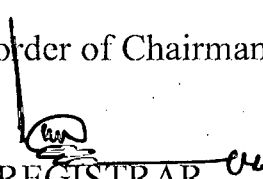


Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 1540/2022

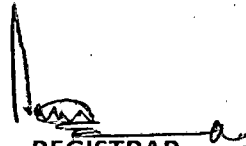
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2022	<p>The appeal of Mst. Alia Jadoon resubmitted today by post through Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Alia Jadoon wife of Muhammad Iqbal r/o near Alias Masjid Nawansher Town Committee A. Abad received today i.e. on 13.10.2022 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 compulsory retirement and down gradation orders mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal against the compulsory retirement order is not attached with the appeal which may be placed on it.

No. 2809 /S.T,

Dt. 13-10-2022 /2022

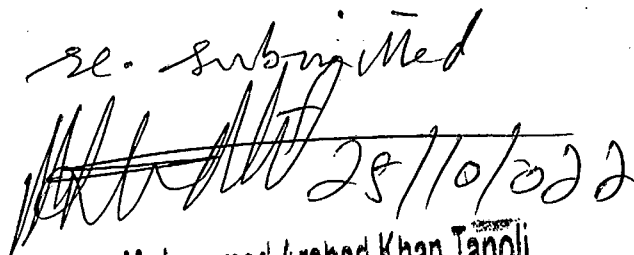

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M. Arshad Khan Tanoli Adv.
High Court A. Abad

Sir,

- 1- compulsory retirement order is attached as Annex - "c", page 11A & 11B
2. Departmental appeal on compulsory retirement is attached with Annex c
3. order of gradation is already placed at Annex "c", Page 11

case is re. submitted


28/10/2022

Muhammad Arshad Khan Tanoli
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent to
Distt. Bar Abbottabad

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

Service Appeal No. 15410 /2022

Alia Jadoon wife of Muhammad Iqbal, resident of Near Aliasi Masjid,
Nawansher Town Committee, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

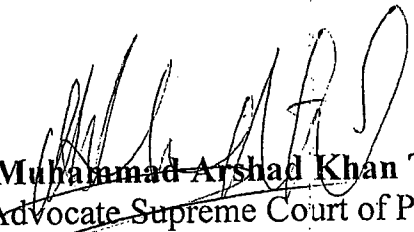
INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service appeal along with affidavit	1 to 6	
2.	Copy of the inquiry report	7-9	"A"
3.	Copy of vide impugned order dated 11/08/2021	10	"B"
4.	Copy of impugned order dated 02/11/2021	"	"C"
5.	Copy of departmental appeal	12-13	"D"
6.	Wakalatnama	14	

Alia Jadoon
...APPELLANT

Through;

Dated: _____ /2022


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad

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

Service Appeal No. 1540/2022

Alia Jadoon wife of Muhammad Iqbal, resident of Near Aliasi Masjid,
Nawansher Town Committee, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer Elementary & Secondary Education (Female), District Abbottabad.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT 1974, FOR
DECLARATION TO THE EFFECT THAT THE
IMPUGNED INQUIRY NO.9925 DATED 02/11/2021
WHEREIN, COMPULSORY RETIREMENT OF THE
APPELLANT WAS REDUCED TO MINOR PENALTY
OF DEGRADING FROM SPST BPS-14 TO BPS-12
FOR THE PERIOD OF THREE YEARS WITH
IMMEDIATE EFFECT VIDE IMPUGNED INQUIRY
REPORT ORDER NO.9925 DATED 02/11/2021

WHICH IS PERVERSE, DISCRIMINATORY
AGAINST THE LAW AND SAME IS LIABLE TO BE
SET-ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL, IMPUGNED ORDER DATED
02/11/2021 MAY GRACIOUSLY BE ORDERED TO
BE SET-ASIDE AND RESTORE THE POST OF SPST
BPS-14 OF THE APPELLANT WITH ALL SERVICE
BACK BENEFITS.

Respectfully Sheweth,

That the facts forming the background of the instant
service appeal are arrayed as under;-

1. That the appellant was compulsory retired from
service on 20/05/2021 the appellant filed a
application to the complete authority against the
impugned compulsory retirement order 20/05/2021
on the representation of the appellant an inquiry
was conducted and concluded on retirement may
be reduced and degrade the appellant from SPST

is attached as Annexure "A".

2. That after the receipt of inquiry report respondent No.3 wrote a letter to SDEO (Female), wherein the major penalty of compulsory retirement has been reduced into minor penalty of degrading of the appellant from the post of SPST BPS-14 to PST in BPS-12 for a period of 03 years. Copy of vide impugned order dated 11/08/2021 is attached as Annexure "B".
3. That, the appellant received the impugned order on 27/06/2022 as the said order was not provided to the appellant before this dated. However the appellant was verbally directed to take charge of the post. Copy of impugned order dated 02/11/2021 is attached as Annexure "C".
4. That, the appellant filed a departmental appeal on 27/06/2022. Copy of departmental appeal is attached as Annexure "D", but respondents' department did not reply to the appellant so far. Therefore, the instant service appeal is filed inter-alia on the following grounds.

BPS-14 to PST BPS-12. Copy of the inquiry report is attached as Annexure "A".

2. That after the receipt of inquiry report respondent No.3 wrote a letter to SDEO (Female), wherein the major penalty of compulsory retirement has been reduced into minor penalty of degrading of the appellant from the post of SPST BPS-14 to PST in BPS-12 for a period of 03 years. Copy of vide impugned order dated 11/08/2021 is attached as Annexure "B".
3. That, the appellant received the impugned order on 27/06/2022 as the said order was not provided to the appellant before this dated. However the appellant was verbally directed to take charge of the post. Copy of impugned order dated 02/11/2021 is attached as Annexure "C".
4. That, the appellant filed a departmental appeal on 27/06/2022. Copy of departmental appeal is attached as Annexure "D", but respondents' department did not reply to the appellant so far. Therefore, the instant service appeal is filed inter-alia on the following grounds.

GROUND:-

- a) That, the impugned order dated 02/11/2021 is illegal, against the law and the degradation of the appellant from service BPS-14 to BPS-12 is not maintainable at law and impugned order dated 02/11/2021 is liable to be set aside.

- b) That, as per E&D Rule 2011 no minor penalty exists mentioned in the impugned order U/S "4" (1) (a) (I) and (II)" as per law mentioned the post of the employee is not regarding degrading of.

- c) That, the impugned order dated 02/11/2021 is based on whims and wishes of respondent No.3 and the punishment awarded to the appellant vide impugned order dated 02/11/2021 is not covered under the head of minor penalty mentioned in E&D Rule 2011. Therefore, the impugned order dated 02/11/2021 is liable to be set aside.

d) That the Honourable Tribunal has jurisdiction to entertain the present appeal under Article 212 of the constitution of Islamic Republic of Pakistan 1973.

e) That the other points shall be argued at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, impugned order dated 02/11/2021 may be graciously be ordered to be set-aside and restore the post of SPST BPS-14 of the appellant with all service back benefits.

Ahmad
...APPELLANT

Through;

Dated: _____/2022

(Muhammad Arshad Khan Tanoli)
(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

Ahmad
...APPELLANT

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

Service Appeal No. _____/2022

Alia Jadoon wife of Muhammad Iqbal, resident of Near Alias Masjid,
Nawansher Town Committee, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Alia Jadoon wife of Muhammad Iqbal, resident of Near Alias Masjid,
Nawansher Town Committee, Tehsil & District Abbottabad*, do hereby
solemnly affirm and declare that the contents of foregoing appeal are true
and correct to the best of my knowledge and belief and nothing has been
concealed therein from this Honourable Tribunal.

Alia Jadoon
DEPONENT

Annex-A

P-7

OFFICE OF THE EX. DISTRICT EDUCATION OFFICER (MALE) K.P. KHISTAN

The Honorable Director E&SED.

Khyber Pakhtunkhwa Peshawar.

Subject: Fact finding inquiry in respect of Ms. Alia Jadoon SPST GGPS Chonakari, District Abbottabad regarding her Compulsory Retirement by DEO (F) Abbottabad.

Memo:

In compliance of your office notification No. 9419-20/F.NO.364/F.Appeal/Atd. Dated Peshawar the 09.06.2021 on the subject cited above. The undersigned visited the DEO (F) Abbottabad office on 16th and 17th June, 2021 after proper intimation to the above mentioned female teachers and the DEO (F) Abbottabad vide letter no.01 and 02 dated 15.6.2021(Annex.01) to probe into the matter.

Brief History.

District Education Officer (F) Abbottabad, the competent authority vide Notification No. 4658-65 dated 20.5.2021, imposed major penalty of Compulsory Retirement as per rule 4(b) of E&D rules 2011, vide notification no.4658-65 dated 20.5.2021, upon Ms. Alia Jadoon, SPST GGPS Chonakari Abbottabad due to her long and habitual absence from her duty as reported by SDEO Abbottabad and circle ASDEO Abbottabad in the light of a fact finding inquiry.

The teacher concerned used her right of appeal before the Director E&SED Peshawar, the appellate Authority as per rule and before deciding the case the respected Director E&SED decided to further probe into the matter and directed the undersigned to probe into the matter.

Procedure

1. The respected teacher Ms. Alia Jadoon was requested through letter to submit her written defense and appear before inquiry officer in the presence of representative of the DEO (F) Abbottabad in the office of DEO (F) Abbottabad.
2. The DEO (F) Abbottabad was requested by letter to nominate a representative to provide the relevant record in this regard.

Alia Jadoon
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Abbottabad
Distt Bar Abbottabad

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3. The Teacher Miss Alia Jadoon was given a conducive environment of personal hearing to cross examine the record and allegations in the presence of representative of DEO(F) Abbottabad. (Annex-2).
4. The written statements of SDEO ATD and the circle ASDEO ATD against Miss Alia Jadoon were examined and discussed during the personal hearing of the respected Teacher Miss Alia Jadoon.
5. The Circle ASDEO ATD briefed the undersigned regarding the late coming of the Teacher Miss Alia Jadoon during her visit to her school.
6. All the relevant record, photocopies of relevant documents, EMA report _____ and supportive environment provided by representative of DEO were carefully observed.
7. Interviews and Briefings.

FINDINGS:

1. A fact finding inquiry regarding habitual absentees of Miss Alia Jadoon SPST was conducive one and a half year ago before the latest proceedings that is on 10-01-2020 and inquiry report submitted on 04-05-2020 by the inquiry officer in which the inquiry officer recommended of proceeding against the mentioned Teacher but as proceeding was initiated in the light of recommendation of inquiry till 09-03-2021 when a show cause notice was served to the concern Teacher for her absence from duty for one day on the report of SDEO ATD.
2. A personal hearing of the concern Teacher was conducive on 11-05-2020 without any show cause notice and this personal hearing even was not decided by the competent authority till a fresh show cause notice for absence from duty of a single day i.e. 16-02-2021 as reported by SDEO ATD. A personal hearing for a committee rather the DEO herself, was conducive on 29-03-2021 and final decision of major penalty of compulsory retirement of the concern Teacher was imposed by the competent authority.
3. No formal inquiry with clear charge sheet and statement of allegations, observing all steps / formalities of the regular / formal inquiry was conducted by the competent authority in the light of fact finding inquiry before imposing major penalty which can easily be challenged in any court of law and may be a source of ill reputation for education department.
4. As per written and verbal statement of the concern Teacher Miss Alia Jadoon she has never been habitual absent from her duty and as her mother is seriously ill and she as to take care of her medicine that is why she often come late to school (Annex-3).
5. The undersigned found a difference between written and verbal statement of the circle ASDEO about habitual absenteeism of the Teacher concern as according to the.

Muhammad Nishad Khan Talochi
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Dist. Bar Abbottabad

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verbal statement of circle ASDEO Ms. Alla Jadoon was late comer only due to the serious illness of her mother, rather than habitual absent. (Annex.4)

6. As per report of the SDEO atd the teacher concern was habitual absent.
7. Though the teacher concern was reported to be irregular, least interested in her professional duties and latecomer to school as per report of EMA, SDEO atd, Circle ASDEO, Inquiry officers as well as her head teacher but it seems that she was not proceeded as per E&D rules 2011 especially for imposing major penalty, also there exists a difference between written and verbal statements as observe during personal hearing.

Recommendations

1. The teacher concerned be reinstated in service and the competent authority i.e the DEO (F) Abbottabad be directed to conduct a formal De novo inquiry with clear charge sheet and statements of allegation and observing all the formalities/steps of regular/formal inquiry in the light of the fact finding inquiry before final decision of imposing any major penalty as per rule 4(B) of E&D rules 2011 or new E&D rules 2020 in the light of recommendations of the regular/formal inquiry report if so recommended,
OR
2. The major penalty of compulsory retirement be reduced to Miner penalty of degrading the teacher concern from SPST 85-14 to PST 85-12 for a period of three years if agree please.
3. All the respected DEOs male and female be directed to conduct a regular inquiry before imposing any major penalty except for long absenteeism for which rule 9 of E&D rules 2011 can be applied without formal inquiry please.
4. A format of, Notice of being proceeded, charge sheet and statements of allegation with constitution of inquiry committee and final show cause notice be circulated in official WhatsApp groups for capacity boosting of respected DEOs please.

Submitted for your kind perusal and necessary action please.

No. 63 / Dated 7/7 / 2021

Attested
[Signature]

[Signature]

Muhammad Ashraf
Ex. DEO KP
deokpk@gmail.com
Cell. 03015712960

Muhammad Arshad Khan
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza Adjacent
Distt. Bar Abbottabad

Annex- B



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

P-70

No. 161 /F.No.364/F/Appeal A,abad

Dated Peshawar the 16/08/2021

To

The District Education Officer,
(Female) Abbottabad

Subject:-

INQUIRY REPORT

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiries report carried out by Mr. Muhamamd Ashraf Ex-DEO Male appeals Mst. Alia Jadoon Ex-PST GGPS, Choona Kari District Abbottabad and Mst. Farah Irshad Ex-PSHT, GGPS Shadaiyal District Abbottabad and to ask you to implement the recommendations of the enquiry officer.

Endst No. _____/

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

Copy of the above is forwarded to the:
1. PA to Director E&SE KPK Peshawar.

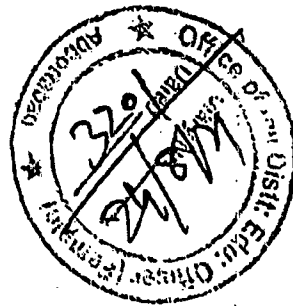
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

*Supath (Primary)
Put up
File
Done*

D/Zubair/Munawar/Appeals 21 Doc

24/8/2021

*Muhammad Arshad M. A. Khan
Advocate Supreme Court of Pakistan
Office # 33 Jinnah Plaza P.D. Road
Distt. Bal Abbottabad*



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Annex- B C

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 9925

Dated: 2/11/2021

0992-342533, 0992-342314

Deofemale_abbottabad@gmail.com

P- 11

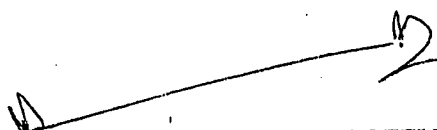
To

The SDEO (Female),
Abbottabad.

Subject: **INQUIRY REPORT.**

Memo;

Reference letter No.8794/F.No.364/F/Appeal A, Abad dated 14-09-2021 received from the office of Deputy Director E&SE Khyber Pakhtunkhwa, you are directed to implement the recommendation of inquiry Officer that. "The Major penalty of compulsory retirement is reduces to Minor penalty of degrading Mst: Aliya Jadoon from SPST BPS-14 to PST BPS-12 for the period of three years" with immediate effects.

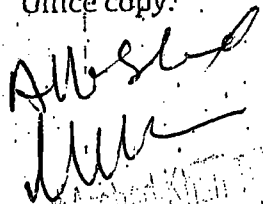

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD


01/11/2021

Endst No: _____ Dated: _____

Copy to:

1. The Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. SDEO (F) Abbottabad with direction to initiate the process of down grading.
3. District Monitoring Officer Abbottabad.
4. District Account Office Abbottabad.
5. ASDEO (F) concerned.
6. Mst. Alta Jadoon,
7. Office copy.




DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Advocate Supreme Court of Pakistan
Office # 20, Jinnah Plaza, Abbottabad
Dist. Bar Abbottabad

P-11-A

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. _____ /Dated: _____/2021

0992-342533, 0992-342314
Deofemale_abbottabad@gmail.com

Notification: -

Mst: Aliya Jadoon SPST GGPS Choonia Kari, was proceeded against under the Khyber Pakhtunkhwa Govt. Servant (Efficiency and disciplinary rules 2011) for charges of habitual absent and habitual late from school, inefficiency and misconduct.

- **AND WHEREAS:** SDEO (F) Abbottabad reported about your absence from school vide letter No: 248 dated: 05-03-2020.
- **AND WHEREAS:** inquiry committee was constituted Vide No: 1779-80 Dated: 10-03-2020, to conducted inquiry against the accused official for the charges levelled against her in accordance with the rules.
- **AND WHEREAS:** inquiry officer Mst: Saima Asghar Principal GHSS Khuthaila after having examined the case confirmed the charges levelled against her, and clearly stated that official concerned has failed to defend the charges levelled against.
- **AND WHEREAS:** Mst: Aliya Jadoon SPST GGPS Choonia Kari, has been served with a show cause notice under No: 2628-32 dated: 09-03-2021.
- **AND WHEREAS:** you were called for personal hearing vide No: 3250 dated: 27-03-2021, but failed to satisfy the undersigned.
- **AND WHEREAS:** the competent authority (District Education Officer (F) Abbottabad), after having considered the charges and evidences on record, inquiry report / personal hearing is of the view that the charges against the accused official have been proved.

NOW THEREFORE, in exercise of the power conferred upon me under section 14 Khyber Pakhtunkhwa Govt. Servant (Efficiency and Discipline rule 2011), the District Education Officer (Female) Abbottabad, being competent authority, is pleased to impose a major penalty of "COMPULSORY RETIREMENT" upon Mst: Aliya Jadoon SPST GGPS Choonia Kari with immediate effect.

[Signature]
District Education Officer
(Female) Abbottabad

20/5/2021

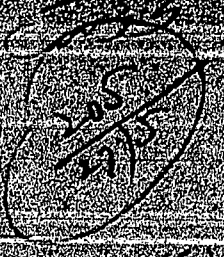
Encls No: 4658-65
Copy to:

Dated: 20/5/2021

1. Director (E&SE) Khyber Pakhtunkhawa Peshawar.
2. Deputy Commissioner Abbottabad.
3. District Monitoring Officer Abbottabad.
4. District Account Office Abbottabad.
5. SDEO (F) Abbottabad with direction to recover the amount of absent period.
6. Official concerned.
7. Office File

[Signature]
District Education Officer
(Female) Abbottabad

Muhammad Arshad Khan Tanoli
Advocate Supreme Court of Pakistan
Office: 22 Durrani Plaza, adjacent to
Distt. Bar Abbottabad



ADDE (P)

میں نے ڈیڑھ گھنٹہ پہلے اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔

سوں مہتری ایس۔ ڈی۔ ای۔ او۔ اور ڈی۔ ای۔ ای۔
 نے دفتر کس وقت اور کس وقت سے شروع کیا ہے۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔

Ministry of
 of Pakistan
 Office of
 Director

صالح علی اور دیگر لوگوں کے ساتھ ساتھ
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔
 اس کے بعد اس کے بارے میں جاننے کی کوشش کی تھی۔

Annex - D

بخدمت جناب ڈائریکٹر صاحب ابتدائی و ثانوی ایجوکیشن خیبر پختونخوا پشاور

P-12

درخواست براد ایچیل بر خلاف انکوائری رپورٹ لیٹر نمبر 9925 مورخہ 02-11-2021 بجاریہ IDEOF ایڈیٹ آباد

جناب عالی!

یہ کہ من ساٹھ محکمہ تعلیم ضلع ایڈیٹ آباد میں بطور 14 SPST/BPS میں اپنے فرائض منصبی سرانجام دے رہی ہوں۔

یہ کہ آفیسر مجاز نے من ساٹھ کو تاخیر سے آنے پر غیر حاضر قرار دیتے ہوئے Major Panalty دیتے ہوئے جبری ریٹائرڈ کی کاپی درخواست کے ساتھ لف ہے۔

یہ کہ مسائل نے اپنے جبری ریٹائرمنٹ کے جواب میں اپنا جواب داخل کیا، ڈائری نمبر 205 ہے۔

یہ کہ ساٹھ کو SDEO صاحب نے جو کہ پہلے ایڈیٹ آباد میں بطور SDEO کام کرتی رہی تھیں وزیر تعلیم کے حکم سے پہلے اپر ڈیر پھر اپنی بھانجی مسز سید فضل کے بھائی جو کہ محکمہ کی سیٹ پر تعینات ہیں کی سفارش پر اب پندرہ دن کے اندر اندر انسپرکٹ ڈسٹرکٹ میں بطور SDEO کام کر رہی ہیں۔ انہوں نے خالصتاً کوئی دیرینہ دشمنی کی بنا پر ہمیں جبری ریٹائرڈ کیا۔

جناب عالی!

آپ سے درخواست ہے کہ دوران سکول معائنہ دیر سے آنے پر مجھے غیر حاضر قرار دے کر مجھے کر دینا کی تعطیلات میں 20 مئی 2021 کو جبری ریٹائرمنٹ کا حکم یعنی نوٹیفکیشن جاری کر دیا، بغیر کسی شوکار کے اور بغیر کسی حکم کے۔ اور لیٹر نمبر 9419-20/F.No 364/F/AppealAtd, Dated: 09-06-2021

جناب عالی!

ڈائریکٹر ایجوکیشن پرائمری نے انکوائری مقرر کی جو کہ مورخہ 02 نومبر 2021 کو دیر کے ڈائریکٹر نے جناب اشرف صاحب نے کی پھر ہماری SDEO صاحبہ نائید فضل نے ٹرانسفر اپر ڈیر ہونے کے باوجود سیٹ پر بیٹھی رہیں اور یکم نومبر کو س عالیہ جدون کو Re Adjust کا نوٹیفکیشن جاری کیا مجھے گریڈ 14 سے گریڈ 12 میں کر کے اپر ڈیر میں چارج سنبھال لیا۔

میں یعنی عالیہ جدون نے ڈائریکٹر کو اپنی طرف سے اپیل کی جس کا جواب ابھی تک ڈائریکٹر صاحب پشاور نے نہ دیا۔

DEO صاحبہ کی اسسٹنٹ میڈیٹورین کو RTI کے ذریعے جو انکوائری مقرر کی گئی اس کی کاپی طلب کی جس کی ڈائری نمبر 3610 ہے جو کہ ابھی تک وصول نہ ہو سکی۔

جناب عالی!

مجھے Major Panalty سے نکال کر پھر سے گریڈ 14 میں بحال کیا جائے۔ اگر تنخواہ سے کٹوتی کی جائے تو مجھے کوئی اعتراض نہ ہوگا۔ (اور میرے بھائی 20 مئی سے 2 مئی کو سب ڈائریکٹر ایجوکیشن پشاور سے)

الغاض

علیہ عالیہ جدون

گورنمنٹ پرائمری سکول چونا کاری نواں شہر (78)

27/6/22

Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza, Adjacent
D.I. Khan, Abbottabad

محنت صاحب D.E.O صاحب سب ڈویژن اور ایجوکیشن آفس

زمانہ اسٹے آباد

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صاحب عالم :-

مودبانہ گزارش ہے کہ مجھے جبری ریٹائرمنٹ لیا

ہے جسکی اپیل میں ڈائریکٹریٹ ہوئی ہے اور ا۔ر۔ا۔ R.T.

کے ذریعے جوائنٹ کوارٹی کمیٹی میں اسکی کاپی ارسال کی

جائے۔

شکر ہے

Attested
M

Advocate
Office
15-9-2021

القاری

Aliya Factory

سپسٹ ٹائٹل عالم خدوون

سرپرٹ 14 "کوارنٹن لرنرز پرائیمری سکول چوناہاری"

مورخہ 9/11/2021

3610
15-9-2021

کورٹ فیس

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وکالت نامہ

بجالت Befor Re Service Tribunal K P Pesh

عنوان: Ali Jaton نام Govt of KPK

منجانب: Applicant

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دی کل کاروائی متعلقہ آن مقام

M. Ashraf Khan Tanali Adv S-L

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرواختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بھلیا، و توجہ وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش و تصنیف مفلسی کے دائرہ کار کے لئے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا گیا تاکہ سند ہو۔

M. Ashraf Khan Tanali

Adv S-L

المرقوم:

بمقام: