


# FORM OF ORDER SHEET

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

C.O.C application No. 664/2022

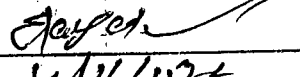
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	04/11/2022	<p>The C.O.C application of Mr. Mujeeb-ur-Rehman submitted today by Mr. Hayat Ullah Khan Advocate. Original file be requisitioned. It is fixed for hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR,</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**  
**CHECK LIST**

Case Title: \_\_\_\_\_ v/s \_\_\_\_\_

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Hayatullah Khan  
Signature:   
Dated: 11/10/22

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

C.O.C.No. 664 /2022

IN

SA No.403/2019

Mujeeb ur Rahman..... Petitioner

Versus

Secretary E&S, KP, & others .....Respondents

**INDEX**

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8.	Wakalatnama in Original		

Petitioner

Through

*Hayat Ullah Khan*  
**Hayat Ullah Khan**  
Advocate Supreme Court

Dated: \_\_\_\_\_

(1)

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

C.O.C.No. 664 /2022  
IN  
SA No.403/2019

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1860

Dated 4-11-2022

Mujeeb-ur-Rahman S/o Nowsherwan  
R/o Mohallah Dagai Cham, Village & P/o Manerai  
Payan, Tehsil & District Swabi..... Petitioner

Versus

- 1) Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2) Director Elementary & Secondary Education, KP, Peshawar.
- 3) Irfan Ali, District Education Officer, Elementary & Secondary Education, Department, ~~Peshawar~~ Swabi
- 4) Principal Govt. Higher Secondary Education Dobian, District Swabi..... Respondents

***PETITION FOR INITIATING CONTEMPT  
OF COURT PROCEEDING AND AWARDED  
EXEMPLARY PUNISHMENT TO THE  
RESPONDENTS FOR FLOATING AND  
VIOLATION OF ORDER DATED 25.03.2022  
PASSED BY THIS HON'BLE TRIBUNAL.***

*Respectfully Sheweth:  
The petitioner states as under:-*

- 1) That the petitioner initially appointed as Lab Attendant in the year 2006, but for a short period of time, he served against his original cadre, and due to inimical attitude of the respondents he was mostly adjusted and posted against the cadre as Chowkidar.

- 2) That this issue remained for long period and finally through a legal process when he succeeded to get his original cadre he was terminated.
- 3) That the petitioner filed appeal against the order of termination and his appeal was allowed and he was reinstated in service and order for re-inquiry was passed, the relevant para of the judgment is reproduced herein below:-

*"It is evident from the above discussion that the competent authority was ignorant of relevant rules as no proper inquiry was conducted and the appellant was not given proper opportunity of defense. The perusal of entire record shows that the proceedings conducted are also in a hotchpotch manner and the proceedings exhumed numerous lacunas and the respondents have blatantly violated the set norms and rules and conducted the proceedings in an authoritarian manner. We have observed that the appellant was kept deprived of having appropriate opportunity of defense as is required under the KP Govt. Servants (E&D) Rules, 2011. It is a well settled legal proposition duly supported by numerous judgments of the apex Court that for*

3

*imposition of major penalty, regular inquiry is a must.*

*For the foregoing reasons, the appeal is partially accepted and case is remitted to the Department for de-novo inquiry. **He is accordingly reinstated for the purpose of de-novo inquiry and the respondents are directed to conduct the same within 90 days of the receipt of copy of this judgment.** The issue of back benefits shall be subject to outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room."*

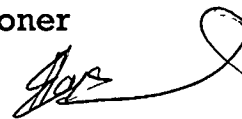
- 4) That it has been specifically mentioned that the petitioner is reinstated in service and thereafter inquiry be re-conducted.
- 5) That the respondents intentionally, malafidely floated the order of this hon'ble tribunal and instead of reinstating the petitioner in his service at the back of him a inquiry was conducted and he was again terminated.
- 6) That without reinstatement and due process of law, the acts of the respondents amounts to contempt of Court, hence they are liable to be dealt with in accordance with law.

4

PRAYER

It is, therefore, most humbly prayed that on acceptance of this application, the contempt of Court proceedings may please be initiated against the respondents and they may please be directed to implement the order in its letter and spirit.

Petitioner  
Through



**Hayat Ullah Khan**  
Advocate Supreme Court

(5)

**BEFORE THE CHAIRMAN OF SERVICE TRIBUNAL**

**KPK PESHAWAR**

~~600~~ petition ...../2022

Mujeeb Ur Rehman

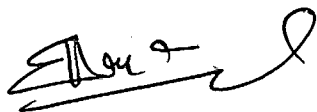
VERSUS

Govt. of KP Through secretary education etc.

**AFFIDAVIT**

I, Mujeeb-Ur-Rehman S/O Nowsherwan R/O Mohallah Dagi Cham Village and po maneri Payan Tehsil & District Swabi, hereby solemnly Affirm and declare on oath. That the content of instant petition are correct to the best of my knowledge and Belief and nothing has been kept secret or concealed from this August tribunal.

Identified By:

  
Ase

مجيب الرحمان  
DEPONENT



(5) (6)

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

C.O.C.No. \_\_\_\_\_/2022

IN

SA No.403/2019

Mujeeb ur Rahman..... Petitioner

Versus

Secretary E&S, KP, & others ..... Respondents

**ADDRESSES OF THE PARTIES**

**PETITIONER:**

Mujeeb ur Rahman S/o Nowsherwan  
R/o Mohallah Dagai Cham, Village & P/o Manerai  
Payan, Tehsil & District Swabi

**RESPONDENTS:**

- 1) Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2) Director Elementary & Secondary Education, KP, Peshawar.
- 3) Irfan Ali, District Education Officer, Elementary & Secondary Education, Department, Peshawar.
- 4) Principal Govt. Higher Secondary Education Dobian, District Swabi

Petitioner

Through

*Hayat*  
**Hayat Ullah Khan**  
Advocate Supreme Court

(7)

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR.

S.A.No. 403 2019

MUJEEB-UR-RAHMAN S/o Nowsherwan

R/o Mohallah Dagai Cham, Village & P.O Manerai Payan,

Tehsil and District Swabi.....Appellant.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 489

Dated 28/3/2019

VERSUS

- 1) Govt. of KPK through Chief Secretary Khyber Pakhtun Khwa Peshawar.
- 2) Secretary Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3) Director Education Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 4) District Education Officer, Elementary and Secondary Education KPK, District Swabi.
- 5) Principal Govt: Higher Secondary School Dobian District Swabi.
- 6) Head Master Government Primary School Rafiq Abad Swabi District.
- 7) Principal Government Secondary School Mansabdar District Swabi..... Respondents

Filed to-day  
Registrar  
28/3/19

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER OF RESPONDENT NO.4 WHERE VIDE HIS ORDER/ NOTIFICATION DATED 19.09.2018 THE APPELLANT WAS TERMINATED/ REMOVED FROM GOVT: SERVICE UNDER RULE 4(B) (III) OF E&D RULES 2011.

Prayer

On acceptance of the instant appeal the impugned order may kindly be set aside



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 403/2019

Date of Institution ... 28.03.2019  
Date of Decision ... 25.03.2022

Mujeeb ur Rehman S/O Nowsherwan R/O Mohallah Dagai Cham,  
Village & P.O Manerai Payan, Tehsil & District Swabi.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary  
Khyber Pakhtunkhwa Peshawar and Six others.

(Respondents)

Hayat Ullah Khan,  
Advocate

... For appellant.

Kabir Ullah Khattak,  
Additional Advocate General

... For respondents.

Salah-Ud-Din  
Rozina Rehman

... Member (J)  
... Member (J)JUDGMENT

ROZINA REHMAN, MEMBER (J): The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the prayer  
as copied below:

**"On acceptance of the instant appeal the impugned  
order may kindly be set aside and the appellant may  
be re-instated in service with all back benefits."**

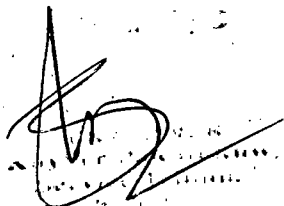
2. The relevant facts leading to filing of instant appeal are that  
appellant was appointed as Lab. Attendant and was posted in  
Government High School Gulshan Abad on 07.10.2006. He was then



transferred to Government High School Mansabdar and was posted as Chowkidar. The respondents were legally bound to adjust him against his original post but he was posted as Chowkidar in different schools and he served there for a pretty long time. To solve his problem, writ petition was filed and during the pendency, notification in respect of his adjustment was produced and he was transferred against the post of Lab. Attendant in the Government Higher Secondary School Dobyar District Swabi. Departmental proceedings were initiated against the appellant and he was removed from service. He submitted departmental appeal which was not responded to, hence, the present service appeal.

3. We have heard Hayat Ullah Khan Advocate for appellant and Kabir Ullah Khattak, learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Hayat Ullah Khan Advocate, learned counsel appearing on behalf of appellant, inter-alia, submitted that the impugned order is illegal, void and without lawful authority, hence, not tenable and liable to be set aside as the appellant was not treated according to law and rules; that the appellant was not given an opportunity of hearing or defense and the impugned order is therefore, against law and in violation of the maxim audi alteram partem. Learned counsel contended that respondents were legally bound to issue a show cause notice or allow him to join the inquiry proceedings but they never informed the appellant about the inquiry. It was further argued that the allegations in respect of absence from duty are totally baseless as

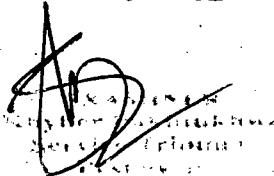


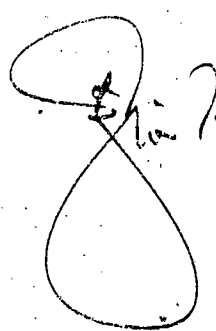
he never absented himself from lawful duty and that the plea in respect of marking false attendance in the relevant register is also not appealable to a prudent mind as all the registers were in the custody of the competent authority and in such like situation, how the appellant could mark his attendance. He, therefore, requested for acceptance of the instant appeal.

5. Conversely learned AAG contended that the appellant was transferred to GHSS Mansabdar on administrative grounds due to non-availability of Lab. Attendant post at the School and that he was temporarily adjusted against the post of Chowkidar. However, he remained absent from duty willfully w.e.f 20.04.2010 to 14.10.2010, 19.10.2010 to 03.02.2011 and 15.01.2016 to 31.03.2016. He contended that the signature in the attendance register were fake and bogus after February, 2011 up to 30.11.2015. It was further submitted that consequent upon his continuance habitual and willful absence the principal concerned relieved him of his duties and his services were placed with DEO Male Swabi who again placed him at the disposal of DEO (Male) Swabi with the request to conduct an inquiry against him. Proper inquiry was conducted and in the light of inquiry report, he was transferred on disciplinary grounds to GPS Rafiq Abad. He submitted that his plea in respect of cadre change was conceded and he was transferred to GHSS Dobyana on his original post of Lab. Attendant where he was removed from service according to law.

6. From the record, it is evident that appellant was appointed as Lab Attendant vide Notification dated 07.10.2006. He was transferred

ATTESTED

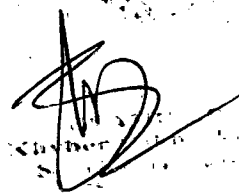
  
 DEO (Male) Swabi  
 District School, Swabi



(11)

to GHSS Mansabdar on administrative grounds against the post of Chowkidar and then he was adjusted in different schools against the post of Chowkidar. He challenged the change of his cadre in the august Peshawar High Court, Peshawar by filing a Writ Petition, wherein he challenged that the respondents could not change the cadre of appellant under the existing rules and during the pendency of writ petition vide office order dated 07.12.2017 appellant was adjusted against the original post of Lab Attendant at GHSS Dobyhan, therefore, he sought withdrawal of the writ petition. From the impugned order dated 19.09.2018 it becomes crystal clear that the appellant was charged for absence. Allegedly, he remained absent from duty willfully w.e.f 20.04.2010 to 10.10.2010, 19.10.2010 to 03.02.2011 and 15.01.2016 to 31.03.2016. His signatures in the register were declared fake and bogus after February, 2011 up to 30.11.2015. An inquiry was conducted against him on 10.03.2016 suggesting his termination but lenient view was taken due to his pretension that he had been wrongly posted as Chowkidar instead of Lab. Attendant. His plea was accepted and he was adjusted against Lab. Attendant post at GHSS Dobyhan on 07.12.2017 but he remained absent from duty and failed to assume charge within the stipulated time. Another inquiry was conducted on 01.08.2018, therefore, he was served with an absence notice on 13.12.2017 and proper notices were also advertised in two leading newspapers but he did not resume his duty. He was, therefore, removed from service under Rule-4(b)(iii) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 vide order dated 19.09.2018 of District Education Officer (Male) Swabi. From the record, it is evident that

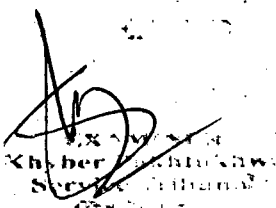
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appellant was charged for willful absence whereas he was departmentally proceeded against and was removed from service under Rule-4(b)(iii) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. A Government servant shall be liable to be proceeded against under Rule-3(d) if he is guilty of habitually absenting himself from duty without prior approval of leave, whereas, procedure in case of willful absence finds mention in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. In the instant case, two different inquiries were conducted against appellant and a strange procedure was adopted by the competent authority.

Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 provides procedure in case of willful absence which is hereby reproduced for ready reference:

**"9. Procedure in case of willful absence.** – Notwithstanding anything to the contrary contained in these rules, in case of willful absence from duty by a Government servant for seven or more days, a notice shall be issued by the competent authority through registered acknowledgement on his home address directing him to resume duty within fifteen days of issuance of the notice. If the same is received back as undelivered or no response is received from the absentee within stipulated time, a notice shall be published in at least two leading newspapers directing him to resume duty within fifteen days of the publication of that notice, failing which an *ex-parte* decision shall be taken against the absentee. On expiry of the stipulated period

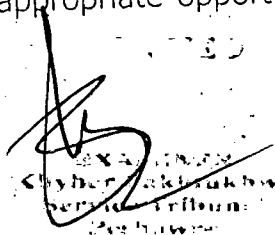
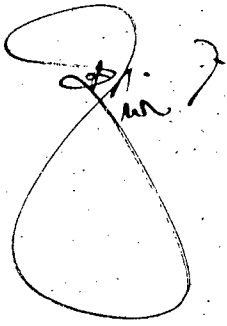
  
Khyber Pakhtunkhwa  
Government Servants  
Rules, 2011

given in the notice, major penalty of removal from service may be imposed upon such Government servant?"

7. As per law, in case of willful absence from duty by a Government servant for seven or more days, a notice shall be issued through registered acknowledgement by the competent authority. In the instant case, no such notice is available on file which could show that the present appellant had properly been informed to resume duty which means that the procedure in case of willful absence prescribed by the law was not properly followed by the competent authority

8. Vide impugned order dated 19.09.2018, major penalty of removal from service was imposed upon appellant under Rule-4 (b)(iii) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 which means that the proceedings were conducted against the appellant on the allegations of being guilty of habitually absenting himself from duty without prior approval of leave. The impugned order also shows that he was charged for willful absence for which procedure has been provided under Rule-9 of the rules *ibid*.

9. It is evident from the above discussion that the competent authority was ignorant of relevant rules as no proper inquiry was conducted and the appellant was not given proper opportunity of defense. The perusal of entire record shows that the proceedings conducted are also in a hotchpotch manner and the proceedings exhumed numerous lacunas and the respondents have blatantly violated the set norms and rules and conducted the proceedings in an authoritarian manner. We have observed that the appellant was kept deprived of having appropriate opportunity of defense as is required



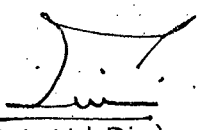
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

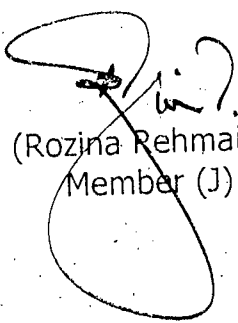


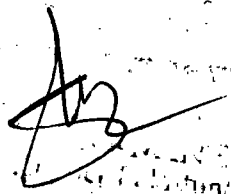
under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. It is a well settled legal proposition duly supported by numerous judgments of the Apex Court that for imposition of major penalty, regular inquiry is a must.

10. For the foregoing reasons, this appeal is partially accepted and case is remitted to the Department for de-novo inquiry. He is accordingly reinstated for the purpose of de-novo inquiry and the respondents are directed to conduct the same within 90 days of the receipt of copy of this judgment. The issue of back benefits shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

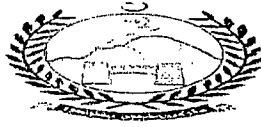
ANNOUNCED.  
25.03.2022

  
(Salah-Ud-Din)  
Member (J)

  
(Rozina Rehman)  
Member (J)

04/04/22 

Number of Presentations of Verdicts ---  
 Number of Writs --- 3200  
 Copying Fee --- 34/-  
 Agent ---  
 Total --- 34/-  
 Name of the Officer ---  
 Date of receipt of copy --- 28/6/22  
 Date of receipt of copy --- 28/6/22



15

"B"

## DISTRICT EDUCATION OFFICE (MALE) SWABI

(Office phone & Fax No 0938280239, [emis\\_swabi@yahoo.com](mailto:emis_swabi@yahoo.com))

### ORDER

**WHEREAS**, disciplinary proceedings were initiated against Mr. Mujeeb ur Rahman, Lab Attendant Govt. Higher Secondary School Dobian, Swabi, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011. The accused was served with charge sheet and statement of allegations.

**AND WHEREAS**, an enquiry committee, conducted the enquiry as per rules and submitted his report, thereafter the accused was served with final show cause notice and after receiving no reply to the same, the accused also opted for personal hearing. Accordingly he was personally heard on 16/09/2022, wherein he badly failed to defend his case.

**AND WHEREAS** after going through the findings and recommendations of the enquiry committee, materials on record, status of reply to the show cause and subsequent personal hearing, the accused found guilty of misconduct.

**NOW, THEREFORE**, in exercise of the powers, conferred upon the undersigned (Irfan Ali, DEO Male Swabi) under Section 4(1) (b)(iii) of the Khyber Pakhtunkhwa (Efficiency & Discipline) rules, 2011, the Competent Authority is pleased to impose the major penalty of "**Removal from Service**" upon Mr. Mujeeb ur Rahman, Lab Attendant Govt. Higher Secondary School Dobian, Swabi **with immediate effect**. The whole absence period till date is treated as unauthorized absence from duty.

(IRFAN ALI)

DISTRICT EDUCATION OFFICER  
(MALE) SWABI

Endst:No. 8h 57-62 /Dated Swabi the:- 23/09 /2022.

Copy of the above is forwarded for information and n/action to

the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar, Service Tribunal, Peshawar.
3. District Accounts Officer Swabi.
4. District Monitoring Officer (DMO) Swabi.
5. Principal, GHSS Dobian, Swabi.
5. Mr. Mujeeb ur Rahman, Lab Attendant, under transfer to Govt. Higher Secondary School Dobian, Swabi ( Mohallah Dagai Lar, VPO Maneri Payan Tehsil & District Swabi), Under Registered cover.
6. Master file.

DISTRICT EDUCATION OFFICER  
(MALE) SWABI

کتب و ضا

سید محمد اسحاق کتب خیمہ کتب و ضا  
راہ

محمد بن اسحاق

صا۔ یں

سید اسحاق صبا ذیل آئی رسد

اب یہ اس کے کتب خیمہ ضلع صوابی میں لکھو۔ Lab attendant لکھی ہوئی تھی

صبر دیا کہ اس کے لکھو۔ یہ سید اس سے لکھی تھی  
یہ اس کے کتب خیمہ ضلع صوابی میں لکھی ہوئی تھی  
صبر دیا کہ اس کے لکھو۔ یہ سید اس سے لکھی تھی  
دعا ہے۔

یہ اس کے کتب خیمہ ضلع صوابی میں لکھی ہوئی تھی

صبر دیا کہ اس کے لکھو۔ یہ سید اس سے لکھی تھی  
دعا ہے۔

سید اس کے کتب خیمہ ضلع صوابی میں لکھی ہوئی تھی  
محمد بن اسحاق  
صبر دیا کہ اس کے لکھو۔ یہ سید اس سے لکھی تھی  
دعا ہے۔



(17)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARIAT PESHAWAR**  
**(PHONE NO. 091-9223587)**

**SO(PE)/E&SED/5-19/re-instatement //2022**

**Dated Peshawar the, October 3<sup>rd</sup>, 2022**

To

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa

Subject: - **REINSTATEMENT**

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Mr. Mujib Ur Rahman R/o District Swabi, for further necessary action, please.

**Encl.As above.**

  
(MUHAMMAD ISHAQ)  
SECTION OFFICER (PE)

Copy forwarded to the; PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

  
SECTION OFFICER (PE)



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. \_\_\_\_\_ /F.No.432/A-20/C-IV/Swabi

Dated Peshawar the 07/10 /2022

Phone: 091-9225344

Email: ddadm.n.ese@gmail.com

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To

The District Education Officer  
(Male) Swabi.

Subject: **APPLICATION FOR RE-INSTATEMENT**

Memo:-

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application in r/o Mr. Mujeb Ur Rahman Lab Attendant GHSS Dobian, Swabi received from Section Officer (Primary) Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No.SO (PE)/E&SED/5-19/re-instatement/2022 dated 03/10/2022.

You are therefore <sup>ask</sup> directed to submit detail report/comments at early date.

*sdlr*  
**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 9031

Copy forwarded to the: -

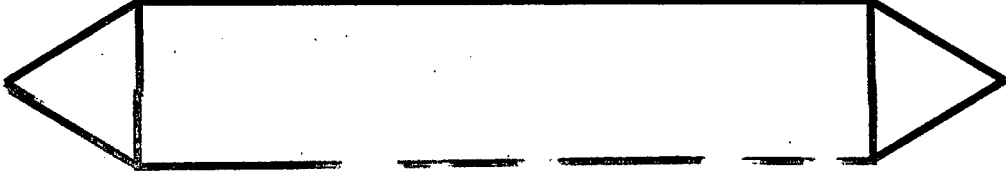
1. Section Officer (Primary) Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide No.SO (PE)/E&SED/5-19/re-instatement/2022 dated 03/10/2022.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

*JFT/22*  
**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

*AP*  
*7/10/22*

بعدالت بسند سوس (سوس) پشاور

19



22ء 2 منجانب

مورخہ

مقدمہ

دعویٰ

BC No = 15-7511  
Mab No - 03005820669  
SCSM III Ogmail.com  
com

باعث تحریر آنکے

عجیب الرحمن  
بنام حکومت

ED. لا

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام پشاور کیلئے سعیدات اللہ خان

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے  
سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔  
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

2022ء

ماہ ۰۴

المرقوم

العبد دگ واہ العبد

کے لئے منظور ہے۔

مقام پشاور

سعیدات اللہ خان