

2. On expiry of leave, the official is likely to report to Establishment Department.

SECRETARY ESTABLISHMENT

Endst. No. & date even

Copy forwarded to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Section Officer (Admn), Administration Department.
3. Section Officer (Secret), Establishment Department.
5. P.A to Deputy Secretary (E), Establishment Department.
6. Official concerned.
7. Personal file.

**(MAQBOOL HUSSAIN)
SECTION OFFICER (E.IV)**

ATTESTED

Recd
20/3/12



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 15.06.2015.

NOTIFICATION

No. SOE.IV(E&AD) 2(214)/1992:- WHEREAS, Muhammad Salim Khan, Assistant (BPS-16), Establishment Department, Civil Secretariat, Khyber Pakhtunkhwa absented himself from duty with effect from 03.02.2015.

AND WHEREAS, notices were served upon him at his home address and subsequently in the newspapers in accordance with the procedure given under rule 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011 requiring him to resume duty forthwith, but he failed to comply.

NOW, THEREFORE, the Competent Authority (Chief Secretary, Khyber Pakhtunkhwa) in terms of Rule 2 (1) (f) (i) in exercising of the powers conferred under Rule 9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, hereby impose the major penalty of "Removal from Service" on Muhammad Salim Khan, Assistant (BPS-16), Establishment Department, Khyber Pakhtunkhwa for willful absence from duty, with immediate effect. The absence period w.e.f. 03.02.2015 till date is treated as unauthorized absence from duty.

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

Endst. No. & Date Even.

Copy forwarded to:-

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Section Officer (Admn), Administration Department.
3. The Section Officer (Secret), Establishment Department.
4. P.S to Secretary Establishment Department.
5. P.S to Special: Secretary (E), Establishment Department.
6. P.A to Addl: Secretary (E), Establishment Department.
7. P.A to Addl: Secretary (HRD Wing), Establishment Department.
8. P.A to Deputy Secretary (E), Establishment Department.
9. Bill Assistant E&A Department.
10. Muhammad Salim Khan S/o Muhammad Umar, H. No. 4, Street No. 3, Kakshal, Wazir Bagh Road, Moh: Muhammad Jee, P.O Namak Mandi, Peshawar.

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12/6

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Wardah Latif
15/6/2015
(WARDAH LATIF)
SECTION OFFICER (E.IV)

ATTESTED

[Handwritten signature]

The Honorable Chief Minister Khyber Pakhtunkhwa,
Chief Minister Secretariat, Peshawar

Subject: Appeal for Re-instatement in Service

His Excellency,

I would like to draw your kind attention towards few facts on the above captioned subject as follows:-

- That I was appointed as an Assistant in April, 1992 in Civil Sectt: Peshawar, being a Master degree holder in English and served different departments. My services last for 23 long years.
- That I was granted deputation abroad on appointment as an English Language Teacher by Ministry of Education in Saudi Arabia in September, 2002 and moved to KSA along with my family while kept intact my service by regularly contributing to pensionary benefits as per rules being on deputation; However, I resigned from the ELT post due to lack of schooling of my kids in Saudi Arabia in 2006 and re-joined my service.
- That in 2008 when the situation in Swat valley got worsened and I had to move once again along with my family to Saudi Arabia on the post of a lecturer in Qassim University; I was given leave with pay for three years which expired in 2011 and further an EOL for three years till 2014.
- I applied for extension in extra ordinary leave but no response was received.
- That I came to know about my removal from service in 2016 when I visited Pakistan with my family, whereas I haven't received any notice from the department regarding removal from service. I submitted an application to the Secretary Establishment but I didn't receive any reply; I tried another application again in 2017 but with no response from the department.
- Due to not receipt of any response as well as removal from service in time, I could not submit departmental appeal before your goodself being appellate authority in the case. The appeal has been time barred which may kindly be condoned.
- That now, I have resigned from my service in Saudi Arabia as living for expatriates has become difficult due to heavy taxation and I had to move back to Pakistan to continue my kids studies;

In view of the above facts, your Excellency is requested to condone the period of absence into Ex-Pakistan Leave and re-instate my services with all back benefits etc.

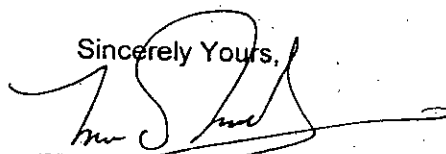
With best regards!

Sect. EsH

Heem put up Summary

Pemey maddh
Chief Minister
Khyber Pakhtunkhwa

Sincerely Yours,



(Muhammad Saleem Khan)

Employee Establishment Department
Civil Secretariat Peshawar

ATTESTED



H-12

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not available*



SECTION OFFICER (E-IV)
Diary No: 400
Dated: 23-5-18

Ps / Sery (E) E & AD
Diary No: 118246
Dated: 23-5-2018

CHIEF MINISTER'S SECRETARIAT
KHYBER PAKHTUNKHWA

13

No. SO (Admn)/CMS/KP/2018 12602
Dated Peshawar the, 22nd May 2018

To

The Secretary to,
Government of Khyber Pakhtunkhwa,
Establishment Department.

Subject:- APPEAL FOR RE-INSTATEMENT IN SERVICE
Dear Sir,

I am directed to forward herewith a copy of self-contained application, submitted by Mr. Muhammad Saleem Khan, ex-Office Assistant, Establishment Department, Khyber Pakhtunkhwa, on the subject noted above, containing following remarks of the Chief Minister:

"Sect. Estt
Please P.u Summary."

2. I am, therefore, directed to request that the case may be examined, under the prevailing laws, rules and policies and take necessary action on above directive accordingly, under intimation to this Secretariat, please.

Encls: As above

Yours faithfully,

ASL
(Usman Ali Shah)
Section Officer (Admn.)

Endt: No. & Date (even)

Copy for information is forwarded to PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.

ASL
Section Officer (Admn.)

SO (E-IV)

ASL
PS Private Secretary to
Secretary Establishment

ATTESTED

26/4/18



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)**

14
15

SUMMARY FOR CHIEF MINISTER

I -

Subject:- **APPEAL FOR REINSTATEMENT IN SERVICE**

Muhammad Saleem Khan, Ex- Assistant was on deputation in the Kingdom of Saudi Arabia for three (03) years w.e.f 15-09-2002 to 14-09-2006 on year to year contract (Annex-I). He was then granted 2 years leave on half pay w.e.f 01-02-2018 and 3 years Extra Ordinary Leave (without pay) from 02-02-2010 to 02-02-2015 (Annex-II). On expiry of leave, he neither applied for extension of leave nor resumed duty. Absence notice was issued on his home address under Rule 9 of Khyber Pakhtunkhwa (Efficiency and Discipline) Rules, 2011. The letter returned undelivered with the remarks that

"No person with such identity resides on the given address".

2. In order to fulfill the procedural requirements of Rule-9 of the rules ibid, a notice was published in two leading newspapers but no response from the official was received which rendered him liable for ex-parte action and the competent authority, after fulfilling all codal formalities, imposed major penalty removal from service on him on 15-06-2015 (Annex-III).
3. Later on, two applications dated 29-07-2016 and 06-09-2017 were received from him for re-instatement in service (Annex-IV&V), which were processed and filed being time barred in the light of Rule-17 of the rules ibid (Annex-VI).
4. Now, Muhammad Saleem Khan, Ex-Assistant, after spending more than 11 years in Kingdom of Saudi Arabia; has again submitted an appeal addressed to Chief Minister, Khyber Pakhtunkhwa and requested to condone the delay in preferring the appeal and re-instate him in service alongwith all back benefits (Annex-VII).
5. It is worth mentioning here that the instant appeal is not only badly time barred but repetition of the earlier ones. The request is therefore not covered under rules and may be filed.
6. The Chief Minister is requested to approve Para-5.

CA/S Khyber Pakhtunkhwa
No. _____
Date. _____

ATTESTED

(Arshad Majeed)
SECRETARY ESTABLISHMENT

30 May, 2018

CHIEF SECRETARY,
KHYBER PAKHTUNKHWA

CHIEF MINISTER,
KHYBER PAKHTUNKHWA

Chief Secretary
Govt. Of Khyber Pakhtunkhwa

SE

4/5

Para 5 is approved.
11/6/18
Chief Secretary

Chief Minister
Khyber Pakhtunkhwa

29/07/2018

VAKALATNAMA

Before the KP Service Tribunal, Peshawar

_____ OF 2018

Muhammad Saleem

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

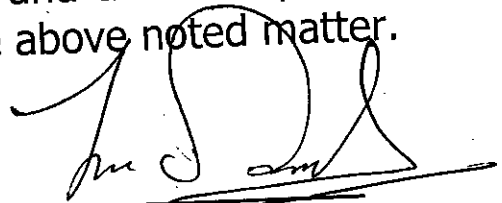
Govt. of KP & Others

(RESPONDENT)
(DEFENDANT)

I/We Muhammad Saleem

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. _____/_____/2018



CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

MUHAMMAD MAAZ MADNI
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391
Mobile No. **0345-9383141**