

17.10.2022

Counsel for the appellant present. Preliminary arguments heard and record perused

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 15.11.2022 before S.B at camp court Abbottabad.

Rs-100/-
Appellant Deposited
Security & Process Fee

At my office
19/10/22

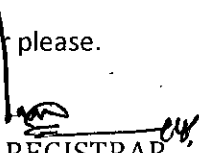


(Fareha Paul)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 806/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/05/2022	<p>The appeal of Mr. Shahid Usman received today by post through Malik Ashfaq Ahmad Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	24-5-22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>15-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
15.06.2022		<p>Nemo for appellant.</p> <p>Despite directions, notices were not issued to appellant/counsel. Therefore, fresh notices be issued to appellant and his counsel for 15.08.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (Rozina Rehman) Member (J) Camp Court, A/Abad</p>

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 866 of 2022

Shahid Usman.....Appellant

VERSUS


The Secretary Elementary and Secondary
Education KPK Peshawar etc
.....Respondents

APPEAL

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Dated 16.05.2022


Shahid Usman
(Appellant)

Through:-


MALIK ASHFAQ AHMED JILLANI
ADVOCATES HIGH COURT

1

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No ____ of 2022

Shahid Usman Primary School Teacher
(PST) posted at GPS Rash Skindra Circle
Khaki Tehsil & District Mansehra
.....**Appellant**

VERSUS

- 1) The Secretary Elementary and
Secondary Education Government of
KPK, Peshawar.
- 2) The Director Elementary and
Secondary Education Peshawar.
- 3) The District Education officer (Male)
Mansehra.
.....**Respondents**

APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL, ACT, 1974 AGAINST
THE IMPUGNED ORDER DATED 21.02.2020
PASSED BY RESPONDENT NO. 03 TO THE
EXTENT OF ONLY NOTE: THE PERIOD W.E.F

29.09.2018 TO 18.10.2019 TREATING THE
SAME AS LEAVE WITHOUT PAY AND
IMPUGNED ORDER DATED 30.03.2022
PASSED BY RESPONDENT NO. 03 UPON THE
DEPARTMENTAL APPEAL OF THE
APPELLANT.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders dated **21.02.2020** only to the extent of **Note** and **30.03.2022** passed by respondent No. 02 upon the Departmental appeal of the appellant be set-aside for being illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect, consequently, respondents be directed to give financial and service back benefits to the petitioner with effect from **29.09.2018** to **18.10.2019** being a legal right.

Respectfully Sheweth:-

1. That, initially, appellant was appointed as **PST** on **07.01.1996**. He was terminated on **28.04.1997**.
2. That, the Govt. of KPK enacted sacked employees Act, 2012,

whereby all the terminated employees were to be re-instated into service. Appellant being terminated on **28.04.1997** on irregular appointment fully covered under the above Act applied for his re-appointment which was not acceded to by respondent No. 02 forcing the appellant and others to invoke the constitutional jurisdiction of Honourable Peshawar High Court and in the light of the judgment/order of Honourable Peshawar High court Abbottabad bench appellant and others were re-instated into service vide order dated **04.12.2017**.

3. That, after re-instatement, the appellant assumed the charge and was performing his duty. The re-instatement order was withdrawn by the authority on **25.08.2018** on the allegation of fake documents.
4. That, Appellant challenged the withdrawal order dated **25.08.2018** before this Hon'ble Tribunal through service appeal No. **1548/2018**, which was allowed vide order dated **17.09.2019** with the direction to

the Department to conduct regular inquiry.

(copies of judgment dated 17.09.2019 annexed as annexure "A").

5. That, it is worthy to note that in the said judgment the issue of back benefits was left subject to the outcome of de-novo inquiry.

6. That, respondent **No. 03** vide order dated **21.02.2020**, reinstated the appellant into service in the compliance with the judgment of this Hon'ble tribunal dated **17.09.2019**.

(copy of re-instatement order dated 21.02.2020 annexed as annexure "B").

7. That, respondent **No. 03** vide order dated **25.11.2019** nominated inquiry officer for the purpose of de-novo inquiry into the case of the appellant.

(copy of order dated 25.11.2019 annexed as annexure "C").

8. That, after conducting a detailed and comprehensive de-novo inquiry, the inquiry officer submitted its detailed report and recommendations. The appointment

order of the appellant was found accurate and correct. It was also recommended that the appellant be given arrears w.e.f **06.12.2017**.

(copies of inquiry report annexed as annexure "D").

9. That, the competent authority agreed with the recommendations of the inquiry officer and as such petitioner was re-instated into service vide order dated **21.02.2019**, but the question of arrears and back benefits were left un-attended.

10. That, for back benefits, appellant filed a Departmental appeal before respondent **No. 02** in which he sought comments from respondent **No. 03** upon the appeal of the appellant.

(copy of Departmental appeal annexed as annexure "E").

11. That, respondent No. **03** on dated **09.02.2022** submitted comments to respondent No. **02** wherein it was stated that the appellant was reinstated into service vide order dated **21.02.2019** upon the recommendation of the inquiry

officer and the intervening period was treated as leave without pay.

(copy of comments annexed as annexure "F").

12. That, respondent No. **02** vide order dated **30.03.2022** rejected the appeal of the appellant without citing any reason at all and the said order was procured by the appellant on **18.04.2022** from the office of respondent No. **03** on his own.

(copy of impugned order dated 30.03.2022 annexed as annexure "G").

13. That, felling aggrieved from the impugned order dated **30.03.2022** passed by respondent No. **02** appellant having no other remedy files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

GROUND:-

- A) That, the impugned action of respondents No. **02** and **03** are scemingly illegal, unlawful and against the rights of the appellant.

- B) That, in the earlier round of litigation, this Hon'able tribunal had left the issue of back benefits to the outcome of the De Novo inquiry. The outcome of the said inquiry has come in the favour of the appellant. Respondents No. **02** and **03** had no reason at all to disagree with the findings of the inquiry officer to the extent of back benefits. The appellant has been deprived of his valuable rights without hearing him and all the fault lied with the department.
- C) That, during the course of inquiry, it came to light that appellant had no fault at all and the fault solely lied with the department, for which appellant should not be made to suffer.
- D) That, no reason has been cited by respondents No. **02** and **03** justifying withholding the back benefits.
- E) That, appellant is within his legal right to claim back benefits and respondents are legally under obligation to grant the same to the appellant.

PRAYER:-

On acceptance of the instant service appeal, the impugned orders dated **21.02.2020** only to the extent of **Note** and **30.03.2022** passed by respondent No. 02 upon the Departmental appeal of the appellant be set-aside for being illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect, consequently, respondents be directed to give financial and service back benefits to the petitioner with effect from **29.09.2018** to **18.10.2019** being a legal right.

Dated 16.05.2022


Shahid Usman

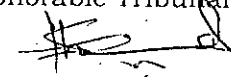
(Appellant)

Through:-


MALIK ASHFAQ AHMED JILLANI
ADVOCATES HIGH COURT

VERIFICATION :

I, Shahid Usman Primary School Teacher (PST) posted at GPS Rash Skindra Circle Khaki Tehsil & District Mansehra, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honorable Tribunal.


SHAHID USMAN
(DEPONENT)

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____ of 2022

Shahid Usman.....Appellant

VERSUS

The Secretary Elementary and Secondary
 Education KPK Peshawar etc
Respondents

APPEAL

AFFIDAVIT

I, Shahid Usman Primary School Teacher
 (PST) posted at GPS Rash Skindra Circle
 Khaki Tchsil & District Mansehra, do hereby
 solemnly affirm and declare on oath that the no
 such subject matter appeal has ever been filed
 before this honorable court nor pending nor
 decided. That the contents of fore-going affidavit
 are true and correct to the best of my knowledge
 and belief and nothing has been concealed or
 suppressed from this Honourable tribunal.

Dated 16.05.2022



Shahid Usman
(DEPONENT)

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____ of 2022

Shahid Usman.....Appellant

VERSUS

The Secretary Elementary and Secondary
 Education KPK Peshawar etc
Respondents

APPEAL

CORRECT ADDRESSES OF THE PARTIES

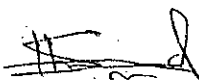
APPELLANT:

Shahid Usman Primary School Teacher
 (PST) posted at GPS Rash Skindra Circle
 Khaki Tehsil & District Mansehra.

RESPONDENTS:

- 1) The Secretary Elementary and
 Secondary Education Government of
 KPK, Peshawar.
- 2) The Director Elementary and
 Secondary Education Peshawar.
- 3) The District Education officer (Male)
 Manshra

Dated 16.05.2022


Shahid Usman
 (Appellant)

Through:-


MALIK ASHFAQ AHMED JILLANI
ADVOCATES HIGH COURT

(31) P. (11)
Arwa A

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT ABBOTTABAD

SERVICE APPEAL NO. 1548/2018

Date of institution ... 26.12.2018
Date of judgment ... 17.09.2019



Shahid Usman, Son of Muhammad Akram,
Resident of Post Office Hari Maira, Tehsil & District Mansehra,
Ex-PST, GFS Hamsheria Tehsil & District Mansehra.

... (Appellant)

VERSUS

1. Secretary, Elementary and Secondary Education Peshawar.
2. Director, Elementary and Secondary Education Peshawar.
3. District Education Officer (Male) Mansehra.

... (Respondents)

SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ORDER DATED 25.08.2018 WHEREBY RESPONDENT
NO. 3 HAS WITHDRAWN THE APPOINTMENT NOTIFICATION
OF THE APPELLANT DATED 04.12.2017 AND DATED 26.11.2018
WHEREBY RESPONDENT NO. 2 UPHELD THE ORDER OF
RESPONDENT NO. 3 DATED 25.08.2018, WHILE REJECTING THE
DEPARTMENTAL APPEAL OF THE APPELLANT.

6/10/19
Mansoor

Mr. Abdul Saboor Khan, Advocate.
Mr. Muhammad Bilal Khan, Deputy District Attorney

For appellant.
For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI
MR. HUSSAIN SHAH

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

ATTESTED

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: - Appellant

alongwith his counsel and Mr. Muhammad Bilal Khan, Deputy District
Attorney alongwith Mr. Hamid Mansoor, Assistant for the respondents present.

Arguments heard and record perused.

2. Brief facts of the case as per present service appeal are that the appellant
was appointed as PST vide order dated 07.01.1996 by the competent authority.

He was terminated alongwith other PTC Teachers vide order dated 28.04.1997

6/10/19
Mansoor
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

32

12

on the allegation that his appointment order was illegal and without prescribed rules. The Government of Khyber Pakhtunkhwa enacted the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 for reinstatement of Sacked Employees terminated during 1996-98 where under the appellant applied for his reinstatement through application dated 11.01.2012, however, the application was regretted vide order dated 03.07.2014 on the ground having not possessing the prescribed professional qualification. The appellant and others filed Writ Petition before the worthy High Court against their termination orders which was allowed vide detailed judgment dated 24.05.2016 and on the basis of the aforesaid judgment, the appellant alongwith others were reinstated in service vide order dated 04.12.2017. After reinstatement, the appellant assumed the charge and was performing his duty and the certificates/testimonials of the appellant were also verified by the department and on receipt of the verification report, the District Education Officer Male Mansehra directed the Sub-Divisional Education Officer Male Mansehra to release the salary of the appellant vide order dated 12.02.2018 however, the respondent-department issued show-cause notice dated 27.04.2018 to the appellant that in the fact finding inquiry dated 14.03.2018 his documents/service record was found fake and fabricated as well as on the allegation that his appointment order and termination order were also found fake and fabricated. The appellant submitted reply and denied the allegation however, the appointment order dated 04.12.2017 was withdrawn by the competent authority vide order dated 25.08.2018 on the allegation mentioned in the show-cause notice. The impugned order was communicated to the appellant on 29.09.2018. The appellant filed departmental appeal on 01.10.2018 which was rejected on 26.11.2018 hence, the present service appeal on 26.12.2018.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

TESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

6/11/19
19.9.2019

33 P.

13

4. Learned counsel for the appellant contended that initially the appellant was appointed PTC Teacher vide order dated 07.01.1996. It was further contended that the appellant alongwith other PTCs was terminated by the competent authority vide order dated 28.04.1997 on the allegation of illegal appointment order and without prescribed manners. It was further contended that the Government of Khyber Pakhtunkhwa enacted the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 for reinstatement of Sacked Employees terminated during 1996-98. It was further contended that the appellant applied for reinstatement through application dated 11.01.2012 under the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 but the application of the appellant was rejected vide order dated 03.07.2014. It was further contended that the appellant alongwith some others PTCs challenged the termination order dated 28.04.1997 through Writ Petition before the worthy High Court. It was further contended that the respondent-department also submitted comments in the said Writ Petition. It was further contended that after hearing arguments on behalf of both the parties and perusal of the record, the worthy High Court accepted the Writ Petition vide detailed judgment dated 24.05.2016 and on the basis of said judgment, the appellant alongwith others were reinstated in service by the respondent-department vide order dated 04.12.2017. It was further contended that the appellant assumed the charge after his reinstatement and was performing his duty. It was further contended that after reinstatement, the academic documents/certificates of the appellant were also verified by the respondent-department from the concerned Board and after verification of academic record his salary was also released by the respondent-department vide order dated 12.02.2018. It was further contended that the respondent-department conducted fact finding inquiry against the appellant and on the basis of fact finding inquiry report dated 14.03.2018, the appellant was issued show-cause notice on the allegation that the service record of the

*Ms. Anwar
17-9-2019*


ATTESTED

[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

34 P. 14

appellant was found fake and suspicious. It was further contended that in the said show-cause notice it was also mentioned that the appointment and termination order was also found fake and suspicious and on the basis of said show-cause notice, the appointment order of the appellant dated 04.12.2017 was withdrawn. It was further contended that neither the appellant was associated in the said fact finding inquiry nor the appellant was issued charge sheet, statement of allegation. It was further contended that in the fact finding inquiry dated 14.03.2018, the inquiry committee submitted their report that the service record/appointment order/termination order was found suspicious and the same may be verified from original office record/dispatch register but there is nothing on the record to show that the aforesaid documents were found suspicious by the concerned Board/Quarter. It was further contended that the Writ Petition of the appellant alongwith others was accepted wherein the respondent-department have also submitted comments therefore, the respondent-department was required to agitate/point out such point in the Writ Petition. It was further contended that the appellant was reinstated in service on the basis of order of worthy High Court therefore, the respondent-department was not competent to withdraw the reinstatement order of the appellant. It was further contended that a show-cause notice was issued to the appellant on 27.04.2018 and after issuing show-cause notice, the respondent-department again initiated fact finding inquiry and the inquiry committee also submitted his inquiry report dated 18.08.2018 and the reinstatement order of the appellant was also withdrawn by the respondent-department mainly on the basis of said inquiry report. It was further contended that neither charge sheet, statement of allegation was framed or served upon the appellant nor the appellant was associated during the inquiry proceeding nor the appellant was issued any show-cause notice after the fact finding inquiry report dated 18.08.2018 therefore, the appellant was condemned

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

6/11/19
7.9.2019

(35) P- (15)

unheard which has rendered the whole proceeding illegal and liable to be set-aside and prayed for acceptance of appeal.

5. On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appointment order/termination order of the appellant as well as academic documents of the appellant were found fake and suspicious during the inquiry proceeding therefore, the reinstatement order of the appellant was rightly withdrawn by the competent authority after fulfilling all the codal formalities and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was appointed as PTC Teacher vide order dated 07.01.1996. The record further reveals that the appellant alongwith others were terminated by the competent authority vide order dated 23.04.1997 on the allegation of illegal appointment and without prescribed manners. The record further reveals that Government of Khyber Pakhtunkhwa enacted the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 for reinstatement of Sacked Employees terminated during the year 1996-98 where under the appellant applied for reinstatement through application dated 11.01.2012 but the application of the appellant was rejected vide order dated 03.07.2014. The record further reveals that the appellant alongwith others filed Writ Petition before the worthy High Court and the Writ Petition of the appellant alongwith others was disposed by the Worthy High Court vide detailed judgment dated 24.05.2016 and the appellant was reinstated by the respondent-department on the basis of aforesaid judgment of the worthy High Court. The record further reveals that after the reinstatement of the appellant, the respondent-department initiated fact finding inquiry against the appellant and the appellant was issued show-cause notice and on the basis of said fact finding inquiry report the academic documents/appointment order and termination order were found fake and suspicious and ultimately the

ATTESTED

M. J. Khan
 6/12/2019
 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

36 P-16

reinstatement order of the appellant was withdrawn by the competent authority. The record further reveals that after reinstatement, the respondent-department also sent academic documents for verification and on the basis of said verification report, the salary of the appellant was released by the respondent-department. Moreover, the respondent-department has also submitted comments in Writ Petition and after hearing of both the parties, the worthy High Court disposed the Writ Petition of the appellant and on the basis of said judgment of the worthy High Court, the appellant was reinstated in service. Moreover, neither charge sheet, statement of allegation was framed nor proper inquiry was conducted nor the appellant was associated in any inquiry proceeding nor any final show-cause notice was issued to the appellant after the so called another fact finding inquiry report dated 18.08.2018. Meaning thereby that the appellant was condemned unheard which has rendered the whole proceeding illegal and liable to be set-aside therefore, we partially accept the appeal, set-aside the impugned order, reinstate the appellant into service with the direction to respondent-department to conduct regular inquiry in the mode and manners prescribed under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 strictly in accordance with law and rules within a period of 90 days from the date of receipt of copy of this judgment. The issue of back benefits will be subject to the outcome of de-novo inquiry. Parties of left to bear their own costs. File be consigned to the record room.

ANNOUNCED

17.09.2019

Muhammad Amin
(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT ABBOTTABAD

Hussain Shah
(HUSSAIN SHAH)
MEMBER

CAMP COURT ABBOTTABAD

Date of Presentation of Application 21-10-18
Number of Words 2400
Copying Fee 28-00
Urgent _____
Total 28-00
Name of Copyist _____
19-10-18

Certified to be true copy

EXCISE OFFICER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar



Office of the District Education Officer (Male)
District Mansehra

Phone # 0997-382211 Fax # 0997-382214
E-mail Address: deom@peshawar.gov.pk
Face book Page: www.facebook.com/DEOMMANSEHRA

No. /Litigation (M)/ Date /2020

REINSTATEMENT ORDER:-

In continuation with this office Endst No.16821-25/PST/(M)/Reinstatement dated 18/10/2019 and in Compliance with the Judgment of the Honorable Service Tribunal Khyber Pakhtun Khawa Peshawar Camp Court Abbottabad dated 17-9-2019 in Service Appeal No.1548-A/2018 case Titled as Shahid Usman vs Govt of Khyber Pakhtun Khawa, whereas the same has been declared unfit for CPLA by law Department Vide its letter No.SO(:LIT)/LD/1-5(61) E&SED/2019/20719-20 dated Peshawar 12/11/2019 and in the light of the recommendation of inquiry committee and on the approval of the competent authority, Mr. Shahid Usman Ex-PST is hereby reinstated into Govt service on regular basis at GPS Rah Sikandara.

Note: The period w.e.f 29/9/2018 to 18/10/2019 may be treated as Leave without pay and necessary entry be made in his service Book.

-sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst No. 1800-07 /PST (M) /Reinstatement, Dated 21/02 /2020
Copy for information to:-

1. The Registrar Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar Service Appeal No.1548-A/2018 case Titled as Shahid Usman vs Govt of Khyber Pakhtun Khawa
2. PA to Secretary Law & Preliminary affair and Human Rights Department Khyber Pakhtunkhwa Peshawar.
3. PA to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. District Accounts Officer Mansehra.
6. Deputy Commissioner Mansehra.
7. District Monitoring Officer Mansehra
8. Office file.
9. Official concerned.

DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA



Attested
D. Amjad

P. 18

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

Amjad

No 18173-74 /lit Branch (M)

Dated 25/11/2019

To,

1. Mr. Muhammad Amjad Principal GHS Naran.....Chairman.
2. Mr. Zulfiqar Ahmed Principal, GHS Trangri Bala.....Member.

Subject: NOMINATED INQUIRY OFFICER IN CASE TITLED MR SHAHID USMAN PST GPS RASH SIKANDRA SACKED EMPLOYEE RESIDENCE OF HARI MAIRA AS PER DIRECTION OF HONOURABLE COURT, FOR DIGOUT THE FACTS AND CLEARCUT RECOMMENDATION WITH IN TWO WEEKS.

I am directed to refer to the subject cited above and state that you are hereby nominated as Chairman/Members inquiry Committee in the matter, and required to scrutinize/check all the documents of above namely teacher in connection with proceedings of denovo inquiry and submit your clear findings and subsequent recommendations for future course of action in the instant case within two weeks positively.

Amjad
DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst No _____ dated _____ /2019

Copy for information to the:-

1. The Honorable Registrar Khyber Pakhtun Khawa Service Tribunal Peshawar Camp Court Abbottabad.
2. The Director E& SE Department Khyber Pakhtun Khawa Peshawar.
3. Mr. Shahid Usman S/o Muhammad Akram Residence and post office Hari Maira Tensii & District Mansehra.
4. Office File.

Amjad
DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Attested
Dante P. Citigian
Cut up on file

SRite P. (19)
Annex (D)

To

The District Education Officer (Male)
District Mansehra

36/2578

Subject: NOMINATION INQUIRY OFFICER IN CASE TITLES MR. SHAHID USMAN PST GPS RASH SIKNADRA SACKED EMPLOYEE RESIDENCE OF HARI MERA AS PER DIRECTION OF HONOURABLE COURT FOR DIGOUT THE FACTS AND CLEARCUT RECOMMENDATION WITHIN TWO WEEKS.

Reference: DEO office letter number No: 18173-74/lit Branch (M); dated 25th November, 2019 on the above noted subject a committee was constituted to investigate matter expressed in given subject.

Scope and Purpose:

Mr. Shahid Usman Teacher PST GPS Rash Sikanadra firstly appointed as PST teacher in 07/1/1996 and was terminated on dated 28/4/1997. Government of Khyber Pakhtunkhwa passed, sacked employee act in 2012. Mr. Shahid Usman approached Director office being sacked employee for reappointment but his appeal rejected by Director office dated 3/7/2014. Worthy High Court and Service tribunal both reinstated Mr. Usman while two inquiries has built barrier, by observing some facts and compels Honorable court to ask for de-novo inquiry about these documentary facts.

8323
31/12/19

Back ground:

Perusal of the record reveals that the Mr. Shahid Usman was appointed as PST teacher vide order dated 7/01/1996. The record further revealed that the Shahid Usman along with others terminated by the competent authority vide order dated 28/4/1997 on the allegation of illegal appointment and without prescribed manners.

The record further revealed that Government of Khyber Pakhtunkhwa enacted the Khyber Pakhtunkhwa sacked employees appointment act 2012 for reinstatement of sacked employees terminated during the year 1996 to 1998 where under the Shahid Usman applied for reinstatement through application dated 11/1/2012 but the application of the Shahid Usman was rejected vide order dated 3/7/2014.

P. 20

To

The District Education officer (Male)
District Mansehra

Subject: - Nomination of Inquiry Officer In case titled Mr. Shahid Usman PST GPS Rash Sikkadra (sacked employee) as Per Direction of Honorable Court

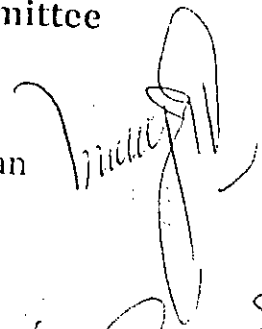
Memo:

Detailed and comprehensive inquiry of Mr. Usman Shahid Is forwarded in response to official letter Endst No: 546/47 dated 14/01/2020.

Inquiry Committee

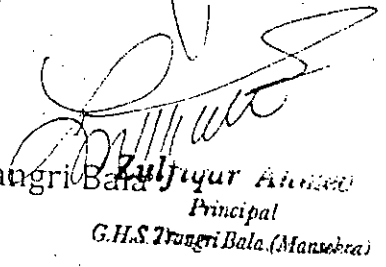
1. Amjid Ali

Principal GHS Naran
Mansehra.



2. Zulfiqar Ahmad

Principal GHS Trangri Bala
Mansehra



Zulfiqar Ahmad
Principal
G.H.S Trangri Bala (Mansehra)

P. 21

To

The District Education Officer (Male)
District Manshra

Subject: NOMINATION INQUIRY OFFICER IN CASE TITLES MR. SHAHID USMAN PST GPS RASH SIKNADRA SACKED EMPLOYEE RESIDENCE OF HARI MERA AS PER DIRECTION OF HONOURABLE COURT FOR DIGOUT THE FACTS AND CLEARCUT RECOMMENDATION WITHIN TWO WEEKS.

Reference: DEO office letter number No: 18173-74/lit Branch (M) dated 25th November, 2019 on the above noted subject a committee was constituted to investigate matter expressed in given subject.

Scope and Purpose:

Mr. Shahid Usman Teacher PST GPS Rash Sikanadra firstly appointed as PST teacher in 07/1/1996 and was terminated on dated 28/4/1997. Government of Khyber Pakhtunkhwa passed sacked employee act in 2012. Mr. Shahid Usman approached Director office being sacked employee for reappointment but his appeal rejected by Director office dated 3/7/2014. Worthy High Court and Service tribunal both reinstated Mr. Usman while two inquiries has built barrier by observing some facts and compels Honorable court to ask for de-novo inquiry about these documentary facts.

Back ground:

Perusal of the record reveals that the Mr. Shahid Usman was appointed as PST teacher vide order dated 7/01/1996. The record further revealed that the Shahid Usman along with others terminated by the competent authority vide order dated 28/4/1997 on the allegation of illegal appointment and without prescribed manners.

The record further revealed that Government of Khyber Pakhtunkhwa enacted the Khyber Pakhtunkhwa sacked employees appointment act 2012 for reinstatement of sacked employees terminated during the year 1996 to 1998 where under the Shahid Usman applied for reinstatement through application dated 11/1/2012 but the application of the Shahid Usman was rejected vide order dated 3/7/2014.

P. (22)

The record further revealed that Shahid Usman along with other filed writ petition before the worthy High court and the writ petition of Shahid Usman along with others disposed by worthy High Court vide detailed judgment dated 24/5/2016 and the Shahid Usman was reinstated by the responded department on the basis of the aforesaid judgment of the worthy high Court. The record further revealed that after the reinstatement of Shahid Usman the responded department initiated fact finding inquiry against him and the Shahid Usman was issued show cause notice on the basis of said fact finding inquiry report. The academic documents/ appointment and termination order were found fake and suspicious and ultimately the reinstatement order of the Shahid Usman was withdrawn by the competent authority.

The record further revealed that after reinstatement, the respondent department also sends academic documents for verification and on the basis of said verification report the salary of Shahid Usman was released by the responded department.

Moreover the respondent department has also submitted comments in the writ petition and after hearing the both parties the worthy High court disposed the writ petition of the Shahid Usman and on the basis of said judgment the worthy High, the Shahid Usman was reinstated in service.

Moreover neither charge sheet, a statement of allegation was framed nor proper inquiry was conducted, nor the Shahid Usman was associated in any inquiry proceeding nor any final show cause notice was issued to the Shahid Usman after so called another fact finding inquiry report dated 18/8/2018.

Meaning there by that Shahid Usman was condemned unheard which has rendered the whole proceeding illegal and liable to be set aside therefore service tribunal partially accept the appeal and set aside the impugned order, reinstate the Usman into service with the direction to responded department to conduct regular inquiry in the mode and manner prescribed under Khyber Pakhtunkhwa Government servants (Efficiency & Discipline) Rules, 2011 strictly in accordance with law and rule within the period of 90 days from the date of receipt of copy of this judgment. The issue of back benefits will be subject to the outcome of the de-novo inquiry.

Proceeding of Facts Finding:

P. (25)

It was demanded by the the court that a regular inquiry in the mode and manners prescribed under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules , 2011 strictly in accordance with the law and rules, therefore following letters were written to understand the truth of first appointment letter and consequent termination letter reality, main melody of de-novo inquiry

1. Head teacher GPS Rash Siknadra to send Shahid Usman on given date..
2. A head Teacher of Banda Thellian (Batal Circle) through ADEO concerned.
3. A letter to Basher Ahmad CT Teacher at GMS bandi Kainth District Mansehra.
4. Statement of Muhammad Yaseen Ex member of Hilkot Union Council
5. A Questionnaire to Shahid Usman in Urdu.
6. A charge sheet of allegation as per procedure
7. Head Teacher GPS Hamsharian Mansehra.
8. Senior Account officer Mansehra.
9. A letter of Attendance of Shahid Usman of meeting with Inquiry committee.

Fact Finding:

1. Statement of Head Teacher of GPS Rash Siknadra :

That Shahid Usman according to Head Teacher as reported joined his services again under reinstatement order on 19/10/2019 at GPS rash Siknadra and started teaching learning process.

That Shahid Usman has very polite manners and a competent teacher and as after his arrival students enrolment has increased due to his efforts. Therefore his salary should be released so that he should work better for better schooling.

2. Statement of Head Teacher of Banda Thellian:

He, the Head Teacher of GPS Banda Thellian reported that Mosque school documentary record of Banda Thellian had already been smashed due to 8th October 2005 devastating earth quake. The existing record bears no picture at all about the Shahid Usman.

He further informed that Basher Ahmad CT teacher at the time before the year 2009 may know about Shahid Usman appointment. Therefore a letter was written to Basher Ahmad who is now working as CT teacher at GMS Bandi Kainth

P. (24)

District Mansehra about Shahid Usman. (Statement is attached here)

3. Statement of Ex - PTC Teacher at Banda Thellian (Basher Ahmad)

Ex - PST Teacher at Banda Thellian before 2009 about whom Head Teacher of Banda Thellian informed the inquiry committee to know truth about Shahid Usman He said That Presently He is working as CT Teacher at GMS Bandi Kainth district Mansehra.

He states that Shahid Usman performed his duty in the year 1996-97 at Banda Thellian He further elaborated that attendance report of Shahid Usman was endorsed by member of UC at that time Mr. Muhammad Yaseen of Hilkot and Imam Masjid of That time. (Statement is attached here). Similarly

Inquiry Committee by any way got the telephone number of Muhaimmad Yaseen member uc and requested to him what he knows about Shahid Usman.

4. Statement of Muhammad Yaseen UC member of Banda Thellian:

That Muhammad Yaseen S/O Khan Gee resident of Banda Hilkot, the Ex UC member of Banda circle confirms that Shahid Usman had performed his duty at Banda Thellian and he endorses it even today at any forum. He informed about Sabir Hussain Shah S/O Syed. Peer Zaman Shah Ex Circle In charge ASDEO Office Circle Batal resident of Chatter Plain about verification of Shahid Usman.

The Inquiry Committee pursued him and asked him to state about Shahid Usman. (Statement is attached here)

5. Statement of Sabir Shah Ex Circle In charge Circle Batal ASDEO Office:

That Sabir Hussain Shah endorses that Shahid Usman PTC GMPS Banda Thellian salary issued on Pay bill in March 1997 and his GP Fund No 11669 issued from account office is to be verified.

6. Statement Of Head Teacher GPS Hamsharian

That Shahid Usman has performed his duties from 6/12/2017 to 2/10/2018 at GPS Hamsharian Mansehra about ninth months and twenty six days.

P. (WB)

That Character and behavior of the Shahid Usman was satisfactory during his duty at GPS Hamsharian. He also attached some supporting document in favor of Shahid Usman like statement of ASDEO on Log book (attached here).

7. Statement of Account office Mansehra.

In response to letter of Inquiry Committee the account office informed through a letter dated 6/12/2019 that it is confirms that Shahid Usman PST appointed in 1996-97 according to account office record.

That he had drawn salary from 1996 to June 1997 as per record and his GP fund No is 11669.

That his GPS fund balance is Rs 782 rupees as per record/(letter is attached here).

Discussion / Grounds

After deep study of statements of Head teachers and related people/account office it is confirmed that Mr. Shahid Usman was appointed in 1996-97 and terminated on original letters issued by DEO office.

Moreover he is good in teaching learning process as per statements of head teachers bear at Primary level and has enough educational testimonials. Some people like Sabir hussain shah has been solicited to provide information about Shahid Usman

Besides this he has received salary and has GPS fund arrear at Account office about 782/00 rupees under GPF Fund No 11669.

Similarly The Inquiry Committee observed that academic documents of Shahid Usman from SSC to BA which are correct and verified from concerned institutions.

A Detail marks sheet of Allama Iqbal Open University was also verified through university web link and found accurate. He performs his duties at satisfactory level.

His appointment and termination letter has to be verified by present ASDEO at Mansehra office (Copy attached) is important factor to understand the datum.

He has been given all opportunities to dialogue/exchange and his attendance certificate as per rules

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of 2011(Efficiency & discipline) rules received from him (copy attached here).

RECOMMENDATIONS:

Therefore a clear cut recommendation is given that

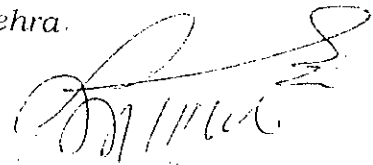
1. His first appointment order is accurate and correct. Similarly termination letter, in the presence of department doings and judicial procedure found to be correct.
2. His arrears are given to him from date of appointment after when worthy High Court took decision of reinstatement that is from 6/12/2017.

Inquiry Committee

1. Amjid Ali Principal GHS Naran Mansehra
2. Zulfiqar Ahmad Principal GHS Trangri Bala Mansehra.



PRINCIPAL
Govt. High School
Naran Mansehra



P. 27
Hajwa

دائریہ سروس کے بارے میں سیکرٹری ایف ایچ ای کے جواب میں
محالی سروس دیک بھینٹ از 29/09/2018 تا 18/10/2019

Med
Hajwa

صدا عالی

گزارشات ذیل عرض فرمائیں۔

- 1- سائل سالانہ نواز شریف دور 96-97 کا ہر طرف شدہ پرائمری پتھر تھا۔
- 2- سائل نے 2012 (Sacked Act) کے تحت محکمہ تعلیم میں دوبارہ بحالی کے لیے اجوعا
- 3- سائل کو شہادتی ٹوٹا ہوا ایڈمٹ کیا گیا ہے۔ غصیلے رٹ نمبر 16-46A کے تحت دوبارہ بحال کر دیا گیا۔ اور پرائمری یونیورسٹی پر جی ای ایس میں ہر سال سرکل خالی میں لکھنا لیا گیا۔
- 4- سائل نے اس دوران دس ماہ تک ٹرانس ریحام دیے۔ بعد ازاں سائل کو دوبارہ صرف 28/08/2018 کو بر طرف کر دیا گیا۔
- 5- سائل نے اس پر آپ صاحب کو دوبارہ بحالی کی اپیل کی تاہم نامعلوم طور پر
- 6- سائل نے سروس ریزومیل شہاد در میں 1548A-2018 اپیل کی ہے جس پر عدالت نے دوبارہ بحالی کا آرڈر جاری کیا۔ جی ای ایس میں سکڑا خالی میں
- 7- سائل کو محکمہ تعلیم نے عدالت کے حکم پر بحال کرنے کی نوڈ انٹرویو مقرر کی۔ جس پر سائل کے جس میں انٹرویو کا فیصلہ ہوا اور سائل کو لار جریج ڈائٹواری کے غصیلے کے بعد 21/02/2020 کو پرنٹ طور پر بحال کر دیا گیا۔
- 8- سائل کو انٹرویو میں جی ای ایس کے باوجود دیک بھینٹ تحریرہ نمبر 08 مارچ 2020 میں دیا گیا۔

ان کو اجاب دینے کے باوجود جس بلوں کا تعلق ہے
ان کو ادیب سے دوچار کیا گیا۔

ان کو اجاب دینے کے باوجود جس بلوں کا تعلق ہے
ان کو ادیب سے دوچار کیا گیا۔

10 - مسائل عدالت ہذا سرورس کے تحت ان کے ساتھ ساتھ عدالت کے ساتھ ایک
بئنٹیف اور سرورس $\frac{12}{4}$ سے مقدار ہے۔

11 - مسائل کو متعلقہ افسران اور عملوں نے ذاتی رجسٹر کا شمار کیا گیا

12 - مسائل نے تمام عملہ ٹوٹ اور دستاویزات درخواست کے ساتھ ساتھ
کمرے میں تازہ حقائق کو سامنے لایا جائے۔

اس تمام تر صورت حال کے پیش نظر مسائل آپ عیناً سے استدعا
کرتا ہے کہ مسائل کو $\frac{09}{2018}$ تا $\frac{10}{2019}$ تک سلیپ لی گا سرورس

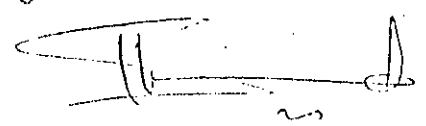
اور ایک بئنٹیف عنایت کر کے مشکور دعوتوں فرمایا جائے
آپ کی عین وزارت ہوگی

الصدر

شاہد عثمان PST

جی ایس ایس رٹس سکدرہ

سرکل خانگی مندرجہ ذیل سائبر



2018



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

No 1316 /Estt : (M)/

/Dated 09/2/2021

29
29

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa

Peshawar.

Attached
Dahlo - F

Subject:

APPEAL FOR REINSTATEMENT ORDER NO.16821-25 DATED 18-10-2019
SERVICE APPEAL KPK SERVICE TRIBUNAL PESHAWAR CAMP COURT
ABBOTTABAD DATED 17-09-2019 SERVICE APPEAL NO.1548-A/2018
SHAHID USMAN PST GPS RASH SIKANDARA (SACKED EMPLOYEE).

Memo:

Reference your office letter No.976/F.No.PF.Shahid Usman PST dated Peshawar 17-11-2021 on the subject cited above:-

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The detailed comments are as under:-

1. That Mr. Shahid Usman was appointed as a PST GPS Hamsharian vide Office Endst No.20672-702 dated 04-12-2017 at serial No.19 in compliance of Honourable Peshawar High Court Bench Abbottabad in COC No.22-A/2016 of writ Petition No.368-A/2018. whereas That After the appointment, verification of documents/Service Record provided by concerned documents have been reported, whereas the matter regarding his appointment as Sacked Employee was resolved by the Commission Authority vide letter No.6500/2018 11-04-2018, the inquiry committee after conducting the detailed inquiry. submitted report vide dated 13-04-2018, wherein the committee scrutinized documents/Service Record provided by concerned the Termination order has been found as fake and fabricated. With the remarks /recommendations of the inquiry Committee that Appointment order may be withdrawn. whereas per inquiry report dated 13-04-2018, a showcase notice was issued to concerned vide this office No. 7204 dated 27-04-2018 and received reply of show cause notice on 07-05-2018. Whereafter the accused teacher was heard in personal 24-05-2018, whereas in pursuance of the inquiry reports & after personal Hearing the charges against the accused teacher were proved. The appointment order in r/o Mr. Shahid Usman PST GPS Hamsharian Mansehra was withdrawn vide this office Endst No.12140-44 dated 25-08-2018.
2. That the appellant filed service Appeal bearing No.1548-A/2018 before KPK Service Tribunal Peshawar which was decided on 17-09-2019 with the direction to respondents that "the appellant reinstatement into service and conduct regular inquiry in the mode and manners prescribed by the KPK Government servants (Efficiency & Discipline) Rules,2011 strictly in accordance with law and rules within a period of 90 days.(Copy of judgment vide dated 17-09-2019 is attached)
3. That as per direction of Honourable Court respondent department reinstate the appellant and conducted full-fledged inquiry, the inquiry officer submitted detail report on 31-12-2019 with the direction that the first appointment order is accurate and correct, similarly termination letter, in the presence of department doings and judicial procedure found to be correct, and his arrears are given to him from the date of Appointment after when worthy High Court took decision of reinstatement that is from 06-12-2017.(Copy of inquiry report is attached)
4. That as per inquiry report of the officer the appellant reinstated into service vide order No.1800/2019 dated 21-02-2019, and the intervening period w.e.f 29-09-2018 to 18-10-2019 may be treated as Leave without Pay and necessary entry be made in his service Book (Copy of Reinstatement order is attached)

The report is submitted for further necessary action please.

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1809
10-2-2022

amur
DISTRICT EDUCATION OFFICER,
(MALE) MANSEHRA.



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 1830 /F.No.3767/Estab-1/Manshra
Dated Peshawar the 30/03/2022

*Affected
Shahid*

*P. 30
Arif
Q*

District Education Officer
(Male) Manshra.

*ADEO City
15/11/22*

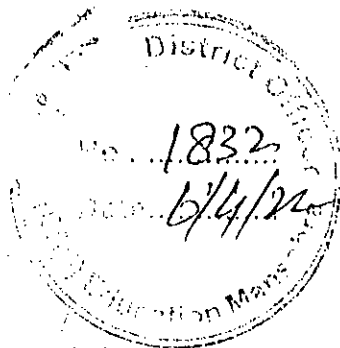
Subject: APPEAL FOR RE-INSTATEMENT ORDER NO. 16821-19A/110 18-10-2019
SERVICE APPEAL KPK SERVICE TRIBUNAL, PESHAWAR CAMP COURT
ABBOTTABAD DATED: 17-09-2019 SERVICE APPEAL No. 1548-A/2018 IN R/O
SHAHID USMAN PST GPS RASH SIKANDARA (SACKED EMPLOYEE).

DEO (M)

Memo:

I am directed to refer to your Letter No. 1316 dated 09/02/2022 on the subject cited above and to ask you that appeal in r/o Mr. Shahid Usman (Sacked Employee) PST GPS Rash Sikandara District Manshra has been rejected.

I am further directed to ask to inform the appellant concerned accordingly under intimation to this office.



Shahid Usman

Assistant Director (Estab-1)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Enclst: No.

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Mr. Shahid Usman PST GPS Rash Sikandara District Manshra.
3. Master File.

Assistant Director (Estab-1)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

وکالت نامہ

P (31)

بعدالت جناب KPK سروس ٹرایبونل پشاور کیمپ کورٹ ایبٹ آباد

شاہد عثمان بنام سیکرٹری ایڈمنسٹری ائیڈیکیشن وغیرہ

سروس اپیل

اپیلانٹ

باعث تحریر آنکہ!

منجانب:

ملک اشفاق احمد جیلانی اینڈ عبدالصبور خان ایڈووکیٹس ہائی کورٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیروی و جواب دہی بہ مقام سروس ٹرایبونل پشاور

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص زور و عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پکھری کے آگے یا پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپرد تالی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کیلئے درخواست حکم امتناعی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا ایگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر داخستہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 16.05.2022

شاہد عثمان پرائمری سکول ٹیچر (PST) حال تعینات GPS رش سکندرہ سرکل خاکی تحصیل ضلع مانسہرہ..... اپیلانٹ

Attested & Accepted
Malik Ashfaq Ahmed Jillani
&
Abdul Saboor Khan
Advocate High Court

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Regd
No.

TB A/Abad

APPEAL No. 806 of 2022

Shahid Usman

Appellant/Petitioner

Versus

Sely. (ESSE) Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Malik Ashfaq Ahmad
Jilani (Advocate)
High Court Manshera

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15-6-22 at 8:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

et amp Court

A/Abad.

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Regd
No.

TB A/Abad

APPEAL No.....806..... of 20 22

Shahid ~~Osman~~ Usman

Appellant/Petitioner

Versus

Sery (E/S/E) Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Malik Ashfaq Ahmed
Jillani (Advocate)
High Court Manshera

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15-6-22 at 8:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court

A/Abad.

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

1089

TR A/Abad

No.

APPEAL No. 806 of 20 22

Shahid Usman

Appellant/Petitioner

Versus

Secy. (CSSF) Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Shahid Usman PST

Posted at GPS Rash Sikandar Circle

Thaki Teh; 8 Distt Manshera

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15-6-22 at 8:30 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court

A/Abad.

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Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

TR AIAbad

Reg
No. _____

APPEAL No. *806* of 20 *22*

Shahid Usman

Appellant/Petitioner

Versus

Sey: (CSES) Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner *Shahid Usman PST*

Posted at GPS Rash Sikandar Circle

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at camp court

AIAbad

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[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.