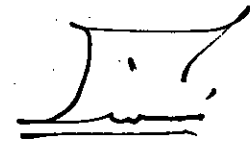


06.10.2022

Learned counsel for the appellant present, Mr. Muhammad Jan, District Attorney for the respondents present.

Vide previous date i.e 06.09.2022, Learned counsel for the appellant has submitted an application for amendment in the memo of appeal and the case was fixed for reply and arguments on the said application for today, however today learned District Attorney stated the he has no objection on acceptance of the said application. The application for amendment in the memo of appeal is thus accepted. Learned counsel for the appellant shall submit amended memo of appeal on 10.11.2022 before the S.B at Camp Court Swat.

**SCANNED
KPST
Peshawar**




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

10th Nov, 2022

Learned counsel for the appellant present, Mr. Muhammad Riaz Khan Painsdakhel, Asst: AG for respondents present.

Learned counsel for the appellant submitted amended appeal which is placed on file. To come up for written reply/preliminary hearing on 08.12.2022 before S.B at camp court Swat.

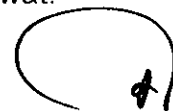


(Kalim Arshad Khan)
Chairman
Camp Court Swat

07.07.2022

Counsel for appellant present.

Let pre-admission notice be issued to the respondents for reply. To come up for reply/preliminary hearing on 06.09.2022 before S.B at Camp Court, Swat.



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

06.09.2022

Learned counsel for the appellant present. Mr. Muhammad Saleem, Section Officer alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

The appeal in hand was fixed for reply/preliminary hearing, however learned counsel for the appellant submitted an application for amendment in the memo of appeal. Application is placed on file and copy of the same is handed over to learned Assistant Advocate General. Adjourned. To come up for reply and arguments on the said application on 06.10.2022 before the S.B at Camp Court Swat.



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

09.05.2022

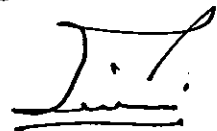
Due to non-availability of the Bench, the case is adjourned to 10.05.2022 for the same as before.


Reader

10.05.2022

Nemo for the appellant.

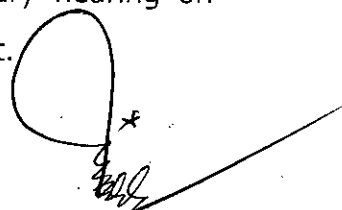
Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for preliminary hearing on 08.06.2022 before the S.B at Camp Court Swat.


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

08.06.2022

Clerk of learned counsel for the appellant present.

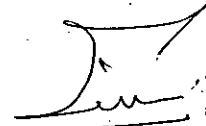
On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for preliminary hearing on 07.07.2022 before the S.B at camp court Swat.


(Mian Muhammad)
Member (E)
Camp Court Swat

06.01.2022

Appellant in person present.

Appellant requested for adjournment on the ground that his counsel is not available today due to general strike of the Bar. To come up for preliminary hearing on 07.02.2022 before S.B at camp court Swat.



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

07.02.2022

Tour is hereby canceled .Therefore, the case is adjourned to 04.04.2022 for the same as before at Camp Court Swat.

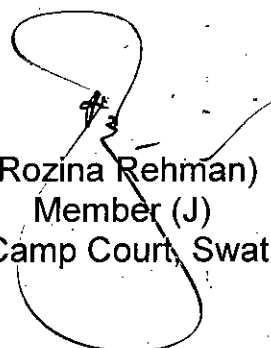


Reader

04.04.2022

Counsel for the appellant present.

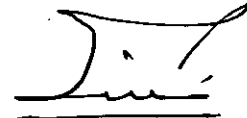
In view of peculiar circumstances of the case, learned counsel for appellant is directed to make sure the presence of the appellant on the next date. To come up for personal appearance of the appellant and preliminary hearing on 09.05.2022 before S.B at Camp Court, Swat.



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

02.11.2021

Appellant alongwith his counsel present. Learned counsel for the appellant sought adjournment for preliminary hearing. Adjourned. To come up for preliminary hearing before the S.B on 09.12.2021 at Camp Court Swat.

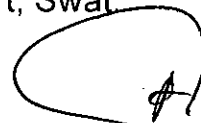


(Salah-Ud-Din)
Member (Judicial)
Camp Court Swat

09.12.2021

Aftab Ali Khan, attorney of appellant on behalf of appellant present.

He made request for adjournment as learned counsel for appellant is not available today. Opportunity is granted and case is adjourned. To come up for preliminary hearing on 06.01.2022 before S.B at Camp Court, Swat



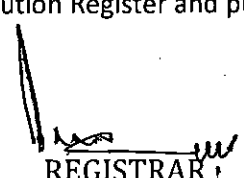

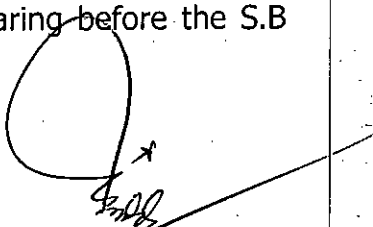
(Rozina Rehman)
Member (J)
Camp Court, Swat

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 7205 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/08/2021	<p>The appeal of Mr. Fazal Maabood resubmitted today by Mr. Irfan Ali Yousafzai 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> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>20.09.2021</p> <p>Learned counsel for the appellant present.</p> <p>Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing before the S.B on 10.11.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>


This is an appeal filed by Fazal Maabood today on 12/07/2021 against his non adjustment on the post of SS against which he preferred/made departmental appeal/representation on 28.04.2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiency.

✓ Copy of enquiry report mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 1239 /ST,

Dt. 13/07 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Sabir Shah Adv. Pesh.

Respected Sir, that the instant appeal

was returned with inspection that the requested period was not

completed. Now the requested

period is completed so it is

requested that the appeal may

kindly be placed before

the Tribunal. The enquiry report
was not noted over to the appellant.

(2) and the enquiry proceedings
are annexed with Annexure

1 - it is request to

place before the Tribunal.

2-08-2021

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

SCANNED
KPST
Peshawar

Fazal Mabood

... Appellant

VERSUS

Government of KP and others.

... Respondents

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S.#	Description of documents	Annexure	Pages
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2.	Certificate	5
3.	Affidavit	6
4.	Memo Of Addresses	7
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6.	Copies of applications and sanction of leave	B	11-16
7.	Copies of applications	C	17-19
8.	Copies of inquiry proceedings, application dated 20.09.2010 & memo of appeal	D	20-31
9.	Power of attorney		32
10.	Wakalat Nama	33

APPELLANT THROUGH
Counsels


Sabir Shah
Advocate Supreme Court

Off: S.8,9 2nd Floor, Continental Plaza,
Makanbagh, Mingora, District Swat.
Cell No: 03005746744

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,**PESHAWAR**Service Appeal No. 7205 of 2021Khyber Pakhtunkhwa
Service TribunalDiary No. 7192Dated 12/7/2021**SCANNED
KPST
Peshawar**Fazal Mabood S/O Marat Khan R/O Village Shalpin, Tehsil
Khwazakhela, Distt: Swat.... Appellant**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer Swat at Gulkadda Swat.
4. Principal GHSS Khwazakhela Swat.

... Respondents

Service Appeal Under Section 4 of Service Tribunal Act, 1974, against the actions and inactions of respondents whereby the appellant has been kept in a hanging position by neither responding him regarding his leave extension application nor allowing him to continue his services as Subject Specialist (Pakistan Studies).

Prayer:

On acceptance of this service appeal, the official respondents may please be directed to re-adjust the appellant as Subject Specialist (Pakistan Studies) at any nearest station with all back benefits.

Filed to-day

[Signature]
Registrar
12/7/2021

Re-submitted to -day
and filed.

[Signature]
Registrar
6/8/2021

Any other relief not specifically prayed but this august court deems proper may also be granted.

Respectfully Sheweth:

1. That appellant is the bonafide resident of Village Shalpin, Tehsil Khwazakhela, District Swat and was appointed as Subject Specialist **(S.S)** (Pakistan Studies) vide order dated 28-08-2003. **(Copies of CNIC and order dated 28-08-2003, are annexed as annexure "A")**
2. That appellant was serving as Subject Specialist (S.S) (Pakistan Studies) at GHSS Khwazakhela, Swat.
3. That appellant applied for leave with pay w.e.f 01-09-2006 to 11-11-2006 and leave without pay w.e.f 12-11-2006 to 31-08-2008 which was allowed accordingly by the competent authority. **(Copies of applications and sanction of leave are annexed as annexure "B")**
4. That the appellant after availing the leave mentioned above upto 31.08.2008, in the meanwhile the security situation in district Swat became bad to worst specially for the persons who were in government service, furthermore all the schools, colleges and government institutions were closed due to militancy in Swat district generally and specifically in Upper Swat where the GHSS Khwazakhela exists, therefore appellant along with family move to down districts of Khyber Pakhtunkhwa and the appellant submitted application for extension in leave w.e.f. from 01.09.2008 to 31.08.2011 and a subsequent application for extension in leave without pay w.e.f 01.09.2008 to 25.10.2020 which have not been responded till date. **(Copies of applications are annexed as annexure "C")**

5. That an inquiry was initiated against the appellant in the year 2010 wherein he submitted his submissions before the inquiry officer/committee and to the respondent No.1 vide a detailed application dated 20.09.2010. **(Copies of inquiry proceedings and application dated 20.09.2010 are annexed as annexure "D")**
6. That the appellant appeared in-person before the inquiry officer i.e. principal of GHSS No.2 Peshawar Cantt. on 26.10.2010 along with all relevant documents, wherein the appellant submitted before the inquiry officer, that whether he should join his duty, in response the inquiry officer told him to wait for the outcome of the inquiry and till the directives of the competent authority.
7. That the appellant time and again asked about the matter telephonically, but when not received any order of the competent authority on the subject inquiry preferred a departmental appeal before the worthy respondent No.1 on 28.04.2021 which has not been responded in its statutory period, therefore the appellant having no other option but to file the instant appeal in its statutory time limitation on the following grounds: *(Copy of appeal is anex. "E")*

Grounds:

- i. That, actions and inactions of respondents are illegal, ultra vires, ultra shariah and against the established norms of administration, therefore, are not tenable in the eyes of law.
- ii. That, appellant has not been dealt with in accordance with law, which is the worst example of discrimination, therefore, is against the fundamental rights of the appellant, as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.

(4)

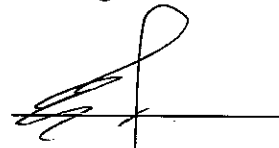
- iii. That, appellant has been deprived of his legal right of service, safeguarded by constitution of Islamic republic of Pakistan, 1973.
- iv. That the appellant has neither been allowed to join his duty nor has been served with an adverse order against him, therefore the appellant has been kept in hanging position which is against the law and rules on the subject.
- v. Any other ground not specifically raised will be argued with the prior permission of this August Court.

In view of the above, it is therefore very humbly prayed that, on acceptance of this service appeal, the official respondents may please be directed to re-adjust the appellant as Subject Specialist (Pakistan Studies) at any nearest station with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.


Appellant

Through Counsel



Sabir Shah
Advocate Supreme Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Fazal Mabood

... Appellant

VERSUS

Government of KP and others.

... Respondents

Certificate

As per instructions received from my client, it is certified that no such like service appeal against the impugned orders, has been earlier filed before this Hon'ble Court.



Appellant

Through Counsel



Sabir Shah

Advocate Supreme Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Fazal Mabood

... Appellant

VERSUS

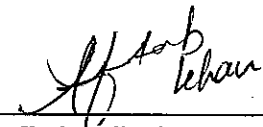
Government of KP and others.

Respondents

Affidavit


I Affab Ali Khan S/O Jehan Sher Khan R/O Village Shalpin Tehsil Khwazakhela, District Swat (**Attorney of the Appellant**), do hereby solemnly affirm and declares on oath that, all the contents of the accompanying **service appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent

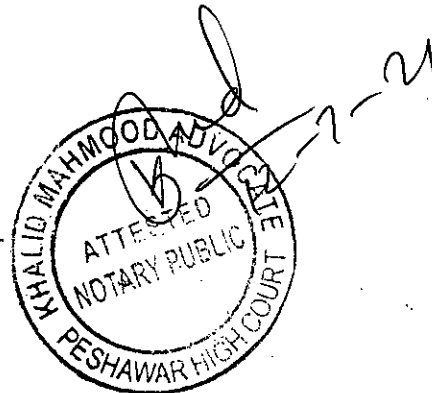


Affab Ali Khan
(Attorney of the Appellant)
CNIC: 15602-6460681-3

Identified By:



Sabir Shah
Advocate Supreme Court



BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021.

Fazal Mabood

... Appellant

VERSUS

Government of KP and others.

Respondents

Address of Appellant:

Fazal Mabood S/O Marat Khan R/O Village Shalpin, Tehsil Khwazakhela, Distt: Swat.

CNIC No: 15602-3620603-5

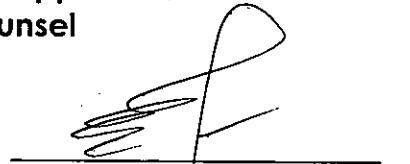
Cell No. 03469422559

Addresses of Respondents:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer Swat at Gulkadda.
4. Principal GHSS, Khwazakhela Swat.


Appellant

Through Counsel



Sabir Shah
Advocate Supreme Court

Amf. A.

(28)

(8)

A

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT.

DATED PESHAWAR THE 28-8-2003.

NOTIFICATION.

NO. SO(S)3-2/2003/S.S.(M&L). Upon the recommendation of the NWFP Public Service Commission, the Competent Authority has been pleased to appoint the following in-service candidates as Subject Specialist in the relevant subject in BPS-17 (Rs.6210-465-15510 plus usual allowances as admissible under the rules) under the provision of the Establishment and Admn: Department order No. SO(R-VI) (E&AD) 2-1/2003 dated 16-4-2003 on regular basis in relaxation of ben with effect from 1-9-2003:

- 1- Mr. Mukhtiar Ali S/O Qamar Ali.
- 2- Mr. Latifullah S/O Abdur Rab.
- 3- Mr. Muhammed Sayyid S/O Saad-ud-Din.
- 4- Mr. Inayatullah Khan S/O Haji Abdul Ghafar.
- 5- Mr. Sajid Mahmood S/O Qazi Mohammad Iqbal.
- 6- Mr. Qayum Nawaz S/O Ahmad Nawaz.
- 7- Mr. Muzaffar Ali Khan S/O Muhammad Fursan.
- 8- Mr. Ismetullah Khan S/O Ali Muhammed.
- 9- Mr. Muhammed Naeem Seddique S/O Muhammed Yasin Seddique.
- 10- Mr. Abid Hussain S/O Fazal Hussain.
- 11- Mr. Iftikhar Ahmad S/O Abdul Menan.
- 12- Mr. Abdul Basir S/O Muhammad Zaman.
- 13- Mr. Akber Saeed S/O Ismail Khan.
- 14- Mr. Dost Muhammed S/O Fazal Ahmad.
- 15- Mr. Kamal Ahmed S/O Mustafa Khan.
- 16- Mr. Akbar Khan S/O Musal Khan.
- 17- Mr. Noor Muhammed S/O Gu, Muhammed.
- 18- Mr. Sher Muhammed S/O Dilbar Khan.
- 19- Mr. Syed Shsh Hussain Shah S/O Syed Chan Bad Shah.
- 20- Mr. Alamgir Afridi S/O Azad Bakht Afridi.
- 21- Mr. Fazal Mebood S/O Merat Khan.
- 22- Mr. Habibur Rehman S/O Akbar Ali Khan.
- 23- Mr. Nawazish Mehboob S/O Mehboob Elahi.
- 24- Mr. Iqtidar Ali S/O Khan Bahader.
- 25- Mr. Aziz Ahmad S/O Ahmad Saeed.
- 26- Mr. Feyyaz Ahmad Khan S/O Nisarul Hoq.
- 27- Mr. Muhammad Azim S/O Dilbar Khan.
- 28- Mst. Najiya Ambreen D/O Muhammed Jehangir Khan.
- 29- Mst. Jamila Begum D/O Nek Amel.
- 30- Mr. Muhammed Naeem S/O Khan Nawaz.

ATTESTED
[Signature]
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Advocate

Contd: Page- 2

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9

O. Name of Candidates.	Place of Posting.	Remarks.
1. Mr. Dost Muhammed S/O Fazal Ahmed, Vill: Kochattia, P.O. Tehsil Ogbi, Distt: Mansehra.	SS(History-Cum-Civics) GHSS, Boi, Abbottabad.	Against Vacant Post.
2. Mr. Kamal Ahmed S/O Mustafa Khan, C/O Shad Ullah Sub-Engineer Qtr. No. 111 Officer Colony Miran Shah Road, Bannu.	SS(H/Cum-Civics) GHSS, Landiwah, Lakki Marwat.	-do-
3. Mr. Akbar Khan S/O Musal Khan, Akbar Khan C/O Sajid Medicose Bara Khyber Agency P.O. & Tehsil Bara.	SS(H/Cum-Civics) GHSS, Sheikhan, Peshawar.	-do-
4. Mr. Noor Muhammad S/O Ghani Muhammad, Moh: Shalmani, Vill: P.O. Dheri Alldand Malakend Agency.	SS(H/Cum-Civics) GHSS, Batera, Buner.	-do-
5. Mr. Sher Muhammed S/O Dilbar Khan, Aryana Public Call Office Bakht Alam Market Lamp Road, South Waziristan Agency.	SS(H/Cum-Civics) GHSS, Nagrai, Buner.	-do-
6. Syed Shah Huesain Shah S/O Syed Ghani Badshah, Vill: P.O. Akbar Pura, Moh: Bajka War. Badshah Teh: & Distt: Nowshera.	SS(Pak: Study) GHSS, Akberpura, Nowshera.	-do-
7. Mr. Alamgir Afridi S/O Azad Bakht Afridi, Shaheen Tent Service, Shaheen Town, University Road, Peshawar.	SS(Pak: Study) GHSS, Pirpai, Nowshera.	-do-
8. Mr. Fazal Mebood S/O Marat Khan, Habib Book Sellers P.O. Khwaza Khela, Distt: Swat.	SS(Pak: Study) GHSS, Khwaza Khela, Swat.	-do-
9. Mr. Habibur Rehman S/O Akbar Ali Khan, Vill: P.O. Dallo Khel Teh: & Distt: Lakki Marwat.	SS(Pak: Study) GHSS, Nagrai, Buner.	-do-
10. Mr. Nawazish Mehboob S/O Mehboob Ellabi, Moh: Session House Shaker Shah Road, Haripur.	SS(Pak: Study) GHSS, Terot, Abbottabad.	-do-
11. Mr. Iqtidar Ali S/O Khan Bahader, PTC, GPS Peshakhara Payan Bara Road, Peshawar.	SS(Pak: Study) GHSS, Ziarat Masoom, Abbottabad.	-do-
12. Mr. Aziz Ahmad S/O Ahmad Saeed, Aziz Ahmad C/O Saeedur Rehman (Principal) Gul Bahar Colony Kachi Find Khan D.I. Khan.	SS(Maths) GHSS, Joseera Chersadda.	-do-
13. Mr. Fayyaz Ahmed Khan S/O Nisar Ali Haq, GHS No. 2 Pirpai Distt: Nowshera, Vill: Dagi Qadeem P.O. Dagi Banda Teh: & Distt: Nowshera.	SS(Maths) GHSS, Baidara, Swat.	-do-
14. Mr. Muhammed Azim S/O Dilbar Khan, Moh: Dewar Khel Vill: P.O. Lund Khawar Tehsil Takht Bhai, Distt: Mardan.	SS(Arabic) GHSS, Drosh Chitral.	-do-

ATTESTED Contd: Page- 4 -
 to be true copy
 Advoc.

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Director Recruitment, NWFP Public Service Commission, Peshawar.
 Principals Concerned, with the request to check the appointment
 orders of in-service Candidates in connection with their appoint-
 ment on regular or on contract basis. In case the candidate has
 been appointed on contract basis then this will be the responsi-
 bility of the Head of the Institutions to inform this department
 immediately to review appointment order of the said candidates.

Candidates concerned (through Registered Cover).

The Manager, Govt. Printing Press, NWFP, Peshawar.

PA to Additional Secretary, S&L Deptt: NWFP.

PA to Deputy Secretary (Admn) S&L Deptt: NWFP.

Office order file.

Syed Mubarik Shah
 (SYED MUBARIK SHAH)

SECTION OFFICER (SCHOOLS).

M.S.KTK./****

ATTESTED

[Signature]
 to be true copy
 Advocate

31

Part 'B'

12

11

APPLICATION FOR LEAVE.

Notes: Item 1 to 9 must be filled in by all applicants. Item 12 applies only in the case of Government servants of B.P.S.-- 16 and above.

- 1. Name of applicant. Mr: Fazal Mabeed.
- 2. Leave Rules applicable. 1981.
- 3. Post held. Subject Specialist.
- 4. Department or office. Edu: Deptt: at GHSS: Khwaza Khela S
- 5. Pay. Rs: 8745/P.M
- 6. House Rent Allowance/conveyance allowance or other compensatory allowances drawn in the present post.
- 7. (a) Nature of leave applied for. Extra Ordinary Leave (Leave with out Pay)
- (b) Period of leave in days. 1095 days w.e.f. 1/9/2008 to 31/8/2011)
- (c) Date of commencement. 1/9/2008.
- 8. Particular Rule/Rules under which leave is admissible.
- 9. (a) Date of return from lost leave. ...
- (b) Nature of leave. (Leave with out Pay)
- (c) Period of leave in days. 659 days i.e.w.e.f. 12/11/2006 to 31/8/2011
- Dated..... Signature of applicant. *Fazal Mabeed*
- 10. Remarks and recommendation of the Controlling Officer.
- 11. Certified that leave applied for is admissible under Rule.....and necessary conditions are fulfilled.
Forwarded in original to the Executive District Officer Elementary and Secondary Education Swat for further necessary action
Dated..... Signature. *M. Shah*
Designation. Principal, Govt. Higher Secondary School Khwazakhela Distt: Swat
- 12. Report of Audit Officer, Executive District Officer Elementary & Secondary Education, Swat.
No. 100. Swat/PA/1/P.A/1/409
Dated.....
1095 days w.e.f. 1/9/2008 to 31/8/2011 is admissible under service leave rules 1981 at the discretion of the sanctioning authority.
Signature. *M. Shah*
Designation. 11-08-08
- 13. Orders of the sanctioning authority certify that on the expiry of leave the applicant is likely to the same post carrying the compensatory allowances being drawn by him.
Add: Distt: A/c Officer, SWAT. *M. Shah*
Signature. *M. Shah*
Designation.
- Dated.....

ATTESTED
M. Shah
to be true copy
Advocate

GOVERNMENT OF N.W.F.P.
FINANCE DEPARTMENT

OFFICE ORDER

No. SO(EST/TRY)FD/1-79/2002. Consequent upon his appointment as Subject Specialist (BPS-17) in School & Literacy Department and posted at GHSS Khawaza Khela, Mr. Fazal Mabood, Sub-Accountant office of the DAO Shangla has been relieved of his duties in Treasury Establishment w.e.f. 31-8-2003. (A.N.) to enable him to join his new assignment. His lien will be retained in Treasury Establishment against his confirmed position in BPS-11 as per rules.

SECRETARY TO GOVT. OF NWFP
FINANCE DEPARTMENT

No. SO(EST/TRY)FD/1-79/2002

Dated Peshawar, the 17-9-2003.

Copy forwarded to:-

1. The District Accounts Officer Shangla w/r to his letter No.1300-A/DAO/Shangl/Admn/ Dated 30-8-2003.
2. The Section Officer (Schools) Schools & Literacy Deptt: Govt:of NWFP w/r to his notification No.SO(S)3-2/2003/S.S(M&F) dated 28-8-2003.
3. The official concerned.


(NASRULLAH KHAN)
SECTION OFFICER(EST/TRY)

ATTESTED


to be true copy
Advocate

13

DIRECTORATE OF ELEMENTARY AND SECY: EDU: NWFP PESH: NO. 192/10-Leave case Dated Pesh: the 4/5/2009

Immediate B. Karan
EDU (MS)
07/08/09

To

The Executive District Officer E&SE Swat.

Subject:-

APPLICATION FOR EXTRA ORDINARY LEAVE WITH EFFECT FROM 1.9.2008 TO 31.8.2009 (1095) days.

Memo:

I am directed to refer your letter No. 518/F.No. 280/Estt./PF dated 19.9.2008 on the subject noted above and to ask you to furnish the requisite report that Mr. Fazal Mabood SS GHSS Khawaza Khela has already availed extra ordinary leave w.e.f, 1.9.2006 to 31.08.2008 (730 days) vide Notification No. A.O/7-11/Leave/Swat 05 dated 1.9.2006, let this office know that position whether the SS(C) report for duty after the expiry of his leave or otherwise.

Necessary report in this regard may be furnish to this Directorate to process the case further.

Hece
4/5/09
Assistant Director Estt:
Elementary & Secondary Educatio
NWFP Peshawar.

Office of the E.D.O (E&S) Education Distt: Swat

Encl: No. _____ Date: 11-10-2009.

Copy of the above is forwarded to:

1. The principal, GHSS Khawaza Khela Swat with the remarks to submit the requisite information to the office for onward submission and urgently as directed to process the case further.
2. The D. F and Secy Edu: NWFP. Peshawar w/r to his No. _____ and -

ATTESTED
[Signature]
to be true copy
Advocate

EDO

Sanction of E/L

(14)

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT

DATED PESHAWAR THE 1.9.06

NOTIFICATION

No. A.O/7-11/leave/Swat/05 Sanction of the Competent Authority is hereby accorded to the grant of 72 day Earned Leave on halfpay with effect from 1.9.2006 to 11.11.2006 and 658 days Extra ordinary leave without pay from 12.11.2006 to 31.8.2008 in favour of Mr. Fazal Mabood Subject Specialist (P/S), GHSS Khawaza Khela Distt: Swat as admissible under the Revised-Leave Rules, 1981:-

Secretary to Govt: of NWFP
Schools & Literacy Department.

Endst: Even No. & date

Copy to:

1. The District Account officer Swat.
2. The Director, S&L Peshawar w/r to his letter No. 7560/F.No. Earned Leave dated 23.3.2006 dated 24.5.2006.
3. Mr. Fazal Mabood S.S. GHSS Khawaza Khela Distt: Swat.


ASSISTANT ACCOUNT OFFICER.

ATTESTED


to be true copy
Advocate

(15) o/c

DIRECTORATE OF ELEMENTARY
AND SECONDARY EDUCATION PESHAWAR.
No. 192 /10-Leave cases.
Dated Pesh: the 4/5/2009.

To:

The Executive District Officer
Elementary and Secondary Education Swat.

Subject:

APPLICATION FOR EXTRA ORDINARY LEAVE WITH EFFECT
FROM 01/09/2008 TO 31/12/2011 (1095) DAYS.

Memo:

I am directed to refer your letter No.518/F.No.280 /Estb./PF dated 19/09/2008 on the subject cited above and to ask you to furnish the requisite report that Mr. Fazal Mabood SS GHSS Khawaza Khela has already availed extra ordinary leave with effect from 01/09/2006 to 31/08/2008 (730 days) vide notification No.A.O/7-11/Leave/swat /05 dated 01/09/2006 let this office know that position as to whether the SSC has reported for duty after the expiry of his leave or otherwise.

Necessary report in this regard may be furnished to this Directorate to process the case further.

-----SD-----

Assistant Director Estb:
Elementary and Secondary
Education NWFP Peshawar.

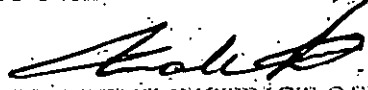
OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND
SECONDARY EDUCATION SWAT.

Endst: NO 854-55/P/F.

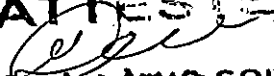
Dated 22/8/2009.

Copy of the above is forwarded to:-

1. The Principal GHSS Khawaza Khela swat with the remarks to submit the requisite information urgently to this office for onward submission to process the case further.
2. The Director (E&S) Education NWFP Peshawar w/r to his no and dated above.


EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT AT GUL KADA.

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Advocate

Office of the Principal GHSS: Khwaza Khela Swat.

To: B.M. (M) No. 478/-
12/08/09

Dt 21/9/2009

(29) (16)

The EDO Elementary & Secondary
Education Swat

Subject: APPLICATION FOR EXTENSION IN EXTRA ORDINARY LEAVES
WITH EFFECT FROM 01/09/2008 TO 31/08/2011 (1095) DAYS

Memo

Please refer to your office Endst letter No 854-55/P/F Dated 22/08/2009 it is reported that as the subject officer has initiated an application for extension in leave on 11/08/2008 through this School he has there for not reported for duty yet.

Keeping in view the uncertain conditions in Swat through the period we also contacted the officer concerned to explain his position. In reply he submitted the application and necessary documents which are attached herewith.

Abdullah Shah 19/9/2008/9
Abdullah Shah
Principal GHSS
Khwaza Khela Swat

Documents attached:

- 1) Application from the officer concerned.
- 2) AIOU Result Cards.
- 3) Research topic intimation letter from AIOU.

986
29/9/09
ATTESTED
to be true copy
Advocate

Ann. 'C'

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND
SECONDARY EDUCATION SWAT AT GUL KADA.**

No. 5672 /PI/ Fazal Mabood / SS
73-

Dated 4/10 /2009

17

40

To:

The Director,
Elementary and Secondary Education
N.W.F.P. Peshawar.

Subject: - APPLICATION FOR EXTENSION IN EXTRA ORDINARY LEAVE
WITH EFFECT FROM 01/09/2008 TO 31/08/2011 (1095) DAYS.

Memo:-

Reference your office memo No.192/10/leave cases dated 04/05/2009 on the subject cited above.

It is stated for your kind information that Mr. Fazal Mabood S.S (Pak Study) GHSS Khawaza Khela District Swat has not reported in the school with the following reason:

- (1) He has ^{sub}mitted an application for extension of leave on 11/03/2008 in the time his leave was not expired.
- (2) He remained busy with his studies in M.Sc (Honors)
- (3) His research work is still in progress which needs full concentration.
- (4) During the period situation in swat was so worst and all the government institutions remained closed.

In the light of the above justification his case is submitted for further action please.

sd
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SWECONDARY
EDUCATION SWAT AT GUL KADA.

Endst. No. *d/c*

Copy forwarded to the Principal GHSS Khawaza Khela Swat w/r to his No. 478 dated 13/09/2009.

d/c
EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SWECONDARY
EDUCATION SWAT AT GUL KADA.

ATTESTED

10-00
10-00 true copy
Aavanna

To

The Director
Elementary and Secondary Education,
NWFP at Peshawar

Through: proper channel

Subject: Application for Extension in Leave w.e.f 01/09/2008 to 31/08/2011

Sir,

In response to your letter No 854-SS dated 22/08/08 for explanation I hereby submit through this application that I have already availed my leave w.e.f. 01/09/2006 to 31/08/2008.

Before completion of the leave period I have applied for extension in leave on 11/08/2008 and due to following reasons I have not reported in school for duty:

- i. I have applied for extension on 11/08/2008 w.e.f 01/09/2008.
- ii. I remained busy with my studies in MSc (hons) Rural Development. In this duration I have completed my course work including preparations of thesis synopsis and my research work is still in progress which needs my full concentration (necessary documents attached herewith).
- iii. During the period, situation in Swat was so worst that almost all govt. institutions remained closed and due to personal security threats me and my family had to displace from the area.
- iv. I did not receive any intimation from the authorities about my leave application status.

Therefore it is requested that my leave may be retrospectively extended w.e.f. 01/09/2008 and oblige.

Thanks

Fazal Mabood

14/09/08

Subject Specialist in Pak. Studies

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to be true copy
Advocate

TO:-

The Secretary,
Govt. of N.W.F.P
Elementary & Secondary Edu:
PESHAWAR.

(19)

Subject: GRANT OF EARNED LEAVE WITHOUT PAY:

Respectfully, It is submitted that already I had been admitted in
A.I.O.U Islamabad w.e.f Sept 2007 to 2011

As I have applied for Earned Leave without Pay w.e.f 1-9-2008
to 31-8-2011. ~~But~~

But the same had not been allowed as for.

The University authorities are pressing very hard to
obtain the Necessary action of leave for which I have made
repeated request but invain.


It is therefore requested to the Director of Education
N.W.F.P Peshawar Elementary & Secondary Edu: to decide my case
of leave as early as possible, in order to reduce my grievance for
all.


Yousaf Obaidullah,
Subject Specialist,
GHSS, Khwazakhela Swat

31/8/2012

Copy to the :-

- 1) The Director Schools & Literacy Elementary & Sec:
Education N.W.F.P Peshawar:

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Advocate

IMMEDIATE/ BY FAX

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

20

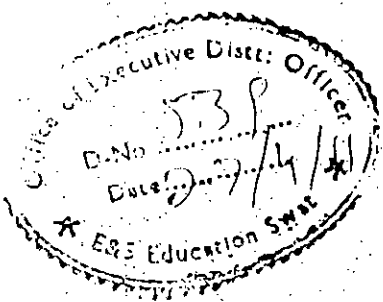
No. AO (7-11/2010/Leave/Swat/08/ Fazale mabood
Dated Peshawar the April 07, 2011

Amr. D'

The Executive District Officer,
Elementary & Secondary Education,
Swat.

Subject: - ABSENCE FROM DUTY AT GHSS KHWAZA KHELA DISTRICT
SWAT.

I am directed to state that the presence/absence of Mr. Fazle Mabood
Subject Specialist Pak Studies (BS-17) GHSS Khwaza Khela District Swat may be
confirmed from the said school. In case he has resumed duty in the school then his
charge report may be furnished within two days through return fax No. 091-9212798.



Mujeeb-ur-Rehman
(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS/MALE)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION DISTT: SWAT.

Event: No. 5386 /P/File/F.Mabood S.S. Dated 28/4 /2011

Copy of the above is forwarded to:

The Principal GHSS Khwaza Khela Swat with their remarks that weather
the Officer concerned resumed his duty, if so charge report should
furnished for onward submission to the authority concerned please.

ATTESTED
[Signature]
to be true copy
Advocate

[Signature]
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDU:
DISTRICT SWAT.

63

(21)

OFFICE OF THE PRINCIPAL,
GOVT: HIGHER SECONDARY SCHOOL
KHWAZAKHELA DISTRICT SWAT.

No. 804 / P. File F. Mah
Dated 7/5 / 2011.

To

The Executive Distt: Officer,
Elementary & Secy: Edu: Swat.

Subject: ABSENCE FROM DUTY AT GHSS: KHWAZAKHELA
DISTRICT SWAT. -----

Memo:

Reference your Office Endst: No. 5336/P/File/
F. Mabeed SS(Pak: Std:) dated 28/4/2011 on the subject cited
above.

It is submitted for your kind information that
Mr. Fazal Mabeed, SS(Pak: Std:) has not resumed his duties
at this School as yet. His va-cancy has been filled up
by the Department as a result of the transferr of
Mr. Umar Mohammad, SS(P/Std:) from GHSS: Zairat Talash Distt:
Dir to GHSS: Khwazakhela Swat on 16/01/2009.

The explanation is forwarded for further necessary
action, please.

Qulhaq
(PRINCIPAL),
GOVT: HIGHER SECONDARY SCHOOL,
KHWAZAKHELA SWAT.

ATTESTED
Qulhaq
to be true copy
Advocate

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT AT GULKADA.

No _____ / P/F/ Fazal Mabood/S.S

Dated:- 12/5/2011 /2011.

To
The Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject: **ABSENCE FROM DUTY AT GHSS KHAWAZA KHELA SWAT**

Memo:-

Reference to the government of Khyber Pakhtoon Khawa (E&S) Education Department No.AO(7-11/2010/Leave/Swat /08 dated 07/04/2011 on the subject cited above.

According to the statement of Principal in written Vide No.804 dated 07/05/2011 Mr. Fazal Mabood S.S (Pak Study) has not resumed his duty and the resulted vacancy has been filled up by Mr. Umar Muhammad S.S on transfer. Report submitted for further action please.

Sd/-
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION SWAT

Endst: No 613132

Copy forwarded to:-

1. The Secretary Elementary and Secondary Education Pukhtunkhwa Peshawar w/r to his no and date cited above.
2. PThe Principal GHSS Khawaza Khela District swat.
3. P.A to E.D.O. local office.

[Signature]
EXECUTIVE DISTRICT OFFICER
(E&S) EDUCATION SWAT

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[Signature]
to be true copy
Advocate

ALLAMA IQBAL OPEN UNIVERSITY ISLAMABAD
(Postgraduate Admission Section)

Registered

23

F.No.4-8/2009-AR
Dated:20.07.2009

Mr. Fazal Mahmood
C/O Habib Book Sellers,
P/O Khawaza Khela,
SWAT

Subject: Research Thesis for M.Sc (Hons) Rural Development Program

The Board of Advanced Studies & Research (BASR) in its 22nd meeting held on May 05-08, 2009 has approved your research topic titled as: "Children in Coalmines: a Case Study of District Shangla" under the supervision of Mr. Sherzad Ali Khan, Program Associate, Monitoring and Evaluation UNDP, Islamabad

You will carry on your research work regularly for a period of one year and shall submit four copies of your thesis through your Supervisor within the prescribed period otherwise you will not be eligible to pursue your program. It is further informed that you cannot apply for any relaxation in the stipulated period.

You are required to intimate your department regularly about your progress through your supervisor as per rules. Before submission of the thesis and fee, other conditions laid down in the regulations for the M.Phil will have to be fulfilled.

The thesis is equivalent to four full credit courses, therefore you are required to send the fee of Rs. 8700/- (if already not paid) equal to Two full Credit Courses as first installment of thesis fee, be deposited through bank challan (enclosed herewith) in any branch of Allied Bank Ltd and send it at the following address within 15 days otherwise your topic will be treated as cancelled. You are also advised to send a summary of your research work in quadruplicate at the time of submission of your thesis for the M.Sc (Hons) Rural Development Degree.

Yours faithfully,

(Sheikh Irshad Qadir)
Assistant Registrar

c.c to:

1. Chairman, Department of Agricultural Sciences
2. Controller of Examination
3. Concerned Supervisor
4. Dean, Faculty of Sciences
5. Concerned File

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to be true copy
Advocate

24

OFFICE OF THE
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDU:
DISTRICT SWAT.

No _____ / P.F/F. Mabood.SS
Dated 3/11 /2010

To

The Director,
Elementary & Secondary Education
Khyber Pakhtoonkhwa Peshawar.

Subject: ABSENCE FROM DUTY AT GHSS KHAWAZA KHELA DISTT:SWAT.
R no:-

Reference to Government of Khyber Pakhtoonkhwa
Elementary & Secondary Education Department No.80(S)7-11/
Leave/Swat/08/Fazal Mabood dated August 31.2010 addressed
to Mr.Fazal Mabood S.c. GHSS Khwaza Khela Swat and endorsed
to this office on the subject cited above.

Enclosed please find herewith detail reply/
report ~~is~~ in respect of the above named Officer in original
for onward submission for further necessary action, ~~please~~.

Encl: 11 pages.

3/11
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDU:
DISTRICT SWAT.

Endst:..o 2613

Copy of the above is forwarded to:
Principal GHSS Khwaza Khela Swat.

[Signature]
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDU:
DISTRICT SWAT.

ATTENTION
to be true copy
Advoc

25

OFFICE OF THE PRINCIPAL,
GOVT; HIGHER SECONDARY SCHOOL
KHA WAZAKHELA DISTRICT SWAT.
No. 737 /GHSS:Kh:Khela.


Dated 27/10 /2010.


To
The Executive District Officer,
Elementary & Secondary Education, Swat.

Subject:- **APPLICATION OF MR. FAZAL MABOOD SS PAK STUDY
FOR ADJUSTMENT AND ABSENCE FROM DUTY APPEAL.**

Memo:

Enclosed please find herewith the application in respect of
Mr. Fazal Mabood, Subject Specialist Pak Studies, along with other connected papers
which is self explanatory for further necessary action, Please.


PRINCIPAL
GOVT; HIGHER SECONDARY SCHOOL
KHA WAZAKHELA DISTRICT SWAT.

ATTESTED

to be true copy
Advocate

To

26

Principal,
Govt. Higher Secondary School
Khwaza Khela, District Swat.

Subject: Enquiry:

Dear Sir,

In reference to your office letter No. 726/Enquiry File dated 20/10/2010 it is submitted that prior to this letter I have received your intimation where two letters were enclosed with it, one was about the enquiry and the other was directives from the section officer directing me to submit my explanation in written to the EDO E&SE Swat.

According to these directives I submitted my explanation and request for adjustment to the EDO but they verbally directed me to submit my this application through Principal GHSS Khwaza Khela. You esteemed honor is therefore requested that I attended your office in person and now submitting my application to forward to the EDO Swat for further action. You are also requested to write the posting situation in your School as my post is already filled long before so that I may be adjusted in some other school at EDOs convenience.

As for as the enquiry officer is concerned whenever he comes and if he thought I was supposed to appear in front of him I will definitely do so.

Yours Obediently

Fazal Mabood 26-10-2010
SS in Pak-Studies.

ATTESTED
to be true copy
Advocate

(27)

Handwritten notes:
B. Kanwar
ESACMS
24/08/2010

The Secretary
Elementary & Secondary Education
Government of Khyber Pakhtun Khwa, at Peshawar

Through: Proper channel.

Subject: ABSENCE FROM DUTY AT GHSS KHWAZA KHELA DISTRICT SWAT.

Reference to your office letter No.SO(S)7-11/Leave/Swat/08/Fazal Mabood. Dated August 31, 2010 I hereby submit my explanations and request through proper channel as directed:

- I have worked as Sub Accountant in district Accounts Offices of Swat and Shangla from 18 Feb 1996 to 31 August 2003. Then I applied for Subject Specialist in Pak-Studies through proper channel and was selected and appointed in GHSS Khwaza Khela on the same position from 1 September 2003. I have properly been relieved by the finance department to join my new assignment retaining my all benefits. (copy of the letter attached)
- I had applied for five years extraordinary leave in 2006. The department granted me leave for 2 years from September 1, 2006 to 31 August 2008 and told me that if you needed further leave you may apply for extension in it.
- I availed the leave from September 1, 2006 to August 31, 2008.
- In the mean while security situation in Swat deteriorate due to militancy to the extent that living at home for me and my family was at high risk. I had received threats to life from the militants and had to ~~leave~~^{leave} my home. As in the new situation I was on one hand unable to fulfill the tasks for which I had availed the leave and on the other hand there were life threats to me and was unable to join my services. Taking this an opportunity I took admission in MSc (Hons).
- While I had already availed leave without pay, during my leave period Allama Iqbal Open University (AIOU) advertised admissions in Feb, 2007 for which I also submitted my admission form. This was not my first course from the Open University. I have already completed BEd, MEd and MSc Sociology from this university while I was doing my job in District Accounts and then in School.
- My research work is still in progress. My synopsis was approved in July 2009 and I have to complete this work at maximum till the end of July 2011.

Office of Executive Officer
D-16/28
24/08/10
E&S Education

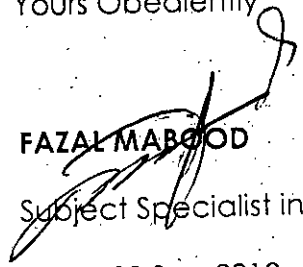
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[Signature]
to be true copy
Advocate

[Handwritten mark]

- There was NTS test for the admission in April 2007 then admission fee. Exam of the first semester held in December 2007 and January 2008. As I was already on leave without pay I did not claim that period to be considered as study leave.
- I applied for extension in leave on August 11, 2008 while my previous leave was ending on August 31, 2008. Therefore I did not give joining from the previous leave.
- My post in GHSS Khwaza Khela was also filled through transfer of another SS in Pak-studies.
- When I was applying for extension in leave without pay I came to know that according to the leave rules one can join study leave with the leave without pay (annexure 1 enclosed). That is why I requested to consider two years of my new leave if granted as study leave.
- My leave case was with the department and I was frequently visiting to pursue my case and request for favorable consideration. I have not received any intimation so far to join the duty. I was waiting for the status of my application it was therefore not tantamount to being absconded.
- It is requested that if the department is not entertaining my leave application then the gap from September 1, 2008 to August 31, 2010 may please be considered as **Study leave** (necessary documents attached)
- The remaining period be considered as leave without pay and give me a post to resume my duties.

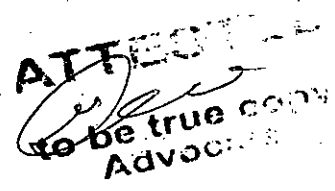
Keeping in view these difficulties I hope the department will take favourable action on my application.

Yours Obediently


FAZAL MABOOD

Subject Specialist in Pak-Studies

Date: 20 Sep 2010

ATTESTED

to be true copy
Advocate

29

OFFICE OF THE PRINCIPAL GOVT;HIGHER SECY;SCHOOL KHWAZA KHELA

No 47 /

Dated 17/12 /2013

To,

The District Education Officer,
M)Secy:Education Swat at Gulkada

Subject SUBMISSION OF PER,s FOR COMPLETION OF RECORD OF B-17

Memo:- Reference your office Memo No.1958/ACR dated 11/12/2013 on the
subject cited above.

It is submitted for your kind information that Mr: Fazal Mabood SS
Pak Study has not resumed his duties at this School as yet.. His vacancy has been filled
up by the Department as a result of the transfer of Mr:Umar Mohammad SS Pak Study
from GHSS:Ziarat Talash District Dir to GHSS:Khwaza Khela Swat on 16/1/2009.

The explanation is forwarded for further necessary action Please.

Abhech
(PRINCIPAL)

GHSS;KHWAZA KHELA SWAT

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W
to be true copy
Advocate



30

To: - The Secretary of Education (E&SED)
Khyber Pukhtoon Khwa Peshawar

Subject: - APPEAL FOR RE- APPOINTMENT AS SS - Pakistan Study

Respected sir,

It is submitted that I have been working as SS (Pak Study) B-17 at Govt Higher Secondary School Khwaza Khela District Swat. since 1.09.2003 up to 31.08.2006. I have taken Leave with pay from 1.09.2006. to 11.11.2006. & leave without pay w.e.f 12.11.2006 to 31.8.2008 (658 days as without pay). Then I applied for extinction in leave without pay w.e.f 1.9.2008 to 25.10.2020. I gave arrival for duty & appeared in front of enquiry Officer Mr. Saif-ur Rehman, Principal B-19 of GHSS NO: 02 Peshawar Cantt on 26-10-2010 along with relevant document i.e. application for adjustment.

During my appearance in front of the enquiry officer on my request whether I should join my duty at school, I was told that I should wait until their report and directives from the competent authorities. But I have not received any directives.

Now, it is requested that I may please be re-adjusted as SS Pakistan Study in any nearest station.

I shall be very thankful to you for your favorable action on my application/appeal.

- Enclose:
- (1) Appeal/application
 - (2) Copy of Notification for enquiry – No.SO(S)7-11/Leave/Swat//08/Fazal Mabood. Dated 31/08/2010.
 - (3) Application for re-adjustment forwarded by Principal GHSS Khwaza Khela – No. 737 dated 27/10/2010.

Yours obediently

(FAZAL MABOOD)

Village Shalpin, Khwaza Khela, Dist: Swat.
Mobil NO; 03469422559

03429793993

ATTESTED
To be true copy
Advocate

31

Shipment Information		Client Information		Price Information KPR	
Tracking No 551668458		Consignee: Secretary		Pieces (1)	
Origin SW	Destination Pesh	Address: Education		Actual Weight	
Booking Date: 28/4/14		Contact: Fazal		Dimension X X	
Booking Time: Route Code:		Shipper: Fazal		Charged Weight	
NTN No: Sales Tax Reg No.		Address: Mehar		Value Declared	
2821502-4 K2824502-4		Contact: Mehar		Insurance	
*Leopards Accepted Above Mentioned Terms On Shipper Risk & Shipper Agreed All The Conditions Printed On Reverse		NTN:		Net Amount	
Shipper Sign		CNIC:		KPR Sales Tax (16%) 700	
on receive delivery photos on your mobile ding SMS or Track (Tracking#) to 3061				Payable Amount	
				Description:	

OVER NIGHT

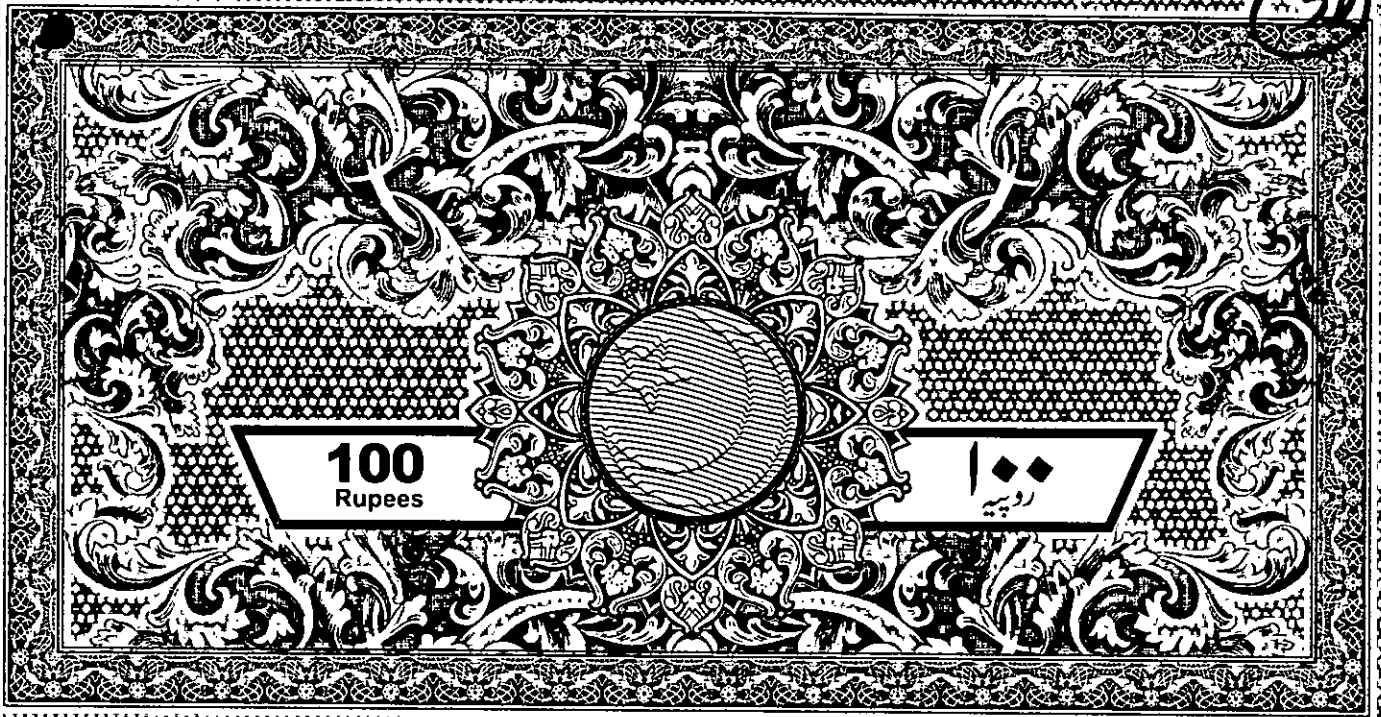
www.leopardcourier.com
DAR: 011-111-306-726

ATTESTED
[Signature]
to be true copy
Advocate

Shipment Information		Client Information		Price Information	
Tracking No: 551668458		Consignee:		KPRA	
Origin: / Destination:		Address:		Pieces:	
Shipping Date:		Contact:		Actual Weight:	
Shipping Time:		Shipper:		Dimension: X X	
Route Code:		Address:		Charged Weight:	
NTN No: 2024502-4		Contact:		Value Declared:	
Sales Tax Reg No: 82874502-4		NTN:		Insurance:	
<small> *Accounts Accepted Above: Merchandise from: On Shipper's Risk & Shipper Agreed All conditions Traded on Reverse Shipper Sign </small>		CFIC:		Net Amount:	
<small> on receipt delivery notes on your mobile using SMS or track tracking@kplc.com </small>				KPRA Sales Tax (16%):	
				Payable Amount:	
				Description:	


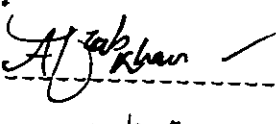
OVER NIGHT

www.kppl.com
 Dar, 021311-300-786



مختار نامہ خاص

منکہ مسی فضل معبود ولد مراد خان ساکن شالپین تحصیل خوازہ حیلہ ضلع سوات کا ہوں بذریعہ تحریر یہذا اقرار کر کے لکھ دیتا ہوں کہ من مقرر ایک درخواست برائے بحالی سروں بعنوان فضل معبود بنام حکومت خیبر پختونخواہ بعدالت جناب سروں ٹریبونل بمقام سید و شریف ضلع سوات میں دائر کرنا چاہتا ہے من مقرر بوجہ ذاتی مصروفیات مقدمہ اپیل عنوان بالا کی پیروی سے اصالتاً قاصر ہیں۔ لہذا اپنی جانب سے معتمد خود افتاب علی خان ولد جہان شیر خان ساکن شالپین تحصیل خوازہ حیلہ ضلع سوات کو مختار خاص مقرر کر کے اختیار دیتا ہوں کہ مختار خاص من مقرر کی جانب سے پیش ہو کر پیروی مقدمہ کریں، کسی وکیل، بیریسٹر یا دیگر قانون پیشہ افراد کو برائے پیروی مقدمہ مقرر کریں، گواہان پیش کریں، بیان دیویں، جواب درخواست دیں، دستاویز عدالت میں پیش کریں، درخواست گزاریں، دستخط کرے، معائنہ وکیل ادا کرے، خرچہ گواہان داخل کرے، کسی آرڈر یا فیصلہ کے خلاف نظر ثانی یا اپیل داخل کریں، غرضیکہ مقدمہ کی پیروی میں ہر قسم کی کارروائی کرے۔ جملہ ساختہ و پرداختہ من مقرر کو قبول و منظور ہوگا، لہذا یہ مختار نامہ خاص تحریر کر دیا ہے تاکہ سند رہے اور بوقت ضرورت کام آویں۔ مورخہ 2/4/2021

العبد  العبد 
 فضل معبود اختیار دہندہ افتاب علی خان اختیار گیریندہ

15602-6460681-3

15602-3620630-5

ATTESTED

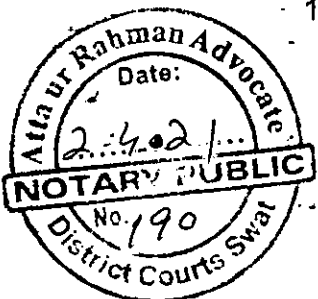


صادق انور ولد محمد انور ساکن چالیار

15602-5990015-5

محمد شیر خان ولد محمدی جان خان ساکن فقیرا

15602-0396458-5



BEFORE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL AT PESHAWAR

WAKALAT NAMA

Service Appeal No. _____ of 2021

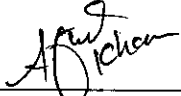
Titled Fazal Mabood VERSUS Government of KP and others.

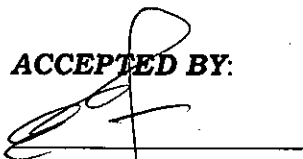
I Aftab Ali Khan S/O Jehan Sher Khan R/O Village Shalpin Tehsil Khwazakhela, District Swat (Attorney of the Appellant), do hereby appoint **Sabir Shah & Irfan Ali Advocates** in the above mentioned case, to do all or any of the following acts, deeds and things:-


- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decreed is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this **12/07/2021**.

Signature of Executants:


Aftab Ali Khan
15602-6460681-3

ACCEPTED BY:

SABIR SHAH,
Advocate, Supreme Court


IRFAN ALI
Advocate High Court *0314-9070658*
BC-09-1766