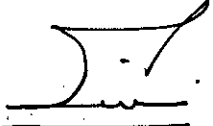


20.09.2021

Clerk of learned counsel for the appellant present, while learned counsel for the appellant is absent due to strike of lawyers. Mr. Usman Ghani, District Attorney for the respondents present and requested for adjournment for submission of reply/comments. Request is accorded with the directions to respondents to furnish reply/comments within 10 days. In case the respondents failed to submit reply/comments within stipulated time from today, they shall have to seek extension of time through written application citing sufficient reasons. Otherwise, their right for submission of reply/comments shall stand ceased. To come up for arguments before the D.B on 20.12.2021 at Camp Court Abbottabad.

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

20.12.2021

Appellant alongwith his counsel present. Mr. Touseef Ahmed, ADO (Litigation) alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Respondents have failed to submit their written reply/comments even today. Vide pervious order dated 20.09.2021 it was directed that the respondents shall positively submit reply/comments on the next date failing which their right for submission of reply/comments shall be deemed as ceased. The right of submission of written reply/comments of respondents thus stands ceased. To come up for arguments on 16.02.2022 before the D.B at Camp Court Abbottabad.

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

16.11.2020

Mr. Zahid, clerk to counsel for appellant is present. Mr. Usman Ghani, District Attorney and Mr. Muhammad Touseef, Litigation Officer, on behalf of respondents No. 1 to 4, are also present.

Representative of respondents No. 1 to 4 seeks further time for submission of written reply/comments. Neither written reply on behalf of respondent No. 5 is submitted nor any representative on his behalf is present; therefore, notice be issued to him for submission for written reply/comments. File to come up for written reply/comments on 20.01.2021 before S.B. at Camp Court, Abbottabad.

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

20.1.2021

Due to covid-19, The case is adjourned to 20-9-21. for the same.

  
Reader

Due to covid ,19 case to come up for the same on / /  
at camp court abbottabad.


Reader

Due to summer vacation case to come up for the same on 1/14  
9/20 at camp court abbottabad.

  
Reader

14.09.2020

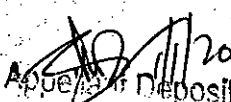
Mr. Muhammad Arshad Khan Tanoli, Advocate for appellant is present. Mr. Usman Ghani, District Attorney is also present. Neither written reply on behalf of respondents submitted nor anyone on their behalf is present, therefore, notices be issued to them for submission of written reply/comments. File to come up for written reply/comments on 16.11.2020 before S.B at Camp Court, Abbottabad.


  
(Muhammad-Jamal-Khan)  
Member  
Camp Court Abbottabad

20.12.2019

Counsel for the appellant Muhammad Nadeem present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving as Junior Clerk in Government Higher Secondary School Kawai. He was transferred from the said school to the Government High School Maira Amjid Ali by the competent authority vide order dated 10.09.2018. It was further contended that the Principal of Government Higher Secondary School Kawai did not relieve him due to non-availability of his substitute and in this respect the Principal Government Higher Secondary School Kawai has also issued a certificate on 29.03.2019. It was further contended that the competent authority imposed a minor penalty of stoppage of one annual increment with effect from 01.12.2019 with accumulative effect and his absence from 10.09.2018 to 25.03.2019 was treated as leave without pay vide order dated. It was further contended that neither proper inquiry was conducted against the appellant nor the appellant was associated in any inquiry nor the appellant was at fault for not assuming the charge at Government High School Maira Amjid Ali rather the Principal of Government Higher Secondary School Kawai did not relieve the appellant for the reason that there was no substitute at the place of the appellant in the said school therefore, it was vehemently contended that the respondent-department was required to initiate disciplinary inquiry against the Principal of the said school rather the respondent-department had made the appellant escape-goat and imposed the aforesaid penalty therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant needs 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 the respondents for written reply/comments for 17.02.2020 before S.B at Camp Court Abbottabad.

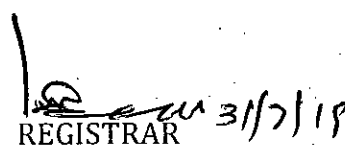


  
Appellant Deposited  
Security & Process Fee

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

Form- A  
FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 995/2019 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge	
1	2	3	
1-	31/07/2019	<p>The appeal of Mr. Muhammad Nadeem received today by post through Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 31/7/19</p>	
2-	20.09.2019	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-9-19</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned to 20.12.2019 for preliminary hearing before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad</p>	

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

Service Appeal No. 995 /2019

Muhammad Nadeem, Junior Clerk G.H.S.S Kawai/ GHS Maira Amjid Ali,  
District Mansehra.

...APPELLANT

**VERSUS**

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

...RESPONDENTS

**SERVICE APPEAL**

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 10	
2.	Copy of order dated 10/09/2018	11	"A"
3.	Copy of service certificate issued by respondent No. 4	12	"B"
4.	Copies of show cause notice dated 10/10/2018 and 27/11/2018	13-14	"C" & "D"
5.	Copy of letter dated 22/12/2018	17	"E"
6.	Copy of impugned order dated 25/03/2019 and relieving order dated 31/03/2019	18-19	"F"
7.	Copy of departmental appeal	20-24	"G"
8.	Wakalatnama	25	

*M/Nadeem*  
...APPELLANT

Through

Dated: 30/7 /2019

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

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

Service Appeal No. \_\_\_\_\_/2019

Muhammad Nadeem, Junior Clerk G.H.S.S Kawai/ GHS Maira Amjid Ali,  
District Mansehra.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Peshawar.
3. District Education Officer (Male), Mansehra.
4. Principal GHSS Kawai, Mansehra.
5. District Accounts Officer, Mansehra.

...RESPONDENTS

**SERVICE APPEAL** UNDER SECTION 4 OF  
KPK SERVICE TRIBUNAL ACT, 1974, FOR  
DECLARATION TO THE EFFECT THAT THE  
APPELLANT WAS POSTED FROM GHS  
KAWAI TO GHS MAIRA AMJID ALI VIDE  
ORDER ENDST NO. 12878-81 DATED

10/09/2018 BUT DUE TO NON AVAILABILITY OF ANY SENIOR/ JUNIOR CLERK AT GHSS KAWAI, RESPONDENT NO. 4 DID NOT RELIEVE THE APPELLANT FOR ASSUMPTION OF CHARGE AT GHS MAIRA AMJID ALI AS A RESULT, THE APPELLANT WAS FORCED/ DICTATED STATEMENT BY RESPONDENT NO. 3 FROM THE APPELLANT ON THE DAY OF PERSONAL HEARING. THEREAFTER, PUNISHMENT OF STOPPAGE OF ONE ANNUAL INCREMENT W.E.F 01/12/2019 WITH ACCUMULATED EFFECT AND PERIOD OF SERVICE AT GHSS KAWAI W.E.F 10/09/2018 TO 25/03/2019 HAS BEEN CONVERTED INTO LEAVE WITHOUT PAY VIDE ORDER ENDST NO. 4655-61 DATED 25/03/2019 WHICH IS PERVERSE AGAINST THE LAW AND IMPUGNED ORDER DATED 25/03/2019 IS LIABLE TO BE SET ASIDE.

---

**PRAYER:** ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, STOPPAGE OF ONE ANNUAL INCREMENT W.E.F 01/12/2019 WITH ACCUMULATIVE EFFECT MAY BE



ORDERED TO BE RESTORED AND PERIOD OF SERVICE W.E.F 10/09/2018 TO 25/03/2019 WITHOUT PAY LEAVE MAY GRACIOUS BE ORDERED TO BE CONVERTED INTO PERIOD OF SERVICE AND RECOVERY ALREADY EFFECTED FROM THE APPELLANT MAY ALSO BE REFUNDED TO HIM.

---

---

Respectfully Sheweth: -

That the facts forming the background of the instant service appeal are as follows:-

1. That the appellant was adjusted from GHSS Kawai Mansehra to GHS Maira Amjid Ali Mansehra vide order Endst No. 12878-81 dated 10/09/2018. Copy of order dated 10/09/2018 is attached as Annexure "A".
2. That there was no Junior Clerk available at GHSS Kawai except the appellant. Therefore, the appellant requested to respondent No. 4 for relieving order from

the School to Join GHS Maira Amjad Ali but he refused to relieve the appellant until or unless replacement of the appellant is provided by respondent No.3. As a result, the appellant regularly served at GHSS Kawai w.e.f 10/09/2018 to 25/03/2019. In this regard, service certificate issued by respondent No. 4 is attached as Annexure "B".

3. That during this period, respondent No. 3 sent show cause notice, final show cause notice against the appellant through respondent No. 4 on 10/10/2018 and 27/11/2018 but respondent No. 4 did not show the show cause notices to the appellant and wrote letter to respondent No. 3 to the extent that the appellant shall be relieved from service provided the replacement of the appellant is provided. Copies of correspondence of respondent No. 4 with respondent No. 3 are available with the said respondents. However show cause notice dated 10/10/2018 and 27/11/2018 are attached as Annexure "C" & "D".

4. That finally, the appellant received letter dated 22/12/2018 for personal hearing from respondent No.3, therefore, the appellant was forced by respondent No. 3 to submit reply of the show cause notice during his personal hearing. Therefore as dictated by respondent No. 3 the appellant submitted reply of show cause notice and affidavit as desired and dictated by respondent No. 3. Copy of letter dated 22/12/2018 are annexed as Annexure "E".

5. That as a result, respondent No. 3 issued impugned Endst No. 4655-61 dated 25/03/2019 wherein one annual increment w.e.f 01/12/2019 with accumulative effect and period of service w.e.f 10/09/2018 to 25/03/2019 has illegally been treated with out pay which is against the law and facts. Copy of impugned order dated 25/03/2019 and relieving order dated 31/03/2019 is attached as Annexure "F". Hence, the appellant filed departmental appeal to respondent No. 2 for redressal of his

grievances but of no avail. Copy of departmental appeal is attached as Annexure "G".

6. That feeling aggrieved this instant service appeal is filed, inter-alia on the following grounds;-

**GROUNDS;-**

- (a) That the impugned order dated 25/03/2019 is illegal against the law and is a result of without following the prescribed codal formalities. Hence the impugned order dated 25/03/2019 is liable to be set aside.
- (b) That no law exist which empowers respondent No. 3 to stop one increment with accumulative effect. Hence, whatever is prescribed in the law on the subject has not been followed.
- (c) That the appellant was not relieved by respondent No. 4 to join GHS Maira

Amjid Ali. Therefore, the appellant served at GHSS Kawai w.e.f 10/09/2018 to 25/03/2018. In this regard respondent No. 4 could be directed by this Honourable Tribunal to produce attendance register w.e.f 10/09/2018 to 25/03/2019. Therefore, respondent No. 3 without proper inquiry converted the service period of the appellant into leave without pay in the impugned order dated 25/03/2019.

- (d) Therefore, the period of services rendered by the appellant cannot be converted into extra ordinary leave, leave without pay. Hence, impugned order dated 25/03/2019 may be cancelled.
- (e) That the matter of relieving of the appellant from GHSS Kawai to GHS Maira Amjid Ali was remained heldup and struck between respondent No. 4 and respondent No. 3 but due to

their turmoil, and no fault the appellant has been made escape goat. The circumstances were beyond the control of the appellant being a low paid Govt. employee.

(f) That instead of taking any action against the relieving officer respondent No.3 imposed minor punishment against the appellant which is unjust and not maintainable at law.

(g) That the matter relates to the terms and conditions of service, therefore, the Honourable Tribunal has jurisdiction to entertain the present appeal.

(h) That other grounds shall be urged at the time of arguments.

It is, therefore, humbly prayed that, on acceptance of the instant service appeal, stoppage of one annual increment w.e.f 01/12/2019 with

accumulative effect may be ordered to be restored and period of service w.e.f 10/09/2018 to 25/03/2019 without pay leave may gracious be ordered to be converted into period of service and recovery already effected from the appellant may also be refunded to him.

*M/NaDeem*  
...APPELLANT

Dated: 30/7 /2019

Through

*(Muhammad Arshad Khan Tanoli)*  
Advocate High Court, Abbottabad

**VERIFICATION:-**

Verified on oath 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 Court.

*M/NaDeem*  
...APPELLANT

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

Service Appeal No. \_\_\_\_\_/2019

Muhammad Nadeem, Junior Clerk G.H.S.S Kawai/ GHS Maira Amjid Ali,  
District Mansehra.

...APPELLANT

VERSUS

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

...RESPONDENTS

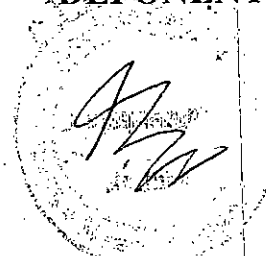
**SERVICE APPEAL**

**AFFIDAVIT**

I, Muhammad Nadeem, Junior Clerk G.H.S.S Kawai/ GHS Maira Amjid Ali, District Mansehra, 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.

*M/Nadeem*  
DEPONENT

7  
30/01/19





P-11

Annex- A



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

Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: edoedu\_mansehra@yahoo.com  
Facebook Page: www.facebook.com/DEOMMANSEHRA

**ADJUSTMENT ORDER**

As approved by the competent authority, the following Clerk is hereby adjusted on their own pay and grade against the vacant posts in the interest of public service with immediate effect.

S#	Name of Official	Design	From	To	Remarks
1	Muhammad Nadeem	J/Clerk	GHSS Kawai	GHS Mera Amjad Ali	A/V Post

Note:

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed

--sd--

DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No 12878-81 /Estt:(M)/F.No.03/Trf: /  
Copy for information to the:

Dated 19/9 /2018

1. District Account Office Mansehra.
2. Principal/Head Master School concerned Mansehra.
3. District Monitoring Officer IMU Mansehra.
4. Officials Concerned.
5. Office order file.

*Attested*  
*[Signature]*  
Muhammad Ahsan Khan T.  
Advocate High Court  
Office No 33 Adjacent  
Dist Bar Abbottabad

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Annex - B

TO WHOM IT MAY CONCERN

P-12

Certified that Mr. Muhammad Nadeem Junior Clerk Government Higher Secondary School Kawai (Mansehra) was transferred from this School to Government High School Maira Amjid Ali (Mansehra) on 10-09-2018. But the undersigned did not relieved him due to non availability of his substitute. Therefore the said Junior Clerk regularly performed his duties w.e.f 10-09-2018 To 25-03-2019 at Government Higher Secondary School Kawai Mansehra.

Muhammad Hussain  
PRINCIPAL 29/03/2019  
GHSS KAWAI  
MANSEHRA  
PRINCIPAL  
Govt: Higher Secondary  
School Kawai(Mansehra)

Attested  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent  
Distt Bar Abbottabad

Annex-C

P-13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA



Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [edocdu\\_mansehra@yahoo.com](mailto:edocdu_mansehra@yahoo.com)  
Facebook page: [www.facebook.com/dcommansehra](http://www.facebook.com/dcommansehra)

No. 15214 / Estt : (M) /

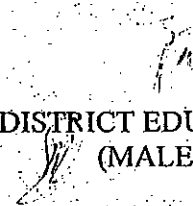
/ Date 10/11/2018

To

The Principal,  
GHSS Kawai Mansehra.

Subject: SHOW CAUSE NOTICE  
Memo;

Showcause notice in R/O Mr. Muhammad Nadeem JC GHSS Kawai is attached herewith (induplicate) with the direction to serve the same to the concerned clerk and return one copy to this office as token of receipt duly received by him.

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA



Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [edocdu\\_mansehra@yahoo.com](mailto:edocdu_mansehra@yahoo.com)  
Facebook page: [www.facebook.com/dcommansehra](http://www.facebook.com/dcommansehra)

No. 15214 / Estt : (M) /

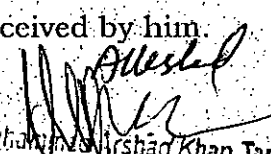
/ Date 10/11/2018


To

The Principal,  
GHSS Kawai Mansehra.

Subject: SHOW CAUSE NOTICE  
Memo;

Showcause notice in R/O Mr. Muhammad Nadeem JC GHSS Kawai is attached herewith (induplicate) with the direction to serve the same to the concerned clerk and return one copy to this office as token of receipt duly received by him.

  
Muhammad Irshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt. - 32r Abbottabad

  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



SHOW CAUSE NOTICE

I, Zaffar Arbab Abbasi District Education Officer (M) Mansehra, as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Nadeem J.C.GHSS Kawai, District Mansehra as follows:-

- i. As per complaint received from Headmaster GHS Maira Amjad Ali Vide No.310 dated 01-10-2018, that you did not obey the adjustment order under Endst; No.12878-81 dated: 10-09-2018 till now.
- ii. As per complaint that, you found guilty of noncompliance of order of competent authority
- iii. I am satisfied that you are guilty of misconduct and inefficiency as specified in rule 3 of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.

2. In exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, the competent authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with the direction to submit your defense in writing within 07 (seven) days of the receipt of this notice as to why one of the major penalty under rule-4 of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person?

3. In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.

COMPETENT AUTHORITY

Muhammad Nadeem JC  
Govt: Higher Secondary School  
Kawai District Mansehra

Attested

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist. For Abbottabad

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

DISTRICT MANSEHRA



Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [edocdu\\_manshra@yahoo.com](mailto:edocdu_manshra@yahoo.com)  
Facebook page: [www.facebook.com/deommanshra](http://www.facebook.com/deommanshra)

No 17571 / Estt :(M)/

/ Date 27/9/2018

To

The Principal,  
GHSS Kawai Mansehra.

*Annex - D*

Subject: FINAL SHOW CAUSE NOTICE  
Memo;

*P-15*

Showcause notice in R/O Mr. Muhammad Nadeem JC GHSS Kawai is attached herewith (induplicate) with the direction to serve the same to the concerned clerk and return one copy to this office as token of receipt duly received by him.

*M. Ullah*  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist. Bar Abbottabad

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

DISTRICT MANSEHRA



Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: [edocdu\\_manshra@yahoo.com](mailto:edocdu_manshra@yahoo.com)  
Facebook page: [www.facebook.com/deommanshra](http://www.facebook.com/deommanshra)

No 17571 / Estt :(M)/

/ Date 27/9/2018

To

The Principal,  
GHSS Kawai Mansehra.

Subject: FINAL SHOW CAUSE NOTICE  
Memo;

Showcause notice in R/O Mr. Muhammad Nadeem JC GHSS Kawai is attached herewith (induplicate) with the direction to serve the same to the concerned clerk and return one copy to this office as token of receipt duly received by him.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



FINAL SHOW CAUSE NOTICE

P-16

I, Zaffar Arbab Abbasi District Education Officer (M) Mansehra, as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Nadeem J.C GHSS Kawai, District Mansehra as follows:-

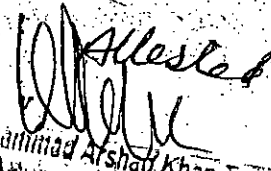
- iv. As per complaint received from Headmaster GHS Maira Amjad Ali Vide No.310 dated 01-10-2018, that you did not obey the adjustment order under Endst; No.12878-81 dated: 10-09-2018 till now.
- v. As per complaint that, you found guilty of noncompliance of order of competent authority
- vi. I am satisfied that you are guilty of misconduct and inefficiency as specified in rule 3 of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.

2. In exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, the competent authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with the direction to submit your defense in writing within 07 (seven) days of the receipt of this notice as to why one of the major penalty under rule-4 of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person?

3. In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and an ex-parte decision will be taken against you.

  
COMPETENT AUTHORITY

Muhammad Nadeem JC  
Govt. Higher Secondary School  
Kawai District Mansehra

  
Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Dist. Bar Abbottabad

P-17

Regist: Annex - E



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA

Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: gdoedu\_mansehra@yahoo.com  
Facebook Page: www.facebook.com/DEOMMANSEHRA

No 018759 Date 22/12/2018

To

Mr. Muhammad Nadeem J/C  
GHSS Kawai Balakot  
Mansehra.

Subject: PERSONAL HEARING

Memo: In continuation to this office <sup>letter</sup> vide No. 15214 dated 10/10/2018 alongwith show cause notice, a final show cause notice was also issued Vide this office letter No 17571 dated 27/11/2018 but no response to this effect has been received in this office by your end.

You are therefore directed to appear in the office of the undersigned for personal hearing on 26/12/2018 positively, otherwise an ex-part decision will be initiated against you under E&D rules 2011.

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No \_\_\_\_\_ /Estt : (M) Dated \_\_\_\_\_ /2018

Copy for information to:

1. Principal GHSS Kawai Balakot
2. Office file.

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

*[Signature]*  
Alloted  
Advocate Arshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt. Bar Abbottabad



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
DISTRICT MANSEHRA

Phone # 0997-382271 Fax # 0997-382244  
E-mail Address: edoedu\_mansehra@yahoo.com  
Facebook Page: www.facebook.com/DEOMMANSEHRA

**NOTIFICATION**

Annex - B F R 18

WHEREAS Mr. Muhammad Nadeem J/C GHSS Kawai Mansehra was proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of unauthorized prolong absent from duty

1. WHEREAS you were transfer from GHSS Kawai to GHS Mera Amjad Ali vide this office No. 12878-81 dated 10-09-2018, but as per report of the Head Master you did not submitted arrival at GHS Mera Amjad Ali.
2. WHEREAS a show cause notice was issued to you vide this office No. 15214 dated 10-10-2018, but no reply received.
3. WHEREAS, a final show cause notice was issued to you vide this office No. 17578 dated 27-11-2018, again no reply received.
4. WHEREAS, a letter addressed to you for personal hearing issued vide this office No. 18758 dated 22-12-2018, but you failed to attend the office, and also telephonically informed on 21-02-02-2019, and received reply of Showcause. alongwith affidavit on 12-03-2019, which is not satisfactory.
5. AND WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having perused the charges and evidence on record, and response of the reply of Showcause notice is of the view that the charges against the accused clerk have been proved.

NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the competent Authority District Education Officer (M) E&SE Mansehra has imposed minor penalty of "Stoppage of one Annual Increment w.e.f 01-12-2019 with accumulative effect, the absent period w.e.f 10-09-2018 to 25-03-2019 is treated as leave without pay" with immediate effect, upon Mr. Muhammad Nadeem J/C GHSS Kawai Mansehra.

-Sd/  
DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA

Endst: No. 4655-61 /Estt:(M)/Showcause Notice/MS/

/Dated 25/03/2019

Copy forwarded for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Mansehra.
3. District Monitoring Officer (IMU) Mansehra.
4. District Account Officer Mansehra.
5. Principal GHSS Kawai Mansehra with the directions to made necessary entries/recovery.
6. Mr. Muhammad Nadeem J/C GHSS Kawai Mansehra with the directions once again report immediately to Head Master GHS Mera Amjad Ali.
7. Office File.

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad

DY. DISTRICT EDUCATION OFFICER  
(MALE) MANSEHRA



Annex G, P-20

To

The Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar.

AF-IV  
put up in relevant  
file please. J  
11/4/18

Through: Proper Channel.

Subject: DEPARTMENTAL APPEAL AGAINST ILLEGAL STOPPED OF INCREMENT FOR UNLIMITED PERIOD AND STOPPAGE OF RECOVERY W.E.F 11-09-2018 TO 25-03-2019 VIDE IMPUGNED ORDER NO. 4655-61 DATED: 25-03-2019.

Sir,


1. Reference is made to impugned order No. 4655-61 dated: 25/03/2019. (Copy attached).
2. It is submitted that the applicant was appointed as Junior Clerk on 30/04/2012 and posted at Govt. Higher Secondary School Kawai (Mansehra).
3. That the applicant served regularly at Government Higher Secondary School Kawai w.e.f 30/04/2012 to 31-03-2019. In this regard attendance certificate duly issued by the principal Government Higher Secondary School Kawai (Mansehra). (Copy attached).
4. That the applicant was transferred from Government Higher Secondary School Kawai (Mansehra) to Government High School Maira Amjid Ali (Mansehra) vide order No. 12878-81, Dated 10-09-2018. (Copy attached).
5. That the applicant was not relieved from duties by the principal Govt. Higher Secondary School Kawai (Mansehra) due to non-availability of the Junior and Senior Clerks in the said school.
6. That the applicant has tried his best to get Relieving from Service order to report in Government High School Maira Amjid Ali (Mansehra) but the principal did not relieve the applicant for assumption of charge from Government Higher Secondary School Kawai (Mansehra) as per transferred order.

*Attested*  
*M. A. Tanoli*  
Mansimdas Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Distt. Bar Abbottabad

7. That the Circumstances were beyond the control of the applicant and shuttling in the office to get the relieving order but in vain.
8. That due to no fault of the applicant, on the basis of show cause, penalty of stoppage of annual increment for the year 2019 for unlimited Period and penalty of recovery of salary w.e.f 11/09/2018 to 25-03-2019 have been imposed upon the applicant which is against the law.
9. That the DEO(M) Mansehra during personal hearing, compelled me to reply to show cause and the applicant under compulsion and on the dictation of the DEO(M) Mansehra submitted reply as desired by him and an affidavit was also provided as per direction of DEO(M) Mansehra, which is against the fact.
10. That as per Law the penalty of stoppage of increment is to be imposed for specific period but not for unlimited period. That the applicant received salary for the period he rendered service w.e.f 11-09-2018 to 31-03-2019. Therefore, Recovery from the applicant for the said period is also illegal.

In view of the above it is prayed that impugned order No. 4655-61 Dated: 25/03/2019. May be set-aside, one increment for the coming year 2019 may be restored, salary already recovered for the period w.e.f 10/09/2018 to 31/03/2019 may be paid and the period w.e.f 10/09/2018 to 25/03/2019 may be converted into regular service with all consequential benefits.

Dated. 10/14/2019

*Allesed*  
  
 Advocate High Court //  
 File No 33 Adjacent to  
 Dist. Abbottabad

Yours Sincerely

*M/Nadeem 10/4/19*  
 (MUHAMMAD NADEEM)  
 Junior Clerk  
 GHSS Kawai Mansehra

OFFICE OF THE PRINCIPAL GHS SCHOOL KAWAI (MANSEHRA)

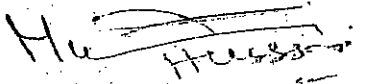
No. 1907

Date:- 31/03/2019

RELIEVING CHIT

P-19

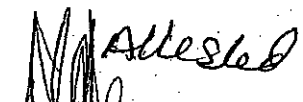
In compliance with the Notification under Endst. No. 4655-61/Estt: (M)/Show cause Notice/MS/dated 25/03/2019, Mr. Muhammad Nadeem Junior Clerk GHSS Kawai, Mansehra is hereby relieved off from his duties today on 31/03/2019 (After Noon) and directed to report in the office of Headmaster GHS Mera Amjad Ali for further duties.


  
PRINCIPAL,  
GHS SCHOOL KAWAI,  
MANSEHRA.

Endst of even No & Date:-

Copy forwarded to the:-

1. Director (E&SE), Khyber Pakhtunkhawa.
2. Deputy Commissioner, Mansehra.
3. District Education Officer, Male, Mansehra.
4. District Accounts Officer, Mansehra.
5. Headmaster, GHS Mera Amjad Ali.

  
Attested  
Advocate Khatir Iqbal  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad

  
PRINCIPAL,  
GOVT HIGH SCHOOL,  
BALAKOT (MANSEHRA).  
PRINCIPAL  
Govt. Higher Secondary  
School Kawai (Mansehra)

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) مانسہرہ۔

شوکار نوٹس / جواب طلبی۔

مضمون:

جناب عالی!

P-20

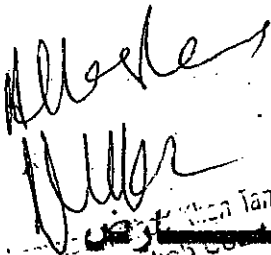
سائل کی موڈ بانہ گزارشات ذیل ہیں۔

- (۱)۔ یہ کہ سائل مورخہ 30-04-2012 کو محکمہ تعلیم میں بطور جونیئر کلرک تعینات ہوا۔
- (۲)۔ یہ کہ سائل نے بعد از تعیناتی گورنمنٹ ہائیر سیکنڈری سکول کیوآئی (مانسہرہ) میں اپنی ڈیوٹی سرانجام دی۔ دوران ڈیوٹی پرنسپل صاحب، اساتذہ اکرام و دیگر ملازمین کو سائل کے کام سے کسی قسم کی شکایت نہیں ہوئی ہے۔
- (۳)۔ یہ کہ مورخہ 10-09-2018 کو سائل کی ٹرانسفر گورنمنٹ ہائی سکول میرا امجد علی (مانسہرہ) کر دی گئی لیکن سائل کی والدہ محترمہ عارضہ شوگر و گردوں میں مبتلا ہیں اور شدید علیل تھیں اور ہیں بوجہ شدید علالت و خدمت گزاری والدہ محترمہ سائل نے سکول میں حاضری نہ کر سکا اور نہ ہی شوکار نوٹسز کے بروقت جوابات دے سکا۔ چونکہ سائل گھر میں واحد مرد گھر کی و علیل والدہ محترمہ کی نگہداشت کرنا والا ہے اور مزید یہ کہ سائل کا ایک ہی چھوٹا بھائی ہے جو کہ ذہنی طور پر معذور ہے جبکہ سائل کے والد محترم بھی وفات پا چکے ہیں۔

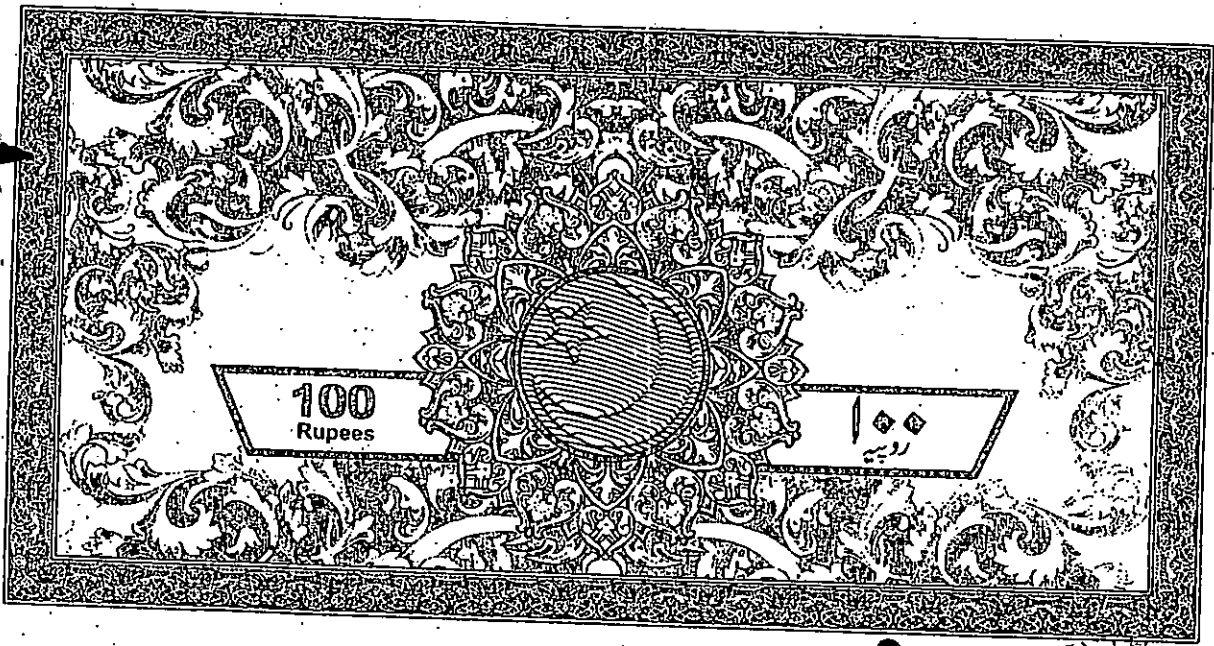
اللہ

آنجناب سے استدعا کی جاتی ہے کہ سائل کی درج بالا مجبوریوں و تکالیف کو مد نظر رکھتے ہوئے اور انسانی ہمدردی کی بنا پر سائل کے خلاف کی جانے والی کارروائی داخل دفتر فرما کر سائل سے محکمانہ خدمات لی جائیں۔ سائل اس مہربانی اور عنایت کے لیے ہمیشہ آنجناب کا ممنون و دعا گو رہے گا اور انشاء اللہ آئندہ شکایت کا موقع نہ دے گا۔

شکریہ

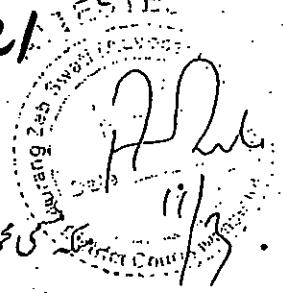
  
Muhammad Naddeem  
Tahsil Tanoli  
District Tanoli  
Government of Punjab  
Pakistan

M/Naddeem



﴿ بیان حلفی ﴾

P-21



محمد ندیم ولد فدا محمد شناختی کارڈ نمبر: 1-0834915-13501 ساکنہ کٹھ دو بندی تحصیل  
بالاکوٹ ضلع مانسہرہ جونیئر کلرک محکمہ تعلیم گورنمنٹ ہائیر سیکنڈری سکول کیوآئی (مانسہرہ)  
حلقاً بیانی و اقراری ہوں کہ میں نے جو جواب Personal و Showcause Notices و Hearing کا دیا ہے۔ وہ سنی برحقیقت ہے۔ میں انشاء اللہ حکمانہ خدمات اذمہ داریاں نبھانے  
میں اپنی تمام تر صلاحیتیں بروئے کار لاتا رہوں گا اور کسی قسم کی کوتاہی و غفلت کامرتکب نہیں ہوں گا۔  
لہذا بیان حلفی سنداً تحریر ہے۔

الرقوم: 11-03-2019

M. Nadeem

محمد ندیم ولد فدا محمد شناختی کارڈ نمبر: 1-0834915-13501 ساکنہ کٹھ دو بندی تحصیل  
بالاکوٹ ضلع مانسہرہ جونیئر کلرک محکمہ تعلیم گورنمنٹ ہائیر سیکنڈری سکول کیوآئی (مانسہرہ)

Handwritten note: "Handwritten note: 13/03/19"

Handwritten signature and date: "13/03/19"

Handwritten signature: "M. Nadeem"

Handwritten signature: "M. Nadeem"

Handwritten signature and address: "Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad"

OFFICE OF THE PRINCIPAL GHS SCHOOL KAWAI (MANSEHRA)


No. 1907

Date: 31/03/2019

RELIEVING CHIT

P-22


In compliance with the Notification under Endst. No. 4655-61/Estt: (M)/Show cause Notice/MS/dated 25/03/2019, Mr. Muhammad Nadeem Junior Clerk GHSS Kawai, Mansehra is hereby relieved off from his duties today on 31/03/2019 (After Noon) and directed to report in the office of Headmaster GHS Mera Amjad Ali for further duties.

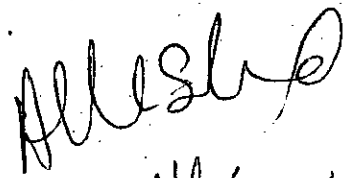
  
PRINCIPAL,  
GHS SCHOOL KAWAI,  
MANSEHRA.

Endst of even No & Date:-

Copy forwarded to the:-

1. Director (E&SE), Khyber Pakhtunkhawa.
2. Deputy Commissioner, Mansehra.
3. District Education Officer, Male, Mansehra.
4. District Accounts Officer, Mansehra.
5. ✓ Headmaster, GHS Mera Amjad Ali.

  
PRINCIPAL,  
GOVT HIGH SCHOOL,  
BALAKOT (MANSEHRA).  
PRINCIPAL  
Govt. Higher Secondary  
School Kawai (Mansehra).

  
Muhammad Arshad Khan Tanchi  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad

P-23

## CHARGE ASSUMPTION CERTIFICATE

In compliance with the Notification under Endst. No. 4655-61/Estt: (M)/Show cause Notice/MS/dated 25/03/2019, Mr. Muhammad Nadeem Junior Clerk is hereby assumed the charge of vacant post of Junior Clerk today on 01/04/2019 (Before Noon) in the office of Headmaster GHS Mera Amjad Ali for further duties.

*M/Nadeem*

(MUHAMMAD NADEEM)

JUNIOR CLERK,

GHS MERA AMJAD ALI,

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL MERA AMJAD ALI

Endst No:- 337-343

Dated:- 01/04/2019.

Copy forwarded to the:-

1. Director (E&SE), Khyber Pakhtunkhawa.
2. Deputy Commissioner, Mansehra.
- ✓ 3. District Education Officer, Male, Mansehra.
4. District Accounts Officer, Mansehra.
5. Principal, GHSS Kawai, Balakot.

*Principal*

PRINCIPAL,

GOVERNMENT HIGH SCHOOL,  
MERA AMJAD ALI,

*Attested*

*MU*

Headmaster Khan Tanvir  
Government High School  
Adjacent to  
Abbottabad  
Dist. Balakot

## ARRIVAL REPORT

P-24

In compliance with the Notification under Endst. No. 4655-61/Estt: (M)/Sho cause Notice/MS/dated 25/03/2019, I, Mr. Muhammad Nadeem Junior Clerk is herel submitted my arrival report for duty against the vacant post of Junior Clerk at G Mera Amjad Ali today on 01/04/2019 (Before Noon).

*M/Nadeem*  
(MUHAMMAD NADEEM)  
JUNIOR CLERK,  
GHS MERA AMJAD ALI,

OFFICE OF THE PRINCIPAL GOVERNMENT HIGH SCHOOL MERA AMJAD ALI

Endst No:- 330-336

Dated:- 01/04/2019.

### Copy forwarded to the:-

1. Director (E&SE), Khyber Pakhtunkhawa.
2. Deputy Commissioner, Mansehra.
- ✓ 3. District Education Officer, Male, Mansehra.
4. District Accounts Officer, Mansehra.
5. Principal, GHSS Kawai, Balakot.

*[Signature]*  
PRINCIPAL,  
GOVERNMENT HIGH SCHOOL,  
MERA AMJAD ALI,

*[Signature]*

*[Signature]*

*[Signature]*  
Mr. Ahmad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad



کورٹ فیس

وکالت نامہ

Before The Chairman Service Tribunal <sup>KPK Peshawar</sup> بعد ازاںMuhammad Nadeem <sup>نام Govt of KPK etc</sup> عنوان:

Appellant منجانب:

Service of نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے و اسے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

Ald. M. Arshad Khan (Tanoli) Advocate High Court <sup>Adv. H.C. AD</sup>

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ مقدمہ کی کل کارروائی 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 کارروائی 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 پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ 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 بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بھینڈہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

اللہ وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 30/03/2019

Accepted

Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent  
Distt 3rd

**"B"**

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

*TE*

No.

*995*

*19*

Appeal No. .... of 20

*11/11/2018 Madam*

Appellant/Petitioner

*Through Sarg Versus Edu: 14/1/18*

Respondent

Respondent No. ....

*Distt. Education Office (Male)*

Notice to: —

*Mansehra*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

*6/11*

Given under my hand and the seal of this Court, at Peshawar this.....

*Jan*

*20*

Day of.....20

*at Camp Court A Mand*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

713

Appeal No.....995..... of 2009

.....Muhammad Mahmood..... Appellant/Petitioner

Versus

.....Farooq Saqib Khan Peshi..... Respondent

Respondent No.....4.....

Notice to: -

Principal, G.H.S.S, Kawai Moushwa

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....17-1-2010.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....6/1/10.....

Day of.....Jan.....20

at Camp Court A. Abad

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**"B"**

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

TB

No.

Appeal No. 995 of 20 19

Muhammad Noor Appellant/Petitioner

Versus

Through Secy. Edn. 15/PL Respondent

Respondent No. 5

Notice to: — Distt. Accounts Office, Manshera.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 17-2-2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 6/1/20

Day of Jan.....20 20

at Comptroller A. Ahsan

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

TB

No.

Appeal No. 995 of 2019

Muhammad Nadeem Appellant/Petitioner

Versus

Through Secy. Edu: KP: Pesh. Respondent

Respondent No. ....

Notice to: —

Govt. of KP through Secy. Education Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....17-2-2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....6/12.....

Day of.....Jan.....2020

at Camp Court A. Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

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**"B"**

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

No.

713

Appeal No. 995 of 20 19

Muhammad Nadeem Appellant/Petitioner

Versus

Inspector Sarghosh Khan Peshi Respondent

Respondent No. 2

Notice to: —

Director, E.O. & Sec. Education Dept. of  
K.P.K. Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 17-2-2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal~~ has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 6/1/20

Day of Jan 2020

at Camp Court A. Abad

Sec.  
15-1-20

[Signature]  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.

**"B"**

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

TB

No.

Appeal No. 995 of 20 19

Muhammad Nadeem Appellant/Petitioner

Versus

Through Secy, Edn: 14 Pk Respondent  
3

Respondent No. ....

Notice to: —

Dust: Edn: officer, (male) Mansherwa.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 16-09-20 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 22/10 .....

Day of Sep ..... 20 20

at Camp Court A. Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

No.

Appeal No..... of 20

TB

995

Appellant/Petitioner

Muhamamd Nadeem

Respondent

Through Edu: Pesh:

4

Notice to: —

Principal GHSS, Kawai Manselva.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal ~~has~~ already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

Sep.

20

22/4

at Camp Court A. Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.



**"B"**

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

713

No.

Appeal No. 995 of 2019

Muliamanad Nadeem Appellant/Petitioner

Versus

Through Secy. Edu. K.P.C. Pesh. Respondent

Respondent No. ....

Distt. Accounts Officer, Manshera.

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 16-11-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 22/11 .....

Day of Sep. 2019

at Camp Court, A. Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

**"B"**

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

TB

No.

Appeal No. 995 of 20 19

M. Nadeem Appellant/Petitioner

Versus

Through Secy. Edm. 12 P.L. Pesh. Respondent

Respondent No. 5

Notice to: —

Distt. Accounts Officer Manshera.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on...20-1-2020.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

~~Copy of appeal is attached.~~ Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....9/16.....

Day of.....Dec......20 20

at Camp Court A Head

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.