4<sup>th</sup> July, 2022

Mr. Bilal Ahmad Durrani, Advocate learned counsel for the appellant present and submitted Wakalatnama on behalf of the appellant.

The appellant had initially filed the writ petition which was sent to this Tribunal by the Hon'ble Peshawar High Court. In the writ petition the Hon'ble Peshawar High Court was pleased to seek comments of respondent No.3 which are found placed on the file. Let other respondents be directed to submit their written reply/comments within 15 days. To come up for written reply/preliminary hearing on 05.09.2022 before S.B.

> (Kalim Arshad Khan) Chairman

05.09.2022

Appellant present in person and made a request for adjournment on the ground that his counsel is not available today. Request accepted. To come up for preliminary hearing/written'reply on 25.10.2022 before S.B.

(Fareeha Paul) Member (E)

# Form-A

# FORM OF ORDER SHEET

Court of\_

## 889/2022

	Case No	889/2022
No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	07/06/2022	The present appellant initially went in Writ Petition before th
ـــــــــــــــــــــــــــــــــــــ		Hon'ble Peshawar High Court Bannu Bench and the Hon'ble High Cour
		vide its order dated 26.05.2022 treated the Writ Petition into a
		appeal and sent the same to this Tribunal for decision in accordance
		with law. The same may be entered in the Institution Register and pu
		up to the worthy Chairman for further order please.
-	· .	
	13 <sup>th</sup> June, 2022	Appellant present in person.
		Counsel are on strike. To come up for preliminary
		hearing on 04.07.2022 before S.B.
	,	
	•	(Kalim Arshad Khan) Chairman

## Form-A

## FORM OF ORDER SHEET

Court of\_

889/2022 Case No. S.No. Date of order Order or other proceedings with signature of judge Proceedings 2 1 3 The present appellant initially went in Writ Petition before the 07/06/2022 1 Hon'ble Peshawar High Court Bannu Bench and the Hon'ble High Court vide its order dated 26.05.2022 treated the Writ Petition into an appeal and sent the same to this Tribunal for decision in accordance with law. The same may be entered in the Institution Register and put up to the worthy Chairman for further order please. REGISTRAR -MI series entrusted to S. Bench at Peshawar This totices shall preliminary hearing to be put up there on be issued to appellants and his counsel for the date fixed. Topella t CHAIRMAN 2. 13-08-27 4/7/

50 رۇپيەيچ 25095 ايثروكيك يشاور بارايسوس ايش ، خيبر پختونخواه باركوسل/ ايسوسى ايشن نمبر: 0333-9274817. رابطتي \_ بعدالت جناب: \_\_\_\_\_ 2 ( Je mar bill دعويٰ: 889 2 Mirlei عليت كمه 13-06-2022. *.*7 تقانه تحرير β مقدمه مندرد دجیعنوان بالامیں این طرف سے داسطے پیر دی وجواب دہی کار دائی منتخلقه AU 101, 1 and the start la آنمقام \_موصوف کومقدمہ کی کل کاروائی کا کامل اختیار ہوگا ہنیز دکیا طاتك كهصات راضي بالمبلا بخير ققر رثالث وفيصله برحلف دينه جواب دعوي اقبال دعوي اور درخواست الزمر شفر كي تطرريق زرلی پالیشت کا ختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطر فہ یا پیل کی برآ مدگ اور کمار ڈی، نیز 4202-5872753-دائر کرم نے اپنی گرانی دنظرتانی و پیروی کرد نے کا مختار ہوگا اور بصورت متر دیات مقدہ مذکوراہ کے کل یا جزوی كاروابي كمنك داسط اوروكيل بالمختار قانوني كواسيع بمراهيا المصبحات تقرركا اختيار بهوكا أفلاصا حسر ماورا كاساخته برداخة منظور وبول موكا مقررشك كوديحماج مذكوره بالختتا بالمشرحا *سے ہوگا کوئی تاریخ پیشی شقام دور*ہ یا ص دوران بيروى مذكوره كركى البنزاد كالت وزامة لكوديا تاكه سند باهر ہوتو وکیر 3. المرتوم: AWAR BAR ASS 20 KISTANICOURTIFEE wh نوث اس وكالت متامك كي فو تُوْجابي ما قابل تي



No: 6

THE PESHAWAR HIGH COURT, BANNU BENCH All the Communications should be addressed to the Additional Registrar of this Bench

Office: +92-928-9270393 Fax: +92-928-9270394 Email:phcbannubench@yahoo.com Email:phcbannubench@gmail.com

Dated Bannu the \_01\_06\_2022

From The Additional Registrar, Peshawar High Court, Bannu Bench.

**WP-Judi** 

2003 Nic 206 000-7-6-2022

To Worthy Service Tribunal, Khyber Pakhtunkhwa Peshawar.

Subject: <u>COURT ORDERS IN WP NO. 1124-B OF 2019</u> Titled: Inam Ur Rehman ..vs... Govt Of KP

Memo:

As per directions of Hon'ble Division Bench of this court vide order dated **<u>26.05.2022</u>**, please find enclosed herewith the above titled writ petition in original for compliance positively.

Enclosure:

1: Writ Petition No 1124-b/2019, Inam ur Rehman vs Govt Of KP.

### **PESHAWAR HIGH COURT BANNU** BF

### FORM OF ORDER SHEET Order or other proceedings with signature of Judge(s) Date of Order or proceedings $\overline{\mathcal{O}}$ (1) (2) W.P No.1124 -B of 2019 04 26.05.2022 Present: Ahmad Farooq Khattak advocate for petitioner. Mr. Saif-ur-Rehman Addl: A.G for the official respondents. \*\*\* Perusal of the record reveals that points so agitated pertain to the terms and conditions of service. In the instant case, the petitioner also availed departmental remedy. We deem it appropriate to send this case to the hon'ble Service Tribunal for its decision in accordance with law. Petitioner shall appear before the tribunal on 13.06.2022. Office is directed to keep memo of this petition and sent the case file to the worthy Tribunal immediately. AT 17 M E JUDGE ł Pesho 3220 1-21 VC JUDGE (D.B) Hon'ble Mr. Justice Linz Anwar and PTIFIED TO BE TRUE COPV Hon'ble Mr. Justice Sabibrada Asaduilita TIFIED TO BE TRUE COPV ЬÍ ma, Eonch Ţ Peshavar 17 Authos Louise mun-o-Shahanal Circlin

2022

﴿ عدالت عاليه پشاور هائی کورٹ بنوں بينچ ﴾

عنوان: انعام الرحمن بنام حکومت

مقدمه نمبر WP 1124-B/2019 پروانه نولس بنام: احمد فاروق ختک ایڈو کیٹ ضلع کرک

مقد مہ مندر جنوان بالامیں تاریخ بیشی مورخہ 26/05/2022 بمقام پشاور ہائی کورٹ بنوں بینچ روبروئے عدالت مقرر کی گئ ہے۔ لہذا <u>وکیل سائل </u> کو بذریعہ نوٹس ہذا <sup>مطلع</sup> کیا جاتا ہے۔ کہ تاریخ نہ کورہ پرعدالت ہذا میں بوقت 30:8 بیج برائے پیروی جوابد ہی مقد مہ اصالتا مختار تا حاضر ہو جائے ۔بصورت عدم موجودگی کاروائی حسب ضابطہ کمیں لائی جائے گی۔

آج مورخه 10/01/2022 . . . . كود شخط اورمهر عدالت كے ساتھ جارى كيا گيا۔

برائے ایڈیشنل رامنوار

# 🔶 عدالت عالیہ پشاور ہائی کورٹ بنوں بینچ ﴾

مقد مذم مربر WP 1124-B/2019 عنوان: انعام الرحمن بنام حكومت پرواندنوش بنام: انعام الرحمن دلد نثين گل يدها خيل تخصيل وضلع كرك مقد مد مندرجه عنوان بالا ميں تاريخ پيش مورخه 26/05/2022 بقام پيثا در بانى كورت بنوں بينچ روبروئے عدالت مقرر كى كى ہے۔ لہذا <u>سائل</u> كوبذر يونوش ہذا مطلع كيا جاتا ہے - كەتارىخ ندكورہ پر عدالت ہذا ميں بوقت 8:30 ہے برائے پيروى جوابد ہى مقد مداصالتا مخارماً حاضر ہوجائے۔ بصورت عدم موجود گى كاروائى حسب ضابط ميں لائى جائے گى۔

کود شخط اورمبرعدالت کے ساتھ جاری کیا گیا۔

آج مورخه 10/01/2022

برائے ایڈیشنل کرجنزار

<u>a6</u>.12.2021 WP 1124-B/2019 (N) with IR adjourned by the court from 20.11.2019 and is fixed before HDB on <u>26.5.2022</u>. Notice be issued to petitioner, his counsel and AAG.

ADDITIONAL REGISTRAR

S.No\_\_\_\_\_

# ACKNOWLEDGEMENT.

Re hman

It is certified that the file copy of Case/Comments in Case No.

12020, titled

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NALEL

has been received by the concerned clerk of this office.

Receiving Clerk AAG Office P.H.C Bannu Bench

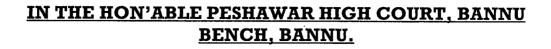
(Receiving Clerk) Additional Advocate General Office, PHC Bannu Bench. ACKNOWLEDGEMENT

1, & Horseren Rartin --Clerk of Advocate/ Advocate for Petitioner/Petitioner in Writ Petition No#-1124-By 219 titled Jollan 45 Repontons Mar 7 (9/1- etc

received one copy of comments by hand from respondent No #3

FC

CNIC#



Writ Petition No. 1124-B of 2019

### Inam ur Rehman (Petitioner)

VERSUS Provincial Govt: of KP & others .(Respondents).

### **INDEX**

S. No	Description of documents	Annexure	Page
1	Written comments	·····	1-2
2	Affidavit		3
3	Authority letter	A	4

Dated:-\_\_\_\_6\_\_/10/2020

Amile 2

Respondent No. 3 District Education Off (M) Karak (Male), Karak. Modelling Modellin

## BEFORE THE HONOURABLE PESHAWAR HIGH COURT, **BANNU BENCH.**

### Writ Petition No. 1124-B of 2019

#### (Petitioner) Inam ur Rehman

VERSUS

Provincial Govt: of KP & others .(Respondents).

**Respectfully Sheweth** 

Written comments on behalf of Respondent No. 3

### **Preliminary Objections.**

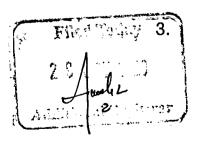
- That petitioner has got no cause of action /locus standi to file 1. the instant writ petition.
- That the petitioner is not entitled to the relief as sought 2.
- That the petitioner is estoped by his own conduct to file the instant writ petition
  - That the instant writ petition is not maintainable & entertainable in its present form.
- The petitioner is not come to this honourable court with clean hands.
- 6. That the instant petition is liable to be dismissed due to misjoinder and non-joinder of the necessary parties.
- 7. That the petitioner is not competent to file instant writ petition.
- 8. That the petition is against the law and facts.

### **Factual Objections**



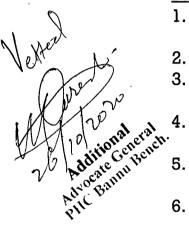
Para No.1 is correct, however, the appointment order of petitioner has been issued by the then Assistant District Dabli Lawaqhar.

> 2. Para No. 2 is correct.



Para No. 3 is incorrect. it is further stated that the petitioner has not been transferred from GHSS Dabli Lawghar to GHS Khurram, however, neither respondent No. 3 has issued his termination order nor stopped his pay but the respondent No.4 (Head Master GHS Khurram) can submit reply to explain the real position.

- Para No. 4 is not related will espondent No. 3 4.
- 5. Para No. 5 is incorrect and wrong. The neither the petitioner has submitted an application to respondent No. 3 nor the respondent No. 3 has stopped his salary and also not



maintained his service. It is job of Headmaster GHS Khurram who can stop his salary, maintain his service hence the Headmaster GHSS Khurram can explain further position of petitioner.

- 5. Para 5 (sub para) is also incorrect and wrong.
- 6. The reply of Para No. 6 is that the respondent No. 6 has not served any show cause notice about the irregularities as the respondent No. 4 (Headmaster GHS Khurram) is the immediate officer of petitioner and he can explain better position about the petitioner services.
- 7. Para No. 7 is incorrect and wrong. Respondent No. 4 (Headmaster GHS Khurram) is responsible the service of the petitioner. The respondent No. 3 has not been received any letter, complaint, application either from petitioner nor Headmaster GHS Khurram.
- 8. Reply of 8 is that when the respondent No. 3 has not terminated the petitioner from his service nor his termination order has been received from Headmaster GHS Khurram then how can respondent No. 3 can reinstate him.

### **Objections on Grounds**.

a. Ground-A to Ground F are related with the respondent No. 4 and he can explain the real situation and position about the petitioner services. It is worth mentioning here that the Headmaster GHSS Dabli Lawghar has not been impleaded as party and he can also explain the services position of petitioner.

b.

Aprel 2

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### **Prayer**

So it is, therefore, most humbly and respectfully prayed that keeping in view the above mentioned written comments this Hon'able court may very kindly be pleased to dismiss the petition against the respondent No. 3

Dated:- ----/10/2020

District Education ( (1ª) Karat District Education Offic (Male), Karak.

## **BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR**

Writ Petition No. 1124-B of 2019

### Inam ur Rehman (Petitioner)

### VERSUS

**Provincial Govt: of KP & others .(Respondents).** 

### AFFIDAVIT

I, Dil Nawaz Sub Division Officer (Male) B.D. Shah (Karak) BPS-17 do hereby solemnly affirm and declare on oath that all the contents of accompanying joint parawise comments are true and correct to the best of my knowledge and belief, nothing is lie and nothing has been concealed from this Hon'able court.

Dated -24/10/2020

10/10/201 Depo Dil Nawaz (BPSP.F.O (M) SDEO(M) BED Shah (Karak)

Identification. Identified by

Advocate General PHC Bannu Bench.

14915

Certified that the above was verified on solemn affirmation before me in office this \_\_\_\_\_6

day of act\_\_\_\_\_ 2020\_ by Dil Nahlaz SDED

FirdTyly

Sto Dashat Mix R/o Karak.

no is personaly know to me

Jan Commissioner eshawar High Court Banny Bench

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OFFICE OF THE DISTR	ICT EDUCATION OFFICER (MALE),
	<u>KARAK</u>
No <u>3558</u>	Dated <u>24 - 10 - 20</u>

### **AUTHORITY LETTER**

Mr. Dil Nawaz Sub Divisional District Education Officer (Male), B.D. Shah Karak do hereby authorized to file written comments on behalf of District Education Officer (Male), Karak in writ petition No. 1124-B of 2019 titled "Inam ur Rehman V.S Provincial Govt: of KP & others in Peshawar High Court Bannu Bench.

trict Education Off. (M) Karak Officer ( District Educa Karak. zh

Peshawar High Court Bannu Bench Writ Branch <phcbwritbranch@gmai



## RECTIONS FOR SUBMISSION OF COMMENTS IN WP 1124-B/2019 INAM UR REHMAN VS GOVT

2 messages

Peshawar High Court Bannu Bench Writ Branch <phcbwritbranch@gmail.com> To: emiskarakmale@gmail.com, aagbannu@gmail.com

10 December 2019 at 10

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## **URGENT COURT MATTER**

# Grounds of petition along order of this Honourable Court is transmitted for information

and necessary compliance at the earliest.

WP 1124 of 2019 Grounds + Order.pdf

and least the

3 November 2020 at 11:37 Peshawar High Court Bannu Bench Writ Branch <phcbwritbranch@gmail.com> To: emiskarakmale@gmail.com, AAG Bannu <aagbannu@gmail.com> W. Basedo . 

. . . . .

· 根本中区集团和1

---- Forwarded message ---From: Peshawar High Court Bannu Bench Writ Branch <phcbwritbranch@gmail.com> Date: Tue, 10 Dec 2019 at 10:59 Subject: DIRECTIONS FOR SUBMISSION OF COMMENTS IN WP 1124-B/2019 INAM UR REHMAN VS GOVT. To: <emiskarakmale@gmail.com>, <aagbannu@gmail.com> 

# REMINDER

[Quoted text hidden]

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.3 . . . and property of the + 2 <sup>\*</sup>\*  $\mathcal{K}_{p,1}$ 的过去分词的过去分词 ٠.

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# REMINDER FOR SUBMISSION OF COMMENTS IN WP 1124-B/2019 INAM UR REHMAN VS GOVT OF KP

2 messages

**Peshawar High Court Bannu Bench Writ Branch** <phcbwritbranch@gmail.com> To: emiskarakmale@gmail.com, aagbannu@gmail.com

23 January 2020 at 14:53

### **URGENT COURT MATTER**

Comments were requisitioned from you respondent by hon'ble court but the same have

not been submitted yet. Therefore it is reminded that comments be submitted within

fortnight.

**Peshawar High Court Bannu Bench Writ Branch** <phcbwritbranch@gmail.com> To: emiskarakmale@gmail.com, aagbannu@gmail.com 18 July 2020 at 11:29

[Quoted text hidden]

WRIT PETITION NO.	1124_B 865
with 2R	
This Writ petition has been presented	
<u> </u>	- <u>110,000,000</u>
n behalf of the petitioner (s).	
This petition is in proper form copies	of all the relevant documents have been attached.
	spare copies of Writ Petition have also been attached.
Writ Petition entered in the relevant	Register and placed before Hon'able Court S.B./D.B.
or further order on $\mathcal{A}$	/// <u>}</u>
	/
	$ \rightarrow $
Dated	READER
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11. 1. 10	
Dated	COUNTERSIGNED
A	ADDITIONAL REGISTRAR
Au unit	
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/, <sup>k</sup>	

X

GS&PD.KP-1856/32-PHC-Writ Petition---2.10.2018-/PHC Jobs/Writ Petition Form

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# **BEFORE PESHAWAR HIGH COURT BANNU BENCH**

1	Case Title Vs is and others		the Augustan and
2	Case is duly signed	PI CS: 11/1	No
3	The law under which the case is preferred has been mentioned	Yes	No
.4	Approved file cover is used	Yes	No
5	Affidavit is duly attested and appended	Yes	No
6	Case and annexure are properly paged and numbered according to index	Yes	No
7	Copies of annexure are legible and attested. If not, then better copies duly attested have been annexed	Yes	No
8	Certified copies of all the requisite documents have been filed	Yes	No
9	Certificate specifying that no case on similar grounds was earlier submitted in this court filed	Yes	No
10	Case is within time	Yes	No
11	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column	Yes	No
12	Court fee in shape of stamp paper is affixed. [For writ Rs. 500, for other as required]	Y OF THE	No
13	Power of attorney is in proper form	Yes	No
14	Memo of addresses filed	Yes	No
15	List of books mentioned in the petition	Yes	No
16	The requisite number of spare copies attached. [Writ Petition-3 Nos, Civil Appeal (SB-1, DB-2), Civil Revision (SB-1, DB-2)]	Yes	No
17	Case (Revision/Appeal/Petition etc.) is filed on a prescribed form.	Yes	No
18	Power of Attorney is attested by jail authority (for jail Prisoners only).	Yes	No

# Check List

It is certified that formalities/Documentations as required in column 2 to 18 above, have been fulfilled.

	Name:	
	Signature:	Jun
	Date:	F
	FOR OFFICE USE ONLY	. ,
Case No. :		
Case Received on:		·
Complete in all respect: Yes/No (I	f No, the grounds:	
Date in Court:		
•	Signature:	
		(Reader)
	Date:	
· · · · · · · · · · · · · · · · · · ·	Countersigned:(Deputy R	egistrar)

# OFFICE OF THE ADDITIONAL ADVOCATE GENERAL, PESHAWAR HIGH COURT, BANNU BENCH.

Phone No. 0928-9270154, Fax No. 0928-9270387

Dated: 13/ // /2019

. . . .

ACKNOWLEDGEMENT.

It is certified that the file copy of Case/Comments in Case No. \_\_\_\_\_/2019, titled ur Rahman vs Great of KPK" nom

has been received by the concerned clerk of this office.

S.No

13-11-19

(Receiving Clerk) Additional Advocate General Office, PHC Bannu Bench.

### **URGENT FORM**

# BEFORE THE HONOURABLE PESHAWAR HGIH COURT BANNU BENCH.

Writ Petition No. ----- 0f 2019

🗉 Inam ur Rehman (Petitioner)

### VERSUS

### Provincial Govt: of KP & Others (Respondents)

Kindly treat the accompanying writ petition as an urgent matter and the ground of urgency is that the official respondents are going to take adverse action against the petitioner, therefore, it is needed to be fixed the above titled writ petition for early hearing.

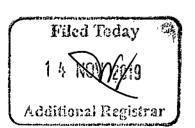
Dated:- 05/11/2019

Petitioner

Inam ur Rehman

Through

Ahmad Farooq Khattak Advocate, Karak.



## IN THE HONOURABLE PESHAWAR HGIH COURT BANNU BENCH, BANNU.

Writ Petition No. 1/24 \_ R Ameal Mo. 889/2022 Inam ur Rehman (Petitioner)

VERSUS

Provincial Govt: of KP & Others (Respondents)

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3	Affidavit in support of Writ Petition.		6
4	Photocopy of appointment order No. 3341-44/ Dated Karak the 03/10/2014	A	7
5	Photocopy of pay slip	В	8-18
<u> </u>	Photocopy of service book	С	19-21
	Photocopy of Source-II Form	D	22
6	Photocopies of applications	Е	23-28
7	Notice & Receipt		\$ 29-3
8	Court Fee Rs. 500/-		2031
9	Vakalat Nama		320 232

Dated:- 04/10/2019

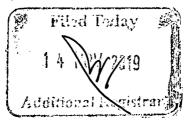
Petitioner

Inam ur Rehman

Ahmad Farooq Khattak Advocate, Karak.

Through

SCADINED



IN THE HON'	<b>IBL</b>	E I	PESH	AWA	R I	HIGH	Case No	
<u>COURT BANNU I</u>	Date of Filing							
<b>OPENING SHEE</b>	<b>OPENING SHEET FOR WRIT BRANCH</b>							
Case Type : Writ I	Petiti	ion	Natu	re of	Orig	ginal P	roceedings	
Case Type : Writ Petition Nature of Original ProceedingsCategory Code52501(Categories & Sub Categories are given at the back of the opening sheet								

1

Review / Contempt of court in respect of

Writ of:	Heabus Corpus	Prohibition	Mandamus	Quo Warrant	Cernari
-------------	------------------	-------------	----------	----------------	---------

Forum	Date	(Interlocutory / Final Order	Case pertains to SB
Elementary & Secondary Education	05-04-19		DB
Department, Karak.			

Petitioner Name	Inam ur Rehamn
Mobile No	0333-9661406
Address	Resident of village & Post Office Mitha Khel Tehsil & District, Karak
CNIC No.	
Email Address	

Counsel of Petitioner	Ahmad Farooq Khattak	
Mobile No	03327778899	
Address	District Courts Karak	
CNIC No.	14202-1347465-5	
E-Mail Address		

Respondents	Office of the District Education Officer (Male),	
	KDA, Karak.	
Address	As above ,	

Original Order/Action/Inaction banning of services of petitioner as Lab Attendant and stoppage of his salary.

Prayer :- So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition this honourable court may very graciously be pleased to declare ban on the services of petitioner imposed by the official respondents is illegal, unlawful, against law & facts, without lawful authority, void ab initio and nullity in the eye of law and this honourable court be pleased to issue writ directing the respondents to restore the services of petitioner as Lab Attendant as well as to release his salary with all back benefits w.e.f February, 2016 till date and onward.

Further prayed that this honourable court may very kindly be pleased to direct the official respondents to transfer respondent No. 6 from GHS Khurram and the petitioner be acjusted on the petitioner be acjusted on his own post as Lab Attendant at GHS Khurram.

Additional RegistAny other relief may also be granted in favour of petitioner if this honourable court deems appropriate in circumstances of the case.

Law/Rules / Governing the original proceedings /action /Inaction :- Constitution of Islamic Republic of Pakistan 1973.

Signature

## BEFORE THE HONOURABLE PESHAWAR HIGH COURT BANNU BENCH BANNU.

2

1 200

Writ Petition No. 12-4 --of 2019 Appeal NOVE

Inam ur Rehman son of Samin Gul Mitha Khel Tehsil & District, Karak.----- (*Petitioner*).

### VERSUS

- 1. Provincial Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Civil Secretariat Peshawar.
- 2. Director Education Elementary & Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
- 3. District Education Officer (Male), Karak.
- 4. Headmaster Govt: High School Khurram Karak.
- 5. District Account Office, Karak.
- 6. Muhammad Shafiq son of Gul Raise R/O Dagar Narı Tehsil B.D. Shah District Karak presently Lab Attendant at Govt: High School Khurram Karak----(Respondents).

Addresses of the parties mentioned above are sufficient for proper service.

## WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973.

Respectfully Sheweth

This writ petition arises out of the following facts.

- 1. That the petitioner was appointed as Lab Attendant vide appointment order No. 3341-44/ Dated Karak the 03/10/2014 and was posted at Govt: Higher Secondary School Dabli Lawaghar. -----(Photocopy of appointment order is attached as Marked -A).
  - That after resuming charge at Govt: Higher Secondary School Dabli Lawaghar, the petitioner started his duty at GHSS Dabli Lawaghar and the petitioner was paid monthly salary from code No. KK7055 Head Master GHS Dabli Lawaghar w.e.f 03/10/2014 to 1<sup>st</sup> March, 2016 as well as Service Book was also prepared for

Regestrati 2.

Atorov,

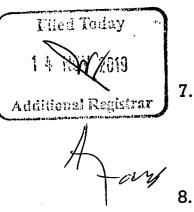
petitioner.-----(Photocopy of pay slip and service book are attached as **Marked-B & C**.

3. That then the petitioner was transferred to Govt: High School Khurram and the petitioner made his arrival report at GHS Khurram and started his official duty but the page of petitioner for the month of February, 2016 was not paid to the petitioner. The petitioner was stopped by the Headmaster GHS Khurram from duty and on political ground the respondent No. 6 was transferred against the post of Lab Attendant but till date neither the petitioner was terminated from service nor suspended and even than no notice has been served to the petitioner.

4. That then the petitioner went to the District Account Office, Karak to know the reason of his stoppage of salar where the petitioner was provided Source-II Form through the pay of petitioner was stopped by the Headmaster GHS Khurram. ------ (Photocopy of Source-II Form is attached as Marked-D)

- 5. That then the petitioner submitted applications before the District Education Officer (Male), Karak with the request to function the services of the petitioner and to release his salary and the petitioner kept in hanging position. -------------------------(Photocopies of applications are annexed as Marked-E)
- 5. That the petitioner requested the DEO (M), Karak several times both written & verbally to solve the grievances of petitioner but till date no response.
- 6. That neither the Headmaster GHS Khurram nor the District Education Officer (Male), Karak have served any show cause notice to petitioner against any charges and irregularities for which the services of the petitioner has been banned and the Headmaster GHS Khurram 1 stopped the pay of petitioner through Source-II Form.
  - That without any cause and genuine reason the services of the petitioner has been banned by the competent respondents and the competent respondents have not considered the applications of the petitioner.

That the respondents No. 3 & 4 (DEO, Karak & Headmaster GHS Khurram) have neither re-instated the petitioner against the post of Lab Attendant nor releating his salary hence the petitioner aggrieved by the illegal and unlawful act of respondents No. 3 & 4 as there is no other efficacious and adequate remedy is available to the petitioner hence the petitioner approaches before this honourable court by filing the instant writ petition on the following grounds.



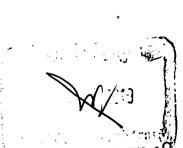
### <u>Grounds.</u>

a. That the services of the petitioner as Lab Attendant at GHS Khurram has been banned and the stopped the petitioner to perform his duty without any reason and also stopped his pay which is illegal and unlawful.

4

- b. That the petitioner neither remained absent nor committed any other irregularity and in case of any irregularity on the part of petitioner then the competent respondents are legally bound to call explanation and to serve show cause notice to petitioner but the competent respondents without any allegations against the petitioner, the services of petitioner has been banned and stopped his salary which is against the law.
- c. That the competent respondents have not fulfilled the legal obligations before imposing ban on the services of petitioner and the petitioner has been kept in hanging position w.e.f February, 2016 till date. Neither the petitioner has been terminated from his service nor suspended but imposed ban on petitioner to perform his duty at GHS Khurram.
- d. That the competent respondents have not given proper attention towards the matter of petitioner which is itself irregularities on the part of competent respondents.
- e. That in case of any mis-conduct on the part of petitioner then the competent respondents were duty bound to call explanation and to give a chance of personal hearing to the petitioner to explain the situation but here no allegations are existed against the petitioner, therefore, to impose ban on the service of petitioner and to stop his pay is illegal and unlawful.
- f. That in case of irregularity or any mis-conduct the competent respondents can suspend the services of the petitioner but cannot stop his salary under the law until and unless proper inquiry may not be conducted nor inquiry report recommends any punishment under E & D Rules against the petitioner.

That any other point will be pressed during course of argument with permission of this honourbale court.



### **Prayer in Writ Petition.**

Ŋ.

So it is, therefore, most humbly and respectfully prayed that on acceptance of the instant writ petition this honourable court may very graciously be pleased to declare ban on the services of petitioner imposed by the official respondents is illegal, unlawful, against law & facts, without lawful authority, void ab initio and nullity in the eye of law and this honourable court be pleased to issue writ directing the respondents to restore the services of petitioner as Lab Attendant as well as to release his salary with all back benefits w.e.f February, 2016 till date and onward.

Further prayed that this honourable court may very kindly be pleased to direct the official respondents to transfer respondent No. 6 from GHS Khurram and the petitioner be adjusted on his own post as Lab Attendant at GHS Khurram.

Any other relief may also be granted in favour of petitioner if this honourable court deems appropriate in circumstances of the case.

### **Interim Relief.**

By way of interim relief, this honourable court may very kindly be pleased to restrain the competent respondents to take any adverse action against the petitioner and be allowed to perform his duty and to release his salary provisionally till final decision of the main writ petition.

Dated:-05/11//2019

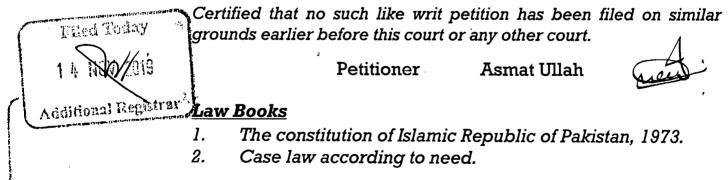
Petitioner

Inam ur Rehman

Through

Ahmad Farooq Khattak Advocate, Karak.

### <u>Certificate</u>



### IN THE HONOURABLE PESHAWAR HGIH COURT BANNU BENCH, BANNU.

Writ Petition No. ----/124\_12

Inam ur Rehman (Petitioner)

### VERSUS

Provincial Govt: of KP & Others (Respondents)

### <u>AFFIDAVIT</u>

I, Inam ur Rehman son of Samin Gul Mitha Khel Tehsil & District, Karak do hereby solemnly affirm and declare on oath that all the contents of the accompanying writ petition are true and correct to the best of my knowledge and belief, nothing is lie and nothing has been concealed from thir Hon'able court.

Dated:04/11//2019

Deponent ~

**Identification** 

Inam ur Rehman

Identified by Ahmad Farooq Khattak Advocate, Karak.

<sup>eclem</sup>Hly MARS 10-Certified that the at affirmation be day of SI0 -Witto VERA Identi is personally anow to me Osth Compliagione Peshawar High bourt 12 Bannu Bench



Annexture - A)



Office of the District Education

#### APPOINTMENT.

Consequent upon the recommendation of the District Recruitment/Selection committee, the following candidates are hereby appointed as Class IV on contract/ regular basis in BPS I @ RS (4800-150-9300) Per Month plus usual allowances as admissible under the rules to him on Merit basis, 25% retired Son Quota Deceased son Quota and 2% Disable Quota w.e.f. the date of their taking over charge.

#### Disable, 2 %

	· · · · ·		,	•	-
5.140 I	Name inani ur Rahman	Father's Name Samin Gul	Vi'lage Mitha Khet	Post Eab attendaria	Where posted   GUSS Dubf:
اسمر م					1.4พมษุโกสา

#### T' RMS AND CONDITION.

- 1 No TA/DA etc is allowed.
- Charge report should be submitted to all concerned. 2.
- Appointment is purely on Contract/ Regular basis and hable to termination without connotice 3.
- 4. He should not be handed over charge if they exceeded 40 years OR below 18 years of ge.
- 5. If he fail to take over charge within 15 days, the appointment order will be deemed as canceled
- 6. Health and age certificate should be produced from the medical superintendent concerned. 7.
- He is entitled for the benefits of a civil servant except pension and gratuity.

114 Endst, N

#### DISTRICT EDUCY (ION O. FELR (M) KARALY

Copy to:

- 1. District Account Officer Karak.
- Principal GHSS Dabli Lawaghar. 2.
- PA to Director E & SE KPK Peshawar. 3
- Candidate concerned. a

KTION OFFICER (M) DISTRICT KARAK

## Better Copy of Page No. 7

### OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE), KARAK.

### Appointment

Consequent upon the recommendation of the District Recruitment / Selection Committee, the following Candidate are hereby appointed as Class-IV on contract / regular basis in BPS-1 @ Rs. 4800+150+9300) per month plus usual allowances as admissible under the rules to him on merit basis, 25% retired son quota, deceased son quota and 2% disable quota w.e.f the date of their taking over charge.

Disable 2% .

S. No	Name	Father's Name	Village	Post	Where pos	ted
1	Inam ur Rehman	Samin Gul	Mitha Khel	Lab Attendant	GHSS Lawaghar	Dabli

Terms & Condition.

- 1. No TA/DA et is allowed
- 2. Charge report should be submitted to all concerned.
- 3. Appointment is purely on contract / Regular basis and liable to termination without any notice.
- 4. He should not be handed over charge if they exceeded 40 years or below 18 years age.
- 5. If he fail to take over charge within 15 days, the appointment order will be deemed as cancelled.
- 6. Health and age certificate should be produced from the medical superintendent concerned.
- 7. He is entitled for the benefits of a civil servant except pension and gratuity.

### District Education Officer (F) Karak.

Endst: No. 3341-44/ Daed Kara k the 3/10/2014

### Copy to

- 1. District Account Officer, Karak.
- 2. Principal GHSS Dabli Lawaghar
- 3. 3.PA to Director E & SE KP Peshawar.
- 4. Candidate concerned.

District Education Officer (F) Karak.

1 Armerture - 6

Karrak

·
Pers #: 00725773 Buckle:
Name: ANAM REHMAN
LAB ATTENDENT
CNIC No.1420258727531
GPF Interest Applied
01 Active Permanent
PAYS AND ALLOWANCES:
0001-Basic Pay
1000-House Rent Allowance
1210-Convey Allowance 2005
1300-Medical Allowance
1971-Adhoc Allowance 20110 15%
1973-Adhoc Allowance 20100 50%
2118-Adhoc Relief Allow (2012)
2148-15% Adhoc Relief All-2013
2174-Adhoc Relief Allow-2014
Gross Pay and Allowances
DEDUCTIONS:
DEDOCTIOND.

GPF Balance 212.00 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK

Total Deductions

P Sec:001 Month:November 2014 KK7055 -Head Master GHS Dabli Lawa Education Schools

NTN: GPF #:

01d #:

KK7055

4,800.00
891.00
1,785.00
1,200.00
445.00
1,485.00
960.00
720.00
480.00
22,709.00

212.00 120.00 3.00 58.00 50.00

443.00

22,266.00

D.O.B 10.04.1979 00 Years 10 Months 029 Days LFP Quota: 4 HABIB BANK LIMITED Mitha Khel, Karak. 7900141601

Subrc:

Karrak

Pers #: 00	725773	Buckle:
Name: AN	AM REHMA	N
LAB	ATTENDE	NT
CNIC No.14	20258727	531
GPF Intere	st Appli	ed
01	Active 3	Permanent
PAYS AND AL	LOWANCES	:
5002-Adjus	tment Ho	use Rent
5012-Adjus	tment Me	dical All
5309-Adj.	15% Adho	c Allowance
5898-Adj.	Adhoc Al	lowance 50%
5911-Adj.	Adhoc Re	lief 2011
5938-Adj.A	dhoc Rel:	ief All 2012
5950-Adj:A	dhoc Rel:	ief All-2014
5801-Adj B	asic Pay	

Gross Pay and Allowances DEDUCTIONS:

GPF Balance

s#:

212.00

P Sec:001 Month:November 2014
KK7055 -Head Master GHS Dabli Lawa
 Education Schools
NTN:
GPF #:
Old #:

KK7055 -834.00 1,123.00 674.00 1,389.00 416.00

> 119.00 4,490.00 22,709.00

898.00

Subrc:

Total Deductions

443.00

22,266.00

D.O.B 10.04.1979 00 Years 10 Months 029 Days LFP Quota: HABIB BANK LIMITED Mitha Khel, Karak. 7900141601

P Sec:001 Month: June 2015

NTN:

GPF #:

Old #:

Education Schools

KK7069 -Head Master GHS Khurram Ka

Karrak

1È. Buckle: Pers #: 00725773 Name: ANAM REHMAN LAB ATTENDENT CNIC No.1420258727531 GPF Interest Applied 01 Active Permanent PAYS AND ALLOWANCES: 0001-Basic Pay 1000-House Rent Allowance 1300-Medical Allowance 1971-Adhoc Allowance 2011@ 15% 1973-Adhoc Allowance 20100 50% 2118-Adhoc Relief Allow (2012) 2148-15% Adhoc Relief All-2013 2174-Adhoc Relief Allow-2014 5002-Adjustment House Rent Gross Pay and Allowances DEDUCTIONS:

S#: <sup>`£'</sup>

1,696.00 GPF Balance 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK 6001-Adj Benevolent Fund 6006-Adj Group Insurance 6075-Adj GPF

Total Deductions

D.O.B 10.04.1979 01 Years 05 Months 029 Days

KK7069 4,800.00 891.00 1,200.00 445.00 1,485.00 960.00 720.00 480.00 5,346.00 87,259.00 212.00 Subrc: 120.00 3.00 58.00 50.00

> 1,272.00 2,931.00

348.00

600.00

84,328.00

LFP Quota: 7909141601

HABIB BANK LIMITED Mitha Khel, Karak.

Karrak

Pers #: 00725773 Buckle: Name: ANAM REHMAN LAB ATTENDENT CNIC No.1420258727531 GPF Interest Applied 01 Active Permanent PAYS AND ALLOWANCES: 5011-Adj Conveyance Allowance 5012-Adjustment Medical All 5309-Adj. 15% Adhoc Allowance 5898-Adj. Adhoc Allowance 50% 5911-Adj. Adhoc Relief 2011 5938-Adj.Adhoc Relief All 2012 5950-Adj:Adhoc Relief All-2014 5801-Adj Basic Pay

s#: 💐

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 1,696.00 6145-Adj Addl Group Insurance 6164-Adj E.E.F NWFP Fund P Sec:001 Month:June 2015 KK7069 -Head Master GHS Khurram Ka Education Schools NTN:

GPF #:

01d #:

KK7069

10,710.00 7,200.00 4,320.00 2,670.00 8,910.00 5,442.00 2,880.00 28,800.00

87,259.00

Subrc:

18.00 250.00

2,931.00

84,328.00

Total Deductions

D.O.B 10.04.1979 01 Years 05 Months 029 Days LFP Quota: HABIB BANK LIMITED Mitha Khel, Karak. 7900141601

av

P Sec:001 Month: July 2015

NTN: GPF #: 01d #:

Education Schools

KK7069 -Head Master GHS Khurram Ka

KK7069

6,210.00 891.00 1,500.00 1,485.00 742.00 495.00 621,00

11,944.00

Karrak

Pers #: 00725773 Buckle:	
Name: ANAM REHMAN	
LAB ATTENDENT	
CNIC No.1420258727531	
GPF Interest Applied	
01 Active Permanent	•
PAYS AND ALLOWANCES:	
0001-Basic Pay	
1000-House Rent Allowance	
1300-Medical Allowance	
1973-Adhoc Allowance 20100 50%	
2148-15% Adhoc Relief All-2013	
2174-Adhoc Relief Allow-2014	
2199-Adhoc Relief Allow @10%	

S#:

Gross Pay and Allowances DEDUCTIONS:

212.00 GPF Balance 1,939.00 Subrc: 120.00 3501-Benevolent Fund 3511-Addl Group Insurance 58.00 3604-Group Insurance 50.00 3990-Emp.Edu. Fund KPK

Total Deductions

443.00

3.00

11,501.00

D.O.B 10.04.1979 01 Years 06 Months 030 Days

LFP Quota: 4 HABIB BANK LIMITED Mitha Khel, Karak. 7900141601



P Sec:001 Month: August 2015

Karrak

	KK7069 -Head Master GHS Khurram Ka Education Schools
Pers #: 00725773 Buckle:	
Name: ANAM REHMAN	NTN:
LAB ATTENDENT	GPF #:
CNIC No.1420258727531	Old #:
GPF Interest Applied	
01 Active Permanent	кк7069 -
PAYS AND ALLOWANCES:	C 010 00
0001-Basic Pay	6,210.00
1000-House Rent Allowance	891.00
1300-Medical Allowance	1,500.00
1973-Adhoc Allowance 2010@ 50%	1,485.00
	742.00
2148-15% Adhoc Relief All-2013	495.00
2174-Adhoc Relief Allow-2014	621.00
2199-Adhoc Relief Allow @10%	021.00

Gross Pay and Allowances DEDUCTIONS:

S#:

2,151.00 GPF Balance 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK

Total Deductions

443.00

11,501.00

11,944.00

212.00

120.00

3:00

58.00

50.00

D.O.B 10.04.1979 01 Years 07 Months 030 Days

LFP Quota: 4 HABIB BANK LIMITED Mitha Khel, Karak. 7900141601

Subrc:



P Sec:001 Month:September 2015 KK7069 -Head Master GHS Khurram Ka

KK7069

6,210.00 891.00 1,500.00 1,485.00 742.00 495.00 621.00

11,944.00

Education Schools

NTN: GPF #: Old #:

Karrak

Pers #: 00725773 Buckle:
Name: ANAM REHMAN
LAB ATTENDENT
CNIC No.1420258727531
GPF Interest Applied
01 Active Permanent
PAYS AND ALLOWANCES:
0001-Basic Pay
1000-House Rent Allowance
1300-Medical Allowance
1973-Adhoc Allowance 2010@ 50%
2148-15% Adhoc Relief All-2013
2174-Adhoc Relief Allow-2014
2199-Adhoc Relief Allow @10%

S#:

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 2,363.00	Subrc: 212	.00
3501-Benevolent Fund	120	:00
3511-Addl Group Insurance	.3	.00
3604-Group Insurance	58	.00
3990-Emp.Edu. Fund KPK	50	.00
• · · · · · · · · · · · · · · · · · · ·		

Total Deductions

443.00

11,501.00

D.O.B 10.04.1979 01 Years 08 Months 029 Days LFP Quota: 4 HABIB BANK LIMITED Mitha Khel, Karak. 7900141601



Karrak

Pers #: 00725773 Buckle: Name: ANAM REHMAN LAB ATTENDENT CNIC No.1420258727531 GPF Interest Applied 01 Active Permanent PAYS AND ALLOWANCES: 0001-Basic Pay 1000-House Rent Allowance 1300-Medical Allowance 1973-Adhoc Allowance 2010@ 50% 2148-15% Adhoc Relief All-2013 2174-Adhoc Relief Allow-2014 2199-Adhoc Relief Allow @10%

S#:

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 2,575.00 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK

Total Deductions

D.O.B 10.04.1979 01 Years 09 Months 030 Days

LFP Quota: 7900141601

4 HABIB BANK LIMITED Mitha Khel, Karak.

Subrc:

and

P Sec:001 Month:October 2015 KK7069 -Head Master GHS Khurram Ka Education Schools NTN: GPF #:

Old #:

KK7069

6,210.00
891.00
1,500.00
1,485.00
742.00
495.00
621.00

11,944.00

212.00

120.00

3.00

58.00

50.00

443.00

11,501.00

P Sec:001 Month:November 2015 KK7069 -Head Master GHS Khurram Ka

Education Schools

KK7069

6,210.00 891.00 1,500.00 1,485.00 742.00 495.00 621.00

11,944.00

274.00

120.00

3.00

58.00

50.00

NTN: GPF #: Old #:

Karrak

<b>`</b>
Pers #: 00725773 Buckle:
Name: ANAM REHMAN
LAB ATTENDENT
CNIC No.1420258727531
GPF Interest Applied
01 Active Permanent
PAYS AND ALLOWANCES:
0001-Basic Pay
1000-House Rent Allowance
1300-Medical Allowance
1973-Adhoc Allowance 2010@ 50%
2148-15% Adhoc Relief All-2013
2174-Adhoc Relief Allow-2014
2199-Adhoc Relief Allow @10%

s#:

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 2,849.00 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK

Total Deductions

505.00

11,439.00

D.O.B 10.04.1979

01 Years 10 Months 029 Days

LFP Quota: 4 HABIB BANK LIMITED Mitha Khel, Karak. 7900141601

Subrc:



Subrc:

4

NTN: GPF #: 01d #:

P Sec:001 Month:December 2015 KK7069 -Head Master GHS Khurram Ka

Education Schools

KK7069

6,405.00 891.00 1,500.00 1,485.00 742.00 495.00 640.00

12,158.00

274.00

120.00

3.00

58.00

50.00

Karrak

Pers #: 00'	725773	Buckle:
Name: ANA	AM REHM	AN
LAB	ATTEND	ENT
CNIC No.142	2025872	7531
GPF Interes	st Appl:	ied
01	Active	Permanent
PAYS AND ALI	LOWANCES	5:
0001-Basic	Pay	,
1000-House	Rent A	llowance
1300-Medica	al Allow	wance
1973-Adhoc	Allowar	nce 2010@ 50%
2148-15% A	dhoc Re	lief All-2013
217 <b>4-Ad</b> hoc	Relief	Allow-2014
2199-Adhoc	Relief	Allow @10%

S#:

Gross Pay and Allowances DEDUCTIONS:

GPF Balance 3,123.00 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp.Edu. Fund KPK

Total Deductions

505.00

11,653.00

D.O.B 10.04.1979 01 Years 11 Months 030 Days

LFP Quota: 7900141601

HABIB BANK LIMITED Mitha Khel, Karak.

any

Karrak P Sec:001 Month: January 2016 S#: KK7069 -Head Master GHS Khurram Ka Buckle: Education Schools Pers #: 00725773 ANAM REHMAN NTN: Name: GPF #: LAB ATTENDENT Old #: CNIC No.1420258727531 GPF Interest Applied KK7069 01 Active Permanent PAYS AND ALLOWANCES: 6,405.00 0001-Basic Pay 891.00 1000-House Rent Allowance 1,500.00 1300-Medical Allowance 1973-Adhoc Allowance 2010@ 50% 1,485.00 2148-15% Adhoc Relief All-2013 742.00 495.00 2174-Adhoc Relief Allow-2014 640.00 2199-Adhoc Relief Allow @10% Gross Pay and Allowances 12,158.00 DEDUCTIONS:

274.00 GPF Balance 3,397.00 Subrc: 120.00 3501-Benevolent Fund 3.00 3511-Addl Group Insurance 3604-Group Insurance 58.00 3990-Emp.Edu. Fund KPK 50.00

Total Deductions

D.O.B 10.04.1979 02 Years 00 Months 030 Days

7900141601

HABIB BANK LIMITED Mitha Khel, Karak.

LFP Quota:

505.00

11,653.00

Name (rt) \_\_ nam-U2-Rehman (19) Nationality and Religion Pakistoni, Islam 2-. (Equiple (Equiple ) Residence <u>VILL& PLO Miltra Khel T&D Karat</u> 3-(متتقل رمائش) Father's name and residence <u>Samin Guls Acabove</u> 4-(والدكانام اورية) 5- Date of birth by christian era as 10/04/1979 [Toh Apzil Nineteen hundred and nearly as can be ascertained (تاريخ پيدائش مطابق بن عيسوي) Seventy nine 6- Exact height by measurement -(قدوقامت) 7- Personal mark of identification Mole Mark on Neck (نثان شاخت) 8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer) (مردکی صورت میں بائیں اور عورت میں دائیں ہاتھ کی انگیوں نے نشانات) Ring Finger (چنگلاکساتھر)انگی) **Middle Finger** Little Finger (انگشت ممانه) (يَعْظُلُ) Thumb **Fore Finger** (انگوٹھا) (انگشت شهادت) 9. Signature of Govt. Servent - Than Allague (سركارى ملازم تَح د ستخط) 10. Signature and designation of the Head of the Office or other Attesting officer (تصديق كننده افيزاك د شخطاورمير) Afar Note: The enteries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule. اس صفح ، عندرجه مم از کم پانچ سال بعد تقدیق ہونا ضروری ہیں ادر نمبر 9اور 10 میں دستخطوں کے پنچ تاریخ لکھنی جا بیے ۔ الطَّيوں كَنشانات كے لئے ہريا يخسال كے بعد تقيديق كي ضرورت نبيس

20) 7 8 6 5 4 2 3 1 Other If officiating ×. emolumstate-(i) substative Whether ents falling Substantive or officiating Signature of Government servant Date of Additional Pay in appointment or appointpay for officiating (ii) whether service substantive under the and whether ment counts for position permanent or temporary term pay Name of Post temporary pension under rule 3-20 of C.S.R. (Pb.) Volume II اکرعارضی ہےتو رول کے مطابق پنشن کا مستحق ہے؟ pension under ماسوائے زائد تنجؤاه : تنخواه بطور بحارضی ملازمت تاريخ دستخط تنخواه دیگر الاوکنس عارضی مستقل با سرکاری ملازم درجه ملازمت.. بطورقائم مقام تقررى Ps. Pś. Rs. Rs. 0/ 4800-150-(Rs <u>A300</u> ab: Attendant Temp 2011 F.N. Dabli Regula CHSS 00 PM Rs  $\boldsymbol{\gamma}$ 48 nadpax . e i. ŧ •1 ••• . .... 5 ¢ ... •• ... . i. . . i đ .

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Z 15 13 14 12 9 10 11 Reference to Allocation of period of Signation of Reason of Date of leave of average pay up to four months (or earned any recorded Signature of Nature and termination termination punishment or Signature of the Head of the the head of the office or duration of the Head of the (such as leave net exceading 120 censure, reward or leave taken days) to which leave salary is debitable to another Government چارماہ تک کی رخصت کے office or other attesting officer promotion. appointment office or other or praised of the other Attesting transfer, attesting Officer Government officer in attestation of dismissal servants column 1 to 8 سزایاجزایا غیرمناسب وجوبات لئے اوسط نخواہ کاتعین تاريخ رخصت کی دستخطافسر انقطاع ملازمت Government to which debitable وستخط نوعيت ومعياد Period انقطاع کارکردگی کا ترقى تتإدله مجاز افسرمجاز افسرمجاز عرصه لورخمنٹ جسے ريكارڈ يابرطرفي ملازمت در سب ۔ رقم اداہوگ 05 Attendan 10 pe. <u>1</u> Se ON ati لاسع arak the? dated 150/14 an 88.5 ĺ . ろく 3 w1 2 30 ٢s y. . . . , Ŋ 7 . •

Anneature-D) FORM: PAY02 PAYROLL SYSTEM AMENDMENT FORM Date 1 3-2-1 SINGLE EMPLOYEE ENTRY Headmaster Citis Khurdame Kanek Page No. 2 OFFICE OF THE FOR THE MONTH OF December 2015 GHS Khurgam DDO Code 5 Description 5 0 (Cost Center) Employée Anam Rehman National ID Personnel Card Number 14209 -58 72-75 3-1 O Number 7 Grade (Pay Saisty 12 10 0 Scale Group) St Step Start GENERAL DATA CHANGE 13 CHANGE IN PAYMENTS / DEDUCTIONS<sup>17</sup> Wage Info :4 Field Amount Effective Type Type 15 ID 15 New Contents 15 Rupees 19 Paisa / Adj Date 21 Remarks 22 Stabed tobba W the officer as n ch \* muchat Head Master G.H.S Khurram Prepared By ta Audited/Checked By 14 25 Entered / Venfied By Karak

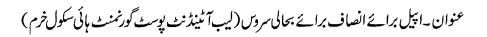
کور منا بخسر من از بوشین افسرز روز منابع کرف (Anneothere - E) ایس دری ال عناف / در این کالی موس · ¿шію اكر در من جرب من الماج وشرحان أسط ترس مام كو برارد مر ود العد المود شارم ۱۰۰،201 - 3 مرمسا رمری استرند وسر مر گردمند ما مرسکند م مول مربعی بولار میں فرایش معادی ما م مر مر دون مراعد اور ناظ مدہ شواس ۔ دی کا -سالم فو ما ما عده شخواه مدما علام معرد لحساب محط مع معدد ما مر تور من و عالی سول

سرمى موجواج - رور ما طالده جاند در الما - مال (س دن س س مر ما حال در در ك مورس مدايع- في موريخوس ملف مح - رور من مول ما ميم م . مار دار مار دمر ، رد مربع ما امد بحد والى ما براج ، سر میزاسه رس م ی مال کو این رور که او سر بر سای کرد کر ک غر جام مر مر مو متخاص ، مفر متزاع ۲ ما ما ٢ فسادر مراوين مراري م مديد دونى سرايى م دے سكي - در مزمان محص ما أمر فيودى كدالد م معاز بإجالها مشعب رح ما - كوند جمع ، و جمع م ع اور نه دفتری رملیکاردی تھے بروف الملدو ی ع - اور نے تھے انھی تک کون در در برے کا روای موصول موصل ج - سرا . استرع ا

وم سے ماما عدرہ کارود 2.9 مر شخا میں سر مرد ای - سو نے مر میری مقبر مرکزی اور کی

سر مال حامد ف مرمع دا مر مال د این دور ظارعین الصاف می هم 25/03/2018 A TT אריא לשציש בארכיי - בלי

بخدمت جناب ڈائر یکٹرایلیمنٹر ی اینڈ سینڈری ایجو کیشن ڈیپار ٹمنٹ خیبر پختون خواہ پشاور



جناب عالى \_ سائل انعام الرحمٰن مود با نه عرض كرتاً ہے ۔

24

گزارش ہے کہ میں سائل انعام الرحمٰن کو ڈسٹر کٹ ایجو کیشن آفیسر (مردانہ)ضلع کرک نے بحوالہ تغرُّری آرڈ رنمبر 44-3341 مورخہ 3 اکتوبر 2014 كونحسثيت ليبارترى آثنيذ نث يوست يربحر كورنمنت ما ئيرسيكندرى سكول دبلى لواغر ميل بحرتى كيا اور ساكل GHSS Dabli Lawaghar میں ڈیوٹیٹ سرانجام دیتار ہا آدراور ماہ اکتوبراور ماہ نومبر سال 2014 کی تخوا ہیں ہیڈ ماسٹر گورنمنٹ ہائی سکینڈ ری سکول دبلی لواغر نے سائل کوآ دا کیااوراس کے بعد سائل کوز بانی احکامات کے تحت گورنمنٹ ہائی سکول خرم میں ڈیوٹی سرانجام دینے کا حکم کیا گیا تو سائل نے گورنمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دسمبر سال 2014 سے کیکر ماہ جون سال 2015 کت نخوا ہیں تکمشت ہیڈ ماسر <sup>گ</sup>ۈرنىنىڭ بائىسكول خرم مىيرنىبر KK7069 سە آ دائىيگى كىگى اور پھر جولائى سال 2015 سەكىكر ماەجنورى سال 2016 تك سائل تخوابېن سکول متذکرہ میں آ دائیگی کی گئی۔ماہ فروری سال 2016 سے نخواہ ہیڈ ماسٹر صاحب نے بذریعہ Source-II Form کے تحت بند کر دی گی اور ساتھا ساتھ سائل کوہیڈ ماسٹر صاحب نے زبانی تھم کیا کہ آئندہ سکول مت آئے۔ بلحد میں سائل کومعلوم ہوا کہ سائل کی یوسٹ شفق الرحمٰن نامی کلاس فورکوگورنمنٹ ہائی سکول خرم سیاسی بنیا دوں ٹرانسفر کیا گیا۔

جناب ولا - سائل نے آپ صاحب کومور خدہ 2016-05-27 اور ڈسٹر کٹ ایجو کیشن آفیسر کومور خدہ 2016-03-25 کو درخواستیں برائے بر اس وق اورآ دائیگی شخوا ہیں ارسال کی ہیں مگر بے سود۔

بناب والا-سائل كويد معلوم نہيں ہے كەكن وجوبات كى بناء پر سائل كوگور نمنٹ ہائى سكول ميں ديونى سے منع كيا اور ساتھ سائل كى تخواہ ۔ بیوں بند کردی گئی۔

لہذا آپ صاحب سے مود بانہ التجا کی جاتی ہے کہ ڈسٹر کٹ ایجو کیشن آفیسر (مردانہ) کرک کو حکم صا در فر مایا جاوے کہ وہ سائل کواپنے یوسٹ لیرا بر Nttendant پر گورنمنٹ ہائی سکول خرم میں سروں پر بحالی اور سابقہ پنخوا ہیں بھی کھو لیے کے احکامات صا در فرمایا جائے ۔ سائل دعا گو رني گار

A

بالمعربي المحارب مسلمين انعام الرحمٰن ولدسمين گل گاؤں وڈ انحانہ ميٹھا خيل النثير سأكل بخصيل ضلع كرك\_

بخدمت جناب ڈائر یکٹرایلیمنٹر می اینڈ سینڈری ایجو کیشن ڈیپار ٹمنٹ خیبر پختون خواہ پشاور

عنوان ۔ اپیل برائے انصاف برائے بحالی سروس (لیب آٹینڈ نٹ لپوسٹ گوزشنٹ ہائی سکول خرم)

جناب عالى \_ سائل انعام الرحمٰن مود بانه عرض كرتا ہے۔

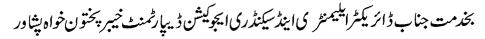
گزارش ہے کہ میں سائل انعام الرحمٰن کو ڈسٹر کٹ ایجوکیشن آفیسر (مردانہ)ضلع کرک نے بحوالہ تقرری آرڈ رنمبر 44-3341 مورخہ 3 اکتوبر 2014 کو بخسشیت لیبارٹری آٹینڈنٹ پوسٹ پر بھر گورنمنٹ ہا ئیر سینڈری سکول دبلی لواغر میں بھرتی کیا اور سائل GHSS Dabli Lawaghar میں ڈیوٹرکش سرانجام دیتار ہاادرادر ماہ اکتوبرادر ماہ نومبر سال 2014 کی تخواہیں ہیڈ ماسٹر گورنمنٹ ہائی سکینڈری سکول دبلی لواغرنے سائل کوآ دا کیا اور اس کے بعد سائل کوزبانی احکامات کے تحت گور نمنٹ ہائی سکول خرم میں ڈیوٹی سرانجام دینے کا تھم کیا گیا تو سائل نے گورنمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دسمبر سال 2014 سے لیکر ماہ جون سال 2015 تک تخواہیں یکمشت ہیڈ ماسٹر <sup>س</sup>گورنمنٹ ہائی سکول خرم ہیڈنمبر KK7069 سے آ دائیگی کی گئی اور پھر جولائی سال 2015 سے کیکر ماہ جنوری سال 2016 تک سائل تخوا ہیں سکول متذکرہ میں آدائیگی کی گئی۔ ماہ فروری سال 2016 سے تخواہ ہیڈ ماسٹر صاحب نے بذریعہ Source-II Form کے تحت بند کر دی گئ اور سانھا ساتھ سائل کو ہیڈ ماسٹر صاحب نے زبانی تھم کیا کہ آئندہ سکول مت آئے۔بعد میں سائل کو معلوم ہوا کہ سائل کی یوسٹ شفق الرحن نامی کلاس فورکو گورنمنٹ ہائی سکول خرم سیاسی بنیا دلوں ٹرانسفر کیا گیا۔

جناب ولا ۔ سائل نے آپ صاحب کوکوئی درخوا تہیں برائے بحالی سروس اورآ دائیگی نخوا ہیں ارسال کی ہیں مگر بے سود۔ ( نفو لات لف ہیں ) ۔

جناب والا-سائل کو بیمعلوم نہیں ہے کہ کن وجو ہات کی بناء پر سائل کو گورنمنٹ ہائی سکول میں ڈیوٹی سے منع کیا اور ساتھ سائل کی تخواہ کیوں بند کردی گئی۔ سائل چونکہ بےوزگارہوا ہےاور سخت ذہنی پریشانی میں مبتلا ہوا ہے۔

لہٰ زاآپ صاحب سے مود بانہ التجا کی جاتی ہے کہ ڈسٹر کٹ ایجوکیشن آفیسر (مردانہ) کرک کو تکم صا درفر مایا جادے کہ وہ سائل کواپنے پوسٹ لیبارٹری Attendant پر گورنمنٹ ہائی سکول خرم میں سروں پر بحالی اور سابقہ پنخوا ہیں بھی کھو لنے کے احکامات صا درفر مایا جائے ۔سائل دعا گو ر بےگا۔

انعام الرحن ولد مين كل كاؤل وذا تخانه ليتها خيل العبر سائل مخصیل وضلع کرک۔



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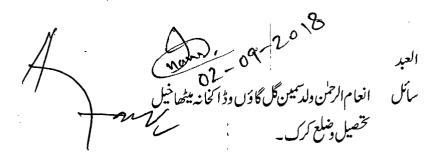
عنوان ۔ اپیل برائے انصاف برائے بحالی سروں (لیب آٹینڈنٹ پوسٹ گورنمنٹ ہائی سکول خرم)

جناب عالی \_ سائل انعام الرح<sup>ن</sup> مود با ن*ه عرض کر*تا ہے۔ پ

تر ارش ہے کہ میں سائل انعام الرمن کو ڈسٹر کٹ ایجو کیشن آفیسر (مردانہ) ضلع کرک نے بحوالد تقرری آرڈر نجبر 44-31 80 مورخہ 30 کو بر 2014 کو بحسثیت لیبارٹری آٹینڈ نٹ پوسٹ پر بھر گور نمنٹ ہا ئیر سینڈری سکول دبلی لواغر میں بھر تی کیا اور سائل GHSS Dabli Lawaghar میں ڈیوٹو بھی سرانجام دیتار ہا اور اور ماہ اکتو بر اور ماہ نومبر سال 2014 کی تخواہیں ہیڈ ماسٹر گور نمنٹ ہائی سینڈری سکول دبلی لواغر نے سائل کو آدا کیا اور اس کے بعد سائل کو زبانی احکامات کے تحت گور نمنٹ ہائی سکول خرم میں ڈیوٹی سرانجام دین گور نمنٹ ہائی سکول خرم میں ڈیوٹر کی سرانجام دیتا رہا اور اور ماہ اکتو بر اس کا 2014 کی تخواہیں ہیڈ ماسٹر گور نمنٹ ہائی سینڈری سکول دبلی گور نمنٹ ہائی سکول خرم میں ڈیوٹر کی سرائل کو زبانی احکامات کے تحت گور نمنٹ ہائی سکول خرم میں ڈیوٹی سرانجام دینے کا تھم کیا گیا تو سائل نے گور نمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے لیکر ماہ جون سال 2015 تک تخواہیں کی مشت ہیڈ ماسٹر گور نمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے لیکر ماہ جون سال 2015 تک تخواہیں کی مشت سر اسٹر ماسٹر گور نمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے لیکر ماہ جون سال 2015 تک تخواہیں کی مشت سائی اسٹر کو ریڈ ای سر کی میں میں میں میں میں میں تی ہو ہو ہی ہا سر گور نمنٹ ہائی سکول خرم ہیں ڈیوٹی دینا شروع کی اور کو میٹر ماسٹر صاحب نے بذریعہ Source-II Form کے بند کر دی سکول متذکرہ میں آدائی کی گئی ماہ فروری سال 2016 سے تخواہ ہیڈ ماسٹر صاحب نے بذریعہ Source-II کی کی کی کو معلوم ہوا کی سکال کی پوسٹ شوں الرمن

اور ڈسٹرکٹ ایجوکیشن آفیسر کو مور خہ جناب ولا- ساكل في آب صاحب كومور محمد 2016-05-27 اور 13 دستمبر 2016 25-03-2016 کودرخواستیں برائے بحالی سروس اور آ دائیگی تخوا ہیں ارسال کی ہیں مگر بے سود۔ جناب والا-سائل کو بیمعلوم نہیں ہے کہ کن وجوہات کی بناء پر سائل کو گورنمنٹ ہائی سکول میں ڈیوٹی سے منع کیا اور ساتھ ساتھ سائل کی نخواہ کیوں بند کردی گئی۔

لہٰ از پ صاحب سے مود بانہ التجا کی جاتی ہے کہ ڈسٹر کٹ ایجو کیشن آفیسر (مردانہ) کرک کوتکم صا در فرمایا جاوے کہ وہ سائل کواپنے پوسٹ لیبارٹر Attendant پر گورنمنٹ ہائی سکول خرم میں سروں پر بحالی اور سابقہ نخوا ہیں بھی کھولنے کے احکامات صا در فرمایا جائے ۔ سائل دعا گو رہے گا۔





جناب عالى

بحدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سکینڈری ایجوکیشن خیبر پختون خواہ

عنوان: \_ اپیل برائے انصاف برائے بحالی سروس (کیب آیٹیڈنٹ بوسٹ)

جناب عالى اييل هذا سے در دمندانه التجاب كه سائل كواب اور يجنل پوسٹ پر دوبارہ بحال كر كے اور ساتھ ميں تخواہ كے احكامات صادر فرمائيں \_ جناب عالى سائل كى تخواہ بند ہونے كى وجہ سے سائل لوگوں كا قرض دار ہوتا چلا جار ہا ہيں \_ مہر بانى فرمايش تاكہ سائل مزيدا پنى ڈيوٹى سرانجام دے سكيس اوراپنے بچوں كا چولھا چلا سكے \_ آپ ہمارى اميد كى آخرى كرن ہيں ، مجور أسائل كو آخر عد الت اپنى فريا د لے كر جانا ہوگا \_ محصح آج تك دفتر سے كوئى آرڈ ريا نوٹس تحريرى يا زبانى بھى موصول نہيں ہوا لہذا استد عاہ كہ سائل كے حالات پن

and And

Dirolb سائل انعام الرحن ولدسمين گل<sup>60</sup>س گاؤں دِدْانخانہ میٹھاخیل تخصيل وضلع كرك

بخدمت جناب سیکرٹری صاحبSecretary E & SED گور نمنٹ آف خیبر پختو نخواہ پشاور

عنوان۔ درخواست بمراد بحالی سروی بحسثیت لیب آنٹیزنٹ گور نمنٹ ہائی سکول خرا ہمعہ ریلز فرمانے سابقہ پنخواہیں

جناب عالی۔سائل انعام الرحن مود بانہ عرض کر کتا ہے۔

گزارش ہے کہ میں سائل انعام الرحمن کو ڈسٹر کٹ ایجو کیشن آفیسر ( مردانہ ) صلح کرک نے بحوالہ تقرر ری آرڈرنجبر 44-331 مورخہ 33 کتو بر 2014 کو بحسثیت لیبارٹری آ ٹینڈ نٹ پوسٹ پر جمر گور نمنٹ ہا ئیر سینڈری سکول دبلی لواغر میں جمرتی کیا اور سائل GHSS Dabli Lawaghar میں ڈیوٹر کی کر انجام دیتار ہا اور اور ماہ اکتو بر اور ماہ نومبر سال 2014 کی تخوا ہیں ہیڈ ماسٹر گور نمنٹ ہائی سینڈری سکول دبلی لواغر نے سائل کو آدا کیا اور اس کے بعد سائل کوز بانی احکامات کے تخت گور نمنٹ ہائی سکول خرم میں ڈیوٹی سر انجام دینے کا تھم کیا گیا تو سائل نے گزیز نمنٹ ہائی سکول خرم میں ڈیوٹر کی کھر انجام دیتار ہا اور اور ماہ اکتو بر اور ماہ کور نمنٹ ہائی سکول دبلی گور نمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے کیر ماہ جون سال 2015 تک تخوا ہیں کی شت گور نمنٹ ہائی سکول خرم میں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے کیر ماہ جون سال 2015 تک تخوا ہیں کہ منٹ گور نمنٹ ہائی سکول خرم ہیں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے کیر ماہ جون سال 2015 تک تخوا ہیں کی مشت گور نمنٹ ہائی سکول خرم ہیں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے کیر ماہ جون سال 2015 تک تخوا ہیں کہ منٹ گور نمنٹ ہائی سکول خرم ہیں ڈیوٹی دینا شروع کیا اور ماہ دیمبر سال 2014 سے لیز میر ہوں کہ ماسٹر کو ایک نے سکوں میں ڈیوٹی میں ایک کو ہیں اسٹر کر دی

جنل ۔ والا۔سائل نے ڈائر یکٹرا یجو کیشن اورڈ شرکٹ ایجو کیشن (مردانہ) کوئٹی درخواستیں ارسال کی تقی مگر کوئی ایکشن نہیں لیا گیا۔ جناب والا۔سائل بےروز گاری کی دجہ سے گونا گومسائل میں تھن سے ہیں۔

لہدا آپ صاحب سے مود بانہ التجا کی جاتی ہے کہ ڈسٹر کٹ ایجو کیشن آفیسر (مردانہ) کرک کوتھم صادر فرمایا جاوے کہ وہ سائل کواپنے پوسٹ آیبارٹری Attendant پر گورنمنٹ ہائی سکول خرم میں سروں پر بحالی اور سابقہ نخوا ہیں بھی کھولنے کے احکامات صادر فرمایا جائے۔سائل دعا گو رہے گا۔

Ant

العبر انعام الرحمٰن ولدسمین گل گاؤں وڈ اکخانہ میٹھا خیل بخصیل وضلع کرک۔ 04 - 05 - 05 سائل

From

Ahmad Farooq Khattak Advocate, Karak.

### **NOTICE**

To:-

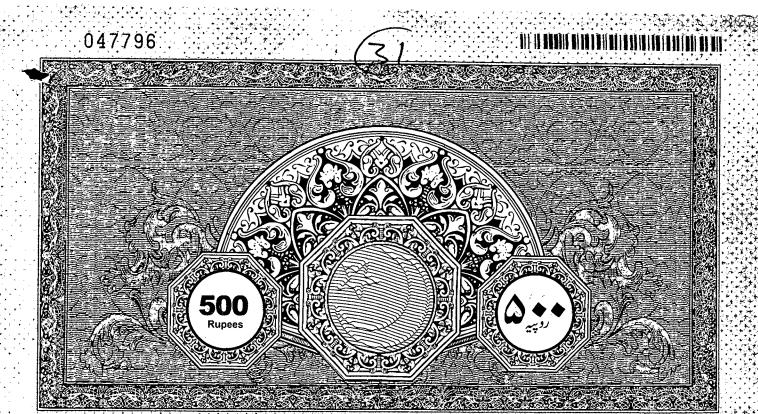
1. District Education Officer (Male), Karak.

- 2. Director Education Elementary & Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
- 3. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhawa, Peshawar.

Please take notice that I am today filing writ petition against appointment order No. 1560-62 daed 16-03-2018 on behalf of petitioner namely Inam ur Rehmam the titled "Inam ur Rehmam V.S Provincial Got: of KP writ petition in the Peshawar High Court Bannu Bench, Bannu.

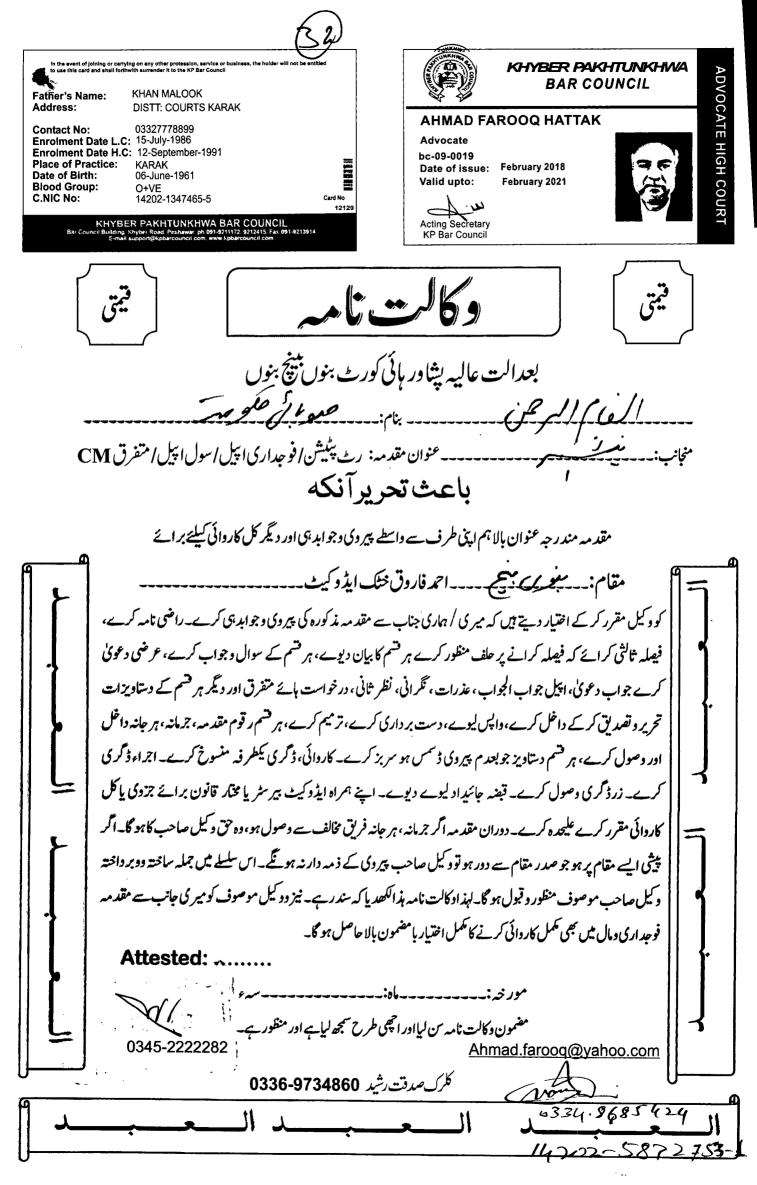
Dated ----/10/2019

Ahmad Farooq Khattak Advocate, Karak



## PAKISTAN COURT FEE

Filed Today



# <u>PESHAWAR HIGH COURT,</u> <u>BANNU BENCH.</u>

### FORM 'A'

#### FORM OF ORDER SHEET

古法にお外文商

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Detent	Order or other proceedings with signature of				
	Judge (s).				
roceedings					
(1)	(2)				
	W.P No.1124-B of 2019.				
20.11.2019	Present:				
	Mr. Ahmad Farooq Khattak Advocate for petitioner.				
	***				
	Respondent No.3 shall file his para-				
	wise comments to reach this Court within				
	fortnight.				
	JUDGE				
	<u> </u>				
	JUDGE				
Africe					
~11"1 Y					
	Date of order or roceedings (1) 20.11.2019 Soffice Refire Refire				

Ihsani. (D.B) Hon'ble Mr. Justice Ikramullah Khan and Hon'ble Mr. Justice Sahibzada Asadullah.