Form-A

FORM OF ORDER SHEET

Court of___ 1340/**2022** Case No.-__ S.No. Date of order Order or other proceedings with signature of judge proceedings 2 3 1 The appeal of Mr. Muhammad Waqas presented today by Mr. 13/09/2022 1-Shahzad Shakoor Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on_____. Notices be issued to appellant and his counsel for the date fixed. By the order of Chairman REGISTRAR

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1340 of 2022

Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad.

Appellant

Versus

The District Education Officer, Elementary & Secondary Education Department, Abbottabad and 02 others.

Respondents

SERVICE APPEAL

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Dated 12/09/2022

Through

(Rashid Iqbal Khan Jadoon) Advocate IBC Islamabad Attorney Abbottabad. (Muhammad Waqas) Appellant in person

J.B

(Shahzad Shakoor) Advocate High Court Abbottabad

Abbott Law Chamber Office No 51, Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

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BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: <u>1340</u> of 2022

Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad.

Appellant

Versus

- 1 The Director, Directorate of Elementary & Secondary Education Department, Peshawar.
- 2 The District Education Officer, Elementary & Secondary Education Department, Abbottabad.
- 3 Mr Alamgir Khan, Drawing Master, GMS Maira Rehmal Abbottabad, now Drawing Master, GHSS Bagnoter, Abbottabad.

Respondents

<u>APPEAL</u> UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE IMPUGNED TRANSFER ORDER NO 2125-30 DATED 11/04/2022 WHEREBY RESPONDENT NO 02 TRANSFERRED, RESPONDENT NO 03 TO GHSS BAGNOTER, ABBOTTABAD, INSTEAD OF APPELLANT AND FOR ACCEPTANCE OF DEPARTMENTAL APPEAL DATED 06/06/2022.

PRAER:-

ON ACCEPTANCE OF INSTANT SERVICE APPEAL, IMPUGNED TRANSFER ORDER NO 2125-30 DATED 11/04/2022 MAY PLEASE BE SET ASIDE AND RESPONDENTS MAY PLEASE BE DIRECTED TO TRANSFER APPELLANT AGAINST THE POST OF DRAWING MASTER, IN GHSS BAGNOTER ABBOTTABAD BY ACCEPTING DEPARTMENTAL APPEAL DATED 06/06/2022 FOR THE SAME TRANSFER. Respectfully Sheweth,

FACTS

- 1) That appellant joined Elementary & Secondary Education department on 05/05/2014 in the capacity of Drawing Master and he is serving in the same present station ever since his appointment.
- 2) That appellant and Mr Muhammad Imran DM GHSS Bagnoter, Abbottabad were mutually agreed for their mutual transfer/substitution of stations, so they applied for Mutual Transfer with the consent and approval of their respective heads of the institutions, through joint application dated 08/12/2021. Copy of Application is annexed as <u>Annexure "A"</u>
- 3) That respondent no 2 did not issue Mutual transfer order and delaying it on one or the other pretext, on the same circumstances appellant approached to respondent No 01 through two applications dated 08/02/2022, 14/02/2022, for his directions in this respect, but in vain. Copy of applications are annexed as Annexure "B"
- 4) That in the meanwhile, due to the inordinate delay, Mr Muhammad Imran DM GHSS Bagnoter, Abbottabad has been promoted and appellant's Mutual transfer application stood infructuous, and post of DM in GHSS Bagnoter became vacant, in the present scenario, appellant submitted his representation to respondent no 02, for transfer against the vacant post of DM in GHSS Bagnoter on 07/04/2022. Copy of Transfer Application is annexed as <u>Annexure</u> "C"
- 5) That respondent No 2, gifted the transfer facility to the respondent No 03 being his favourite child, through Transfer Order dated 11/04/2022 issued under order No 23125-30 by rejecting transfer case of appellant. Copy of impugned Transfer order is annexed as Annexure "D"

- 6) That appellant's service station is hard and is situated farflug area in AJK Zone, when impugned transfer orders, came in to the knowledge of appellant, he filed his departmental appeal on 06/06/2022. Copy of departmental appeal against impugned Transfer order is annexed as <u>Annexure "E"</u>
- 7) That the kind notice of this Honourable Tribunal is drawn to the facts, that private respondent no 3, was found absence from his duty and was suspended for the period of 90 days by the respondent No 2 himself, suspension order was issued on 09/12/2021. Copy of suspension order dated 09/12/2021, is annexed as <u>Annexure "F"</u>
- 8) That Head Master of private respondent no 3, who himself was also absent and got same above suspension order, was immediately transferred on administrative ground to farflung area but respondent no 3 instead of transfer him farflug area, respondent No 2 transferred him nearest his residence through impugned transfer order dated 11/04/2022(Annexure "D"). Copy of transfer order dated 14/12/2021 on administrative ground, re lating to Head Master of respondent no 03 is annexed as <u>Annexure "G"</u>
- 9) That respondents did not decide the appellant's departmental appeal dated 06/06/2022 with in statutory period of 90 days and instant service appeal is within 120 days from the submission of departmental appeal dated 06/06/2022, Hence this appeal intersalia on the following ground.

Grounds

a) That the competent authority (respondent No 02) rejecting the transfer case of appellant, and compensated transfer facility, given to private respondent No 03 near his residence instead of farflung area, in the above mentioned circumstances (suspension), the whole action is illegal and with jurisdiction and treated private respondent No 03 as his favourite child, is also against all the norms of justice. b) That appellant not only senior in tenure against present station but he is senior in service then private respondent no 3, as well as private respondent no 3 was legally entitled for adjust him on administrative grounds, at farflug area just similar treatment of his Head Master, but illegally compensated him out of way.

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- c) That appellant is facing discrimination and impugned Order of respondent no 2 is clear violation of the constitution.
- d) That it is undoubted fact that respondents illegally snatched the legal rights of the appellant in an uncivilized way in a very haste manner, which is against the equity and there is no single example is available in the civilized society.
- e) That the impugned action of respondent no 2 is apparent activity of illegality, which is beyond its jurisdiction.
- f) That appellant is dragged into litigation, the conduct of the respondents is admittedly arbitrary capricious unjust and against all norms of justice and as such requires indulgence of this Honourable Court by awarding appropriate Cost to the respondents.
- g) That respondents ignored the provisions of Article 4 and 25 of the Constitution of Pakistan while exercising their illegal impugned order and their exercising discretionary powers in refusing the relief to the appellant.

It is, therefore, respectfully prayed that on acceptance of instant service appeal, impugned transfer order no 2125-30 dated 11/04/2022 may please be set aside and respondents may please be directed to transfer appellant against the post of drawing master, GHSS Bagnoter Abbottabad by accepting departmental appeal dated 06/06/2022 for the same transfer

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Any other relief for which the appellant is entitled, and the same is not asked/prayed specifically, may very kindly be granted in favour of the appellant.

Dated 12/09/2022

Through

(Rashid Iqbal Khan Jadoon) Advocate IBC Islamabad Attorney Abbottabad.

(Muhammad Wagas) Appellant in person

(Shahzad Shakoor) Advocate High Court Abbottabad

Abbott Law Chamber Office No 51, Ayub Tanoli lawyer plaza Abbottabad. 0333-5025002, 0316-9343818

<u>Affidavit</u>

I, Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad, do here by affirm on oath that contents of instant appeal is correct and true according to my best knowledge and belief and nothing has been suppressed from this Honourable Tribunal and this instant appeal is first appeal & same nature of any other appeal is not pending before Honourable Tribunal

Dated 12/09/2022

(Muhammad Waqas) Appellant

DEPONENT



CNIC No 13101-1827625-7





MEXUGE



THE DEO (M), ABBOTTABAD.

SUBJECT:

APPLICATION FOR MUTIJAL TRANSFER

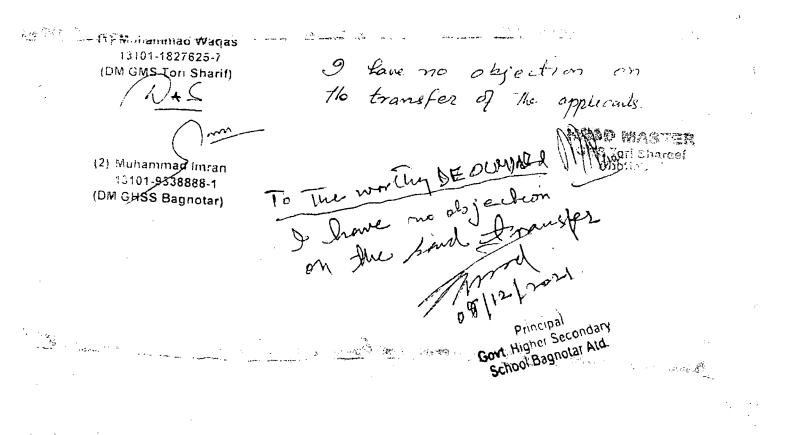
Sir,

With que reverence it is stated that I (Mr. Muhammad Waqas) am rendering my services as DM at GMS Tori due to a Mutual Transfer agreement with Mr. Muhammad Imran.

Mr. Muhammad Imran is working as a DM at GHSS Bagnotar. We both are willing to exchange our posting stations through the mutual transfer policy.

Therefore we humbly request that the order for our mutual transfer may please be commenced as soon as possible. The transfer order is to be from GMS Tori to GHSS Bagnotar and vice versa

Thanking you with best hopes Yours Sincerely,



The Director,

Elementary and Secondary Education

KPK.

Subject: Redressal of Grievance about mutual transfer.

I respectfully state that I've been fulfilling my responsibilities as a DM since 8 years at GMS Tori Sharif. The school is far away from my home town. It takes about a whole day to get there.

Nexuse

Previous month live submitted a mutual transfer application with Muhammad linean from GHSS. Bagnotar with 7857 as diary number.

We've both submitted an Application of mutual transfer via HRIS as well. The mutual transfer has ast been commenced due to the condition that

Mr. Muhammad Imran is proposed for ASDEO. Normally, mutual transfer between two parties is agreed on when there's a promotion at hand or the person is retiring from their services.

Therefore, I request the authorities to take immediate action for my transfer and justice should be given what is rightfully deserved.

Best Regards

Muhammad M

DM GMS Turi Shareef CNIC# 13101-1827625-7

Pirector,

Elementary and Secondary Education KPK.

Subject: REDRESSAL OF GRIEVANCE ABOUT MUTUAL TRANSFER

Kind Sir,

l respectfully state that the petitionary has fulfilled his duties and responsibilities at GMS Tori Sharif ATD (Boi) for Seven and a half years as a DM. My residential area is located in UC Nagri Bala. The estimated distance from my home to school is about 130 Kilometers.

It takes about a whole day to get to the school because of troubles in the transportation process. Moreover, my father is paralysis patient. He is, unfortunately, completely bed ridden. So, keeping his state of health in mind. It is difficult for me to fulfil my duties so far from home and take care of my family at the same time. We've been getting by somehow but the condition is worsening as time passes.

I've submitted many applications for a transfer to District Education Office Abbottabad. Similarly, I've also applied for E-Transfer a couple of times. But it all ended in vain.

I came to know that Muhammad Imran is about to leave his post in a couple of months due to his appointment as an ASDEO via FPSC. So, I got in touch with him in matters of mutual transfer. This was a good opportunity. In December, Muhammad Imran, DM at GHSS Bagnotar, and I agreed on a mutual transfer. The application has been submitted to DEO Abbottabad, along with approval from both parties. The application has also been presented on the HRIS portal.

Muhammad Imran and I met the DEO personally to take immediate action for our request. The DEO stated that the application for mutual transfer will be sent to the secretary for approval. However, the process was delayed deliberately. So, in January, when the ban was lifted from the transfers. We, again, met the DEO but the DEO did the same thing as before. We, again, met the DEO personally he stated that all the orders will be issued at once.

But unfortunately, when the orders of transfer were issued, ours was not in the list.

Upon further investigation, the clerk in charge stated that the transfer was impossible because the DEO had already decided to transfer his desirable person to the designated post. While trying to reach the bottom of the matter, it was found that DEO visited a school on the 9th of December, and two of the teachers were absent from their duties. Therefore, the DEO decided to transfer them from their designated school. As a result, one of them was transferred on the 14th of December. However, the second one (DM Alamgir Khan) was saved by a commendation. Although the absent teacher was suspended for 3 months but the DEO is trying to adjust him or save him by sending him to a nearest station.

At that time there were many vacant posts in the area where the transfer was possible. But DM Alamgir Khan, as a so called punishment for being absent, is being sent to the nearest possible station. Who knows what kind of justice is this? Which law states such actions? Giving relief to the guilty and depriving the one who deserves it.

Keeping everything in mind, the petitionary humbly requests to the authorities that a severe investigation should take place, and the petitionary should be given what is rightfully his. Otherwise, the only choice the petitionary is left with is to go to the court. I hope it will not come to that.

Yours sincerely,

Muhammad Wag

DM GMS Tori Shareef Bio Abbottabad 1310118276257

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'Fbs WECHAR. Sb60112bod.

Subject: <u>TRASSFERRAD.0105TRAEST</u>

I respectfully state that Fve been fulfilling my responsibilities as a DM since & years at 65385 Tool (18ai). My futher's suffering from paralysis. So, taking care of him is getting hard in this situation. I'm having a lot of trouble in dealing with the transportation also as it takes about a whole day just to get here from my facation. It's a hard area 120. Kilometers away from my home town.

Now the post of IDAL is vacant in GHES Bagnobar. So please understand my conditionant und commence my transfer from GRES Tori to GHES Bagaotar.

Best Reyards Mahammad Weges no objection transfer of 19FA GMS Tort Shareef CINECTI3101-1827625-7 appli cand 心胆 EB-IL Mar Lan NIEFE W ene Terl Shared ahlahkatad

13 11 THE DISTRICT <u>ROUCATION</u> (DEFECTER (M) AGENTERAD

No. 2125-20 Wile/Main Rehmal Dated: 14 04/2022 265 - 9992-9340102, 0992-330434 29 - EDO,Falacation,Ald/@gmail.com

TRANSFER.

Mr.Alamgir Khan Drawing Master BPS-15 Government Middle School Maira Relimit Abbottahad is hereby transferred to Government Higher Secondary School Bagnoter, Abbottahad on his own Pay and Scale against the vacant Post of Drawing Master BPS-15 on administrative ground in the best interest of Public Service with immediate effect. Note:

1. Charge report should be submitted to all concerned.

2. No TA/DA is allowed.

Endst of Even No and Dute

Copy forwarded to:

- 1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. District Monitoring Officer EMA Abbottabad.
- 3. District Comptroller of Accounts Abbottabad.
- 4. Principal GHSS Bagnoter, Abboitabad.
- 5. Incharge Head Master GMS Maira Rehnul, Abbonabad.
- 6. AP EMIS Local Office.
- 7. Teacher Concerned.

D

District Education Officer (M)

District Laboration Officer (M)

VNGXMRE



The Director, Directorate of Elementary & Secondary Education Department, Peshawar.

Subject:-

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DEPARTMENTAL APPEAL AGAINST THE IMPUGNED TRANSFER ORDER NO 2125-30 DATED 11/04/2022 (RECEIVED ON 28/05/2022) WHEREBY DEO (M) ABBOTTABAD, TRANSFERRED MR ALAMGIR KHAN, TO GHSS BAGNOTER, ABBOTTABAD, INSTEAD OF APPELLANT.

Respected Sir

With due respect It is stated detail of appellant appeal is as under.

- 1) That appellant joined Elementary & Secondary Education department on 05/05/2014 in the capacity of Drawing Master and he is serving in the same present station ever since his appointment.
- 2) That appellant and Mr Muhammad Imran DM GHSS Bagnoter, Abbottabad were mutually agreed for their transfer/substitution of stations, so they applied for Mutual Transfer with the consent and approval of their respective heads of the institutions.
- -3)- -That-DEO (M)-Abbottabad did not issue Mutual transfer order and delaying it, on one or the other pretext, on the same circumstances appellant approached your good self through two applications dated 08/02/2022, 14/02/2022, for your directions in this respect.
- 4) That in the meanwhile, due to the inordinate delay, the other teacher Mr Muhammad Imran DM GHSS Bagnoter, Abbottabad has been promoted and appellant's Mutual transfer application stood infructuous, and post of DM in GHSS Bagnoter became vacant, in the present scenario, appellant submitted his representation to DEO (M) Abbottabad for transfer against the vacant post of DM in GHSS Bagnoter on 07/04/2022.
- 5) That appellant is serving farflung area of Circle Bakote (AJK Zone) and when he came to office of the DEO (M) Abbottabad and enquired about application on 28/05/2022, whereupon it came in the Knowledge of appellant, that DEO (M) Abbottabad, gifted the transfer facility to the Mr Alamgir Khan being his favourite child,

through Transfer Order dated 11/04/2022 issued under order No 23125-30 by rejecting transfer case of appellant.

That the kind notice of your good self is drawn to the fact that (transferee) Mr Alamgir Khan, was suspended for the period of 90 days, as he found absence from his duty, by the DEO (M) Abbottabad, suspension order was issued on 09/12/2021, while his Head Master who himself was also absent and got suspension, was immediately transferred to farflung area but DEO (M) Abbottabad, instead of transfer him farflug area, Transferred him nearest his residence through impugned transfer order dated 11/04/2022, received on 28/05/2022, and appellant's Departmental appeal is within 30 days from the receiving/knowledge of impugned transfer order.

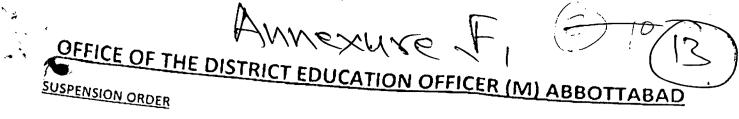
Grounds

6)

- a) That the DEO (M) Abbottabad rejecting the transfer case of appellant, and compensated transfer facility, given to Mr Alamgir Khan near his residence instead of farflung area in the circumstances, the whole action is illegal and with jurisdiction and treated Mr Alamgir Khan as his favourite child, is against all the norms of justice.
- b) That appellant not only senior in tenure against present station but he is senior in service then Mr Alamgir Khan, as well as Mr Alamgir Khan was legally entitled for adjust him farflug area just like his Head Master, but illegally compensated him out of way.
- c) That appellant is facing discrimination and impugned Order of DEO (M) Abbottabad is clear violation of the constitution.

It is respectfully prayed that on acceptance of instant Departmental appeal, impugned transfer order no 2125-30 dated 11/04/2022 (received on 28/05/2022) may please be Cancelled and transfer appellant against the post of drawing master, GHSS Bagnoter.

Dated 06/06/2022 Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad. Note Seven Pag and Persusalges attached for Consideration Please.



During the surprise visit of the undersigned on 9-12-2021 GMS Maira Rehmal, the following teachers / official were found absent from their duties for the period noted below: SNO

3.NO Name/Designation	a de havie à Delow.		
1 Muhammad Z.C.	Absent Period		
2 Alamais Kh	8-9/12/2021		
3 Alamgir Khan DM	8-9/12/2021		
Mst Naheeda Perveen N/Q	Reportedly She is absent since august 2021. However her attendance is marked up to		
	07/12/2021		

The above named teachers/ official are hereby suspended for the period of 90 days with immediate effect.

District Education Officer(M)

Dated : 09/12/2021

Abbottabad

Endst: No. 9732-36/

Copy for information to the

- 1. Director elementary and secondary education Peshawar.
- 3. District account officer Abbottabad.
- 4. Budget and acecount officer local office with the direction to recovery may be made from the above named official and stoped the pay of Mst Naheeda Perveen N/Q. 5. Official concerned.

Distri ducation Officer(M bottabad

OFFICE OF THE DISTRIC ' DU ATION OFFICER (M) ABBOTTABAD.

<u>ar distiment.</u>

Mr. Multimmad Zafras SST (6) Covt: Multile School Multi Relamal Abbottabad is hereby transferred to Government High School Nagri Tutial Abbottab against vacant post on administrative ground on his own poy and BPS in the interest of public service with immediate effect.

Note:

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1. Charge report should be assimitted to all concerned.

2. NO TA/DA & T/G in allowed.

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DISTRICT ÉDÚCATION OFFICER (M ABBOTTABAD.

Endst No. ____/ EB-1/2:27: V (Dated Abbottabad the ____/202 Copy for information to:-____/

- 1. Director Elementary & Econdury Education Khyber Pakhtunkhwa Peshawar.
- 2. District Comptroller of Accounts Abbottabad.
- 3. District Monitoring Officer (EMA) Abbottabad.
- 4. Principal GHS Nagri Tulial Abbottabad .
- 5. Budget & Accounts Officer local office.
- 6. AP EMIS branch local office.
- 7. Head Master GMS Maira Relunal Abbottabad.
- 8. Teacher concerned.

DISTRICT EDUCATION OFFICER (M) ADBOTTABAD.

s.No. 175373 Name of Advocate DBA NO. SC No. R.s.200/= sibu VI CO Dentt Muhammad Education. Nasias Service Appellan (APPrestinger L'EL FEWY 22 Abs مقد مەيندرىية. بالاعتوان بىل اڭ ^{نا}ر ئە- بىن داخىلى بىردىدى دېرىيى برا**يە ي**كتى ياقصۇ Shahzad Shakoor Adu: HC كوحب ذكل شرائط يركيل عفر ركباري تركيل موجنتي برخود بايذريتيه يحارخاص دوبر وجمدالب حاضرادة رمون كالور بردونت ايكاري جائے مقدمدد کیل میا حب موسی ذقب کا طلاح بڑ سے کر حاضرعدالت کرول نگ اگر چیشی پرمظہر عا خریز پردا ایں مقدمہ برگا خیر حاضر کیا کی جبر ے کمی طور بر میر من خلاف ہو گیا او صاحب موسوف اس کے کمی طور برذ مددار ندہول کے طیز ب²ل صاحب موسوف سمدر مفام پجمر کی اسک علادہ کی جگہ یا کچبر کی کے ادقات سے پہلے یا پنجیسے پاہر دزننطیل پیروکی کرنے کے ذمہ دار ندہوں کے ادر مقند مہر کچبر کی کے علادہ کی ادرجگہ ساعت مون بر بابردو تعطيل با رتجر ك كمادقات كم آر يتحص بيش موف يرمظم كدكونى فقصدان ميتيحافاس ك فرمددار بااس ك داسط سی معادضہ کے اداکر نے باعثاث کے دالیس کر نے کے بھی صاحب موصوف ذید در ار نہ ہو نے بچھا دکل ساختہ برداختہ صاحب موصوف مشل كردهذات منظورة يقبول موكااورصاحب موصوف وعرض دعومن باجواب دعوم اوردر فواسسته اجراسيته فأكركي ونظر ثاني الجيل تكراني وبرتسم در خواست برد پتخط دتصد این کریے کا بھی احضیار ہو کا اور کسی تھم یا ڈکری کرانے اور ہر کتم کا دور پیدوسول کرنے ادر رسیرد سینے ادرداخل کرنے اور ہر من کے بیان دیتے اور اس برتائی دراضی نامہ دیکھلہ برحلف کر فیا قبال دیوی دینے کا بھی احتمار ہوگا اور بصورت جانے ہیر دنجات از پچ ری صدرا پیل دیراً مدگی مقدمید اینسوش فرکری بهطر ندد شخاست بیم انتشاع با ترقی با کرفی ارگی از گراناری دا جراح ڈگری بچی صاحب موصوف کو بشرطادا میکی علیجد وافقار مدیردی کا افتر ار موقا اور بصورت شرورت صاحب موصوف کو به بحی احترار وقا که عدمد تدکور با اس ک سمی جزوی کاردائی کے پابصورت اپیل سی دوسر بر کیل کوایت ہجائے پالین ہمراہ مقررکریں ادرایس وکیل کوہمی ہرا مریک دا وادروب القدارات، عاصل ، وعظم عيسه ما تب موصوف كوماصل بإلها وردوران مقدمه بتوجيج برجانها لتوايز محظا وه صاحب موصوف كاين يوگارا گرد كىل ساھ موصوف كو يوردن غير باتاريخ يوش ہے تيم لمادان كردن كالوصاھب موصوف كو يورااغتر بار يودكا كدو المقدمہ کی چیردی ند کریں اورالیمی صورت شکل ایرا کوئی مطالبہ کسی تشم کا معاجب موصوف کے برخلاف تشیش ادگا۔ a22-/09/12-31 لېدادكالت تاميكى ديا ب كەسمدر ب معمون دکالت نارر من لیا ہے اور انتیکی طمرح شمج لیا ہے اور منظور ہے ر) ان نوب : د کالت نا مه کمانو ژوک The for N

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BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No:______of 2022

Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad.

Versus

The District Education Officer, Elementary & Secondary Education Department, Abbottabad and 02 others.

SERVICE APPEAL

POWER OF ATTORNEY

NAME & OTHER PARTICULARS OF ATTORNEY

Mr Rashid Iqbal Khan Jadoon S/o Shamarez Khan Jadoon resident of Street no 15, Mohallah Khawaja Ahmad Khail, Jadoon Colony, Link Road Narrian Cantt; Tehsil and District Abbottabad. CNIC No 13101-0944593-9. Cell no 0333-5025002

I, Muhammad Waqas S/O Muhammad Sadiq, Drawing Master, Government Middle School Tori Shareef, Abbottabad R/O Village & Post Office, Nagri Bala, Abbottabad, deponent, do hereby solemnly affirm and declare on oath that I appoint **above named** as attorney to act on my behalf to appear, plead for me in the titled case in which the same may be tried or heard and any other proceedings arising out of or connected herewith and he would be competent to exercise all the powers which I myself holds as petitioner, he is authorized all powers, to institute case, to submit any kind of application or reply, argue the case, in short, all powers or authority which I am entitled being petitioner, would be transferred to above named attorney through instant power of attorney.

Sworn at Abbottabad Dated this 14th day of May, 2022.

1)A

Appellant

Respondents

Ile

<u>A</u> 1410372

Dated 14/05/2022 CNIC No 13101-1827625-7

DEPONENT (Muhammad Waqas)

