08.09.2022

Appellant in person present. Mr. Hussain Ali, ADEO (Litigation) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Alex Sec

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 06.10.2022 before the D.B at Camp Court Swat.

(Mian Muhammad) Member (Executive) Camp Court Swat

(Salah-Ud-Din)

Member (Judicial)

Camp Court Swat

06.10.2022 -

Clerk of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant submitted an application for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for arguments on 10.11.2022 before the D.B at Camp Court Swat.

(Rozina Rehman) Member (J) Camp Court Swat

(Salah-Ud-Din)

Member (J) Camp Court Swat 8th June, 2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Counsel are on strike. To come up for arguments on 07.07.2022 before the D.B at camp court Swat.

(Mian Muhammad)

Member(E)

(Kalim Arshad Khan) Chairman Camp Court Swat

07.07.2022

Appellant in person present.

Noor Zaman Khan Khattak, learned District Attorney for respondents present.

Former made a request for adjournment as his counsel is not available today. Adjourned. To come up for arguments on 03.08.2022 before D.B at Camp Court, Swat.

(Fareeha Paul) Member(E)

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

Due to Sammar Valation The da is adjourned to 8-9-252 for the Same

10.05.2022

Nemo for the appellant. Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post and to come up for arguments on 07.06.2022 before the D.B at Camp

Court Swat.

(Mian Muhammad)

Member (E) Camp Court Swat

(Salah-ud-Din)

Member (J) Camp Court Swat

07.06.2022

Appellant in person present. Mr. Kabirullah Khattak, learned Additional Advocate General for the respondents present.

Counsel are on strike. Adjourned. To come up for arguments on 08.06.2022 before the D.B at camp court Swat.

(Mian Muhammad) Member (E)

Camp Court Swat

(Kalim Arshad Khan)

Chairman Camp Court Swat

09.02.2022 Tour is hereby canceled .Therefore, the case is adjourned to 06.04.2022 for the same as before at Camp Court Swat.

Reader

06.04.2022

Clerk of counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakheil, Assistant Advocate General for the respondents present.

Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for arguments on 10.05.2022 before the D.B at Camp Court Swat.

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

(Salah-Ud-Din) Member (J) Camp Court Swat 07.10.2021

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present

Learned Members of the DBA are observing Sogh over the demise of Qazi Imdadullah Advocate and in this regard request for adjournment was made; allowed. To come up for arguments before the D.B on 08.12.2021 at Camp Court, Swat.

(Atiq-Ur-Rehman Wazir) (Rozina Rehman) Member (E) Member (J) Camp Court, Swat Camp Court, Swat

08.10.2021

 ~ 2

Counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney for the respondents present.

Former made a request for adjournment; granted. To come up for arguments on 09.02.2022 before D.B at Camp Court, Swat.

1.11

(Atiq-Ur-Rehman Wazir) Member (E) Camp Court, Swat

14

(Rozina Rehman) Member (J) Camp Court, Swat *ob*.01.2021

Due to COVID 19, the case is adjourned to **63**.03.2021 for the same as before.

03.03.2021

Appellant present in person.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Hussain Ali Litigation Officer for respondents present.

Former made a request for adjournment as his counsel is busy before Hon'ble Peshawar High Court; granted. To come up for arguments on 2/6/2021 before D.B at Camp Court, Swat

(Mian Muhammad) Member (E) Camp Court, Swat

(Rozina Rehman) Member (J)

Camp Court, Swat

Due to comp-19 the case is adjourned to 7/10/21

Reader

.2020 Due to COVID19, the case is adjourned to $o \int / 10/2020$ for the same as before.

Real

05.10.2020

Learned counsel for the appellant is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Hussain Ali, Litigation Officer are also present. Learned counsel for appellant is seeking adjournment that he has not prepared the brief of the instant appeal. Adjourned to 04.11.2020 on which to come up for arguments before D.B at Camp Court, Swat.

(Mian Muhammad) Member (Executive) Camp Court Swat

(Muhammad Jamal-Khan) Member (Judicial) Camp Court Swat

04.11.2020

Appellant in person present.

Muhammad Jan learned Deputy District Attorney for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 06.01.2021 for arguments, before D.B at Camp Court Swat.

(Atiq ur Rehman Wazir) Member (E) Camp Court, Swat

(Rozina Rehman)

Member (J) Camp Court, Swat 01.06.2020

Due to Covid-19, the case is adjourned. To come up for the same on 05.08.2020, at camp court Swat.

Appellant in person present. Mr. Riaz Paindakheil learned Assistant Advocate General alongwith representative Hussain Ali Litigation Officer present. Representative of respondent department submitted written reply/comments: To come up for rejoinder if any and arguments on 06.01.2020 before D.B at Camp Court, Swat.

Member Câmp Court, Swat

06.01.2020

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 02.03.2020 for rejoinder, if any, and arguments before D.B at Camp Court Swat.

(Hussain Shah) Member Camp Court Swat

(M. Amin Khan Kundi) Member Camp Court Swat

02.03.2020

Appellant with counsel present. Mr. Usman Ghani learned District Attorney alongwith Hussain Ali, Litigation Officer for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourn. To come up for rejoinder and arguments on 06.04.2020 before D.B at Camp Court Swat.

Member Летber at Camp Court Swat to carona

02.09.2019

Q. .

Learned counsel for the appellant present. Written reply not submitted. Hussain Ali Litigation Officer representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for reply/comments on 08.10.2019 before S.B at Camp Court, Swat.

> Member Camp Court, Swat.

08.10.2019

Appellant in person and Mian Ameer Qadir, Deputy District Attorney alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Written reply on behalf of respondents not submitted. Representative of the respondents requested for adjournment. Adjourned to 05.11.2019 for written reply/comments before S.B at Camp Court Swat.

(Muhammad Amin Khan Kundi) Member Camp Court Swat

05.11.2019

Appellant in person and Mr. Riaz Ahmad Paindakheil, Assistant AG alongwith Mr. Hussain Ali, Litigation Officer for the respondents present. Written reply on behalf of respondents not submitted. Representative of respondents seeks further adjournment. Last chance is granted. Adjourned to 04.12.2019 for written reply/comments before S.B at Camp Court Swat.

(Muhammad Amin Khan Kundi) Member Camp Court Swat

05.04.2019

Learned counsel for the appellant present. preliminary arguments heard.

The appellant (Ex-Chowkidar) has filed the present service appeal against the order dated 26.01.2010 whereby he was terminated from service. Learned counsel for the appellant argued inter-alia that the appellant was taken into custody in 2009 by the security forces and was released on 22.02.2018; that after his release he filed departmental appeal for his reinstatement however the same was dismissed vide order dated 22.02.2019.

Points urged need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 11.06.2019 before S.B at Camp Court Swat.

Appolic Apposited Security & Process Fee

11.06.2019

Appellant in person present. Written reply not submitted Hussain Ali Litigation Assistant (for respondent No.3) present and Seeks finite to furnish written reply/comments. Toseef Ahmad Litigation Officer representative of respondent No.2 absent. Respondents No.1,2, 4 & 5 as well as absent representative be put to notice for submission of written reply/comments. Adjourn. To come up for written reply/comments on 02.09.2019 before S.B at Camp Court, Swat.

Member Camp Court, Swat.

Form- A

FORM OF ORDER SHEET

Court of_ 326**/2019** Case No. Order or other proceedings with signature of judge S.No. Date of order proceedings 3 1 🗯 2 The appeal of Mr. Fazal Ali presented today by Mr. Jehangir 1-05/03/2019 Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. This case is entrusted to touring S. Bench at Swat for preliminary 13-3-14 2hearing to be put up there on 05-04-2019CHAIRMAN

.

03.03.2021

Appellant present in person.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Hussain Ali Litigation Officer for respondents present.

Former made a request for adjournment as his counsel is busy before Hon'ble Peshawar High Court; granted. To come up for arguments on <u>7 / 06 /</u>2021 before D.B at Camp Court, Swat.

(Mian Muhammad) Member (E) Camp Court, Swat

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

07.10.2021

Appellant in person present. Mr. Asif Masood Ali Shah, Deputy District Attorney Present

Learned Members of the DBA are observing Sogh over the demise of Qazi Imdadullah Advocate and in this regard request for adjournment was made; allowed. To come up for arguments before the D.B on 08.12.2021 at Camp Court, Swat.

(Atiq-Ur-Rehman Wazir) Member (E) Camp/Court, Swat (Rozina Rehman) Member (J) Camp Court, Swat 05.10.2020

Learned counsel for the appellant is present. Mr. Usman Ghani, District Attorney alongwith representative of the department Mr. Hussain Ali, Litigation Officer are also present. Learned counsel for appellant is seeking adjournment that he has not prepared the brief of the instant appeal. Adjourned to 04.11.2020 on which to come up for arguments before D.B at Camp Court, Swat.

(Mian Muhammad) Member (Executive) Camp Court Swat (Muhammad Jamal Khan) Member (Judicial) Camp Court Swat

04.11.2020

Appellant in person present.

Muhammad Jan learned Deputy District Attorney for respondents present.

Lawyers are on general strike, therefore, case is adjourned to 06.01.2021 for arguments, before D.B at Camp Court Swat.

(Atiq ur Rehman Wazir) Member (E) Camp Court, Swat (Rozina Rehman) Member (J) Camp Court, Swat Before The Service Tribunal K.P at Peshawar

Allean NO.326

Fazal Ali.....Appellant

Versus

Government of KP and others......Respondents.

INDEX

S.No	Description of Document	Annexure	Page (S)
1	Copy of appeal		1-6
2	Affidavit		7
3	Addresses of the parties		. 8 .
4	Copy of Clearance Certificate Dated 2 nd Oct, 2018.	Α.	9
5	Copy of Dismissal Order, Copy of Appeal, Copy order dated 22-2-2019	В	10-14
6 · .	Copy of Letter dated 3/12/2018 and Letter Dated 12/01/2019	С	15-16
7	Wakalat Nama	· · · · · ·	17

Appellant,

Through JEHANGIR ADVOCATE, High Court.

Office: Allah-o-Akbar Plaza, Saidu Sharif Road Makan Bagh Mingora Swat.

Cell #. 0343±2187908

Dated: 01-03-2019

Before The Service Tribunal K.P at Peshawar

(ስ)

Versus

1) Government of Khyber Pakhtunkhwa through Secretary to Education at Peshawar Secretariat Peshawar

2) Director Education/ School & Literacy Khyber Pakhtunkhwa at Peshawar.

3) District Education Officer School & Literacy District Swat at Gul Kada Saidu Sharif Swat.

4) D.D.O of School & Literacy at Saidu Sharif Swat.

5) Head Master G.P.S, Kaho, Bishbanr, District Swat.

<u>APPEAL UNDER SECTION 4 OF K.P SERVICE</u> <u>TRIBUNAL ACT 1974 AGAINST THE ORDERS</u> <u>DATED 26-01-2010 OF RESPONDENT NO.34 &</u> <u>ORDER DATED 22202-2019 OF RESPONDENT</u> <u>NO.2.</u>

Prayer of Appeal:

On acceptance of this appeal the order dated 26-01-2010 of respondent-No.3 & order dated 22-02-2019 of respondent-No.2 may kindly be declare incorrect, void ab initio against service rules and justice the impugned orders of respondents of awarding punishment to the appellant may kindly be set a side, the appellant may kindly be reinstated in service with all back benefits. Any other remedy coupled with cost may also be granted to the appellant which has not been specifically asked by the appellant.

Respectfully Sheweth;

It is very humbly stated

1) That the appellant was initially appointed as Chawkidar at GPS Kaho, Bishbanr, District Swat on dated 29-04-2004. The service book of the appellant is in possession of respondent No.3, therefore the respondent may kindly be directed to submit the relevant service record of the appellant with their reply.

2) That due to local entity and ill well with some of the villagers of the appellant, those opponents malafidely

and falsely complaint against the appellant to the security forces.

3) That due to those malafide and false & fake complaints the security forces arrested the appellant in 2009 and after a long period of arrest, the security forces after thorough and proper inquiries clear the appellant from all the charges.

- 4) That the appellant was in custody and letter on dated 22-02-2018 was released / acquitted from all the charges of intestate activities (copy of clearance certificate dated 02 October 2018 is attached as annexure A).
- 5) That on dated 04-10-2018 the appellant file appeal before the respondent No.2, which was dismissed on 22-02-2019. (Copy of dismissal order, copy of appeal, copy of order dated 22-02-2019 are attached is annexure B).
- 6) That the respondent No.3 has sent a letter dated 12-01-2019 to respondent No.1 in response of necessary assistance on appeal of the appellant. (copy of Letter dated 03-12-2018 of respondent No.2 & Letter dated 12-01-2019 of respondent No.3 are attached as annexure C).
- 7) That on the following grounds amongst other the above mentioned order are liable to be set a side and the appellant is entitled to be re-instated on his post, with all back benefits.

<u>Grounds:-</u>

i)

ii),

v

vi)

That the orders dated 26-01-2010 and Order dated 22-01-2019 of respondents are illegal, void ab initio, incorrect and against the natural justice hence liable to be set aside.

That no proper & legal procedure has been adopted by the respondents.

 iii) That impugned orders are against the service rules, procedure, policy & non speaking one, hence liable to be set aside.

That the appellant has unblemished services record & no adverse remarks are there against the appellant.

That the appellant has been condemned unheard & no opportunity of defense & personal hearing was provided to the appellant.

That no regular inquiry has been conducted by the respondents against the appellant, neither any inquiry officer has given show cause notice or personal intimation of appearance to the appellant, before the impugned order dated 26-01-2010.

vii) That no explanation has been asked by the respondents from the appellant.

That no right of defense and personal hearing has been awarded by the respondents to the appellant.

viii)

ix)

That the punishment awarded by the respondents to the appellant is very harsh, the appellant being sole earner and supporter of his family, belong to very poor family and no other source of income except the service hence the appellant needs to be reinstated in the service.

x) That the respondents announced the impugned orders in a cursory manner.

- xi) That the appellant was innocent and has been punished while in custody of security forces for a long period of more then 8 years.
- xii) That if the appellant is not re-instated in his service, the appellant will face double jeopardy which is against the constitution.

xiii) That due to un avoidable circumstances the appellant was unable to attend his service and due to those compulsions the appellant was removed from service without any intimation, explanation personal hearing or any other regular proceedings.

xiv) That the appellant deserved to be re-instated on his post with all back benefits.

xv) That some other grounds may be taken at the time of argument with due permission of this august court. Therefore it is very humbly prayed that On acceptance of this appeal the order dated 26-01-2010 of respondent No.3 & order dated 22-02-2019 of respondent No.2 may kindly be declare incorrect, void ab initio against service rules and justice, the impugned orders of respondents of awarding punishment to the appellant may kindly be set aside, the appellant may kindly be reinstated in service with all back benefits. Any other remedy coupled with cost may also be granted to the appellant which has not been specifically asked by the appellant.

Appellant For Ali

FAZAL ALI Through Counsel

JEHANGIR ADVOCATE, High Court.

Office: Allah=o-Akbar Plaza, Saidu Sharif Road Makan®Bagh Mingora Swat.

Cell #. 0343-2187908

Dated: 01-03-2019

Before The Service Tribunal K.P at Peshawar

Fazal Ali V/s Government of KP and others

AFFIDAVIT

I, Fazal Ali, do hereby solemnly affirm and declare on oath that the contents of the attached **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent:

rezal Ali FAZALALI



Before The Service Tribunal K.P at Peshawar

Fazal Ali.....Appellant

Versus

Government of KP and others......Respondents.

ADRESSES OF THE PARTIES

Address of Appellant:

Fazal Ali S/o Muhammad Zahir Shah, R/o Kaho, Bishbanr, District Swat/ (Chawkidar G.PS Kaho, Bishbanr District Śwat.

CNIC No. 15602-0412951-9

Cell # 0340-9246534

Addresses of Respondents:

- 1) Government of Khyber Pakhtunkhwa through Secretary to Education at Peshawar Secretariat Peshawar.
- 2) Director Education/ School & Literacy Khyber Pakhtunkhwa at Peshawar.
- 3) District Education Officer School & Literacy District Swat at Gul Kada Saidu Sharif Swat.
- 4) D.D.O of School & Literacy at Saidu Sharif Swat.
- 5) Head Master G.P.S, Kaho, Bishbanr, District Swat.

.....Respondents

Appellant, Through Counsel JEH⁄ANGIR

Advocate,High Court

TO WHOM IT MAY CONCERN

It is stated that Mr Fazal Ali s/o Muhammad Zahir Shah r/o Beshbanr P/O Manglore Tehsil and District Swat CNIC No 15602-0412951-9 has undergone De-radicalization course at PAITHOM from 14 Nov 2017 to 14 Feb 2018 (registration number AMI/Swt/Act/18/6057 dated 14 Feb 2018). The said indl is currently working for this setup. Nothing adverse has surfaced against him during our probe and no criminal record found in concerned Police Station.

Station (Swat) Date: er 2018

Mai/DD

1D

General Stalf Officer-II (ISI Sub Sector HQ Swad)

5°C

FFICE OF THE EXECUTIVE DIS ELEMENTARY AND SECONDARY ER SWAT

FFICE ORDER

جارن تدر ب

With reference to Home and Ats Department NWFP vide litter No. 1/7-SO [L and O/HD/09. dated 15.12.2009 Anti-state activities and under removal from service Ordinance 2000/2001.

AND WHEREAS the Provincial Government decided to terminate the service of those Government servants involved in Anti-state activities/ militancy in the meeting of competent authorities.

NOW THEREFORE, the services of the following officials is herby terminated with immediate effect under section 3[1][d] of the North-West Frontier Province Removal from Service [Special Power] Ordinance No.V of 2000 read with section 3[2][b][i] and 5[4] of the said ordinance.

No	No in t list	he Name of Official	Post	BPS	Place of Duty	
	82	Muhammad Ghafoor s/o Nadar Khan	N/Q	1	GHSS; Mankyal	
	84	Sarfaraz Khon S/o Muhammad Khan	W/M	1.	GMS: Shakardara	
	106	Anwar Shah S/o Mian Syed Jan	Chw	 I	GPS: Malalay	
	107	Fazal ur Rahman S/o Gulambar.	N/Q	1	GMS: Dakorak	
•	[Fazal Ali s/o Muhammad Zahir Shah r/o Kahe Yakhtany PS Mingora	C-IV]	GPS: Kaho Bishbanr	
•	112	Fazal Mabood S/o Abdul Wahid r/o, Besbanr	C-IV	1	GMS: Beshbanr	
•	115	Moamber // Damghar	C-IV	-	GPS: Damghar	
	123	Saran Zeb S/o Samandar R/o Kalagay Madian	C-IV	1	GPS: Kalagay	
	129	Amir Siab S/oMuhtaj R/o Mohlllah Amir Khan Nawakaly Mingora	Swe:	2	DDO [M] Swat	
	; ;	Ali Rahman	PST	2	GPS: Pir Patay	
	98	Inam s/o Gul Bacha r/o Arkot	PST	9	GPS: Nela gram	
	104	Anwar Zarin S/o Zowan Faqir r/o Doghlai	PST	. 9	GPS: Doghai	
	116	Gulab s/o Momen r/o Chekrai Fatchpur	PST	9	GPS: Baben	
	155	Sher Zada S/O Sher Muhammad r/o Chekrai	PST	9.	GPS: Babin	

EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT

							,	
1			•			- m - / f		
el e	303 J 1 1 4	··, ` {	LENA 3	21/Absentcesin	n dated -	20101	/2019	
Bust NO	135.7		1 1.140.3	12 matuse metean	η αιατού _γ	-se - for the former of the		
fer a second	/		•		• :			
i				• •	-			•

an a mart platestic and states and the same

÷

11-

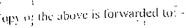
Ľ

najor Swat

3 &

his

he 82



1 Secretary Education NWFP, Peshawar.

2. The Director Elementary and Secondary Education NWFP. Peshawar.

3. Commissioner MKD Division.

4. District Coordination Officer Swat.

5. The D.A.O Swat.

6. Deputy District Officer Elementary and Secondary Education Swat.

is a state in

7. All Concerned.

. .

EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT

Selow Have out

у.

جاری شخه(۲)

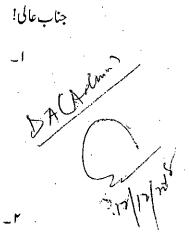
جضوا جناب ڈائر بکٹرا پچوکیشن صوبہ خیبر بختونخواہ بمنا م پشاور۔

<u>درخواست بیحالی ملازمت بدس مراد کر سائل مسمی فضل علی ولد محمد ظاہر شاہ جزئہ گور نمنٹ برائمری سکول</u> <u>بشیز کہو</u> میں بحثیت کلاس فور ملازم تھا کود وران آرمی ابریش راہ ہداست/کشدہ عالات سال 2009 میں <u>آری / سیکور ٹی فور میز نے گرفتار کیا تھا اور اب من سائل کومور خبر 22/02/2018 کو پاک آری /</u> <u>سیکور ٹی فور میز نے وائٹ قرار دیکر بری / Release کیا ہے لہذا من سائل کے حسب سائق جملہ</u> <u>مراعات واستفادہ جات ملازمت مند کرہ پر بحال کرنے کا ت</u>م مصادر فر مایا جائے۔

ا بیلانٹ ذیل عرض رسال ہے۔ بیہ کہ ا بیلا نٹ دیم ہیشنبڑ کہو منگلور تخصیل با بوزی ضلع سوات کا مستقل رہائتی با شندہ ہے اور فضل علی ولد محمد ظاہر شاہ جو کہ گور نمنٹ پر اتمری سکول بیشبز کہو میں بحثیبت کلائن فور ملا زم تھا اور ملا زمت کی ماہوار شخواہ ہی ہے اپنے اہل وعیال کی کفالت کرتا تھا۔

یہ کہ سائل کو دوران آرمی اپریشن راہ راست / کشیدہ حالات سال 2009 میں آرمی / سیکورٹی فورسز نے گرفتار کیا تھا اور اس طرح سائل کئی سال آرمی کے زیر حراست رہایدین وجہ سائل کو افسر ان بالا نے ملاز مت سے برخاست کیا _ جبکہ سائل نے جنوری 2010 تک با قاعدہ ما ہوار تخواہ وصول کی ہے۔ میر کہ بعد از ان من سائل کو مورخہ Release کیا ہے ۔ اور اب من سائل فورسز نے واتن قرار دیکر بری / Release کیا ہے ۔ اور اب من سائل پر سی بھی قشم کے کوئی سول یا فوجد ارمی مقد مات نہ ہے ۔ سائل / ملزم کو غلط قنمی

Children h



48-12-12-18

(12)

جاری صفحہ(۲)

قرار پایا ہوں اسلیح من من سائل کوحسب سابق جملہ مراعات داستفا دہ جات ملازمت متذکرہ پر بحا**ل** کرنا قرین قانون دانصاف ۔۔ ^{ہے}۔ میر که سائل/ اپلانٹ کے ضعیف العمر اور بیار دالدہ ، بوی اور پانچ بچوں کی کفالت صرف اور صرف این تخواہ ہی ہے کرتا تھا۔ اور دیگر کوئی بھی ذریعہ ملاش نہ ہے۔صرف اور صرف تخواہ ہی ہے من سائل اپنے بچوں واہل خانہ کا پلے پالتا ہوں۔ سائل کواپنے ذریعہ معاش سے خلاف انصاف محروم کیا گیا ہے۔ بریں وجہ برخائشی حکم معترضہ قابل منسوخی قرار دیا کرمن سائل کو بحال کرنا قرین قانون دانصاف ہے۔ لېد أاستدعاب كرسائل/ ايپلانك كوتار فخ برخاشكى ب جمله مراعات سرکاری کے ساتھ نوکری پر بیحال فر مایا جائے تو سائل/ ا پیلانٹ اور سائل/ اپیلانٹ کے ضعیف العمر والدہ اور چھوٹے چھوٹے بچے آپ صاحبان کے لئے تادم حیات دعا گوں رمینگے۔ Fazeld City سائل/ا ببلانن فضل على ولدمحد خلام رشاه ساكن بيشبنز كهوضلع سوات كورنمنت يرائمري سكول بيشبنز كهو الرتوم:11/12/2018 C. F. C. Gr. Jehgungwig Jehgungwig

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

NOTIFICATION.

WHEREAS, on finality of disciplinary proceedings under Khyljer Pakhtunkhwa E&D Rules-2011 major penalty of removal from service was imposed upon Mr. Fazal Ali, Ex-Chowkidar GPS Kalo Bishbanr District Swat by the DEO (M) Swat Notification No. 1867-73 dated 26.01.2010.

AND WHEREAS, the said aggrieved Chowkidar filed a departmental appeal dated 4.10.2018 & 11.12.2018 to the Director E&SE Khyber Pakhtunkhwa Peshawar (appellate Authority) for redressal of his grievances/reinstatement in service.

AND WHEREAS, the appellate authority in pursuance of Section 17 read with sub rule (1) & (2) of the E&D Rules-2011 called for the record of the case and comments from the concerned DEO vide letter No. 1182 dated 3.12.2018 for consideration of the appeal.

AND WHEREAS, the DEO concerned provided the requisite record/comments accordingly vide his letter No. 11054 dated 12.1.2019.

AND WHEREAS, perusal of relevant record, reason and circumstances by the appellate authority under which Mr. Fazal Ali, Ex-Chowkidar GPS Kaho Bishbanr District Swat (appellant) was removed from service, the appeal submitted by the aforesaid Ex-Chowkidar for reinstatement was not found tenable.

NOW, THEREFORE, in exercise of the powers conferred under Section-17 rule (2) (a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules=2011, the Director E&SE/appellate authority "uphold the order of Major penalty and reject appeal" lodged by Mr. Fazal Ali, Ex-Chowkidar GPS Kaho Bishbanr District Swat (appellant)

> DIRECTOR Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst: No. 51 47-59 /F.No. 45/A-20/C-IV/Swat-8 Dated Peshawar the 2/2019.

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

- District Education Officer (Male) Swat w/r to his letter No. cited above. 2- District Accounts Officer Swat.
- ٩., Appellant concerned.

1-

D'New folder M

PA to the Director E&SE Khyber Pakhtunkhwa Peshawar. 4.

> Assistant Director (Admn) E&SE, Khyber Pakhtunkhwa, Peshawar Ċ5

Most Urgent Reminder-1st

A More at

Self the

nero (



Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. No // // /F.No. 451/A-20/C-IV/Swat-8 Dated Peshawar the // /2018.

The District Education Officer (Male) Swat

Subject: REINSTATEMENT.

Memo:

Τо

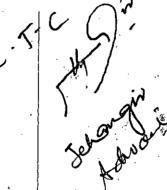
I am directed to refer to this office Endst No. 1182 dated 03/12/2018 on the subject noted above and to ask you once again that the required report is still awaited which may be furnished at your earliest.

201 Assistant Director (Admn)

Assistant Director (Admn) Directorate of E&SE K.P, Peshawar

Endst; No.

Copy forwarded to the: -1. PA to Director Elementary & Secondary Education:Khyber Pakhtunkhwa Peshawar.



حاري صفحه (٢)

C:\Users\Tahir\Desktop\Munawar're

6 OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWAT 254 Dated 12 No /201**R** P/File/C-IV То, The Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar Subject:-<u>Re-instatement.</u>

Memo:-

Reference your No. 1182/F.No.45/A-20/C-IV/Swat-8 dated Peshawar the 03-12-2018 and reminder No. 4363/F.No.45/A-20/C-IV/Swat- δ dated Peshawar the 14-12-2018 on the subject cited above.

In continuation to this office No. 461 LP/File/C-IV in r/o Mr. Fazal Ali Ex-Chwokidar GPS: Kaho Bishbanr District Swat had been absent from duty and this office published absence Notice in daily News Paper or 15-01-2010 after the critical situation in District Swat as per Notification of Chief Sectary Vide No. SOR-L (E.& AD) I-13/81 18-11-2009 and Latter No. COO /E&3/1-15/2001 dated 21-11-2001 (photo Copy attaché). He removéd from service due to anti sate activities/Service ordinance 2001 Vide office order No. 1867-73/F.No. 321 Absentism date 26-01-2010 (Photo Copy attached) and was released by Security Forces on 03-10-2018 (Photo Copy attached) moreoverthe official concerned arrested by Påk Army on February 2010 (Photo Copy attached) which is submitted for your kind perusal and further necessary action please.

on U delale

DISTRICT EDUCATION OFFICER (M) / SWAIT ICI

ليتدالمت جائي سر قمنا كمردير 816 <u>الح/ ۲</u> مخانب مورخه مقذمه دلوكي ماعث تحريراً نكه 7. مقدمه مندرج متوان بالامين ابني طرف مت واسطے پیروی وجواب دہن دکل کاردائی متلقة أن مقام في سورت يسير حي مسير ليرزيك كو ريز . مقرركر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاردائی کا کا ل ، اختياط بوگا- نيز وكيل صاحب كوراضى تامدوتقر ر ثالث وفيصله يرحلف دين جواب دى ادرا قبال دوى ادر درخواست برتىم كى تقىدىق زرادراس يرد ستخط كرف كالغتيار بوگا-نیز بصورت عدم پیردی یا در کری ایک طرف یا ایک کی برامد ہوگی اور منسور تذکور کے سل یا جزوی کاروائی کے داسطے اور وکمل یا مخارقا نونی کواچی ہمراہ یا اپنی بجائے تقرر کا اختیا زہوگا۔ ادرصاحب مقرره متده كوبهي جمله فدكوره بالااختيادات حاصل بوينكح ادراسكاساخته برداخته منظور وقبول موكا _اوردوران مقدمدين جوخ چدد مرجاندالتوا يمقدمدك سب ، المسجق وكيل صاحب موسلك - نيز بقايا وخرجه ك وصولى كرت المحت كابهى اختيار ،وكااكركوني تاريخ بيشي مقام دوره بر ،ويا حد ب با بر ،وتو وكيل مح ماحب پابندند موتلے کی پیروی مقدمہ ندکود لہذاد کالت نامدلکھ دیا ک سندر ہے الرتوم ملی الم الم الم منظور ہے " (م بمقام han WAR R Swart

0343-2187908

Divid

BEFORE THE KHYBER PAKTUN KHWA SERVICE TRIBUNAL AT CAMP COURT SWAT.

Service Appeal No. 326/2019

Fazal Ali Chawkidar Government Primary School Kaho, Bishbanr, District Swat.

Versus

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

Appellant

..... Respondents.

- 2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
- 3. District Education officer (Male) Swat.
- 4. D.D.O of School & Literacy Saidu Sharif Swat.
- 5. Head Master GPS Kaho, Bishnanr, District Swat

Parawise Comments on Behalf of the Respondents Respectfully shewith Preliminary objections

1. That the appellant is not an aggrieved person within the meaning of Section 4 of the service tribunal Act, 1974.

2. That the appellant has no cause of action / locus standi.

3. That the appellant has not come to this honorable court with clean hands.

4. That the appellant has filed this instant service appeal just to pressurize the respondents.

- 5. The present service appeal is liable to be dismissed for non-joinder/miss joinder of necessary parties.
 - 6. That the instant service appeal is against the prevailing law and rules.
 - 7. That the appellant has filled this instant Service Appeal on malafide
- motives.

8. That the instant appeal is time barred.

9. That the instant service appeal is not maintainable in the present form, and above in the present circumstances of the issue.

10. That the appellant has estopped by his own conduct.

11. That the appellant has concealed the material facts from this honorable tribunal.

FACTS

- 1. That the Para No.1 is correct to the extent of appointment order.
- However, rest of Para is incorrect and irrelevant.
- 2. That the Para No.2 is irrelevant, hence no comments.
- 3. That the Para No.3 is irrelevant, hence no comments.
- 4. That the Para No.4 is irrelevant about his Acquittal from charges leveled against him. However, according to the security forces' Statement, the appellant remained in De-radicalization Course at PAITHOM of security forces from 14-11-2017 to 14-02-2018. But his removal took place in 2010. (Statement & Removal order is Annexure A,B)
- 5. Para No. 5 is correct.

6. Para No. 6 is correct.

7. That the instant service appeal of the appellant is bereft of any merit, hence liable to be dismissed inter alia following grounds.

GROUNDS

- That Para No. i is baseless because the respondents issued i. legal orders which comes under the jurisdiction of the concerned authorities.
- That the Para No. ii is incorrect because the order had been ii. issued under the legal procedure by respondents.
- That Para No. iii is incorrect because the orders have been iii. issued according to the service rules and procedures.
- That Para No. iv is incorrect because the appellant has been iv. guilty of absentees from the service.
- That Para No. v is incorrect because the appellant was ٧. informed via daily Mashriq dated 15-01-2010 page-4 to ensure his presence on his duty station otherwise compulsory actions would be taken against absentee (Annerure (
- That the Para No. vi is incorrect because the department had vi. proofs against the appellant of his absentee from duty.
- That Para No: vii is incorrect because the appellant was not vii. available on his duty station from a long time.
- That the Para iliv is incorrect because the appellant failed to viii. make his presence sure after the notice via the newspaper (mentioned above in para No : v)
- That the Para NO.ix is incorrect because "He who seeks equity ix. must do equity "

That the Para No. x is incorrect because the action against the appellant was not announced in cursory manner but it was taken after the proper procedure.

That the Para No. xi is irrelevant to the present respondents, hence no comments. However, according to the statement of the law enforcing agencies the appellant remained in Deradicalization Course at PAITHOM of security forces from 14-11-2017 to 14-02-2018. But his removal took place in 2010. That The para No. xii is irrelevant. Hence no comments

xii. xiii.

Χ.

xi.

xiv.

That the Para No. xiii is irrelevant, hence no comments. That the Para No. xiv is denied because he is not entitled for any back benefits due to his removal from service.

xv. That the Para No. xv is irrelevant, however, the respondents also seek permission of this honorable tribunal to advance furthers grounds at the time of arguments.

It is, therefore, very humbly prayed that the instant service appeal of the appellant may be dismissed with cost in favor of the respondents.

HEAD MASTER GPS KAHO, DISTRICT SWAT

EDUCATION OFFICER (M)

SWAT AT GULKADA

SUB DIVISIONAL EDUCATION OFFICER (M) BABUZAI SWAT

ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHFUNKHWA

認い意思

SECRETARY, ELEMENTARY AND SECONDARY EDUCATION PESHAWAR

TO WHOM IT MAY CONCERN

It is stated that Mr Fazal Ali s/o Muhammad Zahir Shah r/o Beshbanr P/O Manglore Tehsil and District Swat CNIC No 15602-0412951-9 has undergone De-radicalization course at PAITHOM from 14 Nov 2017 to 14 Feb 2018 (registration number AMI/Swt/Act/18/6057 dated 14 Feb 2018). The said indl is currently working for this setup. Nothing adverse has surfaced against him during our probe and no criminal record found in concerned Police Station.

5. C

Station <u>(Sw</u>at) Date: er 2018

Maj/OD Ceneral Staff Officer-II (ISI Sub Sector HQ Swai) سلل

orf

FFICE OF THE EXECUTIVE DIS ELEMENTARY AND SECONDARY ER SWA∜₁

With reference to Hume and Ats Department NWFP vide litter No. 1/7-SO [L and O/HD/09. duted 15.12.2009 Anti-state activities and under removal from service Ortinance 2000/2001.

AND WHEREAS the Provincial Government decided to terminate the service of those Gevernment servants involved in Anti-state activities/ militancy in the meeting of competent authorities.

NOW THEREFORE, the services of the following officials is herby terminated with immediate effect under section 3[1][d] of the North-West Frontier Province Removal from Service [Special Power] Ordinance No.V of 2000 read with section 3[2][b][i] and 5[4] of the said ordinance.

10	No in t list	Me Name of Official	Post	BPS	Place of Duty		
	82	Muhammad Ghafoor s/o Nadar Khan	N/Q	1	GHSS; Mankyal		
	34	Sarlaraz Khan S/o Muhammad Khan	W/M	i	GMS: Shakardara		
	106	Anwor Shah S/o Mian Syed Jan	Chw	1	GPS: Malalay		
1	* ()7 	Fazal ur Rahman S/o Gulambar.	N/Q		GMS: Dakorak		
		Fazal Ali s/o Muhammad Zahir Shah r/o Kahe Yakhtany PS Mingora	C-IV	1	GPS: Kaho Bishbanr		
	112	Fazal Mabood S/o Abdul Wahid r/o Besbanr	C-IV	1	GMS: Beshbanr		
	115	Moamber # Damghar	C-IV .	1	GPS: Damghar		
۰.	123	Saran Zeb S/o Samandār R/o Kalagay Mədian	C-IV	1+	GPS: Kalagay		
	129	Amir Siab S/oMuhtaj R/o MohIIIah Amir Khao Nawakaly Mingora	Swe:	2	DDO (M) Swat		
		Alt Rahman	PST	2	GPS: Pir Patay		
	98	Inam s/o Gul Bacha r/o Arkðt	PST -	9	GPS: Nela gram		
	104	Anwar Za in S/o Zowan Faqir 7/o Doghlai	PST	9	GPS: Doghal		
	116	Gutab s/ Momen t/o Chekrai Fatchpur	PST	9	GPS: Baben		
	155	Sher Zada 5/O Sher Muhammad r/o Chekrai	PŠT	9.	GPS: Babin		

EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION SWAT

جارن محد 🕔

ORDER

Amuel C

ر مالا ہیں کوئی مبکہ نہیں' ڈی پی او موالی(بدرور ارد بر) کاابت مجرز تدماک اوتام مرتم "مم الوروي كى إديم كورمن براترى انہوں نے بازارون ٹر نامانز تمادزات پر شدید بر کا کا لی ک المبار کرتے اور کہا کہ ناجاز تبارزات کا او ے مكول فبرا كاورت في موالة المسيد اللدكي مددادت على ارون ال الدون عن شديد خلات كاما الم بالمردب في كما ك اید. آمزی ریزنس منعق دا جس می مردن کے تریز الب کریے اب ادام آدام کرے کی اور ایکس جا کہ رہے کا ۔ وہ واسر : بر نے کہا کہ مان منس بند کا زین کیلے سرکار کی سر ایت وار کی * کہ رو بھر سر سر سرم کہ اور کرتی واتارب الاركرام ادراساتذ ويفر تشرقو واديم شركت كما مدور بر من اليس المعام الله خان الجاز على مولانا سعيد الله. ة كوپليس كريكان كوپليس تين من د جزو كابا يكاكوكارا ا ادر مولانا تارکی فغل تظیم نے سر میم استاد کوفران متعبدت بیش کرتے اور بے کہا کہ مردوم ند مرف ایک مبترین استاد یتے اکد مام وندک میں اجائی مدی کے مال اگر ا موردادر في انسان يتم-

اس كركت أورناست سراد جرك اليون

فى جارسد وكلب كو شكست دے دى

بارسو، (نماند، شرق) ام ، كرك أور ماسك اہم بچ می سرام مرد اليوں ف جارسد الب ا سات وك في براويا. اختال 67 ف ما تر الالال - برادر شن آف دك في كم عندار يا - 4 ملاده ازی مک مدر کواز کر کرکٹ ورنا منٹ میں يونيركلب في إلك كلب أو120 ولا - براديا بر تيركاب كى طرف ، محمير خان ف 45 ولا بنا ٤ ا، رقاد کمٹ ماکس کتے ،

أربيج والألام ككألماء فيكام Carling and Contraction بزراد دلس مشجر کا باتا ہے کہ بائدادد کان تبر 15 مرد فر بر 512/59 وات لافت بادار بنادر كين جوكة ك موالرشيدوا، موالمي ي لام ي

ردن الميل بكاريان الدائون عن استعال الله في -

دودند جوانان سبد دشریف کے صدر تنحنہ

بموداد دوا ميرون وداليوم ناش مروران واجاسيد بريس مكرون ن الذخان - ادرو ول مواقس المروى جن التر يمين جدا محكم عالم م

براارات ليا المرخان المان الأرخان بشمم الاقبال الإسف خال اسي

ان منعقر و القبال مناراته بهراقبال نلاكي در داؤد شال إن نو نخب

ا ب مدرالان احداد الأمان ... فركها كريج المان ... في كما كريج المحاد المرب ك

در الأ موضحه المسيم الأشق كم تعليقه النهول في كمها كو شريب الاسيم الجون كے

デームシュージア・フリアション

المجاليم كافريدسيت كمطرش تريب افراد سكم الجانن

المال المالية برار في مريد ورك من مرد مريد مريد والمريد المريد المريد المريد المريد المريد المريد الم با تيداد زكور مالاسمي آفراب جيد دامر مدالم يدير غدو بيور جسر كاشو وواللوير تمبر 226 اكاليسرا جلد 10 سوديد 109 ا اوفروان الروك ب- اب كى آناك، ميدولد مجدا لميد ... ف جامعواد خاكور بالا اب تام يعلى كرار فركسك أيك عد ور فواست دفتر خاص كزارى ب- اكرمندرد. بالا جائيراد بركن فنم ويك ياكم ادار في الم الم الم الم الم الم الم الم ا اشتہار برا کی اخمامت کے چورہ این کے اندراندرا با امتراض بر یوت میں کریں اجدازاں نسل کی کارردائی سد رہے بالا

ور تواست كزار كمام بركل ش لافً با ع ك اوركول عدد قال بول ندادكا-Den and A CARE ALAN AND A SHOW

جناب چف سیر فرد کا مکومت شال منرل مرتعد کا سوبه کا تکم کے مطابق بحوالہ مجمع نمبر SOR-I(E&AD) - 1-31/81 ميدنه 15 كومبر 2009 مادر تمنى نمبر COO/E (3/1-15/200) مورجه 21 لوير 2001 ، تكر تعليم تحران تمام طار يكن جوكه كرمه وراز ب بغیر کی اطلاح کے اپنی ڈیونی بے غیر حاضر ہیں یا وہ طار مین جنوں نے کمی تیس نے کمراور چهنی کا تنداع براین دیدنی بین ایمی تک غیر ماشر زین آمر، کو بذرایدا بستهار بذا^{ملل} کراچا تا بین کدده اس اشتبار کی اثنا ات کے چندرہ ان کے اعدا اور اپل ڈیونی برسام او جائمیں بصورت دیکران الاز بین بے خلاف کل یک مرفد کارر الی کرتے الن کی ما زمینہ و کیل آ رؤینس 2000) کی تخت بر خامت، کی جا بیلی اور احد بن کوئی بمی مذر قابل جول کنیں ادکا۔

Call Manual Contraction

INF(SIV) 9

بورالمة، جامر ميشتر ول رفا كرك إن مندرجه ذين أسما مياز، خرل إن منالي كرك ب سُنوق But which is the strength which is the strength of the و25 جورى 10 10 يغور بىيە بىلان سىر ، كى بىل كەن يەر ئول مۇل بىلى ئالان به ۲۰۰ ز. کی دا کنگی به



یر د فیسر تفوظ جان کی نظیمی خدیات یا در کلی جائیں گی

مردان (بدور بودت) بالموز بادا مسلوا مل سرفارا م برا مر مود المر مود ماد بالدال سال م بالى يومى بالخر فران الدين الخال خامد الد الماليان المالية فالم المراج المراجل المشركري ال

ور اسالیل تان (مشرق نیور)فرست انگا، سیو کے لماليكم لمك تمريبة الأمرد مجافع مری کے داخلہ شب ک ين مك برير. مكل إزيش ما ل كرك بيد مك مراسية · كول كارز مار طالبين -

المام بروش محمد بالماجري والمستوي من معد موجور مع معاد المارين مراحد المارين والمعاد المارير والماعة المرام ال المام بروش محمد بالماجرين المالية بالمعادة معاد المالية من معاد المادين المادة المالية مراح المالية المالية الم ومحمد ما محمد الماجر المالية من مراح المحمد المالية المورد المالية والمعادة المادين المعاد المالية مراح المالية

ئانك (نرائنو، شرق) آلی تدیشاسه، داکثر نیاد _ ز کها بیم کر کارژ خارا کی خدمت کر تا شروع ایت ان خالات کااعداد انمان ... الم- بن ميزيكل الموازو کے ذیر اجتراب منوقارہ قرمی آلی کی بی کے دوران فلاب كري ٥٠ كا قرى ألى كي ال 250 مرييشون كالمغيب ودايتيدادو فرياء ولأكدود سيعتك ان ادویات ادر میک تندیم کاکش -

بجواله محكمه يليه عز كابيار بيجتذرك الميجيش منكع موالي شاك كرده اشتهار بذريب. " روز نامه شرق" بپتاورمورهه ۱۵ 1/2011 9/0 لينوان" درخواشين ^{مطل}اب یں ' کے حوالے سے متعافد امید واروں کو مثل کیا جاتا ہے کہ برکورہ اشتہار میں ىپرىل بر 3 پردىيتى كىياتىم (زمرە) " ئادۇر مرداندا : ئاندا كى تقررى فى الحال ! ماتوی کر دی کی ہے۔ ابندا اس سلسلے من درخوا میں بن کرانے کی زمت شرکر ہی۔

الف آركوبات عدائ ليوى فورى عدة ما مال عاين فياد يرتجرنى كرز كيلي مل كراب / الف أداويات الف آ و يتاور كر الوق مال (ويداك أميدة، ون ٢٠٠ ورخواتي ملكوب بي - الما يدفن أور جرتي كالتعميل ذيل بي جركه ذير وتحلي كو -روند (2.5/1/2010 £ . E 2.5/1/2010

مديار بهرتي										
كيغيت	-ب ¹ ون اميرداد			JEEx	أبراد	بادی خوار	الملوبية ساك	D		
	تاب <u>ي</u> ت. 	~5×	تابيت	مرک ما.	31-1	. شيل ا		14		
		301-18		1.45	,	nrs-7	مسو میداد. موجوداد. محکم	-		
			() ()	ايذا	····	528-5	سو بردا.	2		
•··· ·		ا ریز ا د محمد		اليزن	 5		 باک مربیدان			
:	1	Lan	\langle , \rangle	اليذا	16	682.1	 * جالزار			
·	Γ <u>Α, 1</u>		وتأرياه		•		• 2012			
	<u>يزر.</u>	1.0	$\langle \cdot \rangle$	Le:	19	075	 چېنې			
	:: <i>;</i> [1.49	ا ڏي. د سن	ligt		u.:				
	<u>_</u> _!i		999-C.3	land Isari	 174	:: :: :: :::::::::::::::::::::::::::::		••••••		

لعدال فمن الك دوير ابيلامشة ، <u>الجرام</u> مخانب 216 محارفته م سر الم كورغينا فالف سيرقنو مقدر باعث تحريراً نكه دلوكي <u>7</u>7 مقدمه مندرج عنوان بالابين الخطرف سے داسطے پیروی وجواب دہی دکل کاردائی متلقة أن مقام 2 سور ب سير حيا مكتمر المرديد كو ديم . مقرركر كے افراركيا جاتا ہے كہ صاحب موصوف كومقد مدى كل كاردانى كاكال ، اختیاط ہوگا۔ نیز دکیل صاحب کوراضی نامہ دتقرر ثالث دفیصلہ پر حلف دینے جواب دى ادرا قبال دوى اوردر خواست مرتم كى تصديق زرادراس يرد ستخط كرف كااختيار جوگا-نیز بصورت عدم پیردی یا د گری ایک طرف یا بیل کی برامد ہوگی اور منسوخ ندکور نے سل یا جزوی کاردائی کے داسط ادرد کیل یا مختار قانونی کواپنی ہمراہ یا پنی بجائے تقرر کا اختیار ہوگا۔ ادرصاحب مقرره شده كوبهى جمله مذكوره بالااختيارات حاصل موظم ادراسكاساختن برداخته منظور وقبول موكا _اوردوران مقدمه يس جوخر چدد مرجانه التوايي مقدمه ك سبب ، بوگاا سکے ستحق وکیل صاحب ہوئے۔ نیز بقایا وخرچہ کی دصولی کرتے الكوفت كابعى اختيار موكا أكركونى تاريخ بيشى مقام ددره مرمويا حدب بامرموتو وكيل ماحب پابندند ہوئے کی پیروی مقدمہ مذکور لہذاوکالت نامد کھدیا کسندر ہے المرتوم r. 19 11.5 VBAR Swart 0343-2187908 Div

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. TB. No. Appeal No..... of 29 7. Versus Versus Havoregh Seren Elli Barrier B Respondent No..... Distt- Education Offices Ele: 8 Series Education Gulkada Saidu Sharif Sundt Notice to:

GS&PD.KP.SS-1777/2-RST-20,000 Forms-09.05.18/PHC Jobs/Form A&B Ser. Tribunal/P2

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

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

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

at complouet Succet

ite:

1.

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

NN

GS&PD.KP.SS-1777/2-RST-20,000 Forms-09.05.18/PHC Jobs/Form A&B Ser. Tribunal/P2

TB

11/h

PESHAWAR.

326 of 20 1.9 Appéal No..... Fozal Ali Appellant/Petitioner

Versus Through Secep' Edu: 19/9 Respondent D.D.O. 24 Ele & Sec' Education Saiden Sharif Smat

Notice to:

No.

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

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

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

Given under my hand and the seal of this Court, at Peshawar this...... Day of _____ Apsil _____ 19

at complease Surat Registrar. Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Note:

1.

T13 .

"B"

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

No.

Notice to: _

Note:

1.

Appeal No. 32. of 20! 7. Faz al Alia Appellant/Petitioner Versus Versus Thexes of Society Educides Plant Respondent Respondent No......S..... Head Master G. P.S. Kaha BishBany Smati

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

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

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

at camp Coust Swat

^V Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

"B"

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

Appeal No. 326 .F.azal Ali Appellant/Petitioner Versus Timeren Scorf: Edits: 12 Ple Respondent Respondent No. Leftert: of 12 pla Turrength Secep: Edit: De Stratmen. 1

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

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

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

Note:

1. 2

No.

Notice to:

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

at camp court Sweet

Day of April 20 19

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Registrar,

"R"

GS&PD.KP.SS-1777/2-RST-20,000 Form

8/PHC Jobs/Form A&B Ser. Tribunal/P2

326 of 2019 Appeal No..... Forgel A.h. Appellant/Petitioner Wersus Wirkerugh Soup: Edus Respond Respondent No..... Divector Education Sport of KPle Notice to: No Strances.

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

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

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

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

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

abie

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

11/le

Note:

No.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. 7*1*3 No. 326 of 2019 Fazal AliAppellant/Petitioner Versus ear' Edui .Respondent DD O of School For Echarolio Saidi Sharif Scerat Notice to:

"R"

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

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

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

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

June Day of..... at camp Court Sunat

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

2

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. *F13*

No.

326 of 20 19 Appeal No., Fazal AC. Appellant/Petitioner/ Versus Serry El ...Respondent Respondent No Head Master GPS Kaha Bishbour Distt. Swigt Notice to:

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

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

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

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

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

at Camp land Sand

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

Note:

1. 2.

"R"

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

PESHAWAR.

No. 326 of 2019 Appeal No..... al NIAAppellant/Petitioner Versus Scur Edui 19 .Respondent Respondent No. Kespondent No. Sour Education Notice to: Destadance

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case I y the petitioner in this Court and notice has been ordered to issue. You are hereby inform d that the said appeal/petition is fixed for hearing before the Tribunal ton 2 - 9 - 20 9 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

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

Ima Day of.... at camp lant Swat Régistrar. Khyber Pakhtunkhwa Service Tribunal, Peshawar. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

Always quote Case No. While making any correspondence.

Note:

2.

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

66R33

GS&PD.KP.SS-1777/2-RST-20,000 Forms-09.05.18/PHC Jobs/Form A&B Ser. Tribunal/P2

3.2. (of 20 / 9 Appeal No..... Three go Scarp Edis Is Pls. Respondent Respondent No. Divector Education School Gaut of

Notice to: ____

No.

19 P.15 Machina

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

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

office Notice No.....dated

Note:

1

2

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

Day of..... at camplecest Smat Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

BEFORE THE KHYBER PAKTUN KHWA SERVICE TRIBUNAL AT CAMP COURT SWAT.

Service Appeal No. 326/2019

Fazal Ali Chawkidar Government Primary School Kaho, Bishbanr, District Swat.

.....Appellant

Versus

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2. Director Elementary and secondary education Khyber Pakhtunkhwa at Peshawar.
- 3. District Education officer (Male) Swat.
- 4. D.D.O of School & Literacy Saidu Sharif Swat. 🔔 🗄
- 5. Head Master GPS Kaho, Bishnanr, District Swat

...... Respondents.

Parawise Comments on Behalf of the Respondents Respectfully shewith Preliminary objections

- 1. That the appellant is not an aggrieved person within the meaning of Section 4 of the service tribunal Act, 1974.
 - 2. That the appellant has no cause of action / locus standi.
 - 3. That the appellant has not come to this honorable court with clean hands.
 - 4. That the appellant has filed this instant service appeal just to pressurize the respondents.
 - 5. The present service appeal is liable to be dismissed for non-joinder/miss joinder of necessary parties.
- 6. That the instant service appeal is against the prevailing law and rules.
- 7. That the appellant has filled this instant Service Appeal on malafide motives.
 - 8. That the instant appeal is time barred.

18 A.

- 9. That the instant service appeal is not maintainable in the present form,
 - and above in the present circumstances of the issue.
- 10. That the appellant has estopped by his own conduct.
- 11.That the appellant has concealed the material facts from this honorable tribunal.

FACTS

\$

- 1. That the Para No.1 is correct to the extent of appointment order.
- However, rest of Para is incorrect and irrelevant.
- 2. That the Para No.2 is irrelevant, hence no comments.
- 3. That the Para No.3 is irrelevant, hence no comments.
- 4. That the Para No.4 is irrelevant about his Acquittal from charges leveled against him. However, according to the security forces' Statement, the appellant remained in De-radicalization Course at PAITHOM of security forces from 14-11-2017 to 14-02-2018. But his removal took place in 2010. (Statement & Removal order is Annexure A,B)
- 5. Para No. 5 is correct.
- 6. Para No. 6 is correct.
- 7. That the instant service appeal of the appellant is bereft of any merit, hence liable to be dismissed inter alia following grounds.

GROUNDS

the second

i.

-

- That Para No. i is baseless because the respondents issued legal orders which comes under the jurisdiction of the concerned authorities.
- ii. That the Para No. ii is incorrect because the order had been issued under the legal procedure by respondents.

iii. That Para No. iii is incorrect because the orders have been issued according to the service rules and procedures.

iv. That Para No. iv is incorrect because the appellant has been guilty of absentees from the service.

- v. That Para No. v is incorrect because the appellant was informed via daily Mashriq dated 15-01-2010 page-4 to ensure his presence on his duty station otherwise compulsory actions would be taken against absentee. (Annexure C)
- vi. That the Para No. vi is incorrect because the department had proofs against the appellant of his absentee from duty.
- vii. That Para No: vii is incorrect because the appellant was not available on his duty station from a long time.
- viii. That the Para iiiv is incorrect because the appellant failed to make his presence sure after the notice via the newspaper mentioned above in para No. V
 - ix. That the Para NO.ix is incorrect because "He who seeks equity must do equity "

- x. That the Para No. x is incorrect because the action against the appellant was not announced in cursory manner but it was taken after the proper procedure.
- xi. That the Para No. xi is irrelevant to the present respondents, hence no comments. However, according to the statement of the law enforcing agencies the appellant remained in Deradicalization Course at PAITHOM of security forces from 14-11-2017 to 14-02-2018. But his removal took place in 2010.
- xii. That The para No. xii is irrelevant. Hence no comments
- xiii. That the Para No. xiii is irrelevant, hence no comments.
- xiv. That the Para No. xiv is denied because he is not entitled for any back benefits due to his removal from service.
- xv. That the Para No. xv is irrelevant, however, the respondents also seek permission of this honorable tribunal to advance furthers grounds at the time of arguments.

It is, therefore, very humbly prayed that the instant service appeal of the appellant may be dismissed with cost in favor of the respondents.

HEAD MASTER GPS KAHO, DISTRICT SWAT

وبد

 Q_{1} :

DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA

SUB DIVISIONAL EDUCATION OFFICER (M) BABUZAI SWAT

DIRECTOR,

ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA

SECRETARY, ELEMENTARY AND SECONDARY EDUCATION PESHAWAR

TO WHOM IT MAY CONCERN

It is stated that Mr Fazal Ali s/o Muhammad Zahir Shah r/o Beshbanr P/O Manglore Tehsil and District Swat CNiC No 15602-0412951-9 has undergone De-radicalization course at PAITHOM from 14 Nov 2017 to 14 Feb 2018 (registration number AMI/Swt/Act/18/6057 dated 14 Feb 2018). The said indl is currently working for this setup. Nothing adverse has surfaced against him during our probe and no criminal record found in concerned Police Station.

(Swat)

2018

Station

Date;*

Annea A prop

Ili

General Staff.Officer-II. (ISI Sub Sector P.Q. Swai)

bow hat CA.C

FFICE OF THE EXECUTIVE DIS ELEMENTARY AND SECONDARY EAMARA SWAT, IN

Aners

FICE ORDER

With reference to Hume and Ats Department NWFP vide litter No. 1/7-SO [L and O/HD/09. dated 15.12.2009 Anti-state activities and under removal from service Ortinance 2000/2001.

AND WHEREAS the Provincial Government decided to terminate the service of those Government servants involved in Anti-state activities/ militancy in the meeting of competent authorities.

*WOW THEREFORE, the services of the following officials is herby terminated with immediate effect under section 3[1][d] of the North-West Frontier Province Removal from Service [Special Power] Ordinance No.V of 2000 read with section 3[2][b][i] and 5[4] of the said ordinance.

.No	No in t list	ne Name of Official	Poșt	BPS	Place of Duty-		
	82	Muhammad Ghafoor +s/o +Nadar Khan	N/Q	1	GHSS; Mankyal		
	84	Sarfaraz Khan S/o Muhammad Khan	W/M	 ا	GMS: Shakardara		
, }	106	Anwor Shah S/o Mian Syed Jan	Chw	[GPS: Malalay		
I	107	Fazal ur Rahman S/o Gulambar.	N/Q		GMS: Dakorak		
5 ₄ .	111	Fazal Ali s/o Muhammad Zahir Shah r/o Kahe Yakhtany PS Mingora	C-IV	1	GPS: Kaho Bishbanr		
;	112	Fazal Mabood S/o Abdul Wahid r/o Besbanr	C-IV	1 .	GMS: Beshbanr		
7	115	Moamber // Damghar	C-IV	1	GPS: Damghar		
. ز	123	Saran Zeb S/o Samandar R/o Kalagay Madian	C-IV	1	GPS: Kalagay		
9	- 1-29 	Amir Siab S/oMuhtaj R/o Mohlllah Amir Khao Nawakaly Mingora	Swe:	2	DDO [M] Swat		
10	۱.	Ali Rahiman	PST	2	GPS: Pir Patay		
11	98	Inam s/o (Jul Bacha r/o Arkot	- PST	9	GPS: Nela gram		
12	104 -	Anwar Za in S/o Zowan Faqir r/o Doghlai	PST	9 :	GPS: Doghal		
13	116	Gulab s/c Momen t/o Chekrai Fatchpur	PST	9	GPS: Baben		
14	155	Sher Zada G/O Sher Muhammad r/o Chekrai	PST	97.1	GPS: Uabin		

EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY • EDUCATION SWAT

جارل حدر ۱

Armer Circles

ر بالا بې كوئې *مېگەنېي* ژ³ كاي او انہوں نے باداروں ٹن ناجا تر توادرات پر شدید بر من کا الموارك في اور مركبا كمه العائز "بابزات كى اج -المرؤف وان 1 . وودف شل شديد فظلات كاما مناسبها ول في لماكمه ماب کرتے اب دام آدام کرے کی اور پیس جا کی د جرک انہ ان اور مناصر بر میں کی کان من بیڈ کا زیاں کیلی سرکار کی کر باید ، جامل د بد مامر در به فرای مان من بد کان اس کیلی مرکاری کر باید ماری به به به بیس از سرکان اولیس بیش زمار دم و کما با یک کودک کم

ارد الريط بيكاريان الدانون في استعال الأن في -

دو**نو جوانان سرر د**نتر یف کے صدر تعم

استدواد دوا میکران شددالمدم نامی میکران و باسد و ای میکران ن الله خان - اوروسول مراضى كرارى جن في في مجا بعل مالم عن الحر خان والمان الأرخان وبنس الاقبال ويوسف خان وسيو de la late ال متعقود و المال مناداته ريد القال مكاك ادرداد ومثال في فونتخب الد المالا، تحد مارتي كرمسائل ترش الدول بالكرف كالجر دورند موقعها الدور وشق كرينظي المبول في كما كو تريب الارتيم بجول م الي الما مح المرجة من سالم المراجر المراد مد الخ المن یں بائنہ۔

اس كرك أورناسك المرد جرك اليون فے جارسدہ مکب کو شکسنت دے دک مارسد ، (نمائند ، مشرق) این کرک نور نامند ک اہم بچ یں سراج مری الیوں نے سارسدا ظلب ا مات وك في برا را . اشاق 67 مر ك مدرالان احمان الأرخان .. فركبا كريم الي عدداً ميد ي

ار کارتر مان کی کیا والے کا کہ

المرفايان رب اورين آف دل في كا مداريات الادوازي ملك مدد كولذك كركمك أورنا جند أيني ی خبر کب فر پرانگ کاب کو 120 در سے مراد و الد تيركاب كالحرف - منير مان - 5 1/4 14 اور ڈوک ماک کے ۔ MARTIN CLARKE COMPANY COMPANY

ا بدراید اول مشته کیا با تاب کر با تدادد کان فم 15 مرد بر 542/59 والى ليافت بازار فيادر كينت جوك ك موالرشيد ول مردالميد في الم بر با تواد ذكر وبالاسى آفار مدولد مدالم يدي بذر يور جطر كالمد ووتد ويرفير 226 كالمبر الجلد 10 مدون 17/2/19 كوفروانت كروك ب - ب كى آفار جيد ولد مجدا لحمد ... ف جامبواد خاكره بالا اب ما م يحق كرار فركيا في الم م ور فواست دفتر خواش کر اوی برم .. اگر سد رسه بالا جا میراد بر کی فکس دیک با کسی ادار ... مکان کی کو کس احتراض ادتر الشجار فدا كما مناسب كم جدود في محاجر الدوانيا التراش بر مد توت في كري اجدازال فتحل كالاردال معدد ال

موالى (بورور اور) كالبت يجري او ماك ابتا بري ملم الدرذيك او مراكد من براترى

سكول فمبر 1 فكاويت ش مولانا سعيد الله كى مددادت ش

ایک آمرین ریزنس منطق دراجس شک مرحق کے لاج

واتارب ولاركرام اوراساتد وفي كثير تدوياد يم مركت كى

مدر مركم بأيس انوام الله مان الجاديل مولانا سعيد الله. ادر مولانا تارل أمكر بعظيم في مردم استاد كوفران متعدت بی کرے اولے کہا کہ مردوم ند مرف آیے بہترین استاد

قر باک مام زندگی میں اجمال ون کے مال باکر ا

ور دادر بن السان يتم

ر فراست كزار - برا بر ال ش الأ با . برك ادركون عار اللي أجل ندادكا -Killing CR. HEALENDARD

جناب چیف سیر ترکی مکومت شال منرل مرحدی موب کی تکم کے مطابق بحالہ مجل نبر SOR-1(E&AD) - 1-31/81 ميدند 18 تومير 2009 مادر يمنى أبر COO/E&3/1-15/2001 مود يا 2 لوم 200 ، كل تسايم كان قمام طال ان جوك الم ودازے بغیر کی اطلام کے اپنی ڈیوٹی ہے غیر حاضر زریادہ ملاز میں جنہوں نے کم کی جنہی نے کراور تېمنى كامېمة مرما بني ژايدنى-يا بنى تك غير ماضر إي آمر، دېذرايدا سُتهار بداملل كراجا تا- پر كه ده اس اشتہار کی انہامت کے چاردہ دن کے اندر اندا کی ڈیونی پر حاضر او جائی بعسرت دیکران الاثن بر خلاف کلید بعظرانه کارروانی کرتے ان کی مازمت و تبیش آردینس 2090) کی تحت

برخاست، کی جا تلکی اور احد یک کول می مذر ۱۳ مل جول میں اوکا ۔

COLUMPARIA TO

INF(SW) 9

بورالمة، ينام ميشر مولى في كرك إلى مندرجة ذين أسما ميان، فإلى على منا مركب ميشوق $\frac{8}{3}$ (1) $\frac{1}{2}$ (1) 23 جنود كان 20 مقروب مادن منور مكرون كرون في المنان برك أشروند والمان H. J. A.



یر د فیسر تفوظ جان کی نظیمی خدیلات با در کلی جا تیں گی

في كواكرين أسر منوظ مان الك الدار مك في مردان (تدرور اور ف) في أو د باد منت اسلام به كار) م بالآر يوزي بدائير فران الدي بختال فراميداير تطليبان والاندان الدواتيل يتوثير يكري ك المام برونسر محمود جان معریات من معدم و موجود المام معدم و معرف من مود المام معدم مراح المام المراح مام المام ا المام برونسر محمود جان ماد کی دیلیت به معدم مواجع الد جن الدیز کرد سرط ایرانی در مام کی الدار المال المراح کا تر الم جا کرم کی ایک جاری بردانی مراح مارالا مری تشتایی الفرد و مارا می که المارا المام مراح المارا المراح که المس و محمود ما ایک کی ایک جاری بردانی مراح الله می تشتایی الفرد و مارا می که در مارا که در مارا که در مارا که در م

یوز)فرست انگار سو ک

بالج مرى ي واخل مي

erin: Un . r. M. a. r.

يالكران المجار المجا

ک.ل.کاروندار ما^ر مار

بالبلم عدم را لار اللي

ذيره اساليل خان (مشرق

كالنك (نمائني مشرق) آلي يوشله مد (أكمر شا ان خيالت كالقوار المون في المسين ميذيال خوازدیک زیر ایترام معتقده فری آتی کیم بود. ایج ولاب كرت ٥٠٠ كا أول آل كي عن 250 مركانون ۲ مغیر ، جاشیناد، زیز مرلا كدور سیم کا مغیر اور با ساده میکه شمیم کا کمی ...

بخواله محكمه المبهمتر بحاليند سيتثرر كماليج يشن مناق صوابي شاكته كرده اشتهام بذراج "روز نامه شرق بینادر مورجه ۱۵ 1/201 9/0 لِعَوَّان 'درخوا^سن مطلب یں ' کے حوالے سنتھافہ امیدواروں کو مطلع کیا جاتا ہے کہ زکورہ اشتہار میں سریل فسر دیرد بی کیج شم (زمرہ) " خاری مرداندا زیانہ کی تقرری فی الحال ا ماتوی کردنی کی ہے۔ اہما اس سلسلے میں در خوا^{ست}یں بنی کرانے کی زمت نے کریں۔

W. A. Barrilla M. P. P. P. الف الركوبات شرائ فيوى قورى شهرة ما مادى ماين ماين بنياد ير فرق كرف كمايد مل كربات/ الفي وركوبات الفي آبريجاور يك كونى حال فود باكر اميدوارول من ور خواشی الله ... بی ... اما یون اور جرل کی تعمیل ذیل میں جرک زیر وقتلی کو - A. B. B. # 25/1/2010 - 200

معدار بهرتی									
كيغيت	بد ^{بلد} ن امیر دار		· YANDASER		أنداد	باري زر	طلوبها سالي	ار ا	
	کابایت	Sr	باب _ت	مرل س				 ښار	
	· · · · · ·	305-18	<u>с</u> у	्रील्बइ	;	BPS.7	سويروار الر		
	·····	ابينا	اروي <i>يارا.</i> (رايشي	ايذا	,	625.5		 2	
<u>.</u>		إينا	. La	i.r.i		875-J		·	
· [1	Ċei	$\overline{(\cdot)}$	ايد ا	16	45123-1			
·	FA 3		جواذراء		•	ŀ	- A		
		_ <u>- ¹ 2</u> 4	(eg	بينا	1.9	0.25	. Şir		
	<u></u>	<u>(</u>	ا مۇرى بەر يەنى	[.4		 3425-1	ار بېرې د کې ارس د کې		
				1.0	674	::rs :		 7	

"A" BER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, B. Swid PESHAWAR. No. 326 APPEAL No..... Fazal Ali Apellant/Petitioner -Versus Through Seen: AF (EESE), Notice to Appellant/Petitioner Jehangir K (Advocate) 6Aice Allah-o-AKbar Plaza Saidu Sharif - Makan Bagh Mingora Saat Take notice that your appeal has been fixed for Preliminary hearing, replication affidavit/counter affidevit/recordancements/order before this Tribunal

GS&PD.KP-2557/3-RST-5000 Forms C9.07.2018/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal

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.

CAMP CONT Swat Registrar Khyber Pakhtunkhwa Service Tribunal,

----- at-----

Peshawar.

GS&PD:KP-2557/3-RST-5000 Forms-09-17.2018/P4(Z)/F/PHC Jos/Form A&B Ser. Tribunal "A" KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. No. No. TR Swat Fazal Ali **Apellant/Petitioner** Versus Through Sery (EBSE) Postaine, **RESPONDENT(S)** Notice to Appellant/Petitioner Fazed Ali slo M Zahir Shah - R/O Kaho Bishbam DISH Savat Chowkidar GPS Kaho Bishbam Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on at at A.M.

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.

11A camp Court Quat

Khyber Pakhtunkhwa Service Tribunal, Peshawar.