

19.09.2022

Appellant present through counsel.

Kabir Ullah Khattak, Additional Advocate General for respondents present.

Former requested for adjournment as he has not prepared the brief. Adjourned. To come up for arguments on 17.10.2022 before D.B at Camp Court, Abbottabad.



(Fareeha Paul)
Member (E)
Camp Court, A/Abad



(Rozina Rehman)
Member (J)
Camp Court, A/Abad

17.10.2022

Due to summer vacations, tour to Abbottabad has been cancelled. Adjourned to 14.11.2022 for the same as before.

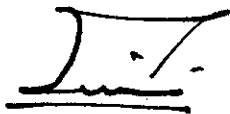


Reader

14th Nov, 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment being not prepared for arguments today. To come up for arguments on 13.12.2022 before the D.B at Camp Court Abbottabad.



(Salah Ud Din)
Member (Judicial)
Camp Court Abbottabad




(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

13.06.2022


Counsel for the appellant present. Mr. Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Reply on behalf of respondents is still awaited. Notice be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 18.07.2022 before S.B at Camp Court Abbottabad.


(Fareeha Paul)
Member (E)
Camp Court A/Abad

18th July 2022 Counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Lutfullah, Litigation Officer for respondents present.

Written reply/comments on behalf of the respondents submitted which is placed on file. A copy of the same is also handed over the learned counsel for the appellant. To come up for arguments on 17.10.2022 before D.B at camp court Abbottabad.


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

18.11.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised 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 submission of reply/comments. To come up for written reply/comments on 16.03.2022 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

(Rozina Rehman)
Member (J)
Camp Court, A/Abad

16.03.2022

Due to retirement of the Hon'able Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same before on 18.05.2022

Reader

18.05 2022

Appellant in person present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

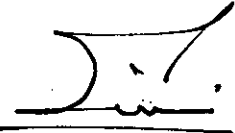
Previous date was changed through Reader's note. Therefore, notices for submission of written reply/comments be issued to the respondents. To come for written reply/comments before S.B at camp court Abbottabad on 13.06.2022.

(Fareeha Paul)
Member (E)
Camp Court Abbottabad

21.09.2021

Nemo for the appellant.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 16.11.2021 at Camp Court Abbottabad.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

17.11.2021

Appellant present through counsel.

A request for short adjournment was made in order to produce relevant documents; granted. To come up for preliminary hearing on 18.11.2021 before S.B at Camp Court, Abbottabad.



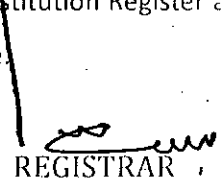
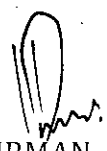
(Rozina Rehman)
Member (J)
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1130 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/09/2020	<p>The appeal of Mr. Saleem Akhtar resubmitted today by Mr. Hamayun Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench A.Abad for preliminary hearing to be put up there on <u>21.01.2021</u></p> <p> CHAIRMAN</p> <p><i>21-1-2021</i></p> <p><i>Due to covid-19, case is adjourned to 21-9-2021 for same.</i></p> <p><i>head</i></p>

The appeal of Mr. Saleem Akhtar son of Fareedon Khan DM GMS Jesol Battagram received today i.e. on 09.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copies of impugned orders dated 11.1.2018 and 26.03.2018 mentioned in the heading of the appeal are not attached with the appeal which may be placed on it.

No. 2654 /S.T,

Dt. 10/09 /2020

REGISTRAR.

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hamayun Khan Advocate,
High Court Abbottabad.

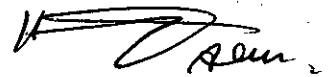
Respected Sir,

As per the above objection, in reply thereto it is stated that, both the orders were mentioned in the service book attached herewith as Annexure. 'B' Page '12', but inspite our repeated requests no order is till date shown nor given to the appellant, except the copy of service book in which the reference of orders was given and in consequence of the orders increments of appellant were stopped.

Hence no order is available except the said service book, it may be called by the court during court proceeding.

So it is requested to put the file before the honorable tribunal for court proceedings. I shall be thankful.

16-9-20

 Saleem

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP AT ABBOTTABAD

Service Appeal No. _____/2020

Saleem Akhtar son of Fareedon Khan, D.M Government Middle School
 Jesol, Tehsil & District Battagram.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Memo of Appeal	1 to 6	
2.	Copy of certificate	7	"A"
3.	Copy of impugned order entry service book	8-14	"B"
4.	Copy of appeal	15-16	"C"
5.	Wakalatnama	17	


 ...APPELLANT

Dated: 1/9 /2020

Through


 (HAMAYUN KHAN)

Advocate High Court, Abbottabad

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP AT ABBOTTABAD

Service Appeal No. 11130 /2020

Saleem Akhtar son of Fareedon Khan, D.M Government Middle School
Jesol, Tehsil & District Battagram.

...**APPELLANT**
Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 9918

Dated 09/9/2020

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Battagram.
4. Deputy Education Officer (Male) Battagram.

...**RESPONDENTS**

APPEAL UNDER ARTICLE 212 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 READ WITH SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUGNED ORDER/
ENTRY DATED 26/03/2018 WHEREBY
RESPONDENT NO. 4 DEDUCTED TWO ANNUAL
INCREMENTS VIDE ORDER NO. 391-97 DATED
11/01/2018 AND NO. 2628-32 DATED 26/03/2018
WHICH IS ILLEGAL, UNLAWFUL, AGAINST THE
LAW FACT AND NATURAL JUSTICE, VOID-AB-
INITIO AND LIABLE TO BE SET-ASIDE.

Filed to-day

Registrar

09/09/2020

Re-submitted to-day
and filed.

Registrar

18/9/2020

PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL ORDER DATED 11/01/2018 AND 26/03/2018 PASSED BY RESPONDENT NO. 3 AND 4 BE DECLARED NULL AND VOID AND ALL FINANCIAL BENEFITS LIKE INCREMENTS BE RESTORED WITH EFFECT FROM PASSING IMPUGNED ORDERS.

Respectfully Sheweth;-

Appellant beg to solicit through this service appeal on the following legal and factual backgrounds;-

1. That appellant was appointed in the year 1981 as D.M Teacher.
2. That thereafter appellant joined service and continuously performed this duties full devotion and liabilities and there had no complaint against the appellant in this regard.
3. That on 06/03/2017 appellant was on leave due to death of his close relative, Copy of certificate annexed as Annexure "A".

4. That on the same day monitoring authority on surprised visit to school appellant was shown as absent from duty, but ignored lawful request of death of closed relative.
5. That in the light of monitoring officer report respondent No.3 &4 initiated one sided proceeding against the appellant, without any intimation.
6. That lastly on 11/01/2018 and similarly 26/03/2018 respondents No 3& 4 passed impugned order against the appellant without any inquiry and intentionally. The same was not delivered to appellant.
7. That through impugned order respondents No.3& 4 stopped to annual increment.
8. That when the said situation come in the knowledge of appellant, Appellant approached the respondent office for delivery of impugned orders but respondent for refused to delivered the copies of impugned orders, and concealed actual facts.

Copy of impugned order entry service book annexed as Annexure "B".

9. That after many request official of the respondent No.3&4 established delivered Copies of service book subject to condition that appellant cannot disclosed name of the official, to the authority/officer.

10. That on 12/05/2020 appellant received copies of the service book and after study of the same on 15/05/2020 appellant filed departmental appeal before the respondent No.2 but till date respondent No.2 not passed any order on the same, Hence this appeal on the following grounds. Copy of appeal annexed as Annexure "C".

GROUND:-

a. That the impugned order dated 26/03/2018 is against the law, facts and circumstances of the case, hence, liable to be set-aside.

b. That order dated 26/03/2018 has been passed without affording opportunity of personal hearing to the petitioner and also

without complying legal formalities, hence, are liable to be set-aside.

- c. That the impugned order has been passed against the basic principle of natural justice and fundamental rights, therefore are liable to be set-aside.
- d. That at the time of passing the impugned order, respondent No. 3&4 ignored all basic legal requirement of law and procedure.
- e. That respondent No. 4 passed impugned order on the basis of misreading and non-reading of available material on record, hence, the same is liable to be set-aside.
- f. That impugned order is against the well known precedents of superior courts as well as E&D Rules, 2011
- g. That other ground shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant appeal order dated 11/01/2018 26/03/2018 and entry dated 26/03/2018 passed by respondent No. 3 and 4 be declared null and void and all financial benefits like increments be restored with effect from passing impugned orders.

Dated: 1/9 /2020

Through


...APPELLANT


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

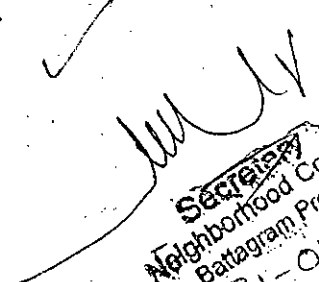
Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

ANNEXURE "A" I

TO Whome it may Concerned

Certified that Mst Chaman Parri w/o DY: Fida
Muhammad Khan resident of village Qatta Behram
Khan has died dated 06⁰³/₂₀₁₇ ✓


Secretary
Neighborhood Council
Battagram Proper,
31-01-2018

Attested
H 

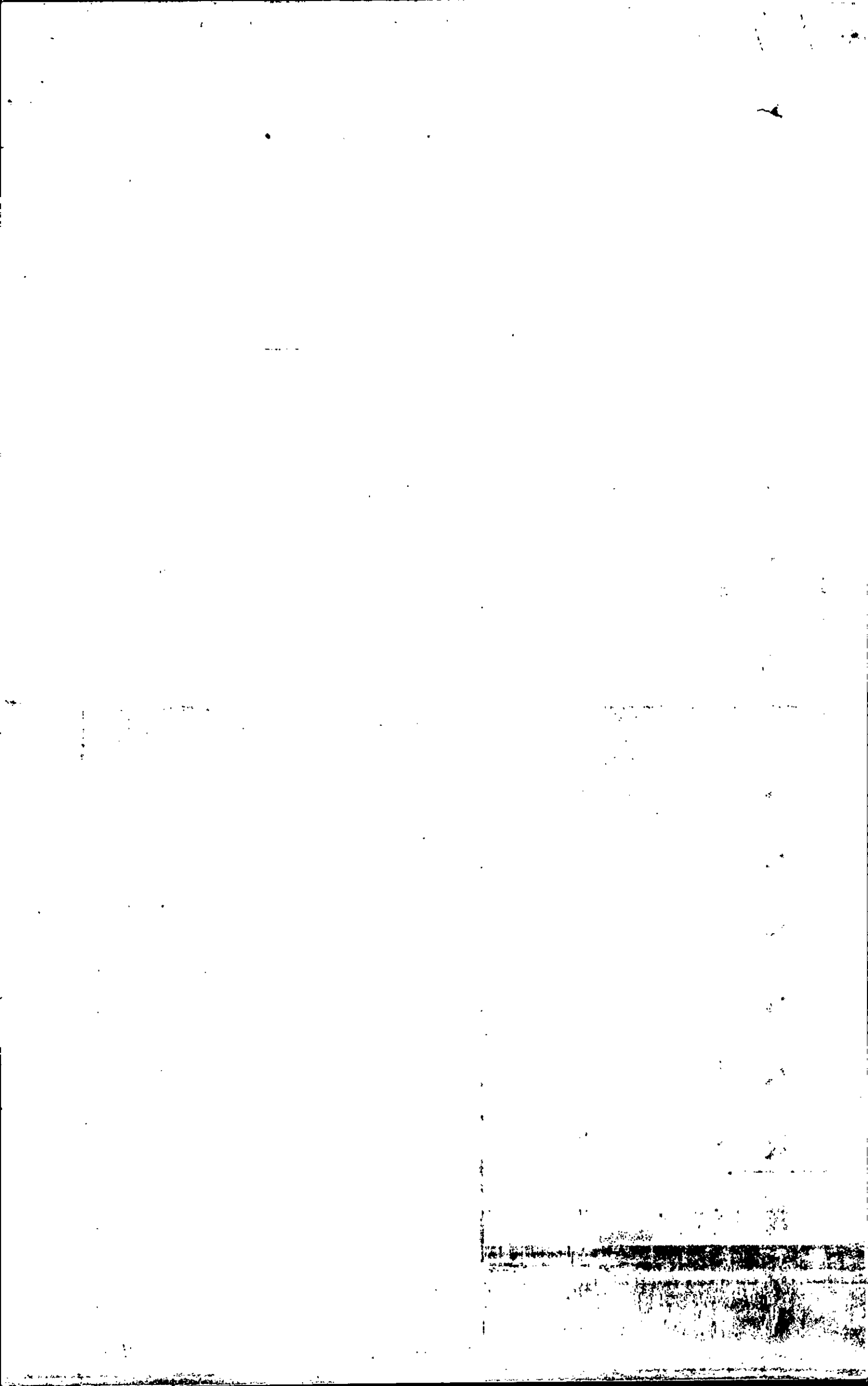
ANNEXURE B⁴ 8

1	2	3	4	5	6	7	8
Name of post	Whether selection is by advertisement and whether provisional or temporary	Minimum age, date of birth, years of experience, or other conditions of eligibility	Pay in substantive post	Additional Pay for officiating	Other allowances payable under the scales	Date of appointment	Signature
<i>GMS/Asst. Executive Engineer</i>							
D.M.			19700/-			7/2012	<i>[Signature]</i>
"			20400/-			12/12	<i>[Signature]</i>
"			21100/-			12/13	<i>[Signature]</i>
"			21800/-			12/14	<i>[Signature]</i>
"		B-15C10985-905-38135	28180/-			7/2015	<i>[Signature]</i>
"		B-15C13510-1120-47110	29085/-			12/2015	<i>[Signature]</i>
"			35910/-			12/2016	<i>[Signature]</i>
<i>M. A. Khan</i>		B-15C16200-1330-56020	37030/-			12/2016	<i>[Signature]</i>
"			44050/-	42720/-		12/2017	<i>[Signature]</i>
"			45380/-	44050/-		12/2017	<i>[Signature]</i>
"			46710/-	45380/-		12/2018	<i>[Signature]</i>

28180/15
35910/16
44050/17

Office of the Additional General
 Manager, Khyber Pakhtunkhwa Power
 Corporation Limited, Rawalpindi
 Pay Fixed @ Rs. 28180/- w.e.f. 01-07-2013
 Pay Fixed @ Rs. 35910/- w.e.f. 01-07-2013
 Pay Fixed @ Rs. 44050/- w.e.f. 01-07-2017
 Pay Fixed @ Rs. 45380/- w.e.f. 01-07-2017
 Pay Fixed @ Rs. 46710/- w.e.f. 01-07-2018

Account Officer
 Election Party



1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C S. R.	4 Pay in substantive post	5 Additional Pay for officiating	6 Other allowances falling under the term 'Pay'	7 Date of appointment	8 Signature Government
<u>GMS Jesole Entries Revised.</u>							
D.M:	-	-	19700/-			7 1/2/22	
- " -	-	-	20400/-			12 1/12	
- " -	-	-	21100/-			12 1/13	
- " -			21800/-			12 1/2/14	
- " -			28180/-			7 1/2015	
- " -			29085/-			12 1/2015	
- " -			35910/-			7 2016	
- " -			37030/-			12 2016	
- " -			42720/-			7 2017	
- " -			44050/-			12 1/2017	
- " -			45380/-			12 1/018	
 Muhammad Han Khan S.P.E.T-16 G.H.S Neelichang Battagram			 14				

9	10	11	12	13	14	15
Signature and designation of the head of the office or other attesting officer of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave Allocation of period of leave on average (pay upto four months for which leave salary is debitable to another Government Nature and duration of leave taken Period Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/6/2012	Appointed to B.P.D.S	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			<p style="text-align: center;">10</p> <p>Service Verified We.f. 12/3/2014 from Acquaintance Roll and other Office Record</p> <p style="text-align: center;">DEO (M) E&SE Battagram</p> <p>Deducted 1-Day Pay on A/c of Absent on 26/11/2015 Period treated as Leave with out pay vide No G238 Dated: 7/1/15</p> <p style="text-align: center;">DISTRICT INSPECTION OFFICER (M) BATTAGRAM</p> <p><i>[Signature]</i></p> <p>Deducted 1-Day Pay on A/c of Absent from work DEO (M) office vide No G276-82 Dated 6/4/2016 and be treated as leave with-out pay</p> <p style="text-align: center;">DEPUTY DISTRICT INSPECTION OFFICER (M) BATTAGRAM</p> <p><i>[Signature]</i></p>
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/11/12	Genct	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/11/13	Genct	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/11/2014	Genct	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/11/2015	Genct	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/6/2016	scale Revised	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/11/2016	Genct	<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram			
<i>[Signature]</i> Distt. Edu. Officer (Male) Battagram	30/6/2017	SIR	<i>[Signature]</i> Dy. DEO (M) Battagram			
<i>[Signature]</i> Dy. DEO (M) Battagram	30/11/2018	A/Genct	<i>[Signature]</i> Dy. DEO (M) Battagram			
<i>[Signature]</i> Dy. DEO (M) Battagram	30/11/2018	Genct	<i>[Signature]</i> Dy. DEO (M) Battagram			
<i>[Signature]</i> Dy. DEO (M) Battagram						

[Signature]
Muhammad Irfan Khan
S.P.E.T-16 G.H.S
Neelishang Battagram

[Signature]
DEPUTY DISTRICT INSPECTION OFFICER (M) BATTAGRAM

[Signature]
H. Aliyev

9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc).	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant.
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
				Period	Government to which debit		

Service Verified w.e.f. 1-1-2017
 30-11-2013 from
 The Acquittance roll and
 other record of this office

DEPUTY DISTRICT EDUCATION
 OFFICER (MALE) BATTAGRAM

Service Verified w.e.f. 1-12-2013
 30-11-2014 from
 the Acquittance roll and
 other record of this office

DEPUTY DISTRICT EDUCATION
 OFFICER (MALE) BATTAGRAM

Service Verified w.e.f. 1-12-2014
 30-11-2015 from
 the Acquittance roll and
 other record of this office

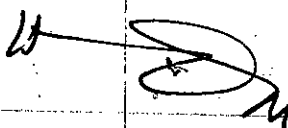
DEPUTY DISTRICT EDUCATION
 OFFICER (MALE) BATTAGRAM

Service Verified W.E.F. 1-12-2015
 To 30-11-2016 Acq roll &
 other office record

DEPUTY DISTRICT EDUCATION
 OFFICER (MALE) BATTAGRAM

Deduction 1-day pay
 on A/c of absenteeism vide
 D.E.O (M) Battagram Enrol.
 No. 2858-60 Dated 20-3-2017
 on 6-3-2017

DEPUTY DISTRICT EDUCATION
 OFFICER (MALE) BATTAGRAM

Attested


Muhammad Irfan Khan
 S.P.E.T-16 G.H.S
 Neelishang Battagram

(For use in Police and other similar Departments)

RECORD OF POSTINGS

12

District and post	No. of District Order	Date	District and post	No. of District Order	Date
			<p><i>Steppang</i> Two Increment Deducted vide DEO(M) Battagram Issue under Endst. No. 391-97. Dated: 11-1-2018 & No. 2628 Dated: 26-3-2018</p> <p>Dy: District Education Officer (M) Battagram</p> <p><u>EXONERATION.</u> Absent period 26-8-2017 to 30-11-2017 (2 days) Treated on The Sick days is pleased to impose minor penalty of two increment</p> <p><i>Attested</i></p> <p><i>Muhammad Irfan Khan</i> Muhammad Irfan Khan S.P.E.T-16 GHS Neelishang Battagram</p> <p><i>Attested</i> <i>H</i></p>		



**PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY**

GSR/FD/NW/FP 569--F S. 3000 Pds of 100 L. 15.12.2002 (25)

13

Form: PAY02

OFFICE OF THE D.P. (M)
FOR THE MONTH OF 07 20019.

Date _____

Page No. _____

DDO Code (Cost Center) Bm6037 Description DDEO (M) Battagram

Personnel Number 00318008 Employee Name Saleem Akhtar

National ID Card No. _____

Grade (Pay Scale Group) 15 DM

Salary Status Start Stop

GENERAL DATA CHANGE ¹³			CHANGE IN PAYMENTS/DEDUCTIONS ¹⁷				Effective Date ²¹	Remarks ²²
Info. Type	Field ID's	New Contents ¹⁶	Wage Type ¹⁸	Amount		Adv. Date ²⁰		
				Rupees ¹⁹	Paisa			
		Basic Pay		467100/-	15	1330/-	Annual bonusment for 2018 may be allowed.	
				Pay @ Rs, 44050/-				
				45380/-				
				Jan; 2019				

Prepared By: _____

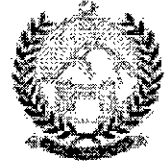
Attested
H → DR

Checked By: [Signature]
Dy: District Education Officer (M) Battagram
08/1/2019

Revised/Verified By _____

Dist. Govt. KP-Provincial
District Accounts Office Batagram
Monthly Salary Statement (June-2020)

14



Personal Information of Mr SALEEM AKHTAR d/w/s of FARIDOON KHAN

Personnel Number: 00318008 CNIC: 1320207472117 NTN:
 Date of Birth: 02.02.1963 Entry into Govt. Service: 29.04.1981 Length of Service: 39 Years 02 Months 003 Days

Employment Category: Vocational Permanent

Designation: DRAWING MASTER 80000701-DISTRICT GOVERNMENT KHYBE

DDO Code: BM6037-DISTT OFFICER EDU (M) S&L MIDDLE

Payroll Section: 001 GPF Section: 001 Cash Center: 01

GPF A/C No: 3138 Interest Applied: Yes **GPF Balance: 411,230.00**

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 20

Wage type		Amount	Wage type		Amount
0001	Basic Pay	42,720.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1923	UAA-OTHER 20%(1-15)	1,000.00	2148	15% Adhoc Relief All-2013	1,090.00
2199	Adhoc Relief Allow @10%	727.00	2211	Adhoc Relief All 2016 10%	3,703.00
2224	Adhoc Relief All 2017 10%	4,272.00	2247	Adhoc Relief All 2018 10%	4,272.00
2264	Adhoc Relief All 2019 10%	4,272.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-761.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-600.00	4200	Professional Tax	-1,200.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 11,256.55 Recovered till JUN-2020: 8,443.00 Exempted: 2813.55 Recoverable: 0.00

Gross Pay (Rs.): 68,761.00 Deductions: (Rs.): -6,176.00 Net Pay: (Rs.): 62,585.00

Payee Name: SALEEM AKHTAR

Account Number: 5247-6

Bank Details: HABIB BANK LIMITED, 220367 AJMERA, BATAGRAM. AJMERA, BATAGRAM., BATAGRAM

Leaves: Opening Balance: Aailed: Earned: Balance:

Attested

Permanent Address:

City: BATGRAM Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official

Temp. Address:

City: Email: saleemakhtarbazar@gmail.com

ANNEXURE 'C'

۵۱

بخدمت جناب ڈائریکٹر صاحب ایجوکیشن
صوبہ ضلع کھٹواڑ سوات

۲۱ اپریل ۱۹۸۲ء عالی سالانہ انٹرمیڈیٹ

صبا عالی

کہ سائل کی تصانیف سال ۱۹۸۲ء میں پختہ ڈائریکٹر صاحب
پورٹی

کہ اس کے بعد سائل فوش اسلوب سے ایسی تصانیف منجھی
انجام دینا

کہ ۳/۱۶ کو سائل کی فہرستیں پوزیشن
سائل لکھ کر کیا گیا تھا اور اس روز فائنل
والے آئے اور سائل کو غلطی سے ایسی تصانیف

صفا علی
H

جمع کیا
کہ تمام اس کی سرٹیفکیٹ جابجا کر رہ گئی

کہ اس کے بعد سائل کے لاٹھی میں ڈیٹا D.O. ہے اور
D.O. ہے سائل کے د سال کے سال کے سال

انٹرمیڈیٹ میں کیا
کہ سائل کو مذکورہ انٹرمیڈیٹ کا علم ہے

سائل نے آفس سے رابطہ کیا، تو آفس کے اہلکاروں
کے مذکورہ بندش سے لاعلمی کا اظہار کیا۔

کہ اس کے بعد سائل مسلسل آفس سے رابطے میں
رہے تاکہ سائل کو اصل حقائق کا علم ہو سکے مگر
اس وقت تک ان D.O صاحب کی ڈائری عناد کی حالت
سے سائل کو کسی قسم کے آرڈر دینے سے سیدھے تیار
نہیں تھے۔

پھر 26/3/2018 کو سائل کو آفس اہلکار نے
فقیہ طریقے سے سرکسٹیکس کا پتہ دیا، جس پر
عدالت کرنے سے معلوم کہ D.D صاحب
26/3/18 سائل کے سرکسٹیکس میں 2 آرڈر
کا حوالہ دینے سے اسے ایسا تاثر ملا کہ وہ آرڈر

بسم اللہ

2 سالانہ ریکورڈنگ کے بند کیا ہے،
کہ مذکورہ تمام کارروائی سائل کے لاعلمی میں ہو رہی ہے۔
کہ سائل کو کسی قسم کا کوئی نوٹس نہیں
دیا ہے۔

آپ سے جو ڈیٹا فراہم کیا گیا ہے اس سے مذکورہ
واقعہ انکو آری کر کے سائل کے انکریڈنٹ
بجائے کی جانے

Dated 15/5/2020

العارض
بم رضند DM گورنمنٹ سٹریٹریجی سول
ضلع گوجرانگورہ

کورٹ فیس

وکالت نامہ

Before the KP.14 Service Tribunal

بعدالت

Saleem Akhtar vs. Govt & P.I.C

عنوان:

Appellant

منجانب:

Senior Appeal

نوعیت مقدمہ:

Pesh / ATD

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Hameem Khan & Fazalullah Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

14/2/22 المرقوم:

بمقام:

Attested

Accepted

AS An,

"A"

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

No. 11130 20

APPEAL No. of 20

Saleem Akhtar

Appellant/Petitioner

Versus

Through Secy: Edu: H.P.C. Pesh:

RESPONDENT(S)

Counsel

Hamayun Khan

Notice to Appellant/Petitioner

Associate High Court

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 16/11/2021 at 9:00 AM

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

at Camp Court A Head

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

713

APPEAL No.....11130..... of 20 20

Saleem Akhtar

Appellant/Petitioner

Versus

through Say: Edm. S.P. Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Saleem Akhtar S/o Farooq
DM Grant: middle school
Tal. Tarsil? Distt. Bannagan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 16/11/2021 at 9:00 AM

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

at Camp Court A-abad

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

“B”

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

Regd
 No.

TRB A/A

Appeal No. 11130 of 20 20
 Saleem Akhtar Appellant/Petitioner

Versus
 Imtiaz Saeed (PESSE) Respondent
 Respondent No. 4

Notice to: - Deputy Education Officer (Male)
 At Buttagram

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13/6/22 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 30

Day of 5 20 22

at camp court
 Alabad.



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.

Regd
No.

TB A1A

Appeal No.....11130..... of 20 20

Salman Akhtar.....Appellant/Petitioner

Versus

Imtiaz Sanyal (SES).....Respondent

Respondent No.....4.....

Notice to: - Deputy Education officer (Male)
At Buttagram

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....13/6/22.....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.....30.....

Day of.....5 22

at camp court

A/Abud.

Registrar, 2

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

“B”

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

Regd
No.

TR A/A

Appeal No. 11130 of 2020

Saleem Akhtar Appellant/Petitioner

Versus

Imran Jey (ESSE) Respondent

Respondent No. 3

Notice to: - DEO (Male) Battagram

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 13/5/22 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 30

Day of 5 2022

at camp court
A/Abad-

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

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

"A"

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

No. *Regd*

TB AIA

APPEAL No. *11130* of 20 *20*

Sulaiman Akhtar

Appellant/Petitioner

Versus

Through Say: (CESSE) Pesh

RESPONDENT(S)

Resr No 4

Notice to Appellant/Petitioner

Deputy Education officer
(MUL) Battagram

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *18-7-2022* at *9-00 AM*

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

at camp court

Al Abed

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.