

03.10.2022

Nemo for the petitioner. Mr. Muhammad Jan, District Attorney for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the petition be issued to the petitioner as well as his counsel through registered post and to come up for arguments on restoration application on 08.11.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (Judicial)  
Camp Court Swat



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

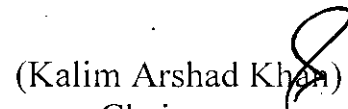
8<sup>th</sup> June, 2022

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.

Junior to counsel for the appellant present.

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

Former made a request for adjournment as senior  
counsel is busy before Peshawar High Court Peshawar.  
Adjourned. To come up for arguments on 05.08.2022 before  
D.B at Camp Court, Swat.



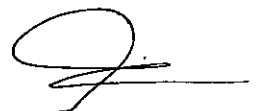
(Fareeha Paul)  
Member(E)  
Camp Court, Swat



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

5.8.22

*due to summer vacation the case  
is adjourned to 3.10.22 for the same*



10.02.2022

Tour is hereby canceled .Therefore, the case is adjourned to 07.04.2022 for the same as before at Camp Court Swat.



Reader

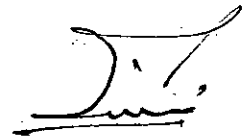
07.04.2022

Nemo for the petitioner. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the petition be issued to the petitioner as well as his counsel through registered post and to come up for arguments on restoration application on 06.06.2022 before the D.B at Camp Court Swat.



(Rozina Rehman)  
Member (J)  
Camp Court Swat



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

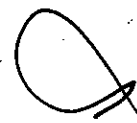
06.06.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

On the call of Khyber Pakhtunkhwa Bar Council, District Bar Association is observing strike today, therefore, learned counsel for the appellant did not appear before the court. Adjourned. To come up for arguments on 08.06.2022 before the D.B at camp court Swat. .



(Mian Muhammad)  
Member(E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

07.10.2021

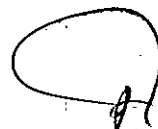
Appellant present through representative.

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 09.12.2021 at Camp Court, Swat.



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



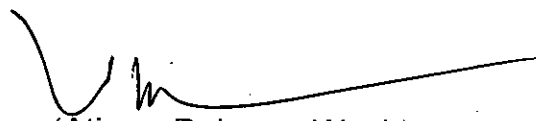
(Rozina Rehman)  
Member (J)  
Camp Court, Swat

09.12.2021

Junior to counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney for respondents present.

Request for adjournment was made on behalf of appellant as senior counsel for appellant is not available today; granted. To come up for arguments on 10.02.2022 before D.B at Camp Court, Swat.



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



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

6.01.2021

Due to COVID 19, the case is adjourned to 3.03.2021 for the same as before.

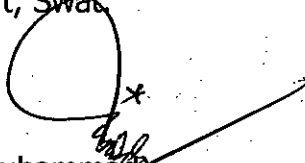
  
Reader


03.03.2021

Appellant present through counsel.

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

Former made a request for adjournment; granted. To come up for arguments on 07/6/2021 before D.B at Camp Court, Swat.

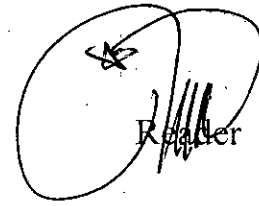
  
(Mian Muhammad)  
Member (E)  
Camp Court, Swat

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

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

  
Reader

03.06.2020 Due to COVID-19, the case is adjourned. To come up for the same on 06.08.2020, at camp court Swat.



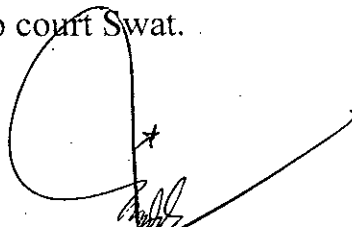
Reader

06.10.2020


Appellant is present in person. Mr. Usman Ghani, District Attorney alongwith Mr. Obaid Ur Rehman, ADEO for respondents present.

Arguments could not be heard due to strike of the District Bar Association, Swat.

Adjourned to 04.11.2020 for arguments before D.B at camp court Swat.



(Mian Muhammad)  
Member(E)



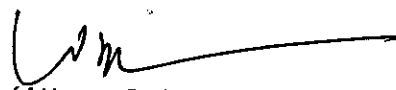
(Muhammad Jamal Khan)  
Member  
Camp Court Swat

04.11.2020


Appellant in person present.

Learned Assistant Advocate General 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

09.01.2020

Due to general strike of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Adjourned to 05.03.2019 for arguments on restoration application before S.B at Camp Court Swat.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Swat


~~05.03.2020~~

~~Nemo for the petitioner. Adjourned for 08.04.2020  
before B at Camp Court, Swat.~~


~~Member  
Camp Court, Swat.~~

05.03.2020

Nemo for the petitioner. Adjourned for 08.04.2020 before D.B. Petitioner and his counsel be put to notice for the date fixed before D.B at Camp Court, Swat.

  
Member  
Camp Court, Swat.



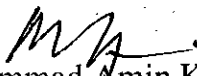
Due to corona virus tour to camp court swat has been cancelled. To come up for the same on 03.06.20

  
Reader

Form-A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Appeal's Restoration Application No. 354/2019

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	23.09.2019	<p>The application for restoration of appeal No. 1171/2013 submitted by Mr. Gulzarullah Advocate, may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p>This restoration application is entrusted to touring S. Bench at Swat to be put up there on <u>05-11-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
05.11.2019		<p>Counsel for the petitioner and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Case to come up for replication and arguments on restoration application on 09.01.2020 before S.B at Camp Court Swat.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court Swat</p>



**BEFORE THE KHYBER PAKHTUNKHA SERVICES TRIBUNAL,**  
**PESHAWAR**

Appeal No:- \_\_\_\_\_ Dated \_\_\_\_\_

Mr. Muhammad Tawab, SET

GMS Fazal banda Tehsil matta swat.

*Restoration Application*

*NO-354/2018*  
Education Department

**INDEX**

S.No	Documents	Annexure	Page No.
1	Memo of Appeal	.....	01-02
2	Copy of order (04-12-2018)	A	03-04
3	Copies of Doctor prescriptions	B	05-10
4	Application for Condonation of Delay	C	11
5	Copy of Vakalat Nama	D	12



Appellant/petitioner

Muhammad Tawab Khan Head master

GHS Sinpora Matta Swat

Ex SSTGMS Fazal Banda Matta Swat

(Through Gulzarullah Adocate)

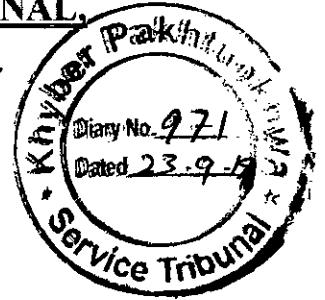
**BEFORE THE KHYBER PAKHTUNKHA SERVICES TRIBUNAL,**

*Restoration* **PESHAWAR**  
Appeal No:- *Application* Dated *NO-354/19*

Mr. Muhammad Tawab, SET

Appellant

GMS Fazal banda tehsil matta swat.



VS

- 1) The chief secretary Khyber Pakhtunkhwa civil secretariat Peshawar.
- 2) Seretary (E & Se Education ) Khyber Pakhtunkhwa civil secretariat Peshawar.
- 3) Director (E & Se Education ) Peshawar. Respondants
- 4) The DEO (M) (E & Se Education ) District Swat.

**APPLICATION FOR RESTORATION OF APPEAL NO# 1171 DATED 2013**

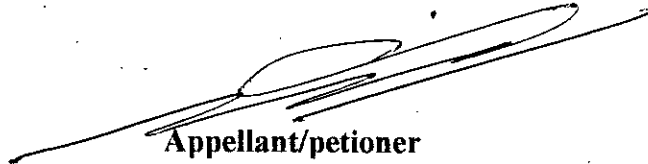
Respected sheweth,

- 1) That the appellant filed an appeal in the honorable Court under section 4 of Khyber Pakhtunkhwa Services Tribunal Act, 1974.
- 2) That the aforementioned case was fixed for arguments on 03-10-2018. But the date changed and the case was fixed for arguments on 05-11-2018.
- 3) That on 05-11-2018 due to the retirement of the Honorable Chairman, services tribunal was is incomplete and tour to camp court swat had been canceled and 03-12-2018 was fixed by reader of the court.
- 4) The appellant on dated 28-11-2018 attended the office of District and session judge Swat in order to find out that what information has been provided for the next camp court but no response was given.
- 5) That no summon was issued to the appellant for the date fixed.
- 6) That on 03-12-2018 the appellant was absent and case was adjourned for argument i-e on 04-12-2018 at DB camp court swat.
- 7) That when the appellant was absent on 03-12-2018 the honorable court should have to informe the appellant through summon but the appellant has not been informed accordingly and thus the absence of the appellant/petitioner was beyond his jurisdiction.
- 8) That on 04-12-2018 the appeal was dismissed in default and the appellant was in hope that summon will be issued to him for proceeding in the case but no summon was issued in this regard.
- 9) That the appellant is the chronic patient of mental deaseases i-e hepolar disorder, mood disorder and dipression the appellant is the regular patient of Dr, Muhammmad ayub psychiatrist the appellant has been unsensible for a long period of time and that is the reason that delay was exercised for the restoration of appeal N0#1170 dated 2013.for validity and realibilty the prescription of the doctor are here by attached.
- 10) The pationer has regularly attended the august court from the very begning that is 2013 to 05-11-2018.

②

- 11) that the appellant/ petitioner was stunned that no summon was issued and inquired for the date at Peshawar and came to know that the case has been dismissed in default.
- 12) That the petitioner/appellant will be suffered if the case is not restored.

It is humbly prayed that the case may kindly be restored in the interest of justice.



Appellant/petitioner  
Muhammad Tawab Khan Head master  
GHS Sinpora Matta Swat  
Ex SSTGMS Fazal Banda Matta Swat



(Through Gulzarullah Adocate)

Annexure A = ~~1~~

(3)

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

Appeal No. 1171 /2013

Mr. Muhammad Tawab, SET,  
Government Middle School, Fazil Banda,  
District Swat.



~~1186~~  
~~216/7/13~~

**APPELLANT**

VERSUS

1. The Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary, Education (E&SE), Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Director of Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer, (E&SE) District Swat.

**RESPONDENTS**

.....

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE PROMOTION ORDER DATED 26.2.2013 WHEREBY MANY JUNIOR HAVE BEEN PROMOTED AS HEAD-MASTER BPS-17 BY IGNORING THE APPELLANT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

.....

~~1186~~  
~~216/7/13~~  
**PRAYER:**

.....

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION AS HEADMASTER BPS-17 FROM THE DATE WHEN THE OTHER OFFICIALS FROM SERIAL NO.193 AND ONWARD PROMOTED VIDE ORDER DATED 26.2.2013 BY CONSIDERING THEIR DATE OF TAKING OVER CHARGE FOR THEIR SENIORITY. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**ATTESTED**

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Appeal No 1171/2013  
Muhammad Tawab vs Govt

4



05.11.2018

Due to retirement of the Hon'ble Chairman Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 03.12.2018 at camp court Swat.

*[Signature]*  
Reader

03.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney present. Adjourn. To come up for arguments tomorrow i.e. on 04.12.2018 before D.B at Camp Court Swat.

*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

04.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney for the respondents present. Case called but no one appeared on behalf of appellant. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.

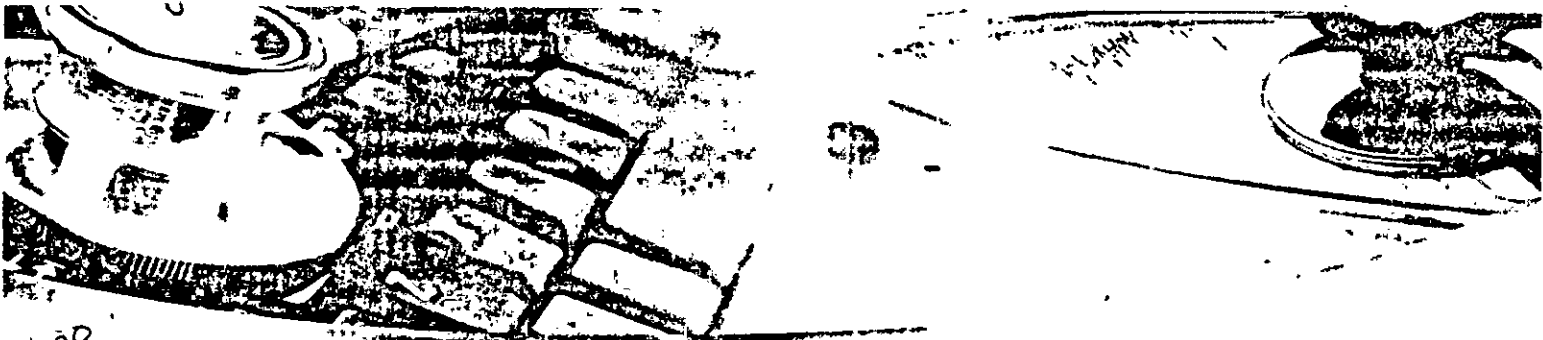
*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

ANNOUNCED  
04.12.2018

Date of Presentation of Application	26-4-18
Number of Volumes	800
Copying Fee	600
Urgent	200
Total	800
Name of Copyist	<i>[Signature]</i>
Date of Completion of Copy	26-4-18
Date of Delivery of Copy	26-4-18

Certified to be true copy  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



40/90  
1. wood oil  
2. kexit  
3. Pami calper  
4. DM.  
RBS - 285 mg/dl

PSYCHIATRIST

# Dr. Mohammad Ayub

MBBS (Pesh) D.P.M UHS Pak) M.S (England)  
Mental Health Care Specialist  
Psychiatrist, Psychotherapist  
3014 Khyber Hospital  
Saidu Sharif Swat  
8. 4. 19

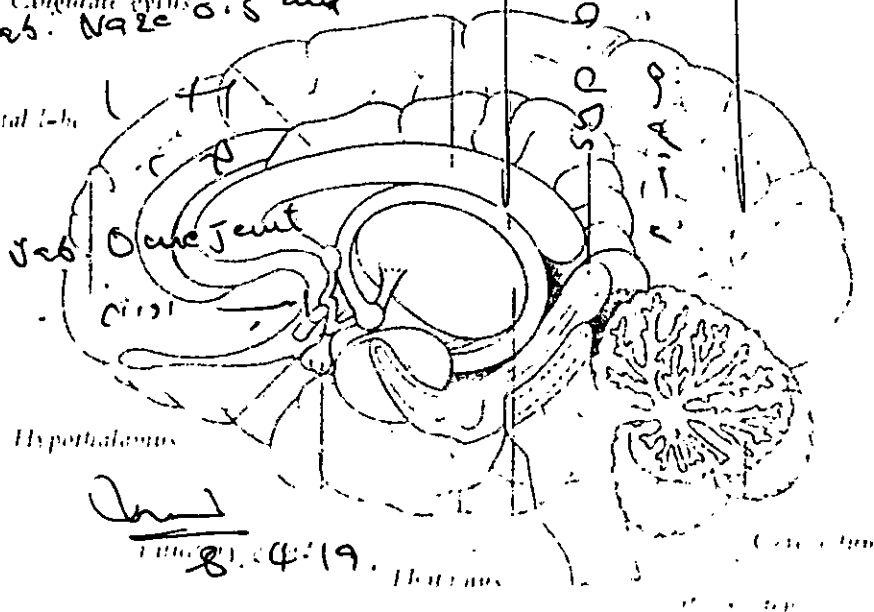
Jawab Khan.

# ڈاکٹر محمد ایوب

ایم بی بی ایس (پشاور)  
ڈی۔ پی۔ ایم (یو ایچ ایس پاک)  
ایم۔ ایس (انگلینڈ)  
ماہر امراض ذہان، نفسیات، جنسیات، منشیات

- R
- 1 - Job. Epival 500mg  
Gr. b. - 1 + 1
- 2 - Job. (7) - PAM 200mg  
Gr. b. - 1 + 1
- 3 - Job. Naze 0.5mg  
Cingulate gyrus
- 4 - Job. Ocul Jent  
Hypothalamus

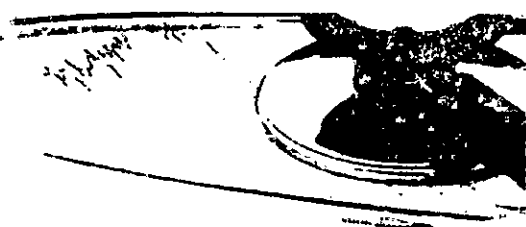
Job. Seroval 10mg.  
Gr. b. - 1 + 1



## خیبر ہسپتال سیدو شریف سوات

ایڈوانس نمبر لینے کیلئے رابطہ کریں۔ ظہور خان: 0335-9181017

E-mail: ayubdr7@yahoo.com



wood dir  
unit.

PSYCHIATRIST  
**Dr. Mohammad Ayub**

MBBS (Pesh) D.P.M UHS Pak M.S (England)  
Mental Health Care Specialist  
Psychiatrist, Psychotherapist

13 Khyber Hospital  
Saidu Sharif Swat

11.8.19.

Jawab kham.

ڈاکٹر محمد ایوب

ایم بی بی ایس (پشاور)

ڈی۔ پی۔ ایم (پشاور) ایس پاکستان

ایم۔ ایس (انگلینڈ)

ماہر امراض: دماغی، نفسیات، جنسیات، نشیات

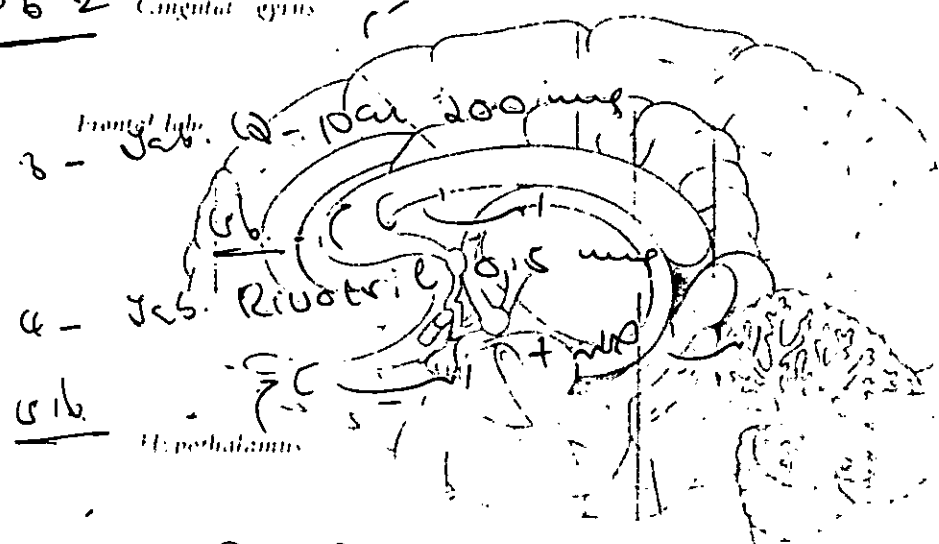
۱۲

1- Tab. Epironal 500 mg

۱۶ - ۱ + ۱

2- Cap. Eucal 200 mg.

۱۶ ۲ Angulae opus



3 - Tab. Par 200 mg

4 - Tab. Rivastigmine 3 mg

۱۶ H. polydammus

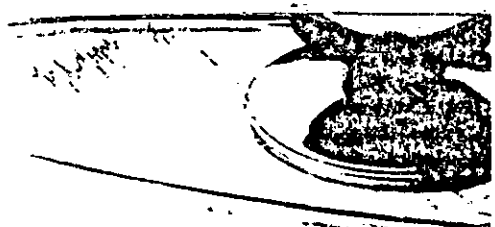
Signature

11.8.19.

خیبر ہسپتال سیدو شریف سوات

ایڈوانس نمبر لینے کیلئے رابطہ کریں۔ ظہور خان: 0335-9181017

E-mail: ayubdr7@yahoo.com



unacad

PSYCHIATRIST  
**Dr. Mohammad Ayub**

MBBS (Pesh) D.P.M UHS Pak) M.S (England)  
Mental Health Care Specialist  
Psychiatrist, Psychotherapist

6 Khyber Hospital  
Saidu Sharif Swat

11. 10. 19.

ایڈوانس  
ڈاکٹر محمد ایوب

ایم بی بی ایس (پشاور)

ڈی پی ایم (ایوانج ایس پاک)

ایم ایس (انگلینڈ)

ماہر امراض ذہانی، نفسیات، جنسیات، منشیات

Abdul Jawad Khan

12  
1- Jab. Epival 500 mg

6 . 1 + 1  
2

2- Jab. EUS-kalam XR  
300 mg.

6 . 1 C . 1

3- Jab. Citide 1 mg

502  
کھانے سے 15 منٹ سے پہلے

4- Jab. Rivotril 150 mg

6 . 1  
77

سید

11. 10. 19.

خیبر ہسپتال سید شریف سوات

ایڈوانس نمبر لینے کیلئے رابطہ کریں۔ ظہور خان: 0335-9181017

E-mail: ayubdr7@yahoo.com





mood ↓  
↓ sleep ↓  
↓ muscle activity

add -  
↓ - Jan PNS

PSYCHIATRIST  
**Dr. Mohammad Ayub**  
MBBS (Pesh) D.P.M UHS Pak) M.S (England)  
Mental Health Care Specialist  
Psychiatrist, Psychotherapist  
Khyber Hospital  
Saidu Sharif Swat  
5.11.18

EP

Abdul Karim

ڈاکٹر محمد ایوب  
(پشاور)  
ای۔ پی۔ ایم (اینگلینڈ)  
ای۔ بی۔ بی۔ ایم (پاکستان)  
ای۔ بی۔ بی۔ ایم (پاکستان)  
ای۔ بی۔ بی۔ ایم (پاکستان)

R

- 1 - Tab. Neurolett SR  
5/6 - 1 + 1
- 2 - Tab. EUS-Kalcium XR  
800 mg  
5/6 - 1 + 1
- 3 - Tab. Ridotril 0.5 mg  
5/6 - 1 + 1

- Tab. Citide 1 mg  
5/6 - 1 + 1
- Cap. ETIPRO 25 mg  
5/6 - 1 + 1
- Tab. AUOVEL 50 mg  
5/6 - 1 + 1

Signature  
5.11.18

# خیبر ہسپتال سید شریف سوات

ایڈوانس نمبر لینے کے لیے رابطہ کریں۔ ظہور خان: 0335-9181017 / 0332-4341772

E-mail: ayubdr7@yahoo.com

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i wit.

PSYCHIATRIST

**Dr. Mohammad Ayub**

MBBS (Pesh) D.P.M UHS Pak M.S (England)

Mental Health Care Specialist

Psychiatrist, Psychotherapist

16 Khyber Hospital

Saidu Sharif Swat

24.10.18

Abdul Jawab.

ڈاکٹر محمد ایوب

ایم بی بی ایس (پشاور)

ڈی۔ پی۔ ایم۔ ایم (یو ایچ ایس پاک)

ایم۔ ایس (انگلینڈ)

ماہر امراض ذہنائی، نفسیات، جنسیات، منشیات

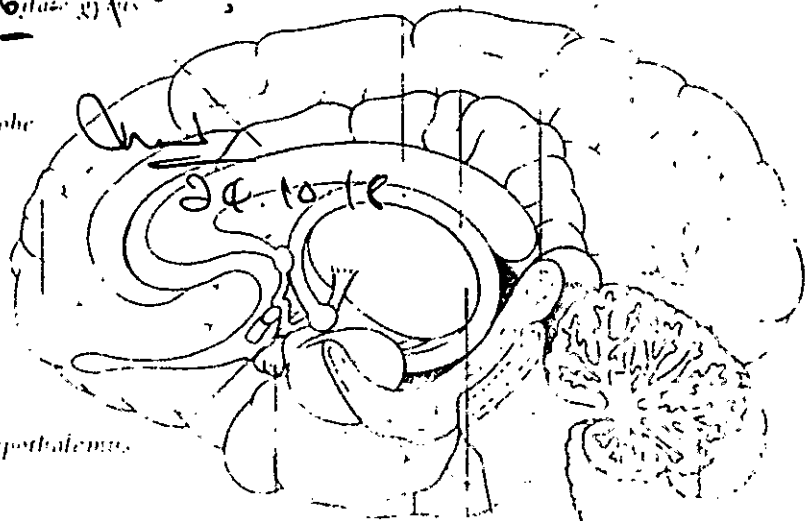
R  
1 - Tab. NeuroLite SR

6 - 1 +  
r

2 - Tab. Quess XR  
150 mg

Subitaz (g) فاسٹ ایب

Frontal lobe



Hypothalamus

Brainstem

Hypothalamus

خیبر ہسپتال سید شریف سوات

ایڈوانس نمبر لینے کیلئے رابطہ کریں۔ ظہور خان: 0335-9181017 / 0332-4341772

E-mail: ayubdr7@yahoo.com

(10)



14095  
www.dr...

PSYCHIATRIST  
**Dr. Mohammad Ayub**

MBBS (Pesh) D.P.M UHS Pak) M.S (England)  
Mental Health Care Specialist  
Psychiatrist, Psychotherapist

3 Khyber Hospital  
Saidu Sharif Swat  
3.. 10.. 18

**ڈاکٹر محمد ایوب**

ایم بی بی ایس (پشاور)  
ڈی۔ پی۔ ایم۔ ایس (انگلینڈ) (پاک)  
ایم۔ ایس (انگلینڈ)

ماہر امراض: دماغی، نفسیات، جنسیات، منشیات

Abdul Jawab

1 - Tab. Epival 500 mg

56 - 1 +

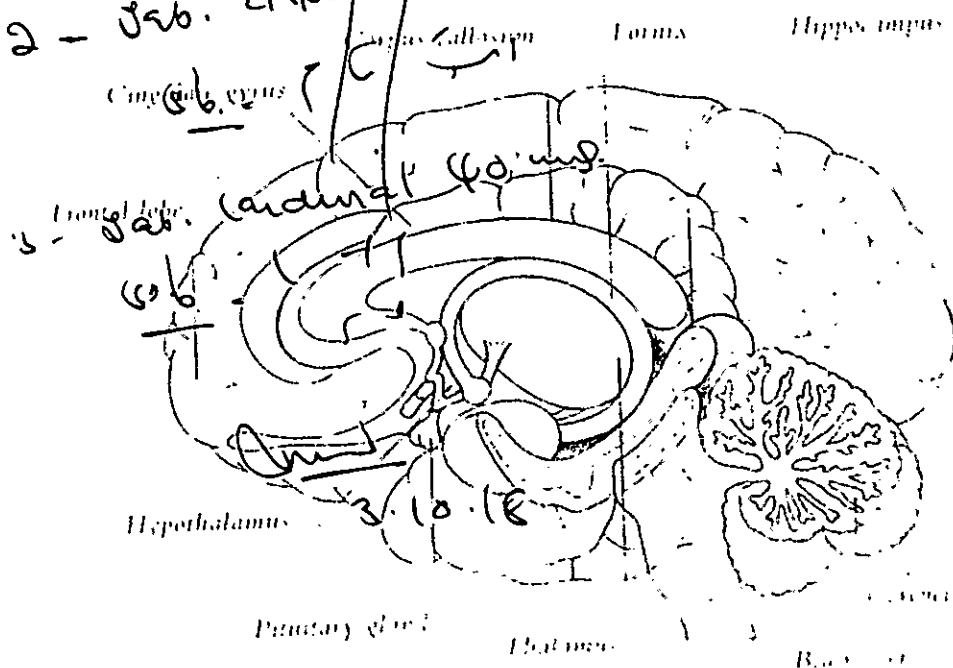
2 - Tab. Zuparel 10 mg

56 - 1 +

3 - Tab. Cardinal 40 mg

56

3.. 10.. 18



**خبر ہسپتال**

ایڈوانس نمبر لینے کیلئے رابطہ کریں۔ فون: 0335-9181017 / 0332-4341772

E-mail: avubdr7@yahoo.com

Annex C

11

**BEFORE THE KHYBER PAKHTUNKHA SERVICES TRIBUNAL,**  
**PESHAWAR**

Mr. Muhammad Tawab Khan, H/M GHS Sinpora Swat  
Ex SST GMS Fazal banda Tehsil Matta Swat.

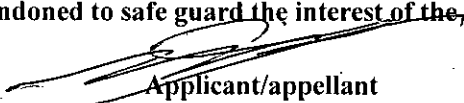
V/S

The chief secretary Khyber Pakhtunkhwa & Others

**APPLICATION FOR CONDONATION OF DELAY**

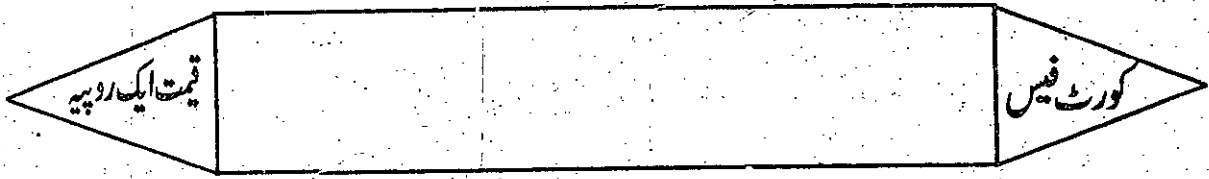
Respected sheweth,

- 1) That the above titled application is being filed in this honorable Court in which no date of hearing has yet been fixed.
- 2) That the applicant/appellant is the chronic patient of mental diseases and has been the patient of psychiatrist.
- 3) That the applicant/appellant has been unsensible for a long period of time.
- 4) That the delay is neither intentional nor deliberate but due to reason mentioned.
- 5) That if the delay occurred is not condoned then the applicant/appellant will suffer an irreparable loss.
- 6) It is, therefore humbly prayed that on acceptance of this application the period of delay may graciously be condoned to safe guard the interest of the applicant/appellant.

  
Applicant/appellant

Muhammad Tawab Khan H/M GHS Sinpora Swat (Ex SET GMS Fazal Banda Swat)

بعدالت جناب خیر بخشوخواہ سروس ٹریڈونل شاور



مورخہ 17 اگست 2013ء، 19 اگست 2013ء، منجانب ایڈیٹنٹ اسٹیل  
مقدمہ ایس آر 1171/2013 محمد قلوب بیام صیف کمرٹی شاور و غیرہ  
دعویٰ

## باعث تحریر آنکے

جرم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام شاور سروس ٹریڈونل خیر بخشوخواہ شاور 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 براختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا یہ مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کر پتے 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 کہ سند رہے

المترجم 17 ماہ 19 اگست، August 2013ء

العبد گواہ شہدہ العبد

مقام شاور  
Attested and accepted  
کے لئے منظور ہے

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR**

Appeal No:- \_\_\_\_\_ Dated \_\_\_\_\_

Mr. Muhammad Tawab, SET

Appellant

GMS Fazal banda tehsil matta swat.

VS

- 1) The chief secretary Khyber Pakhtunkhwa civil secretariat Peshawar.
- 2) Seretary (E & Se Education ) Khyber Pakhtunkhwa civil secretariat Peshawar.
- 3) Director (E & Se Education ) Peshawar. Respondants
- 4) The DEO (M) (E & Se Education ) District Swat.

**APPLICATION FOR RESTORATION OF APPEAL NO# 1171 DATED**  
**2013**


Respected sheweth,

- 1) That the appellant filed an appeal in the honorable Court under section 4 of Khyber Pakhtunkhwa Services Tribunal Act, 1974.
- 2) That the aforementioned case was fixed for arguments on 03-10-2018. But the date changed and the case was fixed for arguments on 05-11-2018.
- 3) That on 05-11-2018 due to the retirement of the Honorable Chairman, services tribunal was is incomplete and tour to camp court swat had been canceled and 03-12-2018 was fixed by reader of the court.
- 4) The appellant on dated 28-11-2018 attended the office of District and session judge Swat in order to find out that what information has been provided for the next camp court but no response was given.
- 5) That no summon was issued to the appellant for the date fixed.
- 6) That on 03-12-2018 the appellant was absent and case was adjourned for argument i-e on 04-12-2018 at DB camp court swat.
- 7) That when the appellant was absent on 03-12-2018 the honorable court should have to informe the appellant through summon but the appellant has not been informed accordingly and thus the absence of the appellant/petitioner was beyond his jurisdiction.
- 8) That on 04-12-2018 the appeal was dismissed in default and the appellant was in hope that summon will be issued to him for proceeding in the case but no summon was issued in this regard.
- 9) That the appellant is the chronic patient of mental deaseases i-e bepolar disorder, mood disorder and dipression the appellant is the regular patient of Dr, Muhammad ayub psychiatrist the appellant has been unsensible for a long period of time and that is the reason that delay was exercised for the restoration of appeal N0#1170 dated 2013.for validity and realibilty the prescription of the doctor are here by attached.
- 10) The pationer has regularly attended the august court from the very begning that is 2013 to 05-11-2018.

11) that the appellant/ petitioner was stunned that no summon was issued and inquired for the date at Peshawar and came to know that the case has been dismissed in default.

12) That the petitioner/appellant will be suffered if the case is not restored.

It is humbly prayed that the case may kindly be restored in the interest of justice.



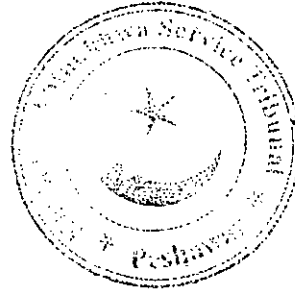
**Appellant/petitioner**  
**Muhammad Tawab Khan Head master**  
**GHS Sinpora Matta Swat**  
**Ex SSTGMS Fazal Banda Matta Swat**

**(Through Gulzarullah Adocate)**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Appeal No. 1171 /2013

Mr. Muhammad Tawab, SET,  
Government Middle School, Fazil Banda,  
District Swat.



~~1186~~  
26/7/13

**APPELLANT**

VERSUS

1. The Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary, Education (E&SE), Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Director of Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer, (E&SE) District Swat.

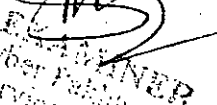
**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE PROMOTION ORDER DATED 26.2.2013 WHEREBY MANY JUNIOR HAVE BEEN PROMOTED AS HEAD-MASTER BPS-17 BY IGNORING THE APPELLANT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

26/7/13  
**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION AS HEADMASTER BPS-17 FROM THE DATE WHEN THE OTHER OFFICIALS FROM SERIAL NO.193 AND ONWARD PROMOTED VIDE ORDER DATED 26.2.2013 BY CONSIDERING THEIR DATE OF TAKING OVER CHARGE FOR THEIR SENIORITY. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**ATTESTED**

  
REGISTRAR  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar



Appeal No 1171/2013  
Muhammad Tawab vs Govt



05.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 03.12.2018 at camp court Swat.

*[Signature]*  
Reader

03.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney present. Adjourn. To come up for arguments tomorrow i.e. on 04.12.2018 before D.B at Camp Court Swat.

*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

04.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney for the respondents present. Case called but no one appeared on behalf of appellant. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.

*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

ANNOUNCED.  
04.12.2018

Certified to be true copy  
*[Signature]*  
K. S. ...

26-4-18  
Number of ..... 800  
Copies No ..... 600  
Urgent ..... 200  
Total ..... 800  
Name of the .....  
Date of ..... 26-4-18  
Date of ..... 26-4-18

**BEFORE THE KHYBER PAKHTUNKHA SERVICES TRIBUNAL,**

**PESHAWAR**

*Restoration App. 354/19*

Appeal No:- \_\_\_\_\_ Dated \_\_\_\_\_

Mr. Muhammad Tawab, SET

Appellant

GMS Fazal banda tehsil matta swat.

VS

- 1) The chief secretary Khyber Pakhtunkhwa civil secretariat Peshawar.
- 2) Seretary (E & Se Education ) Khyber Pakhtunkhwa civil secretariat Peshawar.
- 3) Director (E & Se Education ) Peshawar. Respondants
- 4) The DEO (M) (E & Se Education ) District Swat.

**APPLICATION FOR RESTORATION OF APPEAL NO# 1171 DATED**  
**2013**

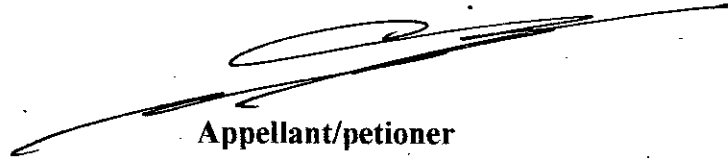
Respected sheweth,

- 1) That the appellant filed an appeal in the honorable Court under section 4 of Khyber Pakhtunkhwa Services Tribunal Act, 1974.
- 2) That the aforementioned case was fixed for arguments on 03-10-2018. But the date changed and the case was fixed for arguments on 05-11-2018.
- 3) That on 05-11-2018 due to the retirement of the Honorable Chairman, services tribunal was is incomplete and tour to camp court swat had been canceled and 03-12-2018 was fixed by reader of the court.
- 4) The appellant on dated 28-11-2018 attended the office of District and session judge Swat in order to find out that what information has been provided for the next camp court but no response was given.
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- 8) That on 04-12-2018 the appeal was dismissed in default and the appellant was in hope that summon will be issued to him for proceeding in the case but no summon was issued in this regard.
- 9) That the appellant is the chronic patient of mental deaseases i-e bepolar disorder, mood disorder and dipression the appellant is the regular patient of Dr, Muhammmad ayub psychiatrist the appellant has been unsensible for a long period of time and that is the reason that delay was exercised for the restoration of appeal N0#1170 dated 2013.for validity and realibilty the prescription of the doctor are here by attached.
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11) that the appellant/ petitioner was stunned that no summon was issued and inquired for the date at Peshawar and came to know that the case has been dismissed in default.

12) That the petitioner/appellant will be suffered if the case is not restored.

It is humbly prayed that the case may kindly be restored in the interest of justice.



Appellant/petitioner  
Muhammad Tawab Khan Head master  
GHS Sinpora Matta Swat  
Ex SSTGMS Fazal Banda Matta Swat

(Through Gulzarullah Adocate)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.

Appeal No. 1171 /2013

Mr. Muhammad Tawab, SET,  
Government Middle School, Fazil Banda,  
District Swat.



1186  
26/7/13  
**APPELLANT**

VERSUS

1. The Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. The Secretary, Education (E&SE), Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Director of Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
4. The District Education Officer, (E&SE) District Swat.


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APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE PROMOTION ORDER DATED 26.2.2013 WHEREBY MANY JUNIOR HAVE BEEN PROMOTED AS HEAD-MASTER BPS-17 BY IGNORING THE APPELLANT AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY DAYS.

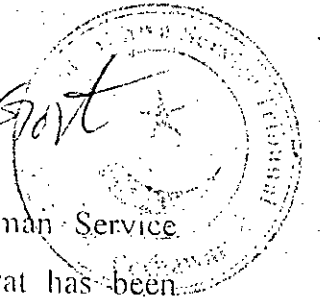
26/7/13  
**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION AS HEADMASTER BPS-17 FROM THE DATE WHEN THE OTHER OFFICIALS FROM SERIAL NO.193 AND ONWARD PROMOTED VIDE ORDER DATED 26.2.2013 BY CONSIDERING THEIR DATE OF TAKING OVER CHARGE FOR THEIR SENIORITY. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**ATTESTED**

  
**REGISTRAR**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar.

Appeal No 1171/2013  
Muhammad Tawab vs Govt



05.11.2018

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03.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney present. Adjourn. To come up for arguments tomorrow i.e. on 04.12.2018 before D.B at Camp Court Swat.

*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

04.12.2018

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney for the respondents present. Case called but no one appeared on behalf of appellant. Consequently the present service appeal is hereby dismissed in default. No order as to costs. File be consigned to the record room.

*[Signature]*  
Member

*[Signature]*  
Member  
Camp Court, Swat

ANNOUNCED.

04.12.2018

Certified True Copy  
*[Signature]*  
Khyber Pakhtunkhwa  
Peshawar

26-4-18  
Number of ..... 800  
Copying Fee ..... 600  
Urgeat ..... 200  
Total ..... 1600  
Name of the .....  
Date of ..... 26-4-18  
Date of Delivery of Copy ..... 26-4-18

"A"

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

No.

APPEAL No. *R.A. No. 354/19* of 20

*Muhammad Fouad*

Appellant/Petitioner

Versus

*The Chief Secy: KP St. Pesh.*

RESPONDENT(S)

Notice to <sup>*Counsel*</sup> Appellant/Petitioner

*Gul Zarullah*  
*Advocate High Court*  
*Swat*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *8-4-2020* at *9:00 AM*

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

*at Camp Court Swat*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

R. A. No. 354/19

TB

APPEAL No..... of 20

Muhammad Tauab

Appellant/Petitioner

Versus

The Chief Secy. to the Govt.

RESPONDENT(S)

Notice to Appellant/Petitioner

Muhammad Tauab SET  
GMS, Fozal Banda Tehsil  
Matla Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 8-6-2020 at 9:00 AM

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

at Camp Court Swat

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

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

Recd  
No.

Restoration APP No 354/19 TB Swat  
APPEAL No.....1171..... of 20 13

Mohammad Jawab

Appellant/Petitioner

Versus

Through Chief Secy Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner Counsel Gulzar Ullah Adv.  
High Court Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 6-6-22 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. Regd

Restoration APP: NO 354/19 TB Swat

APPEAL No.....1171..... of 20 13

.....  
Mohammad Tawab SET Apellant/Petitioner

Versus

.....  
Chief Secy. Pest: RESPONDENT(S)

Notice to Appellant/Petitioner

.....  
Mohammad Tawab SET  
.....  
GMS Fazal Banda teh  
.....  
Matta Swat

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on.....6-6-2022 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

[Signature]

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.