

05.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present and again sought time for submission of reply/comments.

Several opportunities have been given to the respondents for submission of reply/comments, however they have failed to submit reply, therefore, their salaries are attached till the further orders. Registrar of this Tribunal shall send copy of this order to Accountant General Office Khyber Pakhtunkhwa, Peshawar as well as District Accounts Officer Dir Lower for compliance. Last opportunity is given to the respondents for submission of reply/comments subject to payment of cost of Rs. 10000/-. Learned Assistant Advocate General shall intimate respondents No. 3 & 4 to personally appear before the Tribunal alongwith reply on the next date. Adjourned. To come up for reply as well as preliminary hearing on 10.11.2022 before the S.B at Camp Court Swat.

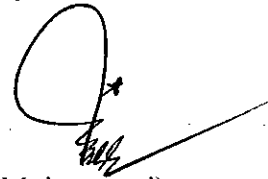


(Salah-Ud-Din)
Member (J)
Camp Court Swat

09.06.2022

Clerk to counsel for the appellant present.

On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for preliminary hearing on 07.07.2022 before the S.B at camp court Swat.

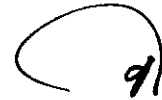


(Mian Muhammad)
Member (E)
Camp Court Swat

07.07.2022

Shahid Attorney of appellant present on behalf of appellant.

He is directed to make sure the personal attendance of the appellant on the next date. In the light of arguments, pre-admission notice be issued to the respondents. To come up for reply/preliminary hearing on 05.09.2022 before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)

05.09.2022

Appellant in person present. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present and sought time for submission of reply. Appellant also requested for adjournment on the ground that his counsel is not available today due to strike of lawyers. Adjourned. To come up for reply/preliminary hearing on 05.10.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

09.02.2022 Tour is hereby canceled .Therefore, the case is adjourned to 06.04.2022 for the same as before at Camp Court Swat.



Reader

06.04.2022 Junior to counsel for the appellant present.

Lawyers are on general strike, therefore, case is adjourned. To come up for preliminary hearing on 10.05.2022 before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

10.05.2022 Learned counsel for the appellant present and requested for adjournment on the ground that he has not made preparation for preliminary hearing today. Adjourned. To come up for preliminary hearing on 09.06.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)
Member (J)
Camp Court Swat

05.10.2021

Nemo for appellant.

Notice be issued to appellant/counsel for 09.12.2021 for preliminary hearing before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

09.12.2021

Zakir Ullah, attorney of appellant on behalf of appellant present.

Request for adjournment was made as learned counsel for appellant is busy before Peshawar High Court. Opportunity is granted and case is adjourned. To come up for preliminary hearing on 06.01.2022 before S.B at Camp Court, Swat.



(Rozina Rehman)
Member (J)
Camp Court, Swat

06.01.2022

Special Attorney for the appellant present.

Special attorney for the appellant requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. To come up for preliminary hearing on 09.02.2022 before S.B at camp court Swat.



(Salah-Ud-Din)
Member(J)
Camp Court Swat

04/04/2021

Due to COVID-19, the case is adjourned to
08/08/2021 for the same.



READER

26.07.2021


To come up for preliminary hearing on 26.08.2021
before S.B at Camp Court, ~~Al Swata~~ Swata. Notices be issued
to appellant/counsel for the date fixed.

†


Chairman

26.08.2021

None for the appellant is present. Notices be issued to
appellant and his counsel. To come up for preliminary
hearing on 06.10.2021 before S.B at camp court, Swat.


Chairman
Camp Court, Swat

†



†

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 1413 /2021 21

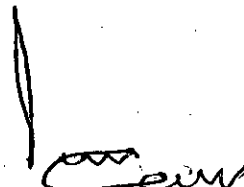
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/01/2021	<p>The appeal of Mr. Shahzada resubmitted today by Syed Abdul Haq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to touring S. Bench Swat for preliminary hearing to be put up there on <u>06-04-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Shahzada son of Abdul Baqi resident of Bagh maidan Tehsil Lal Qala District Dir Lower received today i.e. on 06.10.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned termination order mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal against the impugned order is not attached with the appeal which may be placed on it.

No. 2860 /S.T.

Dt. 07/10 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Abdul Haq Adv.
High Court Swat.

Respected Sir. objections has, been removed positively, however it is to be noted the file has been received by the appellant very late, so in connection any office objection, raised by the concern authorized officer and the notice of objection served ^{or} and unserved upon appellant, the same ~~or~~would not come in the domain limitation and as per spirit of law reported in

2000-SCMR-847 the same be entertained. So the case may kindly be placed before Honorable Tribunal for hearing.

about
Statement objections on
back page

Syed Abdul Haq.
20/10/2021.



Objection #1

the same order is available
on page #9 of petition

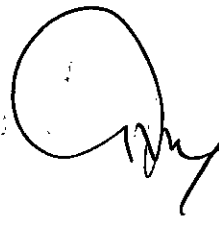
Objection #2

The Termination Order
is available on page #15
of the appeal.

Objection #3

Copy of Departmental
Appeal is attached

Regards

 Syed Abdul Hafiz
Adv

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
AT PESHAWAR**

Service Appeal No. _____/2020

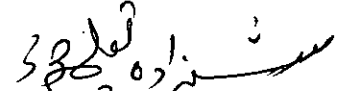
ShahzadaAppellant

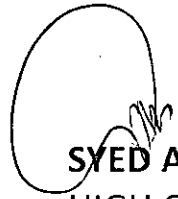
VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary and
Secondary Education and others Respondents

INDEX

S.NO	DESCRIPTION	ANNEX	PAGES
1.	Copy of service appeal alongwith certificate		1-6
2.	Address of the parties		7
3.	Affidavit		8
4.	Copy of appointment letter	A	9
5.	Copy of termination order , <i>Call</i> relevant record	B	10-15
6.	Copy of departmental appeal , <i>Power of Attorney</i>	C	16,18
7.	Wakalath Nama		(18)


appellant through Counsel


SYED ABDUL HAQ
HIGH COURT DARULQAZA
BAR ROOM SWAT
Cell No 0333-9546154

1

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
AT PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 1413 /2020

Diary No. 11243

Dated 06/10/2020

Shahzada, Son of Abdul Baqi, Resident of Bagh Maidan Tehsil
Lal Qala,, District Dir Lower. **Appellant**

VERSUS

- 1) Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Civil Secretariat Peshawar
- 2) Director Elementary and Secondary Education Govt. of Khyber Pakhtunkhwa, at Peshawar.
- 3) District Education Officer (Male) District Dir Lower at Timergara
- 4) District Account Officer Dir Lower at Timergara... **Respondents**

**APPEAL UNDER SECTION 4 OF THE GOVT. OF
KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT,
1974 AGAINST THE ILLEGAL, UNLAWFUL ORDER
DATED 30.07.1981 VIDE WHICH THE APPELLANT
WAS TERMINATED WITHOUT ANY SHOW CAUSE/
CHARGE SHEET.**

Filed to-day

Registrar

6/10/2020

Re-submitted to -day
and filed.

Registrar

27/10/2021

Prayer in appeal.

On acceptance of the instant appeal the impugned termination order may kindly be declared unlawful against the law on subject & be set aside or the penalty i.e. termination for minor acts be converted to minor punishment.

Respectfully Sheweth;

The facts of the instant are as under.

1. That the appellant initially was appointed as PST vide appointment order dated 1969 on contract basis & later on was regularized under the relevant policy. (Copy of appointment letter is enclosed as annexure-A)

2. That the appellant sought leave without pay which was granted to him w.e.f 1.04.1981 to 29.07.1981, however later on the appellant due to some unavoidable circumstances failed to serve the department, however the official respondent without any showcause notice

terminated him vide order dated 30.7.1981 (Copy of termination order is enclosed as annexure-B).

3. That the appellant filed departmental appeal , however, the respondents not paid any attention during stipulated period so, the appellant have no efficacious & appropriate remedy except to file the instant appeal on the following.(Copy of departmental appeal is attached as annexure-C).

GROUND

- A. That admittedly appellant was appointed upon the recommendation of selection committee as PST on contract basis, however, after regularization his service was terminated without issuing any show Cause/Charge sheet or affording him personal hearing, so, in service matters extreme penalty for minor acts depriving person from the right of hearing would defeat reformatory concept of punishment in administration of justice, so, on

such score the penalty *ibid* is highly harsh & not sustainable in the eyes of law.

B. That in the present case employer illegally construed the proceeding allegedly conducted regarding the allegations as mentioned in the impugned order so, in such scenario employer is bound to give a specific notice to employee, but they failed to do so, hence the subsequent superstructure would be illegal & liable to be set at naught.

C. That the allege absentee was not willful & he had not deliberately stayed away from duty so, major penalty could not be imposed upon him & if such impugned order was not set aside, the appellant would be deprived form other legitimate rights attached with his service record, so on this ground too, the impugned order is not maintainable.

D. That if the civil servant/appellant toward official duties was demonstrative of the facts that he had never

performed his duty seriously & remained absent (though not admitted) without intimation to the quarter concerned, however the same amounts merely to misconduct, so in such circumstances the appellant be treated leniently but the action taken by the competent authority is whimsical arbitrary & not based on sound reason & of worthy credence, so this honourable tribunal having ample power under the law to interfere & struck down the impugned order.

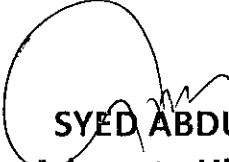
- E. That the same issue has been resolved by this honourable court in case titled as "Amjad Ali vs Government & others" wherein this honourable tribunal converted the termination of employee to compulsory retirement, so appellant be treated alike under the mandate of justice.
- F. That the appellant seeks leave of this honourable tribunal to raise/argue any additional points at the time of arguments.

6

On acceptance of the instant appeal the impugned termination order may kindly be declared unlawful against the law on subject & be set aside or the penalty i.e. termination for minor acts be converted to minor punishment.

سید زاہد علی شاہ
appellant

Through
Counsel


SYED ABDUL HAQ
Advocate High Court

CERTIFICATE

As per instruction of my client no such like service appeal, earlier has been filed by the appellant on the subject matter before this Hon'ble tribunal.


ADVOCATE

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
AT PESHAWAR**

Service Appeal No. _____/2020

ShahzadaAppellant

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT

Shahzada, Son of Abdul Baqi, Resident of Bagh Maidan Tehsil Lal Qala,, District Dir Lower

CNIC _____ MOB _____

RESPONDENTS

- 1) Govt of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Civil Secretariat Peshawar
- 2) Director Elementary and Secondary Education Govt. of Khyber Pakhtunkhwa, at Peshawar.
- 3) District Education Officer (Male) District Dir Lower at Timergara.
- 4) District Account Officer Dir Lower at Timergara.

Appellant, through Counsel

SYED ABDUL HAQ
HIGH COURT DARULQAZA
BAR ROOM SWAT
Cell No 0333-9546154

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
AT PESHAWAR**

Service Appeal No. _____/2020

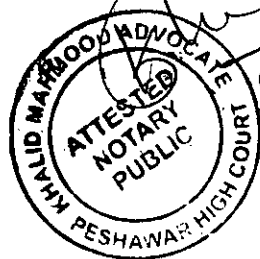
ShahzadaAppellant

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Elementary and
Secondary Education and others Respondents

AFFIDAVIT

I, *Shahzada, Son of Abdul Baqi, Resident of Bagh Maidan
Tehsil Lal Qala,, District Dir Lower*, do hereby solemnly affirm and
declare on oath that the contents of the accompanying writ
petition are true and correct to the best of my knowledge and
belief, and not has been kept concealed from this Honourable
Tribunal.

5-10-20

[Signature]

DEPONENT

CNIC 15302-0987828-5

"C-I-Pry:

KXZ

Amer 9

PROFORMA FOR REST AND RECREATION ALLOWANCE SUB DIVISION TEMERGA

1. Name and Designation. Shahzad P.T. School G.P.S. Han - Jyha
2. Basic Pay on 31/12/1978 Rs. 327/- P.M.
3. Permanent or Temporary Permanent
4. Date of First Appointment 1-11-1969
5. Budget Allotment for 1979-80. Rs: 1,00000/-
6. Head of Account. "37-Education-C-I-Primary Govt: Primary Schools, R & R Allowance for 1979-80, Other Expt:
7. Date of Birth: 26-5-1952 Date of Retirement: 26-5-2012
8. Casual leave taken in the current year 13 days
10. Date of allowance previously drawn on 10/1/78 (Nongazetted)

11. Certificates. -- 1. Certified that I have not availed the leave travelling concession during the last one year 1978.

2. Certified that necessary provision to meet the charges exists in the budget and the charge will be met out from the sanctioned budget grant during 1979-80,

3. Certified that I have rendered more than one year continuous Service

4. Certified that I have opted for the new rules of R & R Allow

5. Certified that I belong to Vacation Deptt: and have already enjoyed the R & R Leave during the last Summer Vacation 1979.

ATTESTED

6xx

Signature of Govt: Servant.

S. D. E. O. Male
Temergara

OPTION

I hereby exercise my option to elect the rest and recreation allowance sanctioned by the Govt: of Pakistan W.E.F. 1/1/1978.

Signature of the Govt: Servant.

Endst: No. 1839 / DE; 17-11-79.

Submitted in original alongwith Service Book of the above teacher for favour of necessary sanction and early return to this office please.

1. The Director of Education, M/s. Divisional Sd. M. Sharif Swat.
2. The District Education Officer, Temergara.

Sub-Divisional Education Officer,
Temergara (Male)

CFC

Amc (10)

OFFICE OF THE DISTT: EDUCATION OFFICER DIR AT TIMERGARA.

OFFICE ORDER.

Leave without pay for the period from 1-4-81 to 29-7-81 is hereby ~~submitted~~ sanctioned in favour of Mr. Shah Zada, PTC, GPS. Bagh Midan. Entries should be made in Service Book of the teacher.

Edr
Distt; Education Officer,
Dir at Timergara.

Endst; No. 9489 /L-2, Dated Timergara the 5/18 1981.
Copy of the above is forwarded to the SDEO, Timergara, for information & necessary action, with reference to his Memo No. 555 dated 19-5-81.

no. 60
Distt; Education Officer,
Dir at Timergara.
ay

A. Sher

146 Thar
15-8-81

R. C. / A. Sher

C-12

Amc

(11)

The entries in this page should be renewed or re-attested at least every five years, and the signature in lines 9 and 10 should be dated.

Name .. Mr. Shahzada,

2. Race ... Muslim (Bahawalpur)

3. Residence .. Vill. Bagh (maiden) Dir Dist.

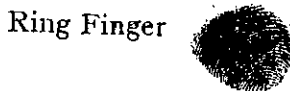
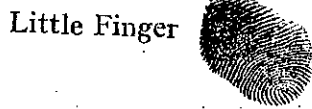
4. Father's name and residence .. Mr. Abdul Bagh
address as above


5. Date of birth by Christian era as nearly as can be ascertained. 26th, May, N. H. 8 fifty two (26-5-1952)

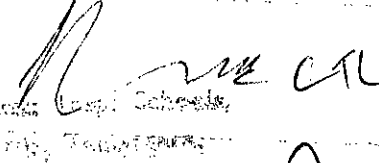
6. Exact height by measurement .. 5-4 (five feet four inches)

7. Personal marks for identification .. Two scars on the right side of the face.

8. Left hand thumb and finger impression of (non-gazetted) Officer



9. Signature of Government Servant ..  13/12/71

10. Signature and Designation of the Head of the Office, or other Attesting Officer. 



1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating, and whether permanent or temporary	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
P.S. Hadigraon (P.T.)	Temp	Temp	100/-	-	-	1-11-1969 (F. 49)	Shal Zade
- do -	-	-	100/-	-	-	1-6-1970	Shal Zade
G.P.S. Bagh Main Den (P.T.)	-	Transit on Duty (3/7/70)	100/-	-	-	4-7-1970	Shal Zade
-	-	-	100/-	-	-	10-11-1969	Shal Zade
-	-	-	104/-	-	-	12/70 P.M.	Shal Zade
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
- do -	- do -	- do -	150/-	-	-	11/71	Shal Zade
G.M.S. Shikarbi	-	-	150/-	-	-	11/73	Shal Zade
- do -	-	-	-	-	-	-	-
G.P.S. Basligraon	-	-	-	-	-	-	-
- do -	-	-	150/-	-	-	18/75	Shal Zade
G.P.S. Bagh Main Den	-	-	-	-	-	-	-
- do -	-	-	150/-	-	-	18/76	Shal Zade

100/- P.M. 1/5

150/- P.M. fixed.

Handwritten marks and signatures at the bottom of the page.

UN DERTAKING!

12

I, Shalzada, Matriso, teacher hereby give an undertaking to the effect if any overpayment is made to me as a result of fixation of pay in the consolidated pay scale, 1970 the amount of overpayment if detected afterwards shall be recovered from my pay/gratuity/pension what-so-ever the Education Department deems necessary.

ATTESTED.

Signature of Govt. Servant. Shalzada

Designation Mat. Primary Postman

Head Master/Principal/District Schools. [Signature]
Dir, Temargara.

<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p>31-5-70</p>	<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p>Service verified w.e. 1.11.69 to 31-12-70 from the office record.</p>
<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p>2-7-70 (A-4)</p>	<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p>Services verified w.e. 1.1.71 to 30.6.71 from the office record.</p>
<p><u>[Signature]</u> Dist: Insp. Schools, Dir, Temargara.</p>	<p>31-10-71</p>	<p>fixation of pay w.e. 1-7-70.</p>	<p><u>[Signature]</u> Dist: Insp. School, Dir, Temargara.</p>	<p>Services verified w.e. 1.1.71 to 30.6.71 from the office record.</p>
<p><u>[Signature]</u> Dist: Insp. School, Dir at Temargara.</p>	<p>31-10-73</p>	<p>Pay in the P.S. scale fixed as under Pay on 12 Rs. 150/-</p>	<p><u>[Signature]</u> Dist: Insp. School, Dir at Temargara.</p>	<p>Services verified w.e. 1-1-71 to 30.6.71 from the office record.</p>
<p><u>[Signature]</u> District Inspector of Schools, Dir at Temargara.</p>	<p>14.6.76</p>	<p>Transfer Allowed in N.P.S. 1-1-1975</p>	<p><u>[Signature]</u> Dist: Insp. School, Dir at Temargara.</p>	<p>Services verified 1-7-71 to 31-12-72 from the office record.</p>
<p><u>[Signature]</u> District Inspector of Schools, Dir at Temargara.</p>	<p>14.9.76</p>	<p>Transfer Allowed in N.P.S. 1-1-1975</p>	<p><u>[Signature]</u> Dist: Insp. School, Dir at Temargara.</p>	<p>Services verified 1-1-73 to 31-12-73 from the office record.</p>

C.T.C.
[Signature]

1	2	3	4	5	6	7	8
Name of post	Whether substan- tive or officiating, and whether permanent or temporary	If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term "Pay"	Date of appointment	Signature of Government servant
G.P.S. Bagh Mandla offg - P.T.C. Insp. Lark		Rs. 165/- per fixed	165/- per			1-8-76	Shahyada
<p>FOR P.T.C. INSPECTION ORDER OF 315/12 final 2/4/77</p>	<p>315/12 final 2/4/77</p>	<p>Pay fixed at 165/- per m wef 1-7-75 with no arrears upto 31/12/74</p>					
- do -	- do -	315-12-399/14 per fixed	315/- per			1-5-77	Shahyada
<p>(1) Attended 1st short term course in P.T.C. wef 10-1-75 to 19-1-75 at G.H.S. Lurangara Centre</p> <p>(2) do do wef 25-12-75 to 24-2-76</p>					<p>masuman Distt Insp: School Dir at Lurangara</p>		

District Accounts Officer
DIB
15/1/77

CTC
M

1 Name of post	2 Whether substan- tive or officiating, and whether permanent or temporary	3 If officiating state— (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emoluments falling under the term "Pay"	7 Date of appointment	8 Signature of Government servant
315-12-399/14-525							
G.P.S. Bagh mandon P.T.	Sub: off	Sub: off	315/-	-	-	14/77	Sh. ab Zada
do P.T. Post	do	do	327/-	-	-	12/78	Sh. ab Zada
G.M. Sambar	do	do	327/-	-	-	15/79	Sh. ab Zada
G.P.S. Bandhly (Musque)	do	do	327/-	-	-	14/79	Sh. ab Zada
do	do	do	339/-	P.M.	-	12/79	Sh. ab Zada
G.P.S. Bagh (P)	do	do	339/-	-	-	17/80	Sh. ab Zada
do	do	do	351/-	-	-	13/80	Sh. ab Zada
C.T.C. A							

9	10	11	12	13			
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government		
				Period	Government to which debitable		

M. Ghossein
11.9.76

31-8 allowed
77 Rs. 155/-
D. M. Ghossein
O. I. S. Dir
Remuneration
vide T-308
15/4/77

Amount of Pay as a result of pay fixation in the revised consolidated pay scale paid to the employee on 31/7/77. Rs. 155/-
Total Rs. 260/-
vide T-308
15/4/77

Director Accounts Officer
Dir.
11/4/77

option
I opt to exercise my right of rest & recreation allowance as sanctioned by the Govt. of Pakistan F. P. Circular No. S. 2 (89, N. 2255 of 23-2-69)

Rest & Recreation Allowance equal to one month's pay i.e. Rs. 155/- for the cycle 1975-76 vide T. No. 208 dt. 22/12/74

M. Ghossein
O. I. S. Dir.
Remuneration

31-10 Award Spl: Rs. 155/-
77 W. O. 1-11-77
Sh. Ali Zaidi

SERVICES...
W. O. 1-11-77
from...

M. Ghossein
4.5.76
D.R. ...
Award

Diff: of Pay due to N.P.S.
Paid as under:-

Pay w.e.f. 1/75 to 31/2 = 285/-
w.e.f. 1/76 to 31/76 = 57/-
Total Rs. 342/-
vide T-508
9/4/77

PAID Rest & Recreation Allowance equal to one month's pay i.e. Rs. 155/-
For the Cycle 1975-76
vide T. No. 162 Date 12/6/76

M. Ghossein
12/6/76
Dir. A/Cs Officer, M.R.

CTV

[Signature]

M. Ghossein
11.9.76

Leave Sanctioned vide Distt. Edu. Officer

<p>Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8</p>	<p>Date of termination of appointment</p>	<p>Reason of termination (such as promotion, transfer, dismissal, etc.)</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Allocation of periods of leave on average pay up to four months for which leave shall be debitable to another office or other Government service to which the Government servant is liable to be transferred</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government servant</p>
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Enclst. No. 5290/2-2 dated 29.9.79 in respect of M. Shah Lachhote W.C.T. 5-5-79 to 2-9-79 (120 days)

Sh. Shivam
J.P. Shivam
Sh. Shivam
Sh. Shivam
Sh. Shivam
Sh. Shivam

30-11-78
 30-4-79
 31-10-79
 30-9-79
 30-8-79
 30-4-80

Sh. Shivam
Sh. Shivam
Sh. Shivam
Sh. Shivam
Sh. Shivam
Sh. Shivam

Bill of Rs. due to A/N.P.
 80/-
 31-7-80 C 40/- (35-25) = 160/-
 30-4-79 C 30/- (63-33) = 120/-
 Total Rs. 280/-
 Less depl. Rs. 12/60
 Net Rs. 267/40

District Accounts Officer
 1-8-76
 1-8-76
 30-9-78
 1-8-76
 1-8-76

PAID Rest & Recreation Allowance equal to Health's Pay for 1979 vide T. No. 92 dated 2/12/79

M. Shah
 Distt. A/Cs Officer, D.P.

PAID Rest & Recreation Allowance equal to Health's Pay for 1978 vide T. No. 515 dated 12/12/78

M. Shah
 Distt. A/Cs Officer, D.P.

PAID Rest & Recreation Allowance equal to Health's Pay for 1980 vide T. No. 102 dated 23/12/80

M. Shah
 Distt. A/Cs Officer, D.P.

31-3-81 Proceeding on Leave.
Sh. Shivam
 Distt. A/Cs Officer, D.P.

1-10-78 to 30-4-79
 in the record
Sh. Shivam
 Distt. A/Cs Officer, D.P.

OP

15

	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government servant
				Nature and duration of leave taken	Allocation of periods of leave on average pay up to four months for which leave salary is debitable to another Government Period Government to which debitable		
							Services verified w.e.f 1-5-79 to 31-10-79. from the officer.
							Leave without pay sanctioned w.e.f 1-4-81 to 23-7-81 vide D.O. Endst. No. 9488/22 dated 5/8/1981.
							S. D. K. G. (M) Inspector, P.W.D. D.D.
							Services terminated w.e.f 30-7-81 due to long absence vide D.O. Dir at Tanjore. Endst. No. 12187-92/279 dated 18-8-81.
							S. D. K. G. Inspector.
							etc

CCO
-4

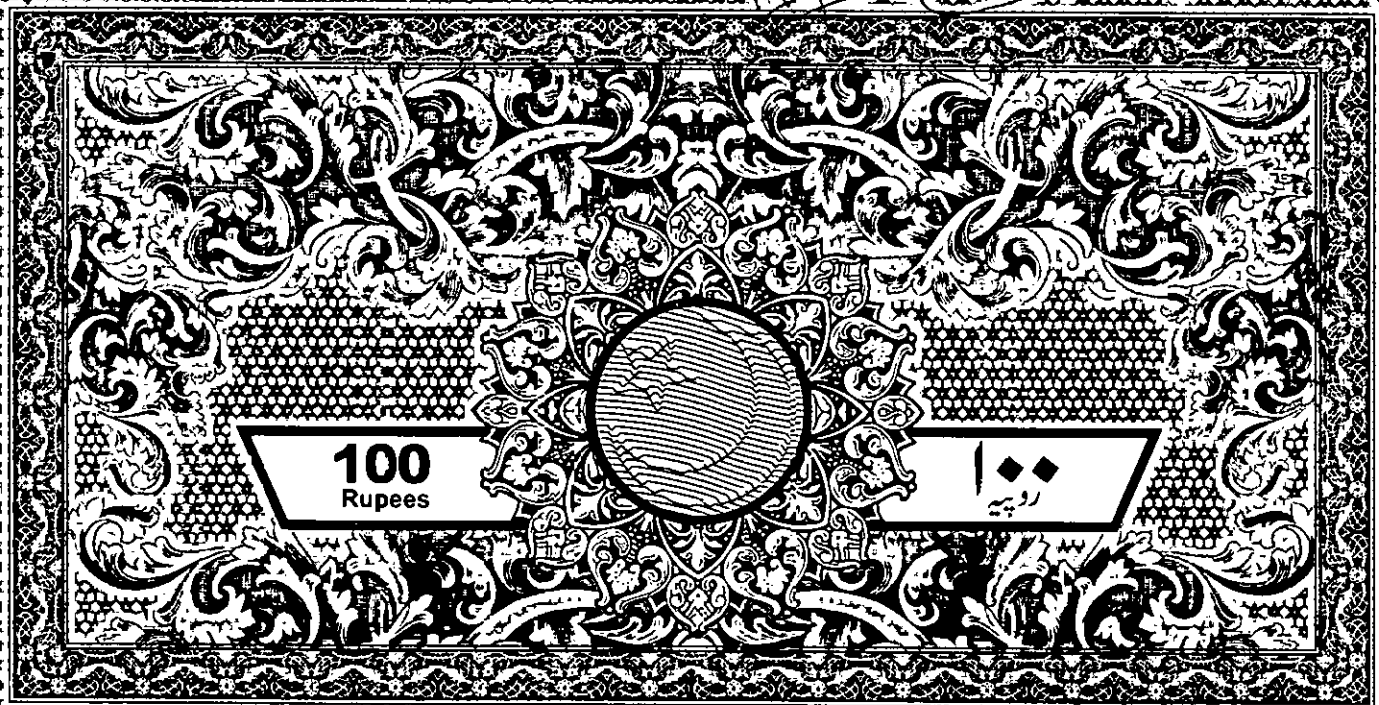
onal

7.

in
CHECK

result

tc



100 Rupees

۱۰۰ روپیہ

لعدالت سرورس ٹریبیونل خیبر پختون خواہ بمقام پشاور -

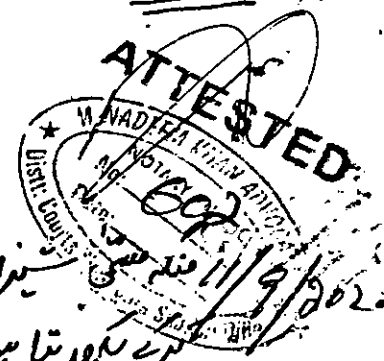
گورنمنٹ خیبر پختون خواہ، سیکٹری ایگمنٹری ایجوکیشن وغیرہ
(اسپانڈنٹس)

بنام

شیرازہ
(ایپلانٹ)

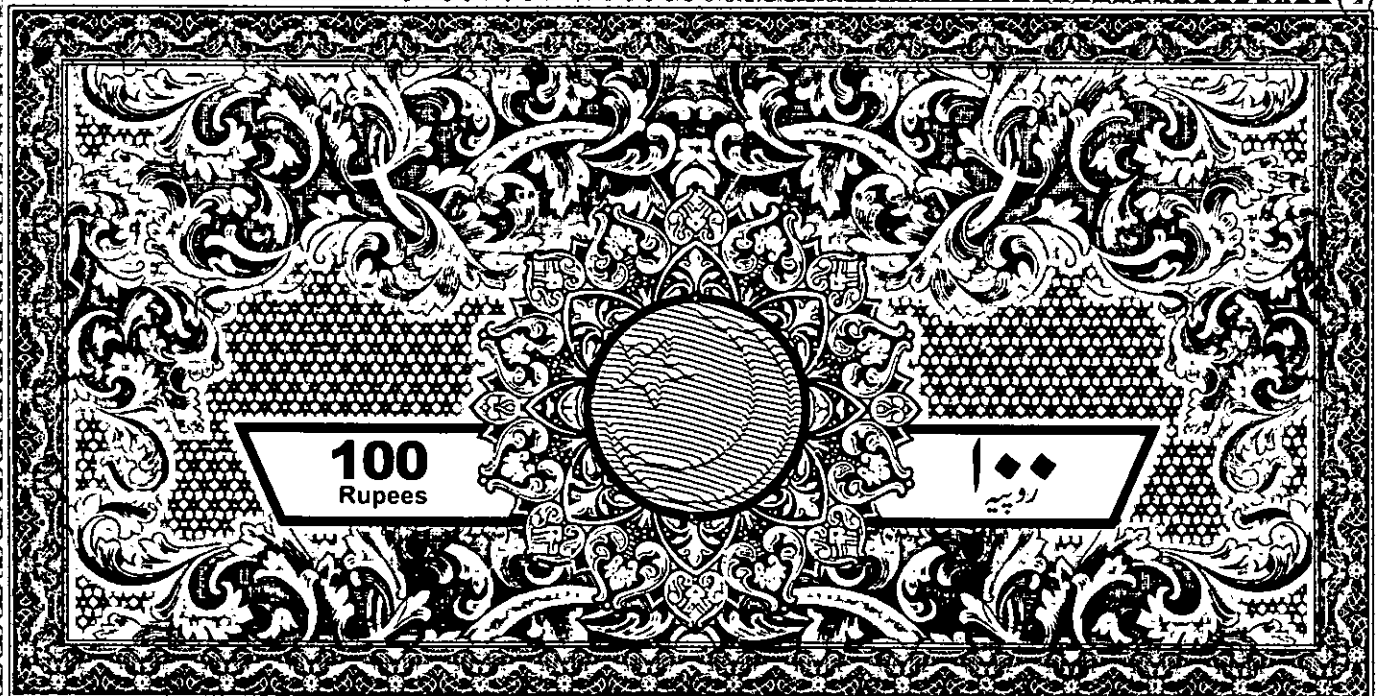
اپیل

مختار نامہ خاص کچن ڈائریکٹور گورنمنٹ پشاور
باغ میدان تحصیل برٹن ضلع دیر ناٹن



شیرازہ ولد عبدالباقی سکنہ باغ میدان تحصیل برٹن ضلع دیر ناٹن برہنہ تحریر کردہ اقدار
کرنے کے بعد تیار ہوں کہ مقدمہ عنوان بالا عدالت حضور میں زیر سماعت ہے۔ میں / حقیر بوجہ ضعیف الوی
و گھریلو معاملات بہ مقدمہ عنوان بالا میں اصالتاً پیروی مقدمہ عدالت حضور میں پیش ہوا
سے قاصر ہوں۔ اسلئے میں اپنے جانب سے مسیحتی ڈائریکٹور گورنمنٹ پشاور باغ میدان تحصیل
برٹن ضلع دیر ناٹن کو مختار خاص حقیر کر دیتا ہوں کہ وہ میرے جانب سے مقدمہ عنوان بالا میں
دعویٰ دائر کرے۔ درخواست دے۔ جواباً درخواست دے۔ عرضی دعویٰ کرے۔ بیان حلفی دے۔
اپیل کرے۔ تگڑائی کرے۔ سرسنگری مقدمہ کرے۔ الفرض من مقدمہ عنوان بالا میں مجھے جو
بھی قانونی اختیارات حاصل ہیں وہ سب اختیارات مختار موصوف کو تفویض کر دیتا ہوں
لہذا مختار نامہ خاص ضلع اسنڈا تحریر شدہ ہے۔

مفتوحاً



100
Rupees

۱۰۰ روپے

اختیار دیندہ:

الوہا شہزادہ

ذات اللہ ولد شہزادہ

CNIC # 15305-1635049-3

اختیار دیندہ:

الو شہزادہ

شہزادہ ولد عبدالباقی

CNIC # 15302-0987828-5

تصدیق کنندہ ②:

الو شہزادہ

حفیظ الرحمن ولد سید بارسا صاحبہ باغ میدان

CNIC # 15305-6975828-3

تصدیق کنندہ ①:

الو شہزادہ

پیرا خان ولد شاہ زین خان صاحبہ فرخشاہ میدان

CNIC # 15302-0982891-9

15305-1635049-3
15302-0987828-5
15305-6975828-3
15302-0982891-9

حکومت صاحب ڈیپارٹمنٹ ختمہ ایجوکیشن حکومت جسٹس کنونشن آف ایڈوکیٹس

درخواست / Re instate کرنے سائل

صاحب عالیٰ مسائل میں گزارا ہے

1- یہ کہ سائل نے 10 سال سے زیادہ ختمہ ایجوکیشن میں حکومت

PTC کی اجازت دینی سے براعظما رہی ہے
2- یہ کہ سائل کو ٹیچر شولکار نوٹس، انڈو ٹرمنس Terminate

کیا ہے۔ توضیح مطابق چاقو سن وضع لکم سرگز نہ ہے

3- یہ کہ سائل اس زمانہ کہ جسے اوقات ختمہ میں گزار کر ڈیوٹی کی ہے

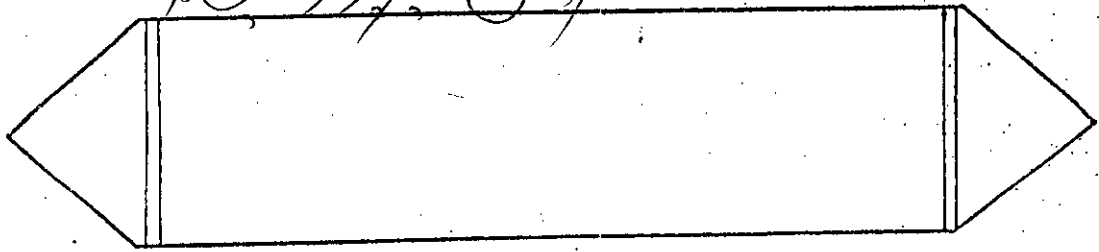
سزا اس قدر عالی ہے مسائل کو اپنے کوست پر

شہزادہ کوٹھوہ بحال کیا جاوے

ایک آلودار شہزادہ کے بارے میں عدلیہ میں جسٹس کے لئے درخواستیں

خروج 1-7-2020

بعدالت سردس نر بنرل حمر نر نر الم نر



بنام حرمیت و صبر و محبت و اخلاص
سیدتی علی المومنین سیدتی

شکر اوہ

موزخہ
مقدمہ
دعوی
جرم

باعث تحریر آئنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام _____ کیلئے _____ سے طے کر کے اور
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لایا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پر واختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا اوکالت نامہ لکھدیا کہ سندر ہے۔

المقوم _____ ماہ _____ 20

العبد _____ الواہ العبد

بمقام _____ کے لئے منظور ہے۔