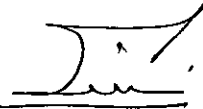
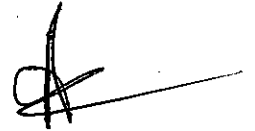


11.10.2021

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Shujja Ali, ADO (Litigation) for the respondents present and sought time for submission of written reply/comments. Respondents are directed to furnish reply/comments within 10 days in office. 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 be deemed as struck off. To come up for arguments before the D.B on 14.02.2022 at Camp Court Abbottabad.



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



CHAIRMAN
CAMP COURT ABBOTTABAD

13.06.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General alongwith Shuja Ali ADEO (Litigation) for respondents present.

Representative of respondents submitted reply/comments. Copy of the same was handed over to junior counsel for the appellant who requested for adjournment as senior counsel is not available today. Adjourned. To come for arguments on 16.08.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

16.07.2021

This case belongs to the Hazara Region and such cases were previously heard at camp court, Abbottabad. May be notices issued to appellant/counsel have not been received by them, therefore, they are not in attendance. Anyhow having gone through the memorandum of appeal and copies of documents annexed there-with, there are arguable points warranting admission of appeal for full hearing. Therefore, this appeal is admitted for regular hearing subject to all just and legal objection. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 11.10.2021 before the D.B, at camp court Abbottabad.

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اپنے پاس کے پاس سے
. اس کے پاس سے

Handwritten notes in Urdu:
16-8-21

Handwritten notes in Urdu:
16-8-21

Appellant Deposited
Security & Process Fee
Signature
16/7/21



Signature
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 3519/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	11/03/2021	<p>The appeal of Mr. Awais Khan presented today by Mr. 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 -</p> <p>2-</p>	3-6-21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16-7-21</u>. Notices be issued to appellants / counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

3519

Service Appeal No. _____/2021

Awais Khan (Driver) DEO Female Officer Abbottabad.

...APPELLANT

VERSUS

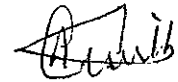
Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service appeal along with affidavit	1 to 7	
2.	Copy of appointed order dated 03/08/2017	8	"A"
3.	Copy of charge report of the appellant	9	"B"
4.	Copy of application duly endorsed	10	"C"
5.	Copy of order	11	"D"
6.	Copy of departmental appeal	12 to 14	"E"
7.	Wakalatname	15	



...APPELLANT

Through

Dated: _____/2021


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

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

Service Appeal No. _____/2021

Awais Khan (Driver) DEO Female Officer Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 FOR DECLARATION TO THE EFFECT
THAT THE APPELLANT WAS REMOVED FROM
ON 12/10/2020. THE APPELLANT WAS SERVING
AS DRIVER WITH SDEO HAVELIAN BUT
WITHOUT ANY SHOW CAUSE NOTICE,
STATEMENT OF ALLEGATION AND WITHOUT
PROVIDING OPPORTUNITY OF PERSONAL
HEARING HAS BEEN REMOVED FROM SERVICE
VIDE IMPUGNED REMOVAL FROM SERVICE**

ORDER DATED 12/10/2020 WHICH IS VOID; AB-INITIO CORAM NON JUDICE, AGAINST THE SETTLED PRINCIPLE OF LAW ON THE SUBJECT HENCE, THE IMPUGNED REMOVAL FROM SERVICE ORDER IS LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANT OF THE INSTANT SERVICE APPEAL IMPUGNED REMOVAL FROM SERVICE ORDER DATED 12/10/2020 MAY GRACIOUSLY BE SET ASIDE AND RESPONDENTS MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL SERVICE BACK BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE IN CIRCUMSTANCE OF CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

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

1. That the appellant was appointed as Driver on 03/08/2017 and was posted in the office of SDEO (Female) Havelian against the vacant post. Copy of

appointment order dated 03/08/2017 is attached as Annexure "A".

2. That the appellant took over the charge of the post in the office of SDEO (Female) Havelian District Abbottabad. Copy of charge report of the appellant is attached as Annexure "B".
3. That the respondent No. 3 posted the appellant from the office of the SDEO (Female) Havelian to SDEO (Female) Lora on 07/12/2019 but the order of transfer/ posting of the appellant was kept secret by respondent No. 3.
4. That the appellant lodged complaint against SDEO Female Havelian regarding misuse of Government vehicle as well as petrol collected from PSO Lady Gardan Abbottabad. Besides, the appellant also submitted that in case of misuse and damage of the vehicle, the appellant shall not be responsible. Copy of application duly endorsed is attached as Annexure "C".
5. That respondent No. 3 with out providing opportunity of personal hearing, show cause notice

and statement of allegation, removed the appellant from service vide impugned removal from service order dated 12/10/2020, received by the appellant on 16/10/2020. Copy of order is attached as Annexure "D".

6. That feeling aggrieved, the appellant filed Departmental appeal against the impugned removed from service order vide departmental appeal dated 20/11/2020, but reply of the departmental appeal is still awaited. Copy of departmental appeal is attached as Annexure "E". Hence, the service appeal of the appellant is filed inter alia on the following grounds.

GROUND:

- a) That the conduct of respondents Department towards the appellant is malafide, perverse, discriminatory and against the law.
- b) That the posting/ transfer order of the appellant from SDEO (Female) Havelian to SDEO Lora remained under key and lock and appellant was not aware about her posting from Havelian to Lora. That, the

appellant is being a made scape goat due to no fault in his part, the respondent No. 3 with the collusion of departmental officials without showing cause, explanation, proceeded, the appellant ex-parte which is against the law. That no one can be proved guilty without giving him opportunities of personal hearing, cross examining the opposite party Besides, as per article 10-A it is fundamental right of every citizen to have fair trail.

- c) That though the appellant was performing his duty during the period with effect from 4-12-19 to 10-10-20 which has been shown as absent. The appellant was not paid salary for the services rendered by him towards the department.
- d) That respondents Department has the appellant to the place which is utterly unknown to the principals of jurisprudence, natural justice, fair play, as well as good governance.

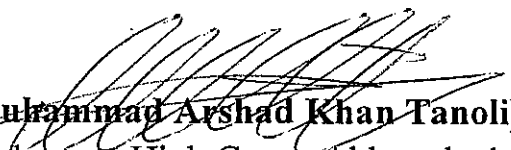
- e) That the matter relates to the terms and conditions of service, and this Honourable Tribunal has jurisdiction to entertain appeal of appellant under article 212 of the constitution of Islamic Republic of Pakistan.
- f) That appeal of the appellant is titled within the period of limitation.

It is, therefore, humbly prayed that on acceptant of the instant service appeal impugned removal from service order dated 12/10/2020 may graciously be set aside and respondents may be directed to reinstate the appellant in service with all service back benefits. Any other relief which this Honourable tribunal deem appropriate in circumstance of case may also be granted to the appellant.


...APPELLANT

Through

Dated: _____/2021


(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.


...APPELLANT

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

Service Appeal No. _____/2021

Awais Khan (Driver) DEO Female Officer Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

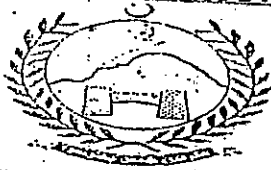
AFFIDAVIT

I, Awais Khan (Driver) DEO Female Officer Abbottabad, do hereby solemnly
affirm and declare that the contents of foregoing appeal are true and correct to the
best of my knowledge and belief and nothing has been concealed therein from this
Honourable Court.



DEPONENT

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. ~~5880-18~~ /ED-III/ Apptt: Drivers

Dated A. Abod the: 31/08/2017

0992-342533, 0992-342314

deofemale_abbottabad@yahoo.com

Annex

P-8


Notification

Consequent upon the recommendation of District Selection Committee & under the provision of Sub rule (4) of rule 10 of the Khyber Pakhtunkhwa Civil servant (Appointment Promotion & Transfer) rules 1989. The following candidates are hereby appointed in DPS-06 @ Rs.(10620-560-27415) plus usual Allowances as admissible under the rules against Vacant post noted against each in the interest of Public Service with the following terms & Conditions w.e.f. the date of their taking over charge.

S.No	Name of Candidate	Father Name	Place of posting	Remarks
1	Awais Khan	Masood-Ur-Rehman	SDEO (F) Havelian	A.V Post.
2	Ahmed Iqbal	Muhammad Iqbal	DY:DEO (F) ATD	A.V Post

TERMS & CONDITIONS


1. Their services will be considered as regular and they will be entitled to contribute towards GPF instead of CPF with reference to Govt. of Khyber Pakhtunkhwa Finance Department Notification No. SOSR-III/FD/12-1/2005 Dated 27-2-2013.
2. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
3. The appointees should join their posts within 30 days of the issuance of this notification. In case of failure to join their posts the appointment will expire automatically and no subsequent appeal etc shall be entertained.
4. They will be on probation for a period of one year extendable for another one year in case their performance found satisfactory.
5. They will be governing by such rules and regulation as may be issued from time to time by the Government.
6. The services of appointee can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed by the Government of Khyber Pakhtunkhwa time to time and will be terminated without issuing any notice.
7. Charge report should be submitted to all concerned.
8. The DDO concerned would furnish a certificate to the effect that the candidate has joined the post within the prescribed period i.e. 30 Days.
9. The candidate concerned will provide age and Health Certificate from the Medical Superintendent DHIQ Abbottabad.
10. The age limit for appointment of Drivers is 18 to 32 years the DDO/HM concerned is directed that he will not handed over charge of the post if their age limit is less than 18 years or above 32 years.
11. No TA/DA is allowed to her for joining duty.

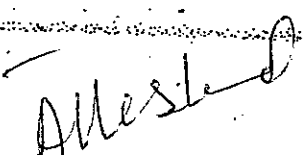
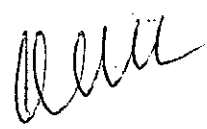

District Education Officer
(Female) Abbottabad

End of Even No & Date

Copy for information to the:-

1. Director Elementary & Secondary Education, KPK Peshawar.
2. Deputy Commissioner, Abbottabad.
3. District Police Officer Abbottabad.
4. SDEO (F) Primary Havelian.
5. ADO Establishment (Sec) Abbottabad.
6. Officials concerned.
7. Office File.


District Education Officer
(Female) Abbottabad

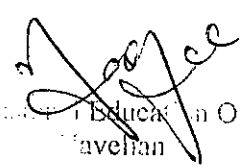


Muhammad Azeem
Advocate High Court
Office No. 33 Adjacent
Abbottabad

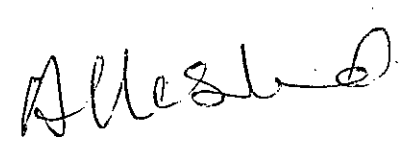
Annex - B

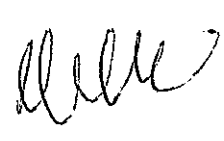
High Court

P-9

Certified that Mr. Awaiz Khan (Driver) of DEO (Female) Havelian is hereby relieved from his duties on 2-12-2019 due to Miss Behavior with Mst. Nageena Bibi SDEO (Female) Havelian and his duties are on disposal of DEO (F) Abbottabad.


Sub Divisional Education Officer (F)
Havelian





Muhammad Arshad
Advocate High Court
Office No. 23-Adjoc
Distt Bar Abbottabad

حکومت خیبر پختونخوا DEO صاحب ذیل میں حکم تعلیم ایبٹ آباد
درخواست برائے براد محمد عزیز قادری کی جوائنٹ اور مکمل ڈیوٹی کی جوائنٹ
ادیس خان ڈیپوٹیشن بنیام (D.D.O) تعلیم ایبٹ آباد

P-10



جناب عالی،
درخواست درج ذیل
DEO (P) ~~DEO (P)~~
Furnished
کہ میں سائل میں تعلیم ایبٹ آباد ڈیپوٹیشن کی درخواست
میں (D.D.O) سماء تعلیم ایبٹ آباد میں جوائنٹ کی درخواست
(D.D.O) کی جوائنٹ کی درخواست کی ہے اور اس میں
جوائنٹ کی درخواست ہے اور یہ جوائنٹ کی درخواست ہے اور اس میں
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جوائنٹ کی درخواست ہے اور یہ جوائنٹ کی درخواست ہے اور اس میں

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MUSHTAQ AHMED GHANI
Speaker Provincial Assembly
Khyber Pakhtunkhwa

17/11/2019

جوائنٹ کی درخواست ہے اور یہ جوائنٹ کی درخواست ہے اور اس میں
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9-698175-131015 لکھنؤ، 12-05-2019

ادیس خان ڈیپوٹیشن
DEO تعلیم ایبٹ آباد
03121597382

Handwritten signature: Allah

Muhammad Arshad
Advocate High Court
Office No. 33 Adilabad
Faisalabad

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No. 7290-96/

Dated: 12/10/2020

0992-342533, 0992-342314

Deofemale_abbottabad@gmail.com

Annex - D


Notification:-

Mr. Awais Khan Driver SDEO (F) Lora was proceeded under the Khyber Pakhtunkhwa Govt. Servant (Efficiency and disciplinary Rules 2011) on charges of misconduct and wilful absenteeism from duty w.e.f 04-12-2019.

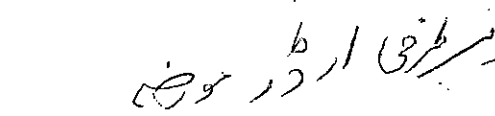

P-11

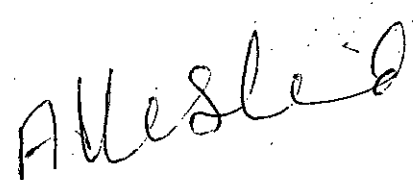

- **AND WHEREAS:** SDEO (F) Havelian has reported about your misconduct, inefficiency and insubordination at work vide letter No: 1523 dated: 12-02-2019,
- **AND WHEREAS:** you were transferred to SDEO (F) Lora vide Endst No. 10152-56/EB-VI Adj./Ministerial staff dated: 07-12-2019.
- **AND WHEREAS:** SDEO (F) Lora reported vide No: 575/ET-05/Drivers dated: 18-12-2019, regarding non-compliance of transfer order.
- **AND WHEREAS:** show cause notice was served upon Mr. Awais Khan, Driver SDEO (F) Lora at his home address vide this office No. 685 dated: 31-01-2020.
- **AND WHEREAS:** Fact finding inquiry conducted under No 953 dated 12-02-2020, and inquiry officer Mst: Ayesha Naz SDEO (F) Lower Tanawal has confirmed the allegations leveled against you.
- **AND WHEREAS:** Mr. Munir Ahmed, Principal Govt. Model High School Havelian and Mr. Rashid S/C GGHSS Malik Pura Abbottabad were appointed as inquiry officer vide this office notification No. 1906-14 dated: 17-03-2020, along statements of allegations, you failed to appear before the committee.
- **AND WHEREAS:** show cause notice served vide No: 2964-68 dated: 23-06-2020, at his home address.
- **AND WHEREAS:** you did not submit reply to the show cause notice and Absent Notice in the two Newspapers was published Vide No: 5077 dated 04-08-2020 on 8th August 2020, and you failed to respond and report to this office.
- **AND WHEREAS:** after going through the material on record, the reports of inquiry officers and your no reply to the show cause and absent notice, the Competent Authority has come to the conclusion that charges against you have been proved.

NOW THEREFORE, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary rule 2011), rule 4 (b) the Competent Authority is pleased to impose the "Major Penalty" of "REMOVAL FROM SERVICE" upon Mr: Awais Khan Driver SDEO (F) Lora upon the above mentioned Rules with immediate effect in the best interest of public service, and intervening period is hereby treated as unauthorized absence.


District Education Officer (Female)
Abbottabad.

12/10/2020


26/10/20


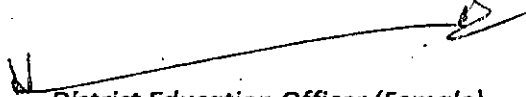


Muhammad Arshad
Advocate High Court
Office No: 33 Adm
Abbottabad

Endst No: 7290-96 Dated: 12/10/2020

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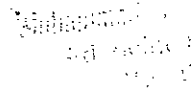
1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Abbottabad.
3. District Monitoring Officer Abbottabad.
4. District Account Office Abbottabad.
5. SDEO (F) Lora/Havelian, with the direction to make entry in S/Book, and if any recovery do it with intimation to undersigned.
6. Official concerned.
7. Office File.

P-12


District Education Officer (Female)
Abbottabad.

Attested





حضرت صاحب کرامت مولانا محمد رفیع صاحب مدظلہ العالی
الہیوٹلن بساؤر

Annex - E P-13

حکمہ زمین سبیل بحال صلاحت

13

حضرت عالی... درخواست / خود سبیل بحال میں ہے

... کے لئے زمین سبیل بحال کی درخواست
مقبول ہوئی ہے اور زمین سبیل بحال کی صورت میں
اعد صورت سے درخواستیں درج ہیں

Attested
MUA

... (SDEO F) میں ہاؤسنگ کے لئے
... کے لئے زمین سبیل بحال کی درخواست
... کے لئے زمین سبیل بحال کی درخواست
... کے لئے زمین سبیل بحال کی درخواست
... کے لئے زمین سبیل بحال کی درخواست

Muhammad Arshad
Advocate High Court
Office No. 33
Lahore

... کے لئے زمین سبیل بحال کی درخواست
... کے لئے زمین سبیل بحال کی درخواست

... کے لئے زمین سبیل بحال کی درخواست
... کے لئے زمین سبیل بحال کی درخواست

پانچ سالہ سابق طالب علم کے لئے اسکول میں داخلہ

۱۶-۲۰۲

مدرسہ اسلامیہ کونوکی پورہ کراچی میں داخلہ فرمایا گیا

اس کی کاپی درج ذیل نمبر پر ۹۶-۷۲۹۵-۷۰۰

۱۲/۱۰/۲۰ کو منظور فرمایا گیا

۲۰/۱۱/۲۰

روشن ڈرائیو محمد امجد علی صاحب
حیدر آباد

Muhammad
Ali

Muhammad Ali
Advocate High Court
Office No. 23 Adilabad
Dist. Ferozshah

810

RGL46610610

P-14 15

Ps.

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* Write here "letter", "postcard", "packet", or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) (in words)

Insurance fee Rs. RAD00504953 Ps. (in words) ght / Kilo Grams

Name and address of sender []

S.No. 3471

Name of Advocate

DBA NO.

BC No.



R.s.100/-

وکالت نامہ
S.D. P. S. (Revenue)
Finance Department
District No. 12, Jammu
Jammu - 180 001

بجرات روس ٹریڈنگ کمپنی کا کاپی

عنوان: ادیس بنام گورنمنٹ سروسز

منجانب: اسد نوعیت مقدمہ سروسز

باعث تحریر آنکہ فہرست درج ذیل کے نوٹوں کے لیے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات پر پیش پانچویں مقدمہ بمقام ایس کے لیے

فہرست درج ذیل کے نوٹوں کے لیے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے

جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ

سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے

علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ

سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے

کسی معاوضہ کے ادا کرنے یا جمانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف

مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی و ہر قسم

درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے

اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات

از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا نظر ذمہ درخواست حکم انتہائی یا ترقی یا گرفتاری قبل از گرفتاری واجرائے ڈگری بھی صاحب

موصوف کو بشرط ادائیگی علیحدہ مٹانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے

کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں

وہی اور ایسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف

کاتق ہوگا۔ اگر وکیل صاحب موصوف کو پوری میں تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ

کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور حضور ہے۔

مورخہ: / / سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Accept

Muhammad Arshad Ishaq
Tanali, Adv Hc Abbottabad

"A"

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

No.

APPEAL No.....3519..... of 2021

Aman Khan

Appellant/Petitioner

Versus

Through Secy' Edin 4/11/21 Peshawar

RESPONDENT(S)

✓
Notice to Appellant/Petitioner Aman Khan (D.No. 21-)
D.S.O. Female office
Abulhasanabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 16-7-2021 at 9:00 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 Peshawar

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

"A"

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

No.

APPEAL No..... of 20

3519

21

Awaris Khan

Appellant/Petitioner

Versus

through Secy. Edn. of P.S.
RESPONDENT(S)

Taraki

Notice to Appellant/Petitioner

Muhammad Rashid Khan
Advocate High Court
Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 16-7-2021 at Peshawar

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 Peshawar

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

2009

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

No.

AL FIAN No. 20

Applicant

Versus

RESPONDENT

Notice to Applicant

This notice is to inform you that your application for the appointment of a member to the Tribunal has been received.

The Tribunal has received your application and is processing it.

You are required to attend the Tribunal for the purpose of the hearing.

You may face either of the following consequences if you fail to attend the Tribunal without a valid excuse:
1. You may be held in contempt of the Tribunal.
2. You may be liable to pay costs of the proceedings.

Yours faithfully,
Secretary

"B"

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

No.

7B

Appeal No. 3519 of 201.

Awaris Khan Appellant/Petitioner

Versus

Mirza Beg Edm. H.P.K. Pesh. Respondent

Respondent No. 3

Notice to: - Distt. Education Officer (Female)
Aleatlaad

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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 11/10/2021 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 29/10/2021

Day of July 201

at Camp Court A-Ahead

[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.

113

No.

Appeal No. 3519 of 21

Awwais Khan Appellant/Petitioner

Versus

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

Respondent No. I

Notice to:

Govt. of K.P.K. Through Secy. Edu. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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 11/10/2021 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 28/7

Day of July 2021

at Camp Court A. Abad

57/09

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.

IB

Appeal No. 3519 of 20 21

Awas Khan Appellant/Petitioner

Versus

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

Respondent No. 2

Notice to: —

Director, Ele: & Sec: Education
Govt: of K.P.K. Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa 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.....11-12-2021.....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.....28/11.....

Day of.....July.....20 21

at Camp Court A. Almad

[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.