


13.12.2021

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Learned counsel for the appellant submitted an application for withdrawal of the instant service with permission to file a fresh one, if a need arises. Application is allowed and the instant service appeal in hand is therefore, dismissed as withdrawn. File be consigned to the record room.

Announced:  
13.12.2021

  
(Mian Muhammad)  
Member(E)

13/12/21

S. Appeal No 7081/2021

Zakirullah

15.07.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present. Preliminary arguments heard.

Learned counsel for the appellant contends that the appellant has on his credit the appointment order issued by respondent No. 2 and furtherance of said order posting was made vide order dated 30.03.2017 and took over charge on 31.03.2017 but thereafter he was verbally restrained from performance of duty. Learned counsel further contends that treatment of the appellant in the said manner is not in accordance with law. The office objection about absence of impugned order is ignored in view of the said submissions. Points raised need consideration. The appeal is admitted for regular hearing, subject to all just and legal objection including that of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 13.12.2021 before the D.B.

Appellant Deposited  
Security & Process Fee

15/7/21

  
Chairman

Before The Hon'ble KP Service Tribunal, Peshawar  
Service Appeal No. 7081 /2021

ZAKIR ULLAH vs The Director etc

Application to withdraw the title Service  
Appeal with a permission to file a fresh one,  
if a need arises

---

Respectfully sheweth,

- 1:- That the titled Service Appeal is pending before this  
Hon'ble Tribunal which is fixed for 13.12.2021.
- 2:- That the appellant want to withdraw the instant  
Service appeal with a permission to file a fresh  
one, if a needed arises.

It is, therefore, most humbly prayed that by  
accepting this application, the appellant may please  
be allowed to withdraw the instant service appeal  
with a permission to file a fresh one, if a need  
arises.

Appellant  
through

AKhonzada Ahmad Saad

Advocate High Court  
Peshawar

Dated 13.12.2021

12.01.2021

Petitioner is present in person. Mr. Noor Zaman Khattak, District Attorney for the respondents, is also present.

Neither reply on behalf of respondents submitted nor representative of the department is present, therefore, notice be issued to the respondents for reply for 07.04.2021.

(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

07.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.


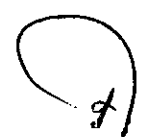
READER

## Form-A

### FORM OF ORDERSHEET

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

Case No. 7081 /2020 \_\_\_\_\_


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	04/12/2020	<p style="text-align: center;">As per direction of the Worthy Chairman this case is submitted to the S. Bench for decision on office objection. To be put up there on <u>11/12/2020</u>.</p> <div style="text-align: right; margin-top: 10px;">   <b>REGISTRAR</b> </div>
	11.12.2020	<p style="text-align: center;">Counsel for appellant present.</p> <p style="text-align: center;">Let pre-admission notice be issued to respondents for reply. To come up for reply and arguments on 12.01.2021 before S.B.</p> <div style="text-align: right; margin-top: 20px;">                       (Rozina Rehman)                      Member (J)                 </div>

The appeal of Mr. Zakirullah son of Abdur Rehman, village Manu Derai Tehsil Utman Khel District Bajaur received today i.e. on 2.12.2020 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 proper rejection order of departmental appeal is not attached with the appeal which may be placed on it.
- 2- Copy of impugned order is not attached with the appeal which may be placed on it.

No. 3944 /S.T,

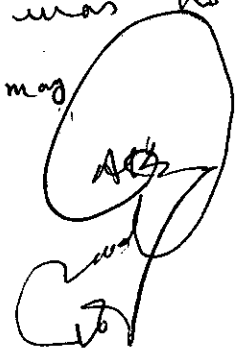
Dt. 02/11 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Akuzada Ahmad Saeed Adv., Pesh.

Reply to objection No. 1: That the departmental appeal of the appellant was not rejected but Respondent No. 02 wrote a note on the reply of Respondent No. 03 which reply was submitted to Respondent No. 02 in the light of Departmental appeal of the appellant thus a short note which is present on page-21 i.e. Annexure "G" may be considered as rejection order.

Reply to objection No. 2: That the appellant was aggrieved from the impugned conduct / Action of Respondent No. 03 whereby the appellant was not allowed to perform his duty. The appeal may kindly be put before the Bench.  
Re-submitted



02.12.2020


Stu

The objections of this office and reply  
of counsel for the appellant is sub-itted  
for order please.

~~2/12/2020~~  
2/12/2020

Honble Chair-man:

Let the appeal be fixed afw  
office objections before an SB.

  
4/12

Registrar

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

Service Appeal No. 7081/2020

Zakir Ullah.....Appellant

**V E R S U S**

The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar & others.....Respondents

**I N D E X**

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-8
2.	Affidavit		9
3.	Application for interim relief		10-12
4.	Addresses of parties		13
5.	Copy of the Domicile Certificate	A	14-15
6.	Copy of the appointment Order dated 29.03.2017	B	16
7.	Copy of the Office Order dated 30.03.2017 and Charge report dated 31.03.2017	C & D	17-18
8.	Copy of Departmental Appeal	E	19
9.	Copy of the Reply	F	20
10.	Copy of the impugned Order dated 19.11.2020	G	21
11.	Wakalatnama		22

Appellant

Through

  
**Akhuzada Ahmad Saeed**  
Advocate High Court(s)

Dated 24.11.2020



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

Service Appeal No. 7081/2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15926

Dated 02/12/2020

Zakir Ullah Son of Abdur Rehman,  
R/o Village Manu Derai,  
Tehsil Utman Khel, District Bajour.....**Appellant**

**V E R S U S**

1. The Director Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar
2. The District Education Officer District Bajour
3. The Principal, Government High Secondary School  
Gardai, District Bajour .....**Respondents**

**SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT,  
1974, AGAINST THE IMPUGNED  
ACT/CONDUCT OF RESPONDENT NO.3 BY  
NOT ALLOWING THE APPELLANT TO  
PERFORM/DISCHARGE HIS DUTY AS MALI  
(BPS-03) AND THE IMPUGNED ORDER  
DATED 19.11.2020 OF RESPONDENT  
NO.02 WHEREBY THE DEPARTMENTAL  
APPEAL OF THE APPELLANT WAS  
REJECTED/REFUSED.**

**Filed to-day**  
*02/12/2020*  
**Registrar**

**PRAYER**

Most humbly prayed that by accepting this service appeal,

- a) The impugned order dated 19.11.2020 of respondent No.2 whereby the Departmental Appeal of the appellant was rejected/refused may please be set aside.
- b) And the appellant may kindly be allowed to perform duty on his post of Mali (BPS-03) with all back and consequential benefits and the respondents may kindly also be directed to release his salary w.e.f 29.03.2017 till date as he has not performed his duty due to the act and commission of the respondent Department.
- c) Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed

---

**Respectfully Sheweth:**

1. That the appellant is the permanent resident of Village Manu Dehri, Tehsil Utman Khel, District Bajour. **(Copy of the Domicile Certificate is attached as Annexure "A")**.
2. That the appellant being eligible in all respect applied for the class-iv post i.e. Mali (BPS-03) as after fulfilling all the codal formalities the appellant alongwith other colleagues were appointed on 29.03.2017. **(Copy of the appointment Order dated 29.03.2017 is attached as Annexure "B")**.
3. That Respondents NO.2 passed an office order dated 30.03.2017 in respect of the appellant to work at G.H.S.S Gardai and in the light of office order dated 30.03.2017 the appellant assumed the charge of his duty on 31.03.2017 at Government High Secondary School Gardei. **(Copy of the Office Order dated 30.03.2017 and Charge report dated 31.03.2017 is attached as Annexure "C & D" respectively)**.

4. That when the appellant was going to perform/discharge his duty as Mali (BPS-03) at GHSS Gardai then he was not allowing for perform discharging his duty.
5. That thereafter the appellant made number of efforts for allowing him to perform his duty as Mali (BPS-03) but all the efforts remained fruitless.
6. That the appellant submitted a Departmental Appeal before Respondent No.2/ District Education Officer for the redressal of his grievances thus Respondent No.2 forwarded the same to respondent No.3 the principal of concerned school by calling reply from him. **(Copy of Departmental Appeal is attached as Annexure "E")**.
7. That respondent No.3 the principal submitted a reply wherein it was stated that the appointment on the posts of Class-IV was in dispute and the case regarding the dispute was pending in the Court of AC/APA Khar, District Bajour.

It is pertinent to mention here that the appellant took the said reply in the court of AC/APA Khar, to inquire about the dispute, however, the appellant received in the form of writing from the court of AC that there was nothing pending about the said dispute. **(Copy of the Reply is attached as Annexure "F").**

8. That the appellant submitted all the developments which had been taken place in the light of the Departmental Appeal before Respondent No.2 but despite of all development which were favoring the appellant Respondent No.2 rejected /refused to accept the Departmental Appeal of the appellant by passing an impugned order wherein it was stated as "**The post will be advertise in newspaper and the posting will be made according to APT Rules, 1989 in the best interest of public service**". (Copy of the impugned Order dated 19.11.2020 is attached as Annexure "G").

9. That the appellant now prefer this Service Appeal for the following amongst other grounds:

**G R O U N D S :-**

- A. That as stated in the body of the appeal that after fulfilling all codal formalities the petitioner was appointed and also assumed the charge of his duty but the impugned Act/conduct of the respondent No.2 by not allowing the appellant to perform his duty and the impugned order of respondent No.2 whereby he rejected/refused the departmental appeal of the appellant is illegal, unlawful and thus ineffective upon the rights of the petitioner.
- B. That the appellant and his batch fallow were appointed in respect of same appointment order as batch fellows of the appellant were allowed to perform their duties but the appellant was treated otherwise by adopting pick and choose policy and the appellant was badly discriminated.

- C. That the respondents have misused their authority by denying valuable rights of the appellant which necessitated the interference of this Hon'ble Tribunal.
- D. That the appellant has been treated against the law and has also been deprived of equal protection of law.
- E. That any other ground, not specifically mentioned, may be raised at the time of arguments, with the prior permission of this Hon'ble Tribunal.

**It is, therefore, most humbly prayed that by accepting this service appeal,**

- d) The impugned order dated 19.11.2020 of respondent No.2 whereby the Departmental Appeal of the appellant was rejected/refused may please be set aside.**
- e) And the appellant may kindly be allowed to perform duty on his post of Mali (BPS-03) with all back and consequential**

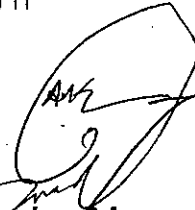
benefits and the respondents may kindly also be directed to release his salary w.e.f 29.03.2017 till date as he has not performed his duty due to the act and commission of the respondent Department.

- f) Any other relief deems fit and appropriate in the circumstances of the instant appeal may also be passed



Appellant

Through



**Akhuzada Ahmad Saeed**  
Advocate High Court(s)

Dated 24.11.2020





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

Service Appeal No. \_\_\_\_\_/2020

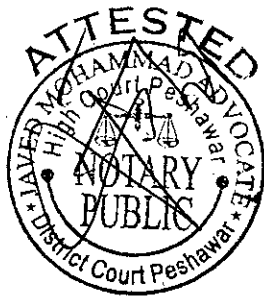
Zakir Ullah.....**Appellant**

**V E R S U S**

The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar & others.....**Respondents**

**A F F I D A V I T**

I, Zakir Ullah Son of Abdur Rehman, R/o Village Manu Derai, Tehsil Utman Khel, District Bajour, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Zakir Ullah*

DEPONENT  
CNIC No.21107-3483901-3  
Cell No.0302-3836738

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

C.M. No. \_\_\_\_\_/2020

In

Service Appeal No. \_\_\_\_\_/2020

Zakir Ullah.....**Appellant**

**V E R S U S**

The Director Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar & others.....**Respondents**

**APPLICATION FOR RESTRAINING THE  
RESPONDENTS TO TAKE ANY ADVERSE  
ACTION AGAINST THE APPELLANT, TILL  
THE FINAL DISPOSAL OF THE MAIN  
SERVICE APPEAL.**

**Respectfully Sheweth:**

1. That the titled Service Appeal is being filed before this Hon'ble Tribunal in which no date of hearing is fixed.
2. That the grounds of main appeal may be considered as integral part of this application.
3. That the balance of convenience also lies in favour of the appellant.

4. That the appellant has a good prima facie case and all the three ingredients are in favour of the appellant.

It is, therefore, most humbly prayed that by accepting this application, the respondents may kindly be restrained to take any adverse action against the appellant, till the final disposal of the main appeal.



Appellant

Through



**Akhunzada Ahmad Saeed**  
Advocate High Court(s)

Dated 24.11.2020

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

C.M. No. \_\_\_\_\_/2020

In

Service Appeal No. \_\_\_\_\_/2020

Zakir Ullah.....**Appellant**

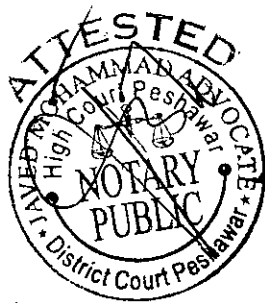
**V E R S U S**

The Director Elementary & Secondary Education, Khyber  
 Pakhtunkhwa, Peshawar & others.....**Respondents**

**A F F I D A V I T**

I, Zakir Ullah Son of Abdur Rehman, R/o Village  
 Manu Derai, Tehsil Utman Khel, District Bajour, do hereby  
 solemnly affirm and declare on oath that the contents  
 of the accompanying **Application** are true and correct  
 to the best of my knowledge and belief and nothing has  
 been concealed from this Hon'ble Court.

*Zakir*



DEPONENT  
 CNIC No.21107-3483901-3  
 Cell No.0302-3836738

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

Service Appeal No. \_\_\_\_\_/2020

Zakir Ullah.....**Appellant**

**V E R S U S**

The Director Elementary & Secondary Education, Khyber  
 Pakhtunkhwa, Peshawar & others.....**Respondents**

**ADDRESSES OF PARTIES**

**A P P E L L A N T:**

Zakir Ullah Son of Abdur Rehman,  
 R/o Village Manu Derai,  
 Tehsil Utman Khel, District Bajour

**R E S P O N D E N T S**

1. The Director Elementary & Secondary Education,  
 Khyber Pakhtunkhwa, Peshawar
2. The District Education Officer District Bajour
3. The Principal, Government High Secondary School  
 Gardai, District Bajour

Appellant

Through

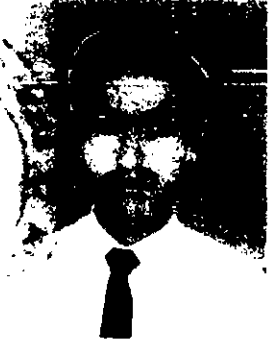
**Akhunzada Ahmad Saeed**  
 Advocate High Court(s)

Dated 24.11.2020

# DOMICILE CERTIFICATE

I solemnly affirm that I, Zakir-ullah  
 Son of Abdurrahman Tribe Utman Khel  
 Section Mulayan Sub-Section Mula Khel  
 Village Mama Dekrai Tehsil Utman Khel  
 belongs to a recognised tribe of Bajaur Agency  
 That my father is a bonafide resident of the Tribal Areas of Bajaur Agency

Signature / L.T.I. of application.  
 Date.....



Certified That Mr. Zakir-ullah  
 Son of Abdurrahman Tribe Utman Khel  
 Section Mulayan is a bonafide resident of village Mula Khel  
 Tehsil Utman Khel Bajaur Agency as verified by his sectional  
 Maliks and is of  
 CATEGORY A

Verified to be correct .....  
 Signature of A.P.A. [Signature]  
 Name Mohammad Iqbal  
 Assistant Political Agent  
 Bajaur Agency  
 Dated: 8/10/08  
 (Court Seal)

[Signature]  
 Signature of P.T.I. / P.N.C. Tehsil  
 Name ABDUL HAKIM  
 Tehsil UTMAN KHEL  
 Dated: 8-10-2008

No. 2023/REGIC

**COUNTERSIGNED**

[Signature]  
**SHAFIR ULLAH**  
 POLITICAL AGENT,  
 BAJAUR AGENCY

Dated Bajaur Agency.

08.10.2008

[Handwritten signature]  
 Attestation

# حلفیہ بیان ملکاتان

ہم مندرجہ ذیل ملکاتان تصدیق کرتے ہیں کہ مسی ذہرائٹ ولد عبدالمجمل  
 ساکن مانوڈیجری ہجڑا ایجنسی کا اصلی رہنما ہے۔ قوم انما نخل سے سیکشن ملکاتان  
 اور سب سیکشن مولانا حیل سے تعلق رکھتا ہے۔ حکومت پاکستان کا وفد دار ہے۔  
 اور اپنے قوم کے ساتھ ہر نفع و نقصان میں برابر کا شریک ہے۔ سائل نے ابھی تک اپنا ایجنسی ڈومیسائل  
 سٹیفکیٹ وصول نہیں کیا ہے۔ لہذا ہمارے ذاتی ذمہ داری پر ڈومیسائل سٹیفکیٹ دی جاتی ہے۔ اگر مذکورہ بالا  
 بیان میں کوئی دروغ گوئی ثابت ہوتی۔ تو ہم ملکاتان ذیل حکومت کو مبلغ        روپے فراڈاً  
 بطور جرمانہ ادا کریں گے۔ جو ہمارے منقولہ وغیر منقولہ جائیداد سے وصول کی جائیگی۔ من کو درست تسلیم کیا۔

عبدانوار  
 عبدالقادر ولد گل می مانوڈیجری  
 2110717109451  
 عدت اسپرین علیہ علیہ جانوڈیجری  
 21107-5584036-9

عبدالمجمل  
 عدت شامی کبیر ولد عدت شامی کبیر  
 2110717109451  
 عدت نانا مولانا ولد عدت شامی کبیر مانوڈیجری  
 21107-5608014-5

استدعا

Political With Tehsildar  
 N. P. A.  
 Bajaur Agency  
 87152222

Handwritten signature and stamp area with the word "Attest" written below.

16

B

**OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR AGENCY AT**

**KHAR**

**APPOINTMENT ORDER**

Consequent upon the nomination by the Political Agent Bajaur vide his office memo No: 1088/2/51/Vol-09/Acett. dated 8-01-2017 and No: 2093/2/51/Vol-09/Acett. dated 17/3/2017, No: 1843/2/51/Vol-09/Acett. dated 6/3/2017, No: 2092/2/51/Vol: X/Acett. dated Khar the 17/3/2017, and No: 1621/2/51/Vol 10/Acett. dated 27/3/2017, the following candidates are hereby appointed against the vacant CIV / Chowkidar Posts at the schools noted against their names in BPS-03 (80-10-325-17790) with usual allowances as admissible under the rules from the date of their taking over charge in the interest of public service.

S.NO	NAME OF CANDIDATE	F/NAME	SCHOOL	REMARKS
1	Asmatullah	Muhammad Zaman Khan	GPS Galkai (M)	Against vacant post of CIV / Chowkidar
2	Ziaullah	Muhammad Zaman	GPS Nakhtr	Against vacant post of CIV / Chowkidar
3	Zakirullah	Abdur Rahman	GHSS Gardai	Against vacant post of Mali
4	Sherin Zada	Umer Zada	GHSS Gardai	Against vacant post of Bearer
5	Shah Zamin Khan	Khansta Rahman	GGMS Shah Narai	Against vacant post of CIV / Chowkidar
6	Muhammad Sabir	Sher Bahadar	GGPS Shah Narai	Against vacant post of CIV / Chowkidar
7	Subhan Zada	Dawari Khan	GGPS-Haji Lawang	Against vacant post of CIV / Chowkidar
8	Abdul Majid	Abdul Ghafoor	GHSS Zoor Bandar	Against vacant post of CIV
9	Shah Nawaz Khan	Shah Zada Asfandyar	GPS Shiekh Baba	Against vacant post of CIV / Chowkidar

**Terms and Conditions**

1. The appointment of the candidates is being made purely on temporary basis and is liable to termination at any time without assigning any reason.
2. In case they wish to resign from their posts they will have to give one month prior notice or forfeit one month pay in lieu thereof.
3. They will not be entitled to get pension/gratuity benefits however CP fund will be deducted as per rules in case of fresh candidate.
4. Charge report should be submitted to all concerned in duplicate.
5. Health and age certificate should be produced to this office to be obtained from the Agency Surgeon Bajaur.
6. They should not be handed over charge of the post if they are below 18 years or above 45 years of age.
7. If they failed to report of their arrival within 15 days their appointment orders will be automatically considered as cancelled.

**(Haji Fazal Mohammad)**  
**Agency Education officer**  
**Bajaur Agency**

Endst No: 8571-76 Dated 29/03/2017

Copy of the above is forwarded to the:

1. Director of Education FATA Peshawar.
2. Political Agent Bajaur Agency.
3. Agency Accounts officer Bajaur Agency.
4. Principals / Head Masters concerned.
5. AAEO concerned
6. Candidates concerned.

*(Handwritten signature)*

*(Handwritten signature)*  
**Agency Education officer**  
**Bajaur Agency**

*Attest*





**OFFICE OF THE AGENCY EDUCATION OFFICER BAJAUR AGENCY AT KHAR**

No. \_\_\_\_\_ Dated \_\_\_\_\_  
Phone: 220395 Fax: 220395 Email: AEOBajaur@gmail.com

**OFFICE ORDER**

The following CIVs are hereby ordered to work at the school noted against their names with immediate effect in the interest of public service.

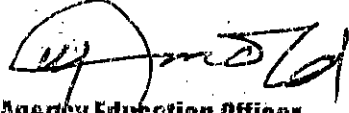
S.No	Name	From	To	Remarks
1	Zakirullah	GHSS Gardai	GHS No: 2 Khar (Higher Section)	
2	Sherin Zada	GHSS Gardai	GHS No: 2 Khar (Higher Section)	

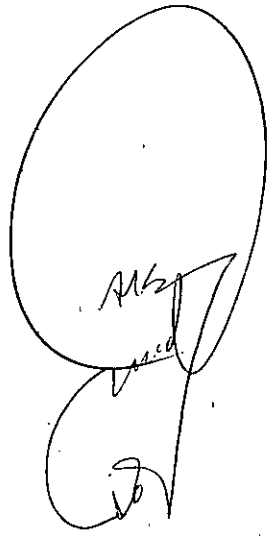
**Haji Fazal Mohammad**  
Agency Education Officer  
Bajaur Agency

Endst No: 8657-58 Dated 30-03-2017

Copy of the above is forwarded to the:

1. Principal GHSS Gardai Bajaur.
2. Officials concerned.

  
Agency Education Officer  
Bajaur Agency



Attestand

No.  
01  
L  
Ae

*[Faint handwritten text at the bottom left]*





GOVERNMENT HIGHER SECONDARY SCHOOL GARDAI BAJAUR AGENCY

Phone No: 0945831026

No \_\_\_\_\_ Dated: / / 2017

CHARGE REPORT:

I Mr. Zakirullah took over the charge of my duties to day on dated 31/03/2017 of the post of Mali BPS-3 vide Agency Education Officer Bajaur Agency appointment order No. 8571-76 Dated 29/3/2017. (F.Noon)

Mr. Zakirullah Mali  
GHSS Gardai Bajaur Agency.

Endost: No. 1127-28 /GHSSGR/BA Dated 31 /3/2017

Copy for information to the:

- 1. Agency Education officer Bajaur Agency.
- 2. Agency Accounts Officer Bajaur Agency.

Principal  
GHSS Gardai Bajaur Agency.

Attested

E

The District Education Officer  
District Bajaur

Subject: Application for adjustment of the  
Applicant on the post of Mali (BPS-3)

Respected Sir,

- 1:- That the applicant was appointed on the post of Mali (BPS-3).
- 2:- That on 31-03-2017, the applicant assumed the charge of his duty at GHSS Gardai Bajaur Agency [copy of charge Report is attached]
- 3:- That after assuming the charge of his duty, when the applicant was going to serve the above mentioned school then he was stopped to serve the above mentioned as Mali (BPS-3).
- 4:- That the applicant has made every possible efforts to serve the school in hand as Mali (BPS-3) but all the efforts remained fruitless.

It is, therefore, most humbly request that by accepting this application, the order may be passed to adjust the applicant as Mali (BPS-3) at GHSS Gardai or somewhere in District Bajaur.

*[Handwritten signature]*

*[Handwritten signature]*  
A D E O C R & D

Principal  
GHSS - Gardai

Your obedient  
M/A *[Signature]*  
Assistant Education Officer  
District Bajaur  
26/10/2017

The DEO Bajaur.

Consequent upon the application concerned, Mr. Zakirullah (the applicant) and Mr. Sherim Zada were appointed as Mali & beaver respectively by the Ex-AEO Bajaur, Mr. Faral Muhammad, on 29/3/2017. But, on the complaint of Mr. Abdul Khaliq and Mr. Zey wali, the AEO stopped the appointment process (i.e. submission of charge report, service book, pay etc) on 02/4/2017 and the applicants discharge no duty at this school.

Note: The appointment on the posts of class-V was already being disputed since 2006 and the case was in process in the court of APA Khar Bajaur.

*(Signature)*  
Attested

The Reader  
Porul Pit

*(Signature)*  
27/10/2020.  
PRINCIPAL  
GHSS Gardai  
Distt: Bajaur KPK

R/Sir,  
No case of the above individuals is under consideration in this office. Submitted please.

ACKNFR) The Reader  
Porul Pit  
*(Signature)*  
Reader  
A. Khar  
18/11/20 18.11.2020

The DEO Bajaur.

Consequent upon the applicant's concern, Mr. Zakirullah (the applicant) and Mr. Sherim Zada were appointed as Mali & beaver respectively by the Ex-AEO Bajaur, Mr. Faraz Muhammad, on 29/3/2017. But, on the complaint of Mr. Abdul Khalique and Mr. Zex wali, the AEO stopped the appointment process (i.e. submission of charge report, service book, pay etc) on 02/4/2017 and the applicants discharge no duty at this school.

Note: The appointment on the posts of class-II was already being disputed since 2006 and the case was in process in the court of APA Khas Bajaur.

The post will be advertised in news paper and the post will be made according to APF rules 1989 in the best interest of public service as the previous

27/10/2020  
 PRINCIPAL  
 GHSS Gardai  
 Dist: Bajaur KPK

9-11-20  
 District Edu: Office  
 Bajaur at Khas

*(Handwritten signature)*

Attested

# WAKALATNAMA

## (Power Of Attorney)

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

ZAKIR-ULLAH

(Petitioner)

(Plaintiff)

(Applicant)

(Appellant)

(Complainant)

(Decree Holder)

**VERSUS**

GOVT. OF KP & OTHERS

(Respondent)

(Defendant)

(Accused)

(Judgment Debtor)

I/ We, \_\_\_\_\_ The undersigned \_\_\_\_\_ in the above noted Service Appeal, do hereby appoint **Mr. Akhuzada**

**Ahmad Saeed**, Advocate to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my /our counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

Attested & Accepted By.

*Ahmad Saeed*

Signature of Executants

*Zakir-Ullah*

Zakir-Ullah

s/o Govt. of KP & Others

**Akhuzada Ahmad Saeed**

Advocate High Court, Peshawar

15-B, Haroon Mansion, Khyber Bazar,

Peshawar

Cell No.0333-2902529