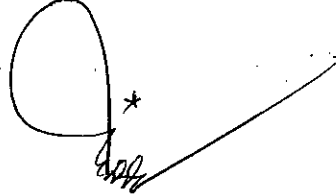


08.09.2022

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

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

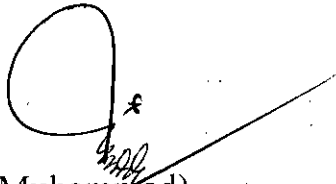


(Salah-Ud-Din)
Member (J)
Camp Court Swat

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.



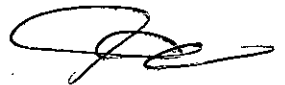
(Fareeha Paul)
Member(E)
Camp Court, Swat



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

3.8.22

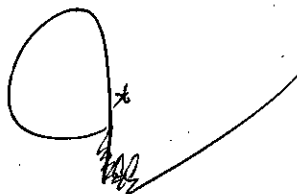
*due to seasonal vacation the case
is adjourned to 8.9.22 for the same.*



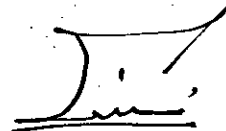
10.05.2022

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

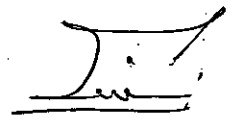
06.04.2022

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

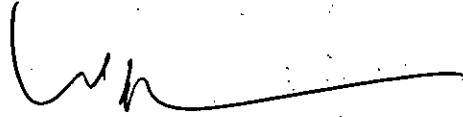


(Salah-Ud-Din)
Member (J)
Camp Court Swat

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)
Member (E)
Camp Court, Swat



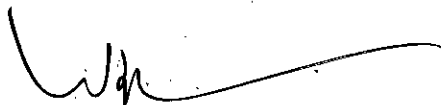
(Rozina Rehman)
Member (J)
Camp Court, Swat

08.10.2021

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.



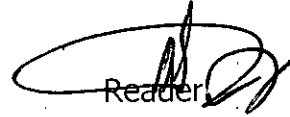
(Atiq-Ur-Rehman Wazir)
Member (E)
Camp Court, Swat



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

06.01.2021

Due to COVID 19, the case is adjourned to
03.03.2021 for the same as before.



Reader

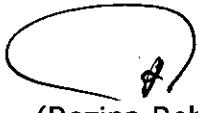
03.03.2021

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 7/6/2021 before D.B at Camp
Court, Swat.


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


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

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


Reader

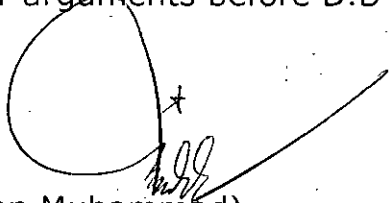
_____ .2020

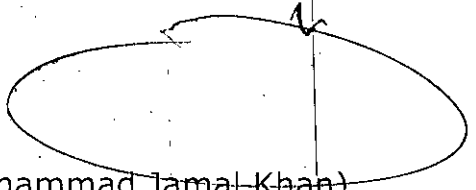
Due to COVID19, the case is adjourned to
05/10/2020 for the same as before.

Reader 

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

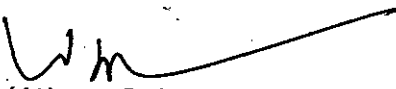

(Muhammad Jamal Khan)
Member (Judicial)
Camp Court Swat

04.11.2020

Appellant in person present.

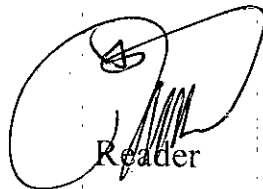
Muhammad Jan learned Deputy District Attorney for respondents present.

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.



Reader


04.12.2019

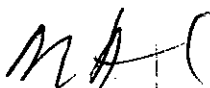
Appellant in person present. Mr. Riaz Paindakheil learned Assistant Advocate General alongwith representative Hussain Ali Litigation Officer present. Representative of respondent department submitted written reply/comments: To come up for rejoinder if any and arguments on 06.01.2020 before D.B at Camp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


Member
Camp 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


Member
at Camp Court Swat

Due to corona virus court
to camp court Swat
has been cancelled. To come up for
the same on 07/06/20

Reader


02.09.2019

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.

Appellate Deposited
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 time 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 _____

Case No. 326/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/03/2019	<p>The appeal of Mr. Fazal Ali presented today by Mr. Jehangir Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	13-3-19	<p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put up there on <u>05-04-2019</u></p> <p> CHAIRMAN</p>





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 7/06/2021 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

Appeal No. 326/2018

Fazal Ali.....Appellant

Versus

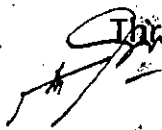
Government of KP and others.....Respondents.

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.	A	9
5	Copy of Dismissal Order, Copy of Appeal, Copy order dated 22-2-2019	B	10-14
6	Copy of Letter dated 3/12/2018 and Letter Dated 12/01/2019	C	15-16
7	Wakalat Nama		17

Appellant,

Through



JEHANGIR

ADVOCATE, High Court.

1-3-19.

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

Cell #. 0343-2187908

Dated: 01-03-2019

①

Before The Service Tribunal K.P at Peshawar

Fazal Ali S/o Muhammad Zahir Shah; R/o Kaho, Bishbanr,
District Swat/ (Chawkidar G.P.S Kaho, Bishbanr District
Swat.Appellant

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.

.....Respondents

APPEAL UNDER SECTION 4 OF K.P SERVICE
TRIBUNAL ACT 1974 AGAINST THE ORDERS
DATED 26-01-2010 OF RESPONDENT NO.3 &
ORDER DATED 22-02-2019 OF RESPONDENT
NO.2.

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 enmity 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.

Grounds:-

- i) 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.
- ii) 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.
- iv) That the appellant has unblemished services record & no adverse remarks are there against the appellant.
- v) That the appellant has been condemned unheard & no opportunity of defense & personal hearing was provided to the appellant.
- vi) 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.

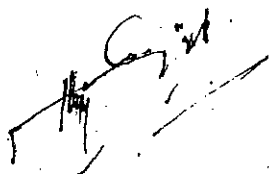
- viii) *That no right of defense and personal hearing has been awarded by the respondents to the appellant.*
- ix) *That the punishment awarded by the respondents to the appellant is very harsh, the appellant being sole earner and supporter of his family, belong to very poor family and no other source 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 than 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 Fazal 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:

Fazal Ali
FAZAL ALI



8

Before The Service Tribunal K.P at Peshawar

Fazal Ali.....Appellant

Versus

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

ADDRESSES OF THE PARTIES

Address of Appellant:

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

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


JEHANGIR

Advocate, High Court

10
⑨

Annex A

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.

[Handwritten Signature]

Maj/DD
General Staff Officer-II
(ISI Sub Sector HQ Swat)



Station: Manglore (Swat)
Date: 20 October 2018

C.T.C
[Handwritten Signature]
Zahangir Adnan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY

17 ER SWAT
Anex B
10

OFFICE ORDER

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 hereby 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.

S.No	No in the list	Name of Official	Post	BPS	Place of Duty
1	82	Muhammad Ghafoor s/o Nadar Khan	N/Q	1	GHSS; Mankyal
2	84	Sarfraz Khan S/o Muhammad Khan	W/M	1	GMS: Shakardara
3	106	Anwar Shah S/o Mian Syed Jan	Chw	1	GPS: Malalay
4	107	Fazal ur Rahman S/o Gulambar.	N/Q	1	GMS: Dakorak
5	111	Fazal Ali s/o Muhammad Zahir Shah r/o Kahe Yakhtany PS Mingora	C-IV	1	GPS: Kaho Bishbanr
6	112	Fazal Mabood S/o Abdul Wahid r/o Besbanr	C-IV	1	GMS: Beshbanr
7	115	Moambet r/ Damghar	C-IV	1	GPS: Damghar
8	123	Saran Zeb S/o Samandar R/o Kalagay Madian	C-IV	1	GPS: Kalagay
9	129	Amir Siab S/o Muhtaj R/o Mohallah Amir Khan Nawakaty Mingora	Swe:	2	DDO {M} Swat
10		Ali Rahman	PST	2	GPS: Pir Patay
11	98	Inam s/o Gul Bacha r/o Arkot	PST	9	GPS: Nela gram
12	104	Anwar Zarin S/o Zowan Faqir r/o Doghlai	PST	9	GPS: Doghal
13	116	Gulab s/o Momen r/o Chekrai Fatchpur	PST	9	GPS: Baben
14	155	Sher Zada S/O Sher Muhammad r/o Chekrai	PST	9	GPS: Babin

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT

C.T.C
J. G. in
Behangin
Arwate

11/15/09

11-~~8~~ #

Copy of the above is forwarded to:-

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.
7. All Concerned.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT

C.T.C
Jehangir
Amoari

بخصوص جناب ڈائریکٹر ایجوکیشن صوبہ خیبر پختونخواہ بمقام پشاور۔

درخواست بحالی ملازمت میں مراد کہ سائل مسی فضل علی ولد محمد ظاہر شاہ جو کہ گورنمنٹ پرائمری سکول
پیشہز کہو میں بحیثیت کلاس فور ملازم تھا کو دوران آرمی اپریشن راہ راست / کشیدہ حالات سال 2009 میں
آرمی / سیکورٹی فورسز نے گرفتار کیا تھا اور اب من سائل کو مورخہ 22/02/2018 کو پاک آرمی /
سیکورٹی فورسز نے وائٹ قرار دیکر بری / Release کیا ہے لہذا من سائل کے حسب سابق جملہ
مراعات واستفادہ جات ملازمت متذکرہ بر بحال کرنے کا حکم صادر فرمایا جائے۔

جناب عالی!

ایپیلانٹ ذیل عرض رساں ہے۔
یہ کہ ایپیلانٹ دیہہ پیشہز کہو منگور تحصیل بابوزی ضلع سوات کا مستقل رہائشی
باشندہ ہے اور فضل علی ولد محمد ظاہر شاہ جو کہ گورنمنٹ پرائمری سکول پیشہز
کہو میں بحیثیت کلاس فور ملازم تھا اور ملازمت کی ماہوار تنخواہ ہی سے اپنے
اہل و عیال کی کفالت کرتا تھا۔

DACA
22/02/2018

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 رہا بدین وجہ سائل کو افسران بالانے ملازمت سے برخاست
کیا۔ جبکہ سائل نے جنوری 2010 تک باقاعدہ ماہوار تنخواہ وصول کی ہے۔

یہ کہ بعد ازاں من سائل کو مورخہ 22/02/2018 کو پاک آرمی / سیکورٹی
فورسز نے وائٹ قرار دیکر بری / Release کیا ہے۔ اور اب من سائل
پر کسی بھی قسم کے کوئی سول یا فوجداری مقدمات نہ ہے۔ سائل / ملزم کو غلط فہمی
کی بنیاد پر متعلقہ سیکورٹی فورسز نے گرفتار کیا تھا جس میں اب سائل بے گناہ

48
12-12-18

جاری صفحہ (۲)

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قرار پایا ہوں اسلئے من من سائل کو حسب سابق جملہ مراعات و استفادہ جات ملازمت متذکرہ پر بحال کرنا قرین قانون و انصاف ہے۔

۴۔ یہ کہ سائل / اپیلانٹ کے ضعیف العمر اور بیمار والدہ، بیوی اور پانچ بچوں کی کفالت صرف اور صرف اپنی تنخواہ ہی سے کرتا تھا۔ اور دیگر کوئی بھی ذریعہ معاش نہ ہے۔ صرف اور صرف تنخواہ ہی سے من سائل اپنے بچوں و اہل خانہ کا پیٹ پالتا ہوں۔ سائل کو اپنے ذریعہ معاش سے خلاف انصاف محروم کیا گیا ہے۔ بدیں وجہ برخواستگی حکم معترضہ قابل منسوخی قرار دیا کر من سائل کو بحال کرنا قرین قانون و انصاف ہے۔

لہذا استدعا ہے کہ سائل / اپیلانٹ کو تاریخ برخواستگی سے جملہ مراعات سرکاری کے ساتھ نوکری پر بحال فرمایا جائے۔ تو سائل / اپیلانٹ اور سائل / اپیلانٹ کے ضعیف العمر والدہ اور چھوٹے چھوٹے بچے آپ صاحبان کے لئے تادم حیات دعاگو رہینگے۔

Fazal عریض

سائل / اپیلانٹ، فضل علی ولد محمد ظاہر شاہ ساکن پیشینہ کہو ضلع سوات
گورنمنٹ پرائمری سکول پیشینہ کہو

الرقوم: 11/12/2018

C.T.C
Jehangir
Advocate

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar

14

NOTIFICATION.

WHEREAS, on finality of disciplinary proceedings under Khyber Pakhtunkhwa E&D Rules-2011 major penalty of removal from service was imposed upon Mr. Fazal Ali, Ex-Chowkidar GPS Kaho 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. 51/17-520 /F.No. 45/A-20/C-IV/Swat-8 Dated Peshawar the 22/12/2019.

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

- 1- District Education Officer (Male) Swat w/r to his letter No. cited above.
- 2- District Accounts Officer Swat.
- 3- Appellant concerned.
- 4- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.


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

Handwritten notes and date:
27/12/2019

Handwritten notes:
C.T.C
Jehangir Advocate

Most Urgent
Reminder-1st

Anexo C

15

Directorate of Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.
No. 312 / F.No. 451/A-20/C-IV/Swat-8
Dated Peshawar the 11/12/2018.

To

The District Education Officer
(Male) Swat

Subject: REINSTATEMENT.

Memo:

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.

12/12/2018
Assistant Director (Admin)
Directorate of E&SE K.P, Peshawar
E/c

Endst; No. _____ /

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

12/12/2018
Assistant Director (Admin)
Directorate of E&SE K.P, Peshawar
E/c

C.T.C
Jehangir
Abdullah



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

16

No. 11250 /P/File/C-IV Dated 12/11/2018

To,

The Director Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject:- Re-instatement.

Memo:-

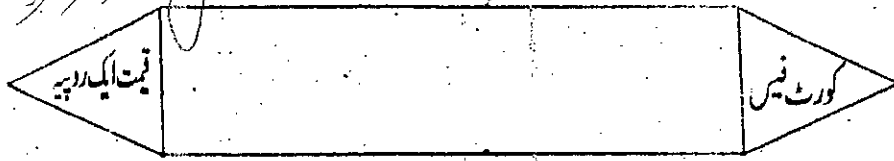
Reference your No. 1182/F.No.45/A-20/C-IV/Swat-8 dated Peshawar the 03-12-2018 and reminder No. 4363/F.No.45/A-20/C-IV/Swat-8 dated Peshawar the 14-12-2018 on the subject cited above.

In continuation to this office No. 4611P/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 on 15-01-2010 after the critical situation in District Swat as per Notification of Chief Sectary Vide No. SOR-I (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 removed 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) moreover the official concerned arrested by Pak Army on February 2010 (Photo Copy attached) which is submitted for your kind perusal and further necessary action please.

DISTRICT EDUCATION OFFICER (M)
SWAT

C. M. G. J.
Tej Singh
Advocate

بعد الت جہات چیسرین سرورس شرک ایٹوٹو چیسرین چیسرین



مورثہ ۱ مارچ ۱۹۱۹ء منجانب ایڈوائس
 مقدمہ فصل علی بنام کورٹ فیس اور غلطیوں اور غلطیوں
 دعویٰ سرورس ایٹوٹو
 جرم باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی

متعلقہ آن مقام ^{کے لئے} سہولت سے سید صاحب گنڈیر ٹریڈنگ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زدا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ وہر جائے التو ایے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا اوکالت نامہ لکھ دیا کہ سند ہے

تقرری ایڈوائس

واہ شہادہ العباد

Accepted

کے لئے منظور ہے
 Jehangir Advani
 Dist BARR Sual
 0343-2187908

بمقام

**BEFORE THE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL AT CAMP COURT
SWAT.**

Service Appeal No. 326/2019

Fazal Ali Chawkidar Government Primary School Kaho, Bishnanr, 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.
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

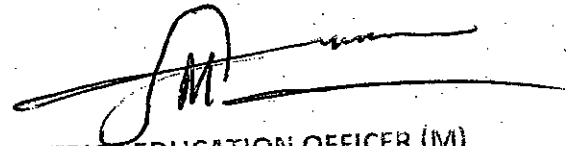
- i. That Para No. i is baseless because the respondents issued legal orders which comes under the jurisdiction of the concerned authorities.
- ii. That the Para No. ii is incorrect because the order had been issued under the legal procedure by respondents.
- iii. That Para No. iii is incorrect because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

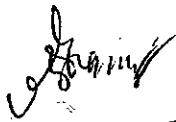
It is, therefore, very humbly prayed that the instant service appeal of the appellant may be dismissed with cost in favor of the respondents.



HEAD MASTER
GPS KAHO, DISTRICT SWAT



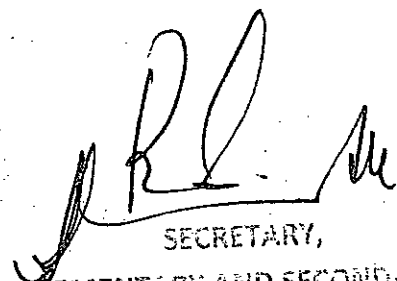
DISTRICT EDUCATION OFFICER (M)
SWAT AT GULKADA



SUB DIVISIONAL EDUCATION OFFICER (M)
BABUZAI SWAT



DIRECTOR,
ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA



SECRETARY,
ELEMENTARY AND SECONDARY
EDUCATION PESHAWAR

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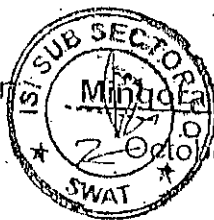
Annex A

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.

[Handwritten Signature]

Maj/DD
General Staff Officer-II
(ISI Sub Sector HQ Swat)



Station: Manglore (Swat)

Date: 20 October 2018

C.T.C

[Handwritten Signature]

Sehanshi Adnan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY

17 ER SWAT, 10
Anexo B

OFFICE ORDER

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 hereby 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.

S.No	No in the list	Name of Official	Post	BPS	Place of Duty
1	82	Muhammad Ghafoor s/o Nadar Khan	N/Q	1	GHSS; Mankyal
2	84	Sarfaraz Khan S/o Muhammad Khan	W/M	1	GMS: Shakardara
3	106	Anwar Shah S/o Mian Syed Jan	Chw	1	GPS: Malalay
4	107	Fazal ur Rahman S/o Gulambar.	N/Q	1	GMS: Dakorak
5	111	Fazal Ali s/o Muhammad Zabir Shah r/o Kahe Yakhtany PS Mingora	C-IV	1	GPS: Kaho Bishbanr
6	112	Fazal Mahood S/o Abdul Wahid r/o Besbanr	C-IV	1	GMS: Beslibanr
7	113	Moamber r/ Damghar	C-IV	1	GPS: Damghar
8	123	Saran Zeb S/o Samandar R/o Kalagay Madian	C-IV	1	GPS: Kalagay
9	129	Amir Siab S/o Muhtaj R/o Mohillah Amir Khan Nawakaly Mingora	Swe.	2	DDO {M} Swat
10		Ali Rahman	PST	2	GPS: Pir Patay
11	98	Inam s/o Gul Bacha r/o Arkol	PST	9	GPS: Nela gram
12	104	Anwar Zamin S/o Zowan Faqir r/o Doghlai	PST	9	GPS: Doghal
13	116	Gulab s/o Momen r/o Chekrai Fatchpur	PST	9	GPS: Baben
14	155	Sher Zada S/O Sher Muhaminad r/o Chekrai	PST	9	GPS: Babin

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION SWAT

C.T. C. [Signature]
[Signature]
[Signature]

015 016

پہلا میں کوئی جگہ نہیں ڈی پی او

پہلا میں کوئی جگہ نہیں ڈی پی او... انیسویں دن ہمارے ہاؤس میں تازہ ہوا... انیسویں دن ہمارے ہاؤس میں تازہ ہوا... انیسویں دن ہمارے ہاؤس میں تازہ ہوا...

دو دو جوانان سید و شریف کے صدر منتخب

دو دو جوانان سید و شریف کے صدر منتخب... سید و شریف کے صدر منتخب... سید و شریف کے صدر منتخب...

کراچی میں سید و شریف کے صدر منتخب

کراچی میں سید و شریف کے صدر منتخب... سید و شریف کے صدر منتخب... سید و شریف کے صدر منتخب...

ان کرکٹ ٹورنامنٹ سیر ڈیپری ایلیون

ان کرکٹ ٹورنامنٹ سیر ڈیپری ایلیون... سیر ڈیپری ایلیون... سیر ڈیپری ایلیون...



پروفیسر کفو ظہان کی تقابلی خدمات یاد رکھی جائیں گی

پروفیسر کفو ظہان کی تقابلی خدمات یاد رکھی جائیں گی

پروفیسر کفو ظہان کی تقابلی خدمات یاد رکھی جائیں گی... کفو ظہان کی تقابلی خدمات یاد رکھی جائیں گی... کفو ظہان کی تقابلی خدمات یاد رکھی جائیں گی...

ذیہ اسماعیل جان (شرقی)

ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی... ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی... ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی...

بجوال محکمہ ایڈیٹر ایچ ایچ بی بی سی کی خدمات یاد رکھی جائیں گی

بجوال محکمہ ایڈیٹر ایچ ایچ بی بی سی کی خدمات یاد رکھی جائیں گی... ایچ ایچ بی بی سی کی خدمات یاد رکھی جائیں گی... ایچ ایچ بی بی سی کی خدمات یاد رکھی جائیں گی...

روزنامہ 'شرق' پشاور مورخہ 9/01/2010ء کی خدمات یاد رکھی جائیں گی

روزنامہ 'شرق' پشاور مورخہ 9/01/2010ء کی خدمات یاد رکھی جائیں گی... 'شرق' کی خدمات یاد رکھی جائیں گی... 'شرق' کی خدمات یاد رکھی جائیں گی...

پہلا میں کوئی جگہ نہیں ڈی پی او

پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او...

نمبر	مطابق آسانی	نمایاں	تعداد	Ex	تعداد	نمایاں	تعداد
1	سورجیہ	7	1	45	1	45	1
2	سورجیہ	5	2	10	2	10	2
3	سورجیہ	4	5	15	5	15	5
4	سورجیہ	1	16	16	16	16	16
5	سورجیہ	1	19	19	19	19	19
6	سورجیہ	1	23	23	23	23	23
7	سورجیہ	1	77	77	77	77	77

ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی... ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی... ذیہ اسماعیل جان (شرقی) کی خدمات یاد رکھی جائیں گی...

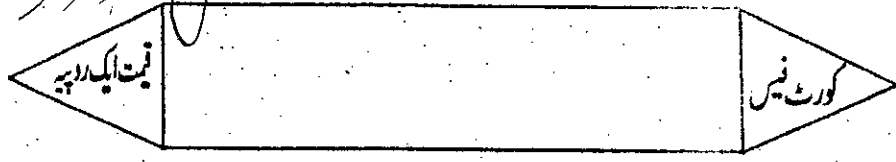
پہلا میں کوئی جگہ نہیں ڈی پی او

پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او...

پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او...

پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او... پہلا میں کوئی جگہ نہیں ڈی پی او...

بعدالت جناب جسٹس سرورس شراک الہوی صاحب محترم کو



موزنہ ۱ مارچ ۲۰۱۹ منجانب اسپلائٹ
 مقدمہ فضل علی بنام گورنمنٹ آف صیغہ پختہ خواہ وغیرہ
 دعویٰ سرورس اپیل
 جرم باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی

متعلقہ آن مقام ^{مکمل} سوات سید صاحب گنڈی ریزروٹ کو وکیل

مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل

اختیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب

دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔

نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل

یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔

اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ

برداشتہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوا یہ مقدمہ کے

سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے

وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل

صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا یک سند ہے

۲۰۱۹

ماہ مارچ

المرقوم

فضل علی اسپلائٹ

Accepted

Accepted

کے لئے منظور ہے

Jehangir Advocate
 Dilli BAR Seal
 0343-2187908

بمقام

"B"

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

No.

TB

Appeal No. 326 of 2019

Fazal Ali Appellant/Petitioner

Versus

Through Secy. Edu. Respondent
Respondent No. 3

Notice to:

Distt. Education Officer Elai Secy
Education Gulbada Saidi Sharif Sweet

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 11-6-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 11/6

Day of April 2019

at Camp Court Sweet

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TB

Appeal No. 326 of 20 19

Fazal Ali Appellant/Petitioner

Versus

Through Secy. Edu. 19 Pk Peshi Respondent

Respondent No. 4

Notice to: —

D.D.O of Ele 2 Sec: Education Saidur
Sharif Swat

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 11-6-2019 at 8.00 A.M. If you wish to urge anything against the appellants/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 11/6

Day of April 20 19

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No. 713

Appeal No. 326 of 2019

Fazal Bani Appellant/Petitioner

Versus

Through Secy. Ed. KPTK Pesh. Respondent

Respondent No. 5

Notice to: — Head Master G.P.S Kabra
BishBany Swat.

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 11-6-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 11/6/19

Day of April 2019

at Camp Court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

TB

No.

Appeal No. 326 of 2019

Fazal Ali Appellant/Petitioner

Versus

Through Secy. Eds: 12 Pk Pesh. Respondent

Respondent No. 1

Notice to: —

Copy of 12 Pk Through Secy. Eds: Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....11-6-2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....11/12.....

Day of.....April.....20 19

at Camp Court Sweet

17/4

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TB

Appeal No. 326 of 2019

Fozal Ali Appellant/Petitioner

Versus

Through Secy. Edu. Pesh. Respondent

Respondent No. 2

Notice to:

Director Education Dept. of K.P.K.
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 11-6-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 11/6

Day of April 2019

at Camp Court Street

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

TR

Appeal No. 326 of 2019

Fazal Ali Appellant/Petitioner

Versus

Through Secy: Education Pesh. Respondent

Respondent No. 4

Notice to: -

D.D. O of School & Gov. Education
Saidu Sharif Swat

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 2-9-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Day of June 2019

at camp court Swat

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

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

“B”

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

913

No.

Appeal No. 326 of 20 19

Fazal Ali Appellant/Petitioner

Versus

Through Secy. Edu. 14/16 Pesh. Respondent

Respondent No. 5

Notice to:

Head Master G.P.S Kahra
Bishkhar Distt. Swat

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 2-9-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Given under my hand and the seal of this Court, at Peshawar this 14/14

Day of June 2019

at Camp Court Swat



Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

"B"

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

TB

No.

Appeal No. 326 of 2019

Fazal Ali Appellant/Petitioner

VERSUS

Through Secy. Edu. 14 Pk Pesh. Respondent

Respondent No. 1

Govt. of 14 Pk Through Secy. Education
Peshawar

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 2-9-2019 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 11/6

Day of June 2019

at Camp Court Secret

S.P.
2/6

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"B"

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

No.

Appeal No.....326..... of 20 19

Fazal Ali.....Appellant/Petitioner

Versus

Mirza Saad Khan.....K.P.S. Respondent
Respondent No.....2.....

Notice to: - Director Education School Dept. of
K.P.S. Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....2-9-2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Day of.....June.....20 19

at Camp Court Soviet

20/6/2019

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

**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.
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

- 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 "

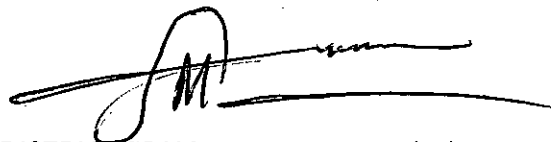
- x. That the Para No. x is incorrect because the action against the appellant was not announced in cursory manner but it was taken after the proper procedure.
- xi. That the Para No. xi is irrelevant to the present respondents, hence no comments. However, according to the statement of the law enforcing agencies the appellant remained in De-radicalization 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 further 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.

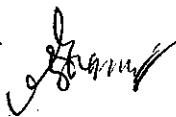


HEAD MASTER

GPS KAHO, DISTRICT SWAT



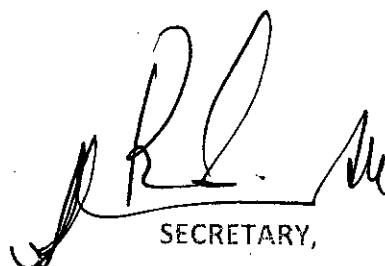
DISTRICT EDUCATION OFFICER (M)
SWAT AT GULKADA



SUB DIVISIONAL EDUCATION OFFICER (M)
BABUZAI SWAT



DIRECTOR,
ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA

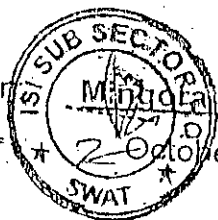


SECRETARY,
ELEMENTARY AND SECONDARY
EDUCATION PESHAWAR

Annex A
Anex A

TO WHOM IT MAY CONCERN

It is stated that Mr Fazal Ali s/o Muhammad Zahir Shah r/o Beshbanr P/O Maglore 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: Maghola (Swat)
Date: 20 October 2018

[Signature]
Maj/DD
General Staff Officer-II
(ISI Sub Sector HQ Swat)

C.T.C
[Signature]
Sahangia Advocate

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY

17/ Anned B
ER SWAT, (10)
Anex B

OFFICE ORDER

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 hereby 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.

S.No	No in the list	Name of Official	Post	BPS	Place of Duty
1	82	Muhammad Ghafoor s/o Nadar Khan	N/Q	1	GHSS; Mankyal
2	84	Sarfaraz Khan S/o Muhammad Khan	W/M	1	GMS: Shakardara
3	106	Anwar Shah S/o Mian Syed Jan	Chw	1	GPS: Malalay
4	107	Fazal ur Rahman S/o Gulamgar	N/Q	1	GMS: Dakorak
5	111	Fazal Ali s/o Muhammad Zahir Shah r/o Kahe Yakhtany PS Mingora	C-IV	1	GPS: Kaho Bishbanr
6	112	Fazal Mabood S/o Abdul Wahid r/o Besbanr	C-IV	1	GMS: Besbanr
7	115	Moamber r/ Damghar	C-IV	1	GPS: Damghar
8	123	Saran Zeb S/o Samandar R/o Kalagay Madian	C-IV	1	GPS: Kalagay
9	129	Amir Siab S/o Muhtaj R/o Mohiullah Amir Khan Nawakaly Mingora	Swe:	2	DDO (M) Swat
10		Ali Bahman	PST	2	GPS: Pir Patay
11	98	Inam s/o Gul Bacha r/o Arkot	PST	9	GPS: Nela gram
12	104	Anwar Zamin S/o Zowan Faqir r/o Doghlai	PST	9	GPS: Doghal
13	116	Gulab s/o Momen r/o Chekrai Fatchpur	PST	9	GPS: Baben
14	155	Sher Zada S/O Sher Muhammad r/o Chekrai	PST	9	GPS: Babin

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
- EDUCATION SWAT

C.T.C
J. G.
Sahangin
Advocate

115 016

"A"

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

No.

326

APPEAL No. of 20

Fazal Ali

Appellant/Petitioner

Versus

Through Secy: (ESSE)

RESPONDENT(S)

counsel
Notice to Appellant/Petitioner *Jehangir K (Advocate)*
Office Allah-o-Akbar Plaza Saidu Sharif
- Makaan Bagh Mingora Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication/affidavit/counter affidavit/record/documents/order before this Tribunal on *7-6-22* at *8:00 AM*

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

at camp court Swat

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. *Razq*

TB Swat

APPEAL No. *326* of 20*18*.

Fazal Ali

Appellant/Petitioner

Versus

Through Secy. (CEBSE) Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Fazal Ali s/o M Zahir Shah

R/o Kahro Bishbarr DIST Swat

Chowkidar G PS Kahro Bishbarr Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *7-6-22* at *8:30 AM*.

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

*WT camp court
Swat*

[Signature]

[Signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.