

19th Sept 2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Rahim Dad, ADEO for respondents present.

Written reply/comments submitted on behalf of the respondents which is placed on file. To come up for arguments on 14.11.2022 before D.B at camp court Abbottabad.

This copy is being set aside

Sareena Padi
Member

(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

20.12.2021

Clerk of learned counsel for the appellant present. Ms. Zubaida Khattak, District Education Officer (Female) alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for written reply/comments on 14.02.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)
Member (J)

Camp Court Abbottabad

14-2-2022

Due to retirement of the Hon'ble Chairman the case is adjourned. To come up for the same as before on 18/7/22.

For...
Reader

18th July 2022 Learned counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Written reply/comments not submitted. Notice be issued be issued to the respondents through registered post for submission of written reply/comments. To come up for written reply/comments on 19.09.2022 before S.B at camp court Abbottabad.



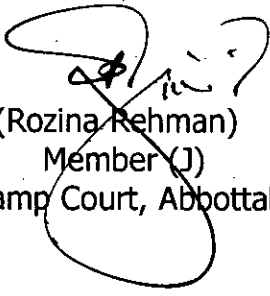
(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

15.02.2020

Learned counsel for the appellant present. Preliminary arguments heard. File perused.

Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.05.2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee
27/2/21


(Rozina Rehman)
Member (J)
Camp Court, Abbottabad

19.05.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 27.09.2021.


Reader

27.09.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt AG alongwith Shehzad, ADO and Zahid Khattak, DEO for the respondents present.

Representatives of the respondents seek further time to submit reply/comments. Request is accorded but as last chance. Respondents are directed to furnish written reply/comments ^{within 10 days} in office, positively. If the respondents have not submitted written reply/comments within the stipulated time, their rights of filing of reply/comments stands struck off and the case will be heard and decided on the basis of available record. Case to come up on 20.12.2021 before the D.B at Camp Court, Abbottabad.

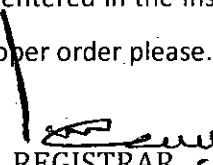

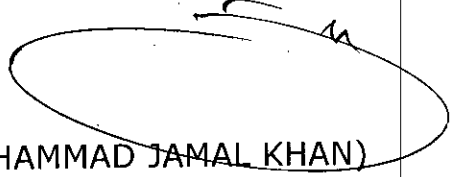

Chairman
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 9269 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/08/2020	<p>The appeal of Mst. Farhat Jabeen resubmitted 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> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>16.11.2020</u></p> <p> CHAIRMAN</p>
	16.11.2020	<p>Mr. Zahid, clerk to learned counsel for appellant is preset and seeks adjournment on the ground that learned counsel for appellant is not available today. Adjourned to 15.02.2021 on which date file to come up for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER CAMP COURT ABBOTTABAD</p>

The appeal of Mst. Farhat Jabeen daughter of Kala Khan Tehsil and District A.Abad received today i.e. on 16.07.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is wrong.
- 2- Copy of termination order 21.03.2011 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-C and page 15 of the appeal are illegible which may be replaced by legible/better one.

No. 1677 /S.T,

Dt. 17-07 /2020.

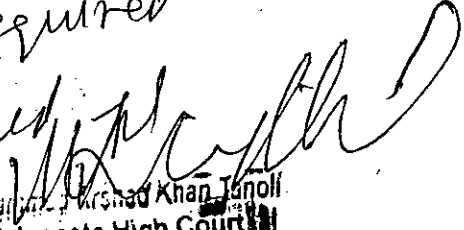

REGISTRAR -
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Arshad Khan Tanoli Adv. A.Abad

Sir objections have duly
been removed as required.

File is re-submitted

8/8/20


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

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

Service Appeal No. 9269/2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

INDEX

S.No	Description of Document	Annexure	Page #
1.	Service appeal alongwith affidavit		1 to 9
2.	Copy of appointment order of the appellant	"A"	10- 11
3.	Copy of transfer order of appellant	"B"	12
4.	Copies of applications	"C"	13-16
5.	Copy of order of provincial ombudsman dated 07-11-2019	"D"	17-19
6.	Copy of departmental appeal	"E"	20 -
7.	Copies of medical documents of the appellant	"F"	21-27
8.	Wakalat Nama		28

Farhat Jabeen

...APPELLANT

Dated: 18/7 /2020

Through;

(M)
Arshad Khan Tanoli
(ARSHAD KHAN TANOLI)
Advocate High Court Abbottabad

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

Service Appeal No. _____/2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK SUPREME COURT OF SERVICE TRIBUNAL ACT, 1974 FOR DECLARATION TO THE EFFECT THAT THE APPELLANT WAS APPOINTED AS PST IN THE RESPONDENTS DEPARTMENT VIDE ORDER NO.12126/70 DATED 27-09-1996. THE APPELLANT WAS TRANSFERRED TO GGPS HAIDER KHAIL THEREAFTER TO GGPS KALASH BUT NO SCHOOL WAS AVAILABLE IN THIS AREA.

HENCE, THE APPELLANT APPLIED TO THE DEO (FEMALE) KOHISTAN, FOR HIS ADJUSTMENT IN ANY OTHER SCHOOL BUT NO REPLY WAS MADE TO THE APPELLANT AS A LAST RESORT, THE APPELLANT FILED APPLICATION TO PROVINCIAL OMBUDSMAN THROUGH HER REAL SON. DURING THE INVESTIGATION, THE RESPONDENTS' DEPARTMENT PROVIDED TERMINATION ORDER OF APPELLANT DATED 21-03-2011 WHICH WAS NEVER PROVIDED TO THE APPLICANT PRIOR TO THE COMPLAINT BEFORE OMBUDSMAN. THE TERMINATION ORDER DATED 21-03-2011 IS WITHOUT ANY SHOW CAUSE NOTICE, EXPLANATION AND IS A RESULT OF AUDI ALTRUM PARTRUM AND THE SAME IS LIABLE TO BE SET-ASIDE.

PRAYER; ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL OF THE APPELLANT IMPUGNED REMOVAL FROM SERVICE ORDER DATED 21-03-2011 MAY BE SET-ASIDE AND RESPONDENT NO.3 MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL SERVICE BACK BENEFITS. ANY OTHER

6

RELIEF WHICH THIS HONOURABLE TRIBUNAL
DEEMED APPROPRIATE IN THE
CIRCUMSTANCES OF THE CASE MAY ALSO BE
GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

1. That the appellant got appointment as PST in the respondents' department on 27-09-1996. Copy of appointment order of the appellant is attached as Annexure "A".
2. That the appellant served the department with complete devotion and dedication. The appellant was transferred to GGPS Kalash on 2011. Copy of transfer order of appellant is attached as Annexure "B".
3. That the appellant visited the area and found that no school was available, therefore, the appellant filed representations and started shuttling in the offices of respondent No.3 for her adjustment but of no avail. Copies of applications are attached as Annexure "C".

4. That as a last resort, the appellant filed complaint before the Honourable provincial ombudsman. During the course of investigation, the respondent No.3 provided termination order dated 21-03-2011 of the appellant. As a result, ombudsman did not entertain the complaint on the basis of jurisdiction vide finding order dated 07-11-2019. Copy of order of provincial ombudsman dated 07-11-2019 is attached as Annexure "D".

5. That the appellant filed departmental appeal against the impugned order on 01-07-2019 but the same was not redressed by the competent authority. Copy of departmental appeal is attached as Annexure "E". Therefore, the instant service appeal is filed inter-alia on the following grounds;-

GROUND S;-

- a) That the impugned removal from service order dated 21-03-2011 is malafide, discriminatory, against the law, without following the prescribed code of formalities.

Hence, the impugned order is liable to be set-aside.

- b) That respondent No.3 did not issue show cause notice, explanation to the appellant prior to the issuance of impugned removal from service order.
- c) That when law prescribed something which is to be done in a particular manner that must be done in that manner and not otherwise. The impugned removal from service order is a result of audi altrum partrum.
- d) That the appellant is suffering from knee joint disease and could not approach the Honourable Tribunal due to prolong ailment. Copies of medical documents of the appellant are attached as Annexure "F".
- e) That the matter relates to the terms and conditions of service, therefore, the instant service appeal is entertainable by this Honourable Tribunal.

It is therefore, humbly prayed that on acceptance of the instant service appeal of the appellant, impugned removal from service order dated 21-03-2011 may be set-aside and respondent No.3 may be directed to reinstate the appellant in service with all service back benefits. Any other relief which this Honourable Tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.

Faikat Jabeen

...APPELLANT

Dated: 16/7 /2020

Through;

M. Arshad Iqbal Tanold

(ARSHAD IQBAL TANOLD)
Advocate High Court Abbottabad

Office No. 33 Adjacent to
Distt Bar Abbottabad

VERIFICATION:

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal.

Faikat Jabeen

...APPELLANT

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

Service Appeal No. _____/2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad.

...APPELLANT

VERSUS

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

...RESPONDENTS

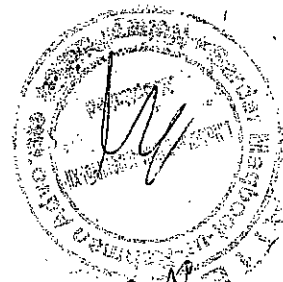
SERVICE APPEAL

AFFIDAVIT

I, Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad, do hereby solemnly affirm and declare on Oath that the contents of the accompanying service appeal are true and correct to the best of my knowledge, belief and information, and that nothing has been concealed from this Hon'ble Tribunal.

Farhat Jabeen

...DEPONENT



15/11/2020



BEFORE THE CHAIRMAN SERVICE TRIBUNAL,
KHYBER PAKHTUNKHWA, PESHAWAR

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan Tehsil and District, Abbottabad

...APPELLANT

VERSUS

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

...RESPONDENTS

APPEAL

**APPLICATION FOR CONDONATION OF
DELAY W.E.F 01/11/2019 TO 16/07/2020.**

Respectfully Sheweth; -

1. That the titled appeal is pending adjudication before this Honourable Tribunal and this application is part and parcel of the main service appeal.
2. That the appellant was suffering from multifarious knee joint deceases and could not approach this Honourable Tribunal well within the period of limitation. Copies of medical certificates are attached.

9

3. That the circumstances were beyond the control of the appellant as human being. Hence, delay w.e.f 01/11/2019 to 16/07/2020 is to be condoned.
4. That the valuable rights of the appellant are involved.


It is therefore, humbly prayed that on acceptance of instant application delay w.e.f 01/11/2019 to 16/07/2020 may graciously be condoned in the interest of justice.

Farhat Jabeen

...APPELLANT

Through

Dated: 16/7 /2020


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad
Office No 33 Adjacent
Distt Bar Abbottabad

AFFIDAVIT

I, Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan Tehsil and District, Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

Farhat Jabeen
DEPONENT



15/7/2020

Annex- A

OFFICE OF THE DISTRICT EDUCATION OFFICER PRIMARY KOHISTAN.

P-10

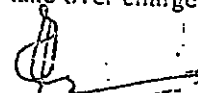
APPOINTMENTS

Consequent upon the selection by the departmental selection Committee District Education officer (Male & Female) Primary Kohistan has been placed. To appoint the following untrained female District candidates in DPS-7 (1480-81-2695) Rs. 1480/- per month fixed plus usual allowances his admissible under the rule w.e.f the date of their taking over charge against the vacant PTC posts noted against each name with the following terms and conditions:

S.No	Name & F. Name	School	Remarks
1.	Shazia D/o. Munawwar Khan	GGPS Busa	AVP
2.	Rabin D/o Aman Ullah	-do-	AVP
3.	Nadia Hassan D/o Gul Hassan	GGPS Pashol	AVP
4.	Farhatabeen D/o Kala Khan	-do-	AVP

CONDITIONS:

1. No TA/DA is allowed to anyone.
2. They should not be allowed to take over charge if their age is less than 18 and above 30 years.
3. They should provide age and Health Certificate from the DHO Kohistan.
4. Their original certificates should be checked and verified before handing over of charge by the SDEO(F) Kohistan.
5. Their services are purely temporary and can be terminated with out assigning any reason.
6. Charge reports should be submitted to the concerned.
7. Their order will be cancelled if they failed to take over charge within 10 days.

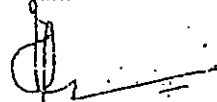


ABDUR RASHID
DISTRICT EDUCATION OFFICER
PRIMARY KOHISTAN AT DASSU.

Endst. No. 1264-70 dated Kohistan the 27-09-96.

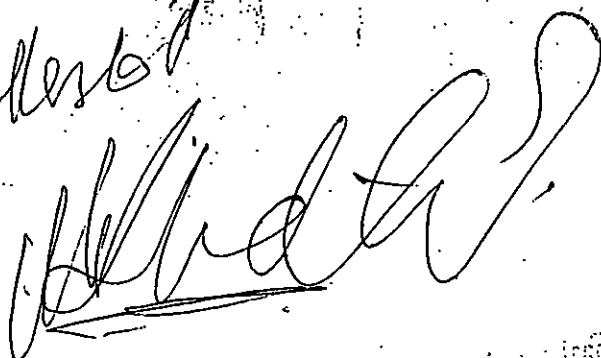
C/pt. to:

1. The Director Primary Education N.W.F.P. P. shawar.
2. The District Accounts Officer Kohistan.
3. The Sub-Divisional Education Officer (Female) Kohistan at Pattan.
4. Candidate Concerned.



ABDUR RASHID
DISTRICT EDUCATION OFFICER
PRIMARY KOHISTAN AT DASSU.

Alert



Muhammed Wahid
Advocate High Court
Office No. 33 Adjacent
Dist. Bar Abbotabad

OFFICE OF THE DISTRICT EDUCATION OFFICER PRIMARY KOHISTAN**APPOINTMENTS.**

Consequent upon the selection by the departmental selection committee district education officer (Male & Female) primary Kohistan has been placed. To appoint the following untrained female out district candidates in BPS-7 (1480-81-2695) Rs.1480/- per month fixed plus usual allowances has admissible under the rule w.e.f the date of their taking over charge against the vacant PTC posts noted against each name with the following terms and conditions;

S.No	Name & F. Name	School	Remarks
1.	Shazia D/o Munawar Khan	GGPS Bush	AVP
2.	Rabia D/o Aman Ullah	Do	AVP
3.	Nadia Hassan D/o Gul Hassan	GGPS Pashol	AVP
4.	Farhat Jabeen D/o Kala Khan	Do	AVP

CONDITIONS.

1. No TA/DA is allowed to anyone.
2. They should not be allowed to take over charge if their age is less than 18 and above 30 years.
3. They should provide age and Health Certificate from the DHO Kohistan.
4. Their original certificates should be checked and verified before handing over of charge by the SDEO(F) Kohistan.
5. Their services are purely temporary and can be terminated without assignongany reason.
6. Charge reports should be submitted to at concerned.
7. Their orders will be considers cancelled if they failed to take over charge within 10 days.

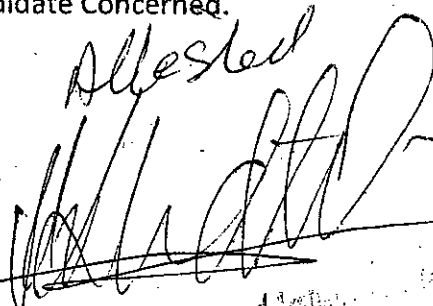
Sd/-

ABDUR RASHID
DISTRICT EDUCATION OFFICER
PRIMARY KOHISTAN AT DASSU

Endst: No.1264-70 dated Kohistan the 27-09-96

Copy to;

1. The Director Primary Education N.W.F.P Peshawar.
2. The District Accounts Officer Kohistan.
3. The Sub-Division Education Officer (Female) Kohistan at Pattan.
4. Candidate Concerned.

Attested


Sd/-

ABDUR RASHID
DISTRICT EDUCATION OFFICER
PRIMARY KOHISTAN AT DASSU

Muhammad Wali
 Advocate High Court
 Office No 33 A
 Dist Bar Abbottabad

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, ELEMENTARY AND
SECONDARY EDUCATION KOHISTAN.

Annex - B

P-12

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer Female E&SE Education District Kohistan, the service of the following female PST teachers are hereby terminated due to absent from their duties under special power ordinance 2001 on disciplinary ground with effect from 03-2011 in the interest of public service.

No	Name of Teacher		Name of School		Absent Period	Remarks
1	Afshan Hayat	PST	GGPS	Mujawar Abad	From 9/2010	
2	Nuzhat Yasmen	PST	GGPS	Dharo Bela	From 9/2010	
3	Fahar Jabeen	PST	GGPS	Qalash	From 9/2010	

[Signature]
Executive District Officer
E&SE District Kohistan

Order No. 600-604 Dated Kohistan the 21/3 /2011

Copy of the above is forwarded to the:-

1. Director E&SE Department KPK Peshawar.
2. District Coordination Officer, District Kohistan.
3. District Accounts Officer Kohistan.
4. Deputy District Officer Female Kohistan

[Signature]
Executive District Officer
E&SE District Kohistan

[Large Signature]

Advocate
Office No. 11 Adjacent
Distt. Sd Abbottabad

Annex - C

The Director (Elementary & Secondary
Education) Peshawar

P-13

Subject: Departmental Order regarding adjustment of the Applicant against
the Post PST District Kohistan.

Respected Sir,

That the applicant got appointment as PST in Government Girls Primary School Pashot vide appointment Order No. 12126-70 dated 27-09-1996 copy appointment order of the applicant is attached.

The applicant served the department as PST with effect from the date of her appointment i.e. 28-09-1996 to Feb. 2011 with complete devotion and dedication to the entire satisfaction of her superiors.

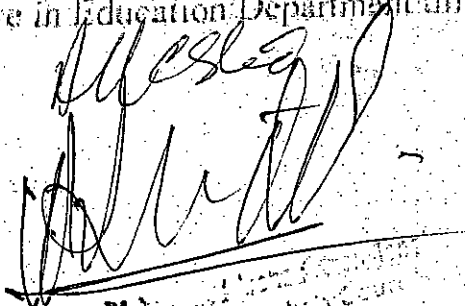
That during this period the applicant was transferred from GCPS Pashot to Haider Khail in the year 2010, the applicant thereafter was told by some official of the DFO Female Kohistan that she had been transferred at GCPS Qalash. Therefore, the applicant approached GCPS Kalash and found no Gov. School in Qalash.

Hence, the applicant started shuffling between the offices of Education Department for her adjustment in other schools but of no avail.

That the applicant has been in de a rolling stone since 2011 to till that. That the applicant has rendered near about 15 years of service till 2011 but the applicant is neither being retired nor adjusted for performing her service.

That the applicant is suffering from financial hardship and hardly cope with unavoidable expenses of her dependent children.

In view of the above it is prayed that the applicant may graciously be ordered to be retired from service compulsory having 15 years service at her credit or she may be adjusted at any Gov. School at District Kohistan so as to enable her to serve in Education Department till her date of superannuation and oblige.


Muhammad Iqbal
Advocate
Office No. 33
District Peshawar

Sincerely Yours,

Farehat Jabeen

Jiangi Syedan ATO, Manshera
Road Jalspall

03175652235 / 0341999020

ASSISTANT DIRECTOR INVESTIGATION PROVISIONAL OMBUDSMAN
SECRETARIAT KHYBER PAKHTUNKHWAH

Subject: NON-PAYMENT OF SALARIES AND PROVISION SERVICE BOOK

Sir,

1. Reference is made to your letter No. PO/Complaint/ 0362/04/2018.
2. Rejoinder of the reply of District Education Officer Female Kohistan is appended below.
3. Reply of Para No. 1 is correct.
4. Para No. 2 of the reply to the extent of payment of salary is correct and the rest of the para is incorrect.
5. Para No. 3 of the reply is incorrect because the petitioner applied for the provision of service book but in vain.
6. Para No. 4 it is submitted that the applicant petitioner has never been provided copy of removal from service and it is the first time that the applicant came to know through the reply of D.E.O (Female) Kohistan dated 13-06-2019 that the applicant has been removed from service 21-03-2011 therefore, in this regard, departmental appeal to the next higher authority against the impugned removal order dated 21-03-2011 is being filed.

Prayer:

In view of above it is prayed that complaint of the applicant may be accepted as prayed for.

Thanks *Farhat Jabeen*

Your Obediently

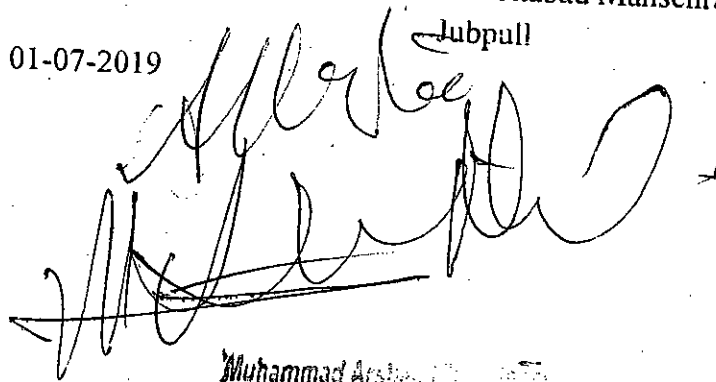
Farhat Jabeen D/o Kala Khan

Address: Jhangi Syedan

Abbottabad Mansehra Road

Jubpull

Date: 01-07-2019



Muhammad Arshad, Advocate High Court
Office No. 33 Adjacent to
Distt Bar Abbottabad

LETTERS FROM THE DEPARTMENT AND RECEIVED BOOKS OF SERVICE DOCUMENTS

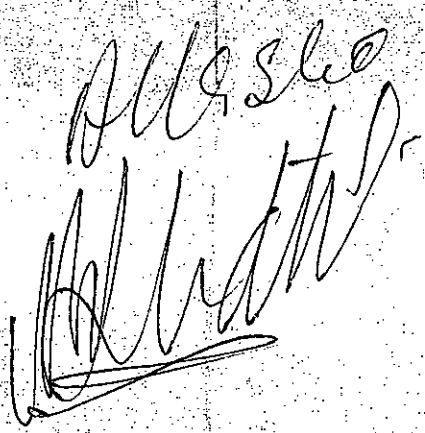
P-15

Respected Sir,

1. It is respectfully submitted that the applicant joined Service as PST on 15-07-1998 in District Kohistan under the control of Distt Education Officer Elementary & Secondary Education District Kohistan.
2. That the applicant served the Department with devotion and received salary till February, 2011. Thereafter, the applicant is neither being appointed nor being retired from service by the DEO(Female) Kohistan since March, 2011.
3. That besides, the petitioner is not being provided her service book etc. The department has also not provided any justification of stoppage of salary/increase/adjustment of the applicant in any school since March, 2011 onward.
4. That the act of DEO(Female) Kohistan is without lawful justification and contrary to law.

It is prayed that the DEO(Female) Kohistan may be directed to provide/produce Service Book and other Service Record and the said authority may also be directed to either retire the applicant or adjust in any school of Kohistan.

Thanks



Farhat Jabeen

Jhangl Syedan, Manshra Road

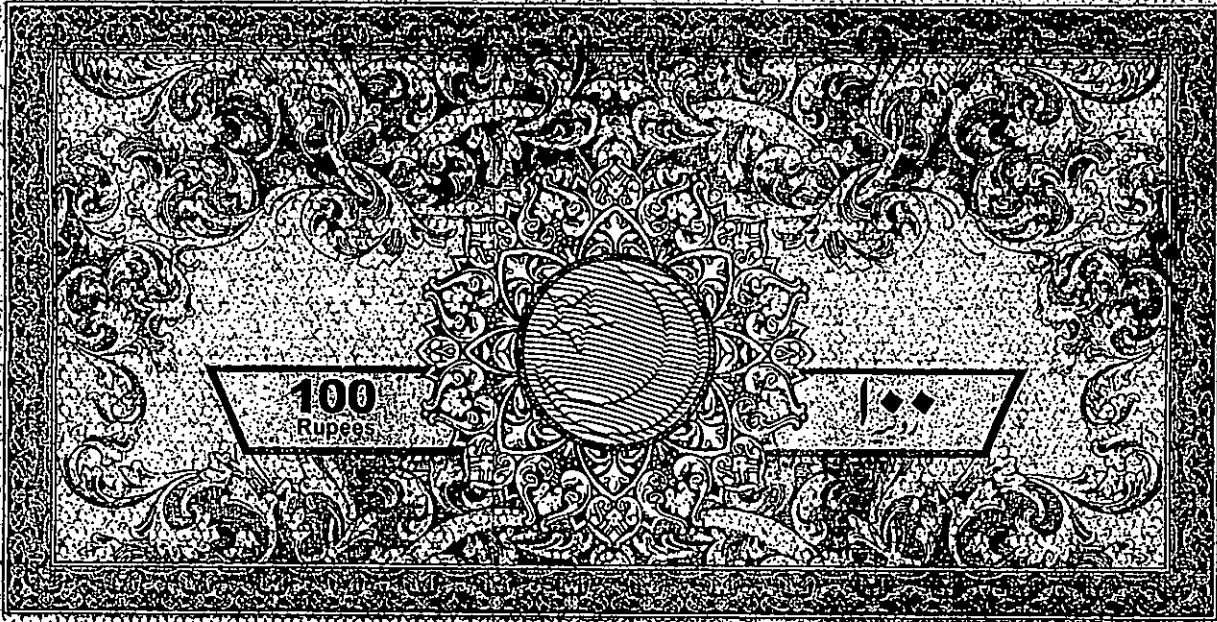
Jalpuddi, Abbottabad

Mobile # 0317-5682234

Mobile # 0344-1999020

Date:01-03-2019

Muhammad Iqbal
 Adviser
 Office of the
 District Abbottabad



AFFIDAVIT

- a) The allegations contained in the complaint are true to the best of my knowledge and belief.
- b) Previously no complaint on the subject was filed at the Head Office or any Regional Office.
- c) No suit, Appeal, Petition or any other judicial proceedings in connection with the subject matter of the complaint is pending before any Court.

You are also advised to provide relevant documents, if any, to proceed further in the matter.

THIS ISSUE WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN

DEPONENT

Farhat Sabeen

FARHAT JABEEN
(Complainant)
CNIC No: 13101-1350343-0



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



Annex - D

PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

P-17

PO/Complaint No.0362/04/2019

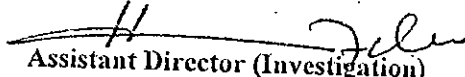
Dated 07/11/2019

1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa.
3. District Education Officer (Female), Kohistan.
4. Mst. Farhat Jabeen w/o Muhammad Shafeeq r/o Jhangi Syedan Mansehra Road Jubpull, Abbottabad (Contact # 0317-5652234, 0344-1999020).

Subject: **NON-PAYMENT OF SALARIES AND PROVISION OF SERVICE BOOK.**


Memo:

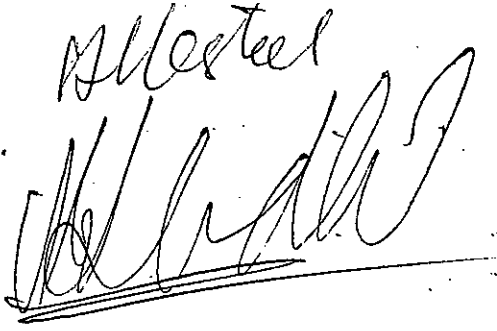
Copy of the Findings dated 07/11/2019 issued by the Hon'able Provincial Ombudsman Khyber Pakhtunkhwa in Complaint No. 0362/04/2019 filed by Mst. Farhat Jabeen r/o Abbottabad regarding the subject is enclosed herewith for information and necessary action.


Assistant Director (Investigation)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.

ENDST: EVEN NO & DATE:

Copy forwarded to the i/c Computer Section, Provincial Ombudsman Secretariat Khyber Pakhtunkhwa alongwith findings in duplicate for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.


Assistant Director (Investigation)
Provincial Ombudsman Secretariat,
Khyber Pakhtunkhwa.


Muhammad
Advocate High
Office No 33
Distt Bar Abbottabad



**PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA**

CLOSURE FINDINGS		
1	COMPLAINT NO.	PO/Complaint No.0362/04/2019.
2	NAME & ADDRESS OF THE COMPLAINANT	Mst. Farhat Jabeen w/o Muhammad Shafeeq r/o Jhangi Syedan Mansehra Road Jubpull, Abbottabad (Contact # 0317-5652234, 0344-1999020).
3	NAME OF THE AGENCY COMPLAINED AGAINST	1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar. 2. Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa. 3. District Education Officer (Female), Kohistan.
4	NAME OF THE INVESTIGATION OFFICER	Hanif Khan, Assistant Director.
5	SUBJECT OF COMPLAINT	Non-payment of salaries and provision of service book.
6	DATE OF REGISTRATION	29/04/2019.
7	DATE OF FINDINGS	07/11/2019.

THE COMPLAINT

Ms. Farhat Jabeen, instituted complaint stating that she was appointed as PST in E&SE Department, in Kohistan, vide Order No. 12126-70, dated: 27/09/1996. She was transferred to GGPS Haider Khail thereafter to GGPS Qalash. The complainant visited the said area but could not find any Government School. She further added that the complainant requested DEO (F) Kohistan for adjustment in any other school but she was terminated. The complainant has requested this Forum to probe the matter.

REPORT OF THE AGENCY

The matter was taken up with Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, and District Education Officer (Female) Kohistan to meet the allegations and submit reply including rebuttal, if any. In response, DEO (Male) Kohistan submitted that the complainant was not regular in her service. The DEO (F) Kohistan acted as per rules and the complainant was served with Show Cause Notice but she failed to submit any cogent reply. She neither attended the school nor visited the DEO office. The removal order was issued by the competent authority vide order No. 600-604, dated: 21/03/2011. His request was now hopelessly time barred.

REJOINER

Reply of the Agency was shared with the complainant for feedback/rejoinder, who expressed discontent over reply of the Agency.

HEARING

Due to divergent pleadings, the complaint was fixed for hearing on 25/07/2019, which was adjourned on the request of the Agency to bring the record. Hearing notice for 05/09/2019 and 16/10/2019 were served but nobody proved the point.


(Handwritten signature)
 Muhammad Arshad
 Advocates High Court
 Office No. 33 Adja
 Dist Bar Abbottabad

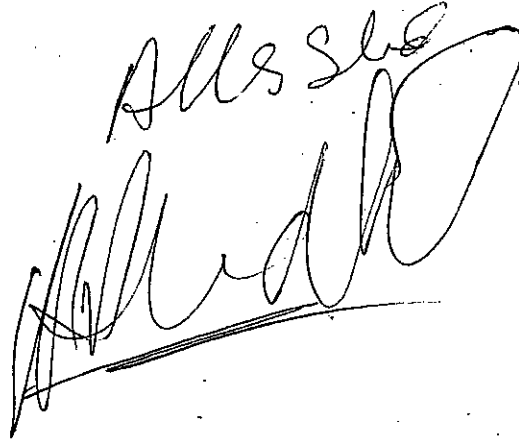


P-19
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,
KHYBER PAKHTUNKHWA

FINDINGS

Reinstatement in service is purely service matter. This forum lacks jurisdiction to adjudicate ^{upon} the matter. Accordingly, investigation in the complaint is closed under Regulation 17(a)(k) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation, and Disposal of Complaints) Regulations, 2011.


AQAL BADSHAH
PROVINCIAL OMBUDSMAN



07/11
19

Muhammad Arshed Khan (encl)
Advocate High Court
Office No. 33 Adjacent
Distt Bar Abbottabad

Annex - E

TO THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION
KPK PESHAWER.

P-20

Subject : DEPARTMENTAL APPEAL AGAINST IMPUGNED REMOVAL
FROM SERVICE ORDER DATED 21-03-2011.

Sir,

1. It is submitted that the applicant filed complaint before the provincial ombudsman KPK, regarding release of her salary with effect from 2011 onwards and provision of service documents now, the applicant has been informed by the ombudsman for the submission of rejoinder in complain wherein, termination order was found attached with documents received from ombudsman.
2. That the officer of DEO (Female) Kohistan kept the removal from service order date 21-03-2011 vide letter dated 18-06-2019 of the applicant as secret therefore, the applicant got the impugned order through letter of ombudsman dated 18-06-2019. (Copy of the letter ombudsman dated 18-06-2019 in comments of DEO Female Kohistan dated 13-06-2019 is attached).
3. That the impugned termination order dated 21-03-2011 has been issued without show cause notice, charge sheet and without following the code formalities under the rules therefore, order dated 21-03-2011 is liable to be set aside.

Prayer:

In view of the above, it is prayed that impugned remove from service order at 21-03-2011 may be set aside and the applicant may be re-instated in service with all back benefits.

Thanks Farhat Jabeen

Your Obediently
Farhat Jabeen D/o Kala Khan
Address: Jhangi Syedan
Abbottabad Manshara Road
Jubpull

Attested
Date: 01-07-2019

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

Room No :
 Department : ORTHOPEDIC-A
 Date : 30-JUN-20 09:24:58
 Dept Fee : 30
 User : FARHAT NOMAN
 MRNO : K0400002297037
 Invoice No : K04200903686
 Sex : Female

OPD Prescription form

Name : MRS SHAFFIQ
 Name : M SHAFFIQ
 Age : 40 Year(s) 00 Month(s) 0 Day(s)
 Sex : REGULAR
 Occupation :

Annex - F

P. 21

RA O.A. L

- Ch
- O.A. (R) knee - 1 yr.
 - pain at knee point during
 - upstairs & down stairs.
 - follow up can from 1 yr.

M. Aslam

[Handwritten signature]

① Pat. Epi Sachet

Painkiller

3/16 4/16 5/16 1/2 2/16

Kept to
 Muhammad Aslam
 Advocate High Court
 Office No. 33, Adipatti Road
 New Market, Abbottabad

physiotherapy

②

Sachet Pat. N.E.M.S

1/1

③

Pat. Dabur-D

[Handwritten signature]

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OPD Prescription form

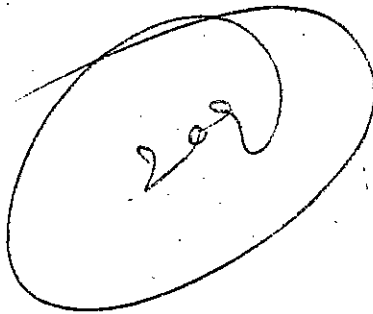
Name : FARHAT BIBI
Father Name :
Husband Name : M SHAFFIQ
Age : 38 Year(s) 00 Month(s) 0 Day(s)
Patient Type : REGULAR

Room No :
Department : ORTHOPEDIC-B
Date : 27-FEB-20 11:37:39
Dept Fee : 30
User : FIZZA ZAHEER
MRNO : K0400002239695
Invoice No : K04200452785
Sex : Female

Investigation

✓ Rt knee joint pain - 3-4 months
- Pain while climbing up/down stairs
- Anterior drawer (+)
- Xray Rt knee joint AP/lateral view Digital
Add MRI Rt knee joint

P-22



[Handwritten signature]

Muhammad Aslam
Advocate
Office No 11 Addis Ababa
Dist. for Addis Ababa

⑥ Tab with 1000
③ (14) 1-1
③ Tab Nuberol Forte
③ (14) 1-1-1
③ Cap Roid-2 400
③ (14) 2/2/20

④ Tab ostipw-k
cc ① 2/2/20

27/2/2020



OPD Prescription form

Name : MRS SHAFIQUE
Father Name :
Husband Name : SHAFQUE
Age : 41 Year(s) 00 Month(s) 0 Day(s)
Patient Type : ACUTE EMERGENCY

Token No : 119
Room No :
Department : EAR CLINIC
Date : 23-OCT-19 18:39:19
Dept Fee : 10
User : SHERAZ KHAN
MRNO : K04ACE19490670
Invoice No : K04192015902
Sex : Female

Investigation

yc
long

99

Adh
Z. value
mm

P-23

AS
2 Rem
RT knee
joint

All 9.5 ltr

[Handwritten signature]

Muhammad Arshad
Advocate High
Office No 22 A.C.

las. Mon. 20
las. 1-1
las. Myonof 50
las. Musiden 2-8
Targeste 1-1
Cy 10 16/2-11

Neuro Surgeon

Brain for Brains

Dr. Abdul Aziz Khan

Associate Professor

M.B.B.S (Gold Medalist) RMP MCPS

FCPS (Neuro Surg)

AMC Complex Abbot Abad



ایسوسی ایٹ پروفیسر نیوروسرجن

ڈاکٹر عبدالعزیز خان

ایم۔ بی۔ بی۔ ایس گولڈ میڈلسٹ

آر۔ ایم۔ بی۔ ایس۔ ایف۔ سی۔ پی۔ ایس۔ پی۔ ایس۔ (نیوروسرجری)

ماہر امراض: فالج، حرام مغز، مرگی، ہشتمہ، جوڑ، دماغ، کمر درد، عرق النساء

ایب میڈیکل کیمپس ایبٹ آباد

Name Farooq Rizk Age 45 Sex F Date 28/11/2020

P-24

Handwritten notes on the left side of the diagram, including a circled 'P' and some illegible text.



Handwritten notes on the right side of the diagram, including 'Cp Gallego', '1-1', 'Bz Beston', '1-1 20', 'Cp B-pout', 'Bz Zurich', and '4-1/2'.

Handwritten signature and notes at the bottom right, including 'Cp Dites-4' and '1-1'.

Not Valid for Court

ٹیلی فون نمبر: 0300-5820422

آبٹ آباد ایبٹ ایف ایس پی ایف: 2 سے 7 بجے تک

عبدالروف میڈیکل سنٹر آسنور گیٹ نمبر 3

1/3



AYUB TEACHING HOSPITAL ABBOTTABAD



FILTER OUTPATIENT DEPARTMENT

P-25

A9265

B.Code No: _____ Appointment Time: 11:30 Book No: _____
 Patient Name: FARID BIBI M.R No: _____
 Patient Sex: Female Patient Yearly No: K0400001915748
 Patient Age: 40 Year(s) Date & Time: _____
 Address: _____ O.P.D: 22-06-2019 11:29:15
 Amount: 30.00 Computer Operator: ORTHOPEDIC-B - OPD

pain in neck region - 15 days.
 pain in (R) Shoulder
 Joint - 15 days.
 Movements are restricted
 at (R) Shoulder joint - 15 days.

Token# 198

Adv;
 X-ray Cervical spine AP
 Lat

[Handwritten signature]

[Handwritten signature]
 Muhammad Aslam
 Advocate High Ct
 Office No 33 Adjacent
 21st Bar Abbottabad



MEDICAL TEACHING INSTITUTION ABBOTTABAD

Avub Teaching Hospital. Phone: 0992-9311162. Fax: 0992-380328
Email: info@ath.gov.pk. Website: www.ath.gov.pk

OPD Prescription form

Token No : 001 07
Room No :
Department : **CARDIOLOGY**
Date : 18-JUN-20 08:50:22
Dept Fee : 30
User : FAIZAN ALI
MRNO : K0400002293191
Invoice No : K04200861252
Sex : Female

Name : MRS SHAFIQUE
Father Name :
Husband Name : M SHAFIQUE
Age : 40 Year(s) 00 Month(s) 0 Day(s)
Patient Type : REGULAR

Investigation

Chest pain radiating to back
SOB = -ve
vomiting = -ve

** on pain meds for 1 week*
P-26

Add

- * CBC
- * ECG
- * ALT
- * S-Dmy base
- * RFTs

All clear

Muhammad Arshad
Advocate High Court
Office No. 33 Adjacent
Distt. Bar Abbottabad

RAUF

P-27



MEDICAL LABORATORY

Committed to Excel in Quality

FULLY COMPUTERIZED

24 Hours Service

FINAL LABORATORY REPORT

MR No: 4634

DATE: /01/2020

NAME: FARHAT

AGE/SEX: ** YRS/FEMALE

REF BY: RMC

SPECIMEN: BLOOD

BLOOD PROFILE

TEST	UNIT	RESULT	NORMAL RANGE
Uric Acid	mg/dl	5.0	(M) - 3.5..... 7.0 (F) - 3.0..... 5.0
Calcium	mg/dl	9.8	8.6----10.3
Rheumatoid Factor:		NEGATIVE	NEGATIVE

[Signature]
 Muhammad Arshad
 Advocate High Court
 Office No 33 Adjacent
 Dist Bar Abbottabad

[Signature]
 Lab Technologist

Incorrect results?
 Contact: 0345-9588690
 For a Single repeat
 test within 24 hours.

Following tests are available now:

1. EILISA for BBsAg, HBeAg, and HCV (reports delivered with in 2 hours)
2. T3, T4, TSH, FSH, Prolactin, Testosterone (reports delivered within 24 hours)
3. TORCH Screening, CMV IgM (cytomegalovirus), EBV VCA IgM (Epstein-Barr virus) and HSV 1 & 2 IgM (Herpes simplex virus).... (reports Deliver With In 24 Hours)

Address: NOR Gate, Ayub Medical Complex, Main Road, Rawal, Abbottabad

کورٹ فیس

وکالت نامہ

Service Tribunal ICPK Peshawar بعدالت

Farhat Jabeen vs Govt of ICPK عنوان

Petitioner/Appellant منجانب

لوحیت مقدمہ

باعث تحریر آنگہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے بیرونی و جناب دینی اکل کارروائی متعلقہ آں مقام

Adv. Muhammad Arshad Khan Tanzeel

کو وکیل مقرر کر کے تقرر کرتا ہوں کہ صاحب موصوف کو مقدمہ میں کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقریر نمٹ و فیصلہ برصفت ہو سیتا اقبال و کوئی اور بصورت دیگر و کوئی کرانہ اجراء و سولی چیک روپیہ و مرضی و کوئی کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی اکل یا کسی بیرونی کارروائی کے لئے کسی اور وکیل یا محکمہ صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی دینی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم جو کہ منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ الخوائے مقدمہ کے سبب ہوگا اس کے سنجی وکیل صاحب ہوں گے نیز ہتھیار تم وصول کرنے کا بھی اختیار ہوگا اگر کوئی دینی مقام دورہ پر ہر پاسد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ بیرونی مقدمہ مذکورہ کریں اور اگر محکمہ مقرر کردہ میں کوئی بڑو بھایا ہو تو وکیل صاحب موصوف مقدمہ کی بیرونی کے پابند ہوں گے۔ نیز درخواست ہر اور تجارت بائس بیسٹہ مجلسی کے دائرہ کرنے اور اس کی بیرونی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کروایا تاکہ سند ہو۔

المترجم (15/3/2020)

Farhat Jabeen

Advocate High Court
Office No: 33 Adjacent to
Dist Bar Abbottabad

"B"

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

No.

TB

Appeal No. 92129 of 20 20

Fazhat Jabbari Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Pesh. Respondent

Respondent No. 3

Notice to:

Distt. Education Office (Female)
Kohistan

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 19-5-2021 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 or 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 26th

Day of Feb: 20 21

at Camp Court Road

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.

TB

Appeal No. 9269 of 20 20

Farhat Juboon Appellant/Petitioner

Versus

Through Secy, Edu: to Pk Pesh Respondent

Respondent No. I

Govt. of Pk Through Secy, Education
Peshawar.

Notice to:

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 19-5-2021 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.

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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 26th

Day of Feb 20 21

at Camp Court A Abad

Beju
01/03

[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.

No.

113

Appeal No. 9269 of 20 20

Fazhat Jabeen Appellant/Petitioner

Versus

Through Secy. Edu. P.P.K. Peshawar Respondent

Respondent No. 2

Notice to:

Director, Ele: & Sec: Education Guvt: of
P.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 19-5-2020 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.

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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 26th

Day of Feb 20 21

at Camp Court A. Abad

[Signature]
27/03

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.

"A"

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

Resd

TB AIA

APPEAL No..... 9269 of 20 20

Farnat Jabeen

Appellant/Petitioner

Versus

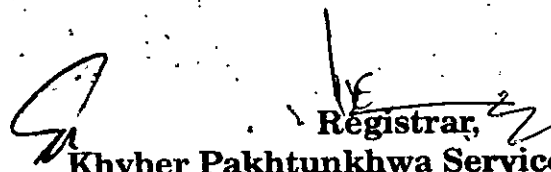
Through Secy. (E&SE) Peshawar
RESPONDENT(S)

Notice to Resp No 3 Appellant/Petitioner District Education officer
(Female) Kohistan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-9-22 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 camp court
A/Abad.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 9269 of 20

Farhat Jabeen

Appellant/Petitioner

Versus

Through Secy. # (EBSE) Pesh

RESPONDENT(S)

Resp No. Director (EBSE)
Notice to Appellant/Petitioner Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-9-22 at 9: AM

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

at camp court

A/Abad.

[Signature]
7/9/22

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

"A"

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

No.

TB AIA

APPEAL No. 9269 of 20

Farhat Jabeen

Appellant/Petitioner

Versus

Through Secy. (ESSE) Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Resp. No I Govt of KPK Through
Secretary (ESSE)
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-9-2022 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 camp court

A/Abad

Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.