


16th Nov 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Learned counsel for the appellant seek some time to prepare the case. To come up for arguments on 14.12.2022 before D.B at camp court Abbottabad.



(Salah Ud Din)
Member (Judicial)




(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

2088/2019

19th Oct., 2022

Nemo for the appellant. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

This case pertains to Abbottabad and because of cancellation of tour the matter was fixed for arguments on 19.10.2022 at the Principal Seat. Because of cancellation of tour, the parties and their learned counsel might not have appeared. Notice be issued to appellant and his counsel for the next date. To come up for arguments on 16.11.2022, ~~before the D.B. at Camp Court, Abbottabad.~~



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

19.05.2022

Counsel for the appellant present. Syed Naseer ud Din, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment to place some documents. Adjourned. To come up for arguments before D.B on 16.06.2022 at camp court Abbottabad.


(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad


16.06.2022

Appellant with counsel present.

Noor Zaman Khan Khattak, learned District Attorney alongwith Hamid Mansoor DEO (Male) for respondents present.

Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 17.08.2022 before D.B at Camp Court, Abbottabad.


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


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

15.03.2022

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

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



Arguments heard. Learned AAG says that almost similar nature of appeals have been fixed tomorrow. Let it be fix for tomorrow for the D.B. Mr. Hamid Khan showing himself as Litigation Officer in attendance on behalf of DEO (Male) Mansehra, but has no authority letter. This attitude of the department taken serious notice, therefore DEO (Male) Mansehra appear in person alongwith all relevant record in order to properly assist the court. To come up arguments before this D.B on 19.05.2022 at camp court Abbottabad.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

2088/19

14.10.2021

Clerk of counsel for appellant and Mr. Muhammad Tauseef, ADEO for the respondents present.

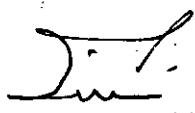
Written reply/comments are still awaited. Last opportunity is granted to the respondents for submission of written reply/comments on next date. If they fail to submit reply/comments on the next date, their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 23.12.2021 before the S.B at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

23.12.2021

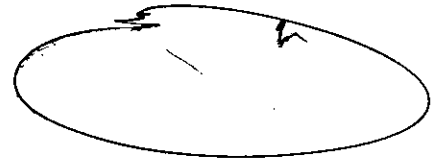
Appellant in person present. Mr. Muhammad Touseef, ADEO (Litigation) alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present.

Para-wise reply on behalf of respondents No. 1 to 3 submitted, which is placed on file and copy of the same is handed over to the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 15.03.2022 before the D.B at Camp Court Abbottabad.


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

17.09.2020

Appellant is present in person. He is seeking adjournment that his counsel is not available today. Adjourned to 18.12.2020. File to come up for preliminary hearing before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

*Due to COVID-19 case is
adjourned to 18-03-2021*



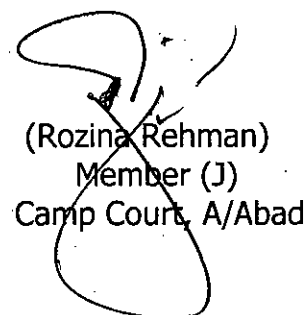
18.03.2021

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

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 14/07/2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

24/3/21

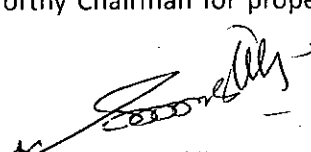
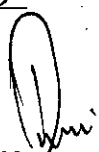




(Rozina Rehman)
Member (J)
Camp Court, A/Abad

FORM OF ORDER SHEET

Court of _____

Case No.- 2088/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/12/2019	<p>The appeal of Mr. Muhammad Riaz received today by post through Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-02-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid ,19 case to come up for the same on <u>16/4/20</u> at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p> <p>Due to summer vacation case to come up for the same on <u>17/19/20</u> at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p>

The appeal of Mr. Muhammad Riaz son of Wali Muhammad PST GPS Kalwal District Mansehra received today i.e. on 03.05.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of Writ Petition filed by the appellant mentioned in para-2 of the appeal is not attached with the appeal which may be placed on it.
- 2- Copy of order dated 13.02.1997 is illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be flagged.
- 4- Affidavit may be got attested by the Oath Commissioner.

No. 911 /S.T,

Dt. 10/5 /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M.Arshad Khan Tanoli Adv.
High Court Abbottabad.

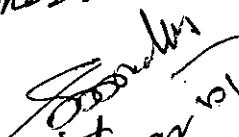
Sir,

objection as desired
have been removed



Muhammad Arshad Khan Tanoli
Advocate High Court
Office No 33 Adjacent to
Dist Bar Abbottabad

Objections are still stand the present
appeal is returned to the counsel for the
appellant for completion and resubmission
with 15 days.


Registrar

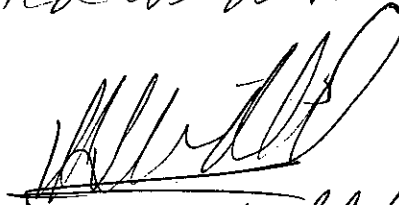
M. Arshad Tanoli Adv.

no. 1777

1ST dt. 10-10/2019

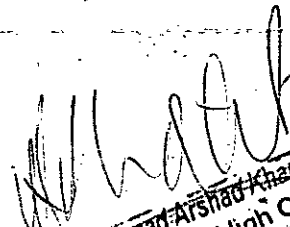
Siv,

case of the appellant
is re-submitted as
rectified as desired


M Arshad Khan Janoli
Adv

Siv,

Better copy of order dt 13-2-1995
is attached. Rest of the appeal
is ^{also} duly rectified as desired


Muhammad Arshad Khan Janoli
Advocate High Court
Office No. 33 Adjacent to
Distt 37r Abbottabad

فصل اول در بیان کلیات
ماده ۱۰۱ - هرگاه در دادگاه
درخواستی در خصوص
تجدید نظر در دادگاه

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

Service Appeal No. 2088 /2019

Muhammad Riaz son of Wali Muahmmad, PST, GPS Kalwal, District
Mansehra.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 8	
2.	Copies of service book/ appointment order and termination order	9-22	"A" & "B"
3.	Copies of judgment in writ petition No.368-A/2013 and appointment order dated 04/12/2017	23-31	"C" & "D"
4.	Copy of impugned withdrawn order dated 27/06/2018 and departmental appeal dated 30/06+/2018	32-35	"E" & "F"
5.	Copy of rejection letter	36	"G"
6.	Wakalatnama		

Muhammad Riaz
...APPELLANT

Through

Dated: _____ /2019

(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

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

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 706

Dated 3-5-2019

Service Appeal No. 2088 /2019

Muhammad Riáz son of Wali Muahmmad, PST, GPS Kalwal, District
Mansehra.

...APPELLANT

VERSUS

1. Govt. of KPK, through, Secretary, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer E&SE (Male) District Mansehra.

...RESPONDENTS

Filed to-day

Registrar

Re-submitted to-day
and filed.

Registrar

**SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WAS APPOINTED AS PST ON
04/12/2017 IN PURSUANCE OF JUDGMENT
OF PESHAWAR HIGH COURT BENCH**

ABBOTTABAD IN WRIT PETITION NO.368-A/2018. AFTER DUE VERIFICATION OF DOCUMENTS, THE PETITIONER'S APPOINTMENT ORDER HAS BEEN WITHDRAWN VIDE IMPUGNED ORDER ENDORSEMENT NO.9908-22 DATED 27/06/2018 WHICH IS PERVERSE, AGAINST THE LAW AND THE SAME IS LIABLE TO BE SET-ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED WITHDRAWAL ORDER NO.9908-22 DATED 27/06/2018 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS DEPARTMENT MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL SERVICE BACK BENEFITS. ANY OTHER RELIEF THIS HONOURABLE TRIBUNAL DEEMS APPROPRIATE IN THE CIRCUMSTANCES MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth: -

1. That the appellant was appointed as PST on 20/01/1996 and was terminated on 13/02/1997. Copy of service book/ appointment order and termination order are attached as Annexure "A" & "B".
2. That the appellant applied for appointment under the KPK Sack Employees Appointment Act 2012 but respondents department did not bother to appoint the appellant as a result, the appellant filed writ petition No.368-A/2013 which was decided on 14/05/2013. In pursuance of the said judgment, the appellant was appointed as PST in Govt. Primary School Kalwal vide order dated 04/12/2017. Copy of judgment in writ petition No.368-A/2013 and appointment order dated 04/12/2017 are attached as Annexure "C" & "D".
3. That after appointment of the petitioner, his documents were got verified from the concerned board which were found correct.

However, at the time of termination in the year 1997 the appellant was terminated under general order of 1998. The appellant obtained copy of termination order from the office of District Education Officer, which was found tempered by the department, hence, the petitioner's order dated 04/12/2017 has been withdrawn without proper inquiry on 27/06/2018 as a result, the appellant filed departmental appeal against the said order on 30/06/2018. Copy of impugned withdrawn order dated 27/06/2018 and departmental appeal dated 30/06/2018 are attached as Annexure "E" & "F".

4. That the appellant departmental appeal has been rejected by the department ^{on 7/9/18} which is received by the appellant ^{on 2/4/19}. Copy of rejection letter is attached as Annexure "G".

Hence, the instant service appeal is filed inter-alia on the following grounds:-

GROUND:-

- (a) That the impugned withdrawal order dated 27/06/2018 is perverse, discriminatory, against the law. The respondents' department did not fulfilled the codal formality required prior to imposition of major penalty.
- (b) That the appellant has not been given proper opportunity of defending his case because the appellant received the termination order from the office of respondent No.3. Therefore, the withdrawal of appointment order dated 27/06/2018 is not maintainable in the eye of law.
- (c) That though, after getting employment the appellant served as PST in GPS Kalwal District Mansehra w.e.f the date of his appointment to the date of withdrawal, hence, the appellant is also entitled for receipt of

salary for the period he has rendered services in the department.

(d) That the respondents have led the appellant to the place which is utterly unknown to the jurisprudence, natural justice and fair play.

(e) That there is no other prompt and efficacious remedy except the invocation of jurisdiction of this Honourable Tribunal.

(f) That other grounds shall be urged at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, impugned withdrawal order No.9908-22 dated 27/06/2018 may graciously be set-aside and respondents department may be directed to reinstate the appellant in service with all service back benefits. Besides, salary w.e.f the date of appointment to the

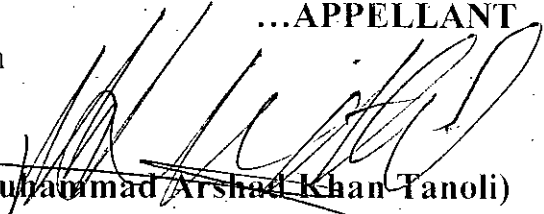
date of withdrawal of appointment order. Any other relief this Honourable Tribunal deems appropriate in the circumstances may also be granted to the appellant.

Muhammad Rizal

...APPELLANT

Through

Dated: _____/2018


(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

VERIFICATION:-

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

Muhammad Rizal

...APPELLANT

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

Service Appeal No. _____/2019

Muhammad Riaz son of Wali Muahmmad, PST, GPS Kalwal, District
Mansehra.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Muhammad Riaz son of Wali Muahmmad, PST, GPS Kalwal, District
Mansehra, do hereby solemnly affirm and declare that the contents of
foregoing appeal are true and correct to the best of my knowledge and belief
and nothing has been concealed therein from this Honourable Court.

Muhammad Riaz
DEPONENT



21/1/19

Annex - A

(For use in Police Department only)

Heirs:—

P-9

- 1.
- 2.
- 3.

Verification Roll No. dated received back.

1. Passed Matric Ex-^{no.} from BISE Abbottabad under roll no. 13982 obtaining 383/850 marks in the year 1994.

Left Thumb-Impression

Qualifications	Date	Qualifications	Date
English		First Arts	
Pushto		B.L. or B.A.	
Urdu		Pleadership Examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications:—	
Drill Instructing			
Court Duties			
Reserve Duties			

Shabbir Ahmad

N.B.— Line to be drawn under the qualification possessed.

Shabbir Ahmad
S.S.T B.17-G.H.S
Kal.Wal Mansehra

Note:— The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Muhammad Riaz

2. Race Tanoli

3. Residence vill: Gandan P.O. Lason Nawabi
Teh: S Dist: Mansehra

4. Father's name and residence Wali Muhammad

5. Date of birth by Christian era as nearly as can be ascertained (20-06-1977)
20th June A.H. 8 Seventy Seven

6. Exact height by measurement 5-3

7. Personal marks for Identification A cut on right hand fingers

8. Left hand thumb and Finger Impression of (Non-Gazette) Officer.

Little Finger



Ring Finger



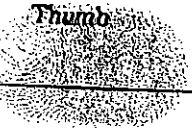
Middle Finger



Fore Finger



Thumb



Tran Lof
Shabbir Ahmad

S.S.T.B.17-G.H.S.
Kal.Wal Mansehra

9. Signature of Government Servant Riaz

10. Signature and Designation of the Head of the Office, or other Attesting Officer.
Shabbir Ahmad

9 Signature and designation of the head of office or other attesting officer in forms 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 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 debitable to another Government			
					Period			Government to which debitable
<p><i>JE</i> <i>S.D.O.</i> <i>(M)</i></p>	<p><i>24/11/96</i></p>	<p><i>Terminated</i></p>	<p><i>AC</i> <i>S.D.O. (M)</i> <i>(M)</i></p>			<p><i>Appointed as a PT Teacher at G.S./MOS Jabba Blavia vide DRO (M) No. 36 dated 17-1-96 signed under Order No. 800/805 dated 17-1-96.</i></p> <p><i>S.D.O. (M)</i> <i>(M)</i></p> <p><i>Service Verified w.e.f. 20-1-96 to 24-11-96 with A.C.R. and others record of this Office.</i></p> <p><i>S.D.O. (M)</i> <i>(M)</i> <i>Mansehra</i></p>		
<p><i>Princ. Officer</i></p> <p><i>(Signature)</i></p> <p><i>M. S. T. B. 17-G.H.S.</i> <i>Kal. Wal. Mansehra</i></p>								

B

OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) PRIMARY, MANSEHRA.

OFFICE ORDER NO. 36
DATED 17/11 /1996.

APPOINTMENTS:

PB

Consequent upon the finalization of the lists of un-trained candidate on need basis duly approved by the Minister for Primary Education, NWFP and endorsed by the Director Primary Education, NWFP, Peshawar MR. Rias S/O Wali Muhammad R/O Manjiani. is hereby appointed at GPS/GMPS Mosque Jabba Balachian in PP-46 in BPS-7 @ Rs.1480/- fixed per month plus usual allowances as admissible under the rules w.e.f. the date of their taking over charge in the interest of public service.

TERMS & CONDITIONS:

1. They should submit their charge reports to all concerned.
2. Their appointment is purely on temporary basis and LIABLE for termination at any stage without assigning any reason.
3. Their appointment is subject to the verification of their original Academic and Professional Certificates/documents. Their original Academic and Professional Certificates/documents should be checked thoroughly before handing over the charge and should not be handed over charge if their original certificates are not found correct.
4. No one should be handed over charge if he is below 18 years and above 20 years, in case of the candidates relating to Zone III and 27 years of others.
5. Their pay will not be drawn until they produce age and Health certificate from Medical Superintendent DHQ Hospital Mansehra.
6. They will be governed under prescribed service rules framed by the Government of NWFP.

Shabbir Ahmad
Shabbir Ahmad
S.S.T. GHS
Kal. Wal Mansehra

Indst. No. 800-805

sd/-
(MUHAMMAD ISHAK)
DISTRICT EDUCATION OFFICER(MALE)
PRIMARY, MANSEHRA.

Dated Mansehra the 17/11 /1996.

Copy forwarded to the:-

1. Secretary to Government of NWFP, Education Department, Peshawar.
2. Director, Primary Education, NWFP, Peshawar.
3. District Accounts Officer, Mansehra.
4. Sub Divisional Education Officer(Male), Mansehra.
5. Candidate concerned.
6. Superintendent Local Office.

Shabbir Ahmad
DISTRICT EDUCATION OFFICER(MALE)
PRIMARY, MANSEHRA.

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BETTER COPY

No. 7097-0290

Divisional Directorate of Edu:
Hazara Division Abbottabad
O.O No. 12
Dated: 05/04/1997

To,

All the D.E.Os (M&F),
Hazara Division, Abbottabad.
All the Principals/ Headmasters/ Headmistresses,
GHSS, GGHSS, GHS, & GGHS in Hazara Division.

Subject: IRREGULAR APPOINTMENTS.

I am directed to refer Director of Education, (secy) NWFP, Peshawar's No. 4392-438 dated 31/03/1997 and to say that all the irregular appointments made from 01/11/1993 to date have been terminated by this office and as well as pointed out by the enquiry committees and inspite of this if any irregular appointee has been left and detected later on, the concerned will be held responsible for the consequences. In case there is any ambiguity regarding regular or irregular appointee, the fact can be verified from this office within a week time.

Therefore, after all such efforts made by this office/ depart: if any irregular appointee is detected the concerned DDO will be held personally responsible for the consequences.

Sd/-
ASSISTANT DIRECTOR (ESTT)
DIVISIONAL DIRECTOR OF EDU: ATD.

Endst: No. 8297-99 / Dated 05/04/1997

Copy of:-

1. The Director of Edu: (Secy) NWFP, Peshawar w/r to his No. mentioned above.
2. ADE Local Directorate.
3. O.O File.

Sd/-
ASSISTANT DIRECTOR (ESTT)
DIVISIONAL DIRECTOR OF EDU: ATD.

Serial No. 115

22/11/94
Enclst No = 2485-2626
22-11-90

P-14

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY HANSEHRA

NO. 5
Dated February 13, 1997

Termination
Order

OFFICE ORDER

On perusal of the relevant record, the appointments of the following Primary Teachers have been found illegal ab initio and against the prescribed rule. Their services are, therefore, hereby dispensed with with immediate effect.

S.No.	Name & Father's Name	Residence	Place where Appointed
1	Fakhar-ud-Din S/O Ghulam Mohyud Din	Numbal	GPS Numbal
2	Muhammad Khalid S/O Abdul Gayum	Lassan Nawab	Msq: Khatyala
3	Sheikh Amjad S/O Sheikh Taj Muhammad	Shakopki	GPS Bat Doga
4	Muhammad Sajjad S/O Ali Akbar	Thakar Hera	Msq: Poddara
5	Zulfikar S/O Fazal-ur-Rehman	Shergarh	GPS Serl Goria
6	Sarfaraz S/O Muhammad - Jan	Moorab Hera	Msq: Hathra
7	Khalid S/O Sheer Muhammad	Hera Khurd	GPS Numbal
8	Sain Ahmad S/O Muhammad Zaman	Haryala	Msq: Loharbanda
9	Muhammad Aslam S/O Fazal Rehman	Chansair	GPS Serl Goria
10	Haider Zaman S/O Muhammad Suleman	Karori	GPS Beerian
11	Amjad Hussain S/O Anwar Shah	Dhaman Dhery	GPS Batdoga

Sr. No. 1
2
3
4
5
6
7
8
9
10
11

Contd: Page No. 2

PRINCIPAL
Govt Higher Secondary School
Batal (Hanshira)

31 -
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8197	12	Abdur Rahman S/O Faidur Zaman	Gali Badral	GPS Daroo
8198	13	Muhammad Parvez S/O Muhammad Zuber	Kali Hera	Hsq: Ginnel, Gali
8199	14	Muhammad Imad S/O Sheer Muhammad	Pongarhi	Hsq: Khamari
8200	15	Muhammad Arif S/O Muhammad Zaman	Gali Badral	GPS Lubar
8201	16	Muhammad Saad S/O Muhammad Ayub	Shakooki	GPS Sijal Banda
8202	17	Muhammad Yousuf S/O Fazal-ur-Rahman	Handp	Hsq: Tunimar
8203	18	Muhammad Rizq S/O Kala Khan	Haril Doga	GPS Chamal
8204	19	Muhammad Tariq S/O Abdur Rehman	Chansair	GPS Sunj
8205	20	Muhammad Haroon S/O Ghulam Haider	Moorat Mera	GPS Sunj
8206	21	Lal Khan S/O Fazal-ur-Rahman	Tarmang	GPS Tarmang
8207	22	Abdus Salam S/O Harroof	Kalus	GPS Seri Gali
8208	23	Muz Ali Shah S/O Farman Ali Shah	Darband	Hsq: Chakir Mangal
8209	24	Muhammad Ishaq S/O Ghulam Qadir	Hakan Gali	GPS Chatta
8210	25	Arbab Ahmad S/O Abdul Gali	Haril Doga	GPS Chatta
8211	26	Abdul Malik S/O Rehmatullah	Chansair	GPS Ba
8212	27	Muhammad Shameer S/O Qamar Zaman	Jasgran	GPS Spkal
8213	28	Nabeem Anwar S/O Muhammad Anwar	Shangli	GPS Neel Batia
8214	29	Muhammad Haroon S/O Khalil ur Rehman	Kutaira	GPS Neel Batia

30	Muhammad Shariq S/O Mustafa Shariq	Tamali Bindi	GPS Nawari Sher
31	Shakir S/O Arshad Dabir	Sokal	GPS Sokal
32	Rashid Hameed S/O Abdul Maman	Lassan Nawab	GPS Sokal
33	Taj Muhammad S/O Sher Dill	Chakri	GPS Namshera
34	Shaukat Ali S/O Gohar Rehman	Darband	GPS Namshera
35	Abdur Rashid S/O Abdul Karim	Jan Sefi	GPS Namshera
36	Javed S/O Fazal ur Rehman	Shalotta	GPS Khudian
37	Muhammad Arshid S/O Sher Muhammad	Gahaki	GPS Khudian
38	Muhammad Fayaz S/O Hafiz Muhammad	Bandi Mera	GPS Garwal
39	Muhammad Faraz S/O Wali Muhammad	Coontani	Meg: Jamb Sahar
40	Muhammad Gulab S/O Sikandar Khan	Rafra	Meg: Jorian
41	Abdus Sadiq S/O Brahman	Kalap	GPS Minjahan
42	Muhammad Ali S/O Aj Muhammad	Taqia Shamskeen	GPS Dham Halla
43	Masum Kabir S/O Anisam Sarwar	Lassan Nawab	GPS Hallan
44	Muhammad Hameed S/O Habib ur Rehman	Bandian	GPS Matserlan
45	Muhammad Farvez S/O Muhammad Zaman	Tharman	GPS Miana Gali
46	Zulfiqar S/O Chulani Sarwar	Darband	Meg: Karam

PRINCIPAL
 Govt High Secondary School
 Bada (Muzaffargarh)

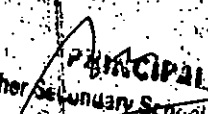
2 P. 17

Sl. No.	Name	Rank	Post	Station
47	Habib-ur-Rahman	S/O	GAZI	GAZI
48	Muhammad Saad	S/O	GAZI	GAZI
49	Muhammad Bukhtiar	S/O	GAZI	GAZI
50	Ettikhar	S/O	GAZI	GAZI
51	Muhammad Saad	S/O	GAZI	GAZI
52	Muhammad Saad	S/O	GAZI	GAZI
53	Muhammad Saad	S/O	GAZI	GAZI
54	Muhammad Saad	S/O	GAZI	GAZI
55	Muhammad Saad	S/O	GAZI	GAZI
56	Muhammad Saad	S/O	GAZI	GAZI
57	Muhammad Saad	S/O	GAZI	GAZI
58	Muhammad Saad	S/O	GAZI	GAZI
59	Muhammad Saad	S/O	GAZI	GAZI
60	Muhammad Saad	S/O	GAZI	GAZI
61	Muhammad Saad	S/O	GAZI	GAZI
62	Muhammad Saad	S/O	GAZI	GAZI
63	Muhammad Saad	S/O	GAZI	GAZI
64	Muhammad Saad	S/O	GAZI	GAZI
65	Muhammad Saad	S/O	GAZI	GAZI
66	Muhammad Saad	S/O	GAZI	GAZI
67	Muhammad Saad	S/O	GAZI	GAZI
68	Muhammad Saad	S/O	GAZI	GAZI
69	Muhammad Saad	S/O	GAZI	GAZI
70	Muhammad Saad	S/O	GAZI	GAZI

Handwritten notes or signatures at the bottom of the page.

65	Dost Muhammad S/O Mir Muhammad	Khair Abad	Msc: Delarian
66	Jehanگیر S/O Fazal Karim	Hal Kaloo	GPS Hariyala
67	Hazoor Ahmad S/O Habeeb-ur-Rehman	Chandoor	Msc: Chandoor
68	Laj Khan S/O Sher Muhammad	Jhanla	GPS Chandoor
69	Sultan S/O Rehmatalah	Nara Doga	GPS Gora
70	Durr Aman S/O Nasir Muhammad	Sharotta	Msc: Kamar
71	Salaf Khan S/O Abdul Kkbar	Karrori	GPS Akhuni Band
72	Faiz Khan Ahmad S/O Ali Zaman	Shakokki	GPS Kandah
73	Mubarak S/O Haideh Zaman	Pakpna	GPS Maseran
74	Sayyid S/O Muhammad Yaqoob	Pakpna	GPS Ghazi Kot
75	Dilkar S/O Haqir Muhammad	Mohar	Msc: Belanz
76	Rafique S/O Sikandar	Bandian	GPS Bandi Khan Khat
77	Shakeel Ahmad S/O	Ayub Khailgal	Msc: Kotla darwaza
78	Sadiq S/O Farid	Jahand	Msc: Gud
79	Khurshid S/O Haqir Muhammad	Chitti Mpori	GPS Ghonta
80	Muhammad Bahonar S/O Kala Khan	Kalla	GPS Kalla
81	Nazar Hussain S/O Ghulam Haider	Nikka Pani	Msc: Gali Tendki
82	Sarwar S/O Abdil Nabi	Thanda	GPS Chariya

Contd: Page No


PRINCIPAL
 Govt Higher Secondary School
 Satta (Narsahra)

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page No. 6

1783	Muhammad Han Ghulam Sarwar	S/O	Sokai	Hera Khairat
1784	Nazir Ahmad Ghulam Sarwar	S/O	Batal Paur	Hera Khajambar
1785	Ali Musaf Ali Zaman	S/O	Doga	GPS Badar
1786	Saffaraz Iqbal	S/O	Jarai	GPS Thadhi Kalia
1787	Yaqub Muhammad Afzal	S/O	Lari	Hera Shahaya Pali
1788	Ayub	S/O	Tangar	Hera Khairan
1789	Hakim Khan Gulab Khan	S/O	Khullia	GPS Hara Khairoo
1790	Zaman Khan Gulab Khan	S/O	Shirgarh	GPS Sera Golia
1791	Salim Munib	S/O	Shanaya	Hera Pradar
1792	Rehman Muhammad Zaman	S/O	Kandar	GPS Kandar
1793	Sajid Habib-ur-Rehman	S/O	Phulra	GPS Kafia
1794	Muhammad Haroon Ali Zaman	S/O	Bati Bhal	GPS Badoga
1795	Muhammad Javid Aurang Zeb	S/O	Thanda	GPS Gali Badral
1796	Muhammad Ismail Muhammad Zaman	S/O	Gorha	GPS Theri
1797	Muhammad Riaz Fariullah	S/O	Bandi Hara	Hera Khantia
1798	Naveed Shah Muazam Shah	S/O	Shan Kot	GPS Nam Nalla
1799	Muhammad Nazir Muhammad Assem	S/O	Nikka Pani	GPS Hara Bad
1800	Muhammad Azam Sheer Muhammad	S/O	Bandian	GPS Hara Doga

Contd: Page No. ---

101. Ashiq Hussain S/O Abdur Rahman	Pakoona	GPS Chanial
102. Muhammad Asif S/O Wali Jaji	Munda Gocha	GPS Chanial
103. Rahid Ahmad S/O Ghulam Nabi	Jabor	GPS Gund
104. Muhammad Naem S/O Attai Khan	Phala	GPS Neel Ban
105. Muhammad Nayeed S/O Muhammad Ayub	Sachan Kalan	GPS Bahadra
106. Muhammad Shakel S/O Muhammad Mussa	Sachan Kalan	GPS Said Abad
107. Ghulam Hassan S/O Muhammad Tahaq	Nalia Jabbar	GPS Nalia Jabbar
108. Muhammad Khalid Aziz ul Rehman	Munda Gocha	GPS Munda Gocha
109. Gul Dad S/O Mughalada	Punjo	GPS Sukian
110. Muhammad Aslam S/O Muhammad Alam	Gali Jabbar	GPS Jabbar
111. Ghulam Nabi S/O Arsala Khan	Keerl Bala	GPS Sattan Gali
112. Akhtar Nawaz S/O ✓ Haji Nawaz Khan	Sucha Kalan	GPS Kodar
113. Gul Nazir S/O ✓ Sarfraz Khan	Buz Bala	GPS Banda Geesach
114. Ghulam Nabi S/O Qadar	Chotta Bala	GPS Mohri
115. Javed Iqbal S/O ✓ Ahmad Jee	Punjo	GPS Mohri
116. Ashiq Hussain Shah S/O Muntaz Ali Shah	Bal Bala	GPS Chatta
117. Sajid Hussain Shah S/O Hayat Shah	Kot Chattar	GPS Dheri Nambardar

Contd Page No


 Govt Higher Secondary School
 Sahal (Muzaffargarh)

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113. Muhammad Fayaz S/O Abdul Wahab	Hilko	GPS Dheri Hiteem
119. Javed Hussain Shah S/O Nawab Said Shah	Lachi Mang	GPS Dheri Hambarbara
120. Zulfikar Ali Shah S/O Sadiq Shah	Bai Bala	GPS Shandretar
121. Abdul Ghaffar Ali Shah S/O Pir Badshah	Saloon	GPS Chharkot
122. Ijaz Hussain Shah S/O Shah Said Shah	Bhumla Chatta	GPS Kote
123. Qasim Raut S/O Abdul Raut Khan	Sachal Kala	GPS Kheri Nawaz
124. Dalshat Khan S/O Hani Fajir Khan	Sharkool	GPS Dheri Hiteem
125. Muhammad Saeed S/O Huskeeh	Karan	GPS Matseri
126. Abdul Razaq S/O Mir Hussain	Hakar Gali	GPS Doka
127. Muhammad Ijaz S/O Omar Zaman	Dhanaka	Hdq: Pagora
128. Muhammad Aslam S/O Omar Zaman	Gundan	GPS Battiari
129. Abdus Sattar S/O Abdul Rehman	Dhaman	GPS Chatta
130. Muhammad Yousaf S/O Aurang Zeb	Seri Gal	GPS Shanaya
131. Farid-ud-Din S/O Abdul Hadi	Matseri	GPS Jiggi
132. Sadique S/O Haider Zaman	Purni	GPS Hariyala
133. Azmat Ayub S/O Muhammad Ayub	Naryala	GPS Chandyari Ghazi Kot
134. Said Badshah S/O Mudassar Shah	Sarori (K.D)	Hdq: Cheer

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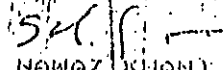
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Page No.

135. Muhammad Mustafa S/O Yasin Khan	Judba	Msq: Kalata
136. Abdul Bashir S/O Gul Balz	Dehtair	Msq: Mohri Danna
137. Farooq Shah S/O Syed Azeem Shah	Rongaly	Msq: Soormal Madda Khail
138. Syed Mahab S/O Muhammad Mustafa	Jatka	Msq: Laka Tiga
139. Pir Mukamill Shah S/O Pir Ahmad Shah	Jatka	Msq: Tara Madda Khail
140. Liaqat Ali S/O Shah Muhammad Khan	Shinkiyari	Msq: Jhangri
141. Saqdar Zaman S/O Shah Uzat Khan	Deri Kaka Khail	Msq: Markharain

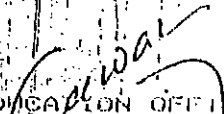
دفعہ 13

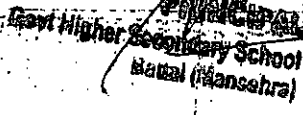



 (HAQ NAWAZ KHAN)
 DISTRICT EDUCATION OFFICER
 (MALE) PRIMARY MANSEHRA

Encls. No. 217-367 / Dated Mansehra the February 13, 1997

- Copy forwarded to the :-
1. P.S to Secretary to Government of N.W.F.P Education Department Peshawar.
 2. P.A to Director Primary Education N.W.F.P Peshawar.
 3. District Accounts Officer Mansehra.
 4. Sub-Divisional Education Officer (Male) Mansehra.
 - 5-10. ASDEO Circle, Fulra, Shergarh, Oghi, Battal, Jatori & Kala Dhaka.
 - 11-15. All concerned.


 DISTRICT EDUCATION OFFICER
 (MALE) PRIMARY MANSEHRA


 Govt Higher Secondary School
 Battal (Mansehra)

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OFFICE OF THE DISTRICT EDUCATION OFFICER, (MALE) PRIMARY MANSHERA

No.5

Dated February 13 1997

OFFICE ORDER

On perusal of the relevant record. The record the appointments of the following primary Teachers have been found illegal, ab-initio void and against the prescribed rules. Their Services are therefore hereby dispensed with, with immediate effect.

S.No.	Name & Father's name	Residence	Place where appointed
1.	Fakhar-ud Din S/o Ghulam Mohyud Din	Nambal	GPS Nambal
2.	Muhammad Khalid s/o Abdul Qayum	Lassan Nawab	Msq Khalyala
3.	Sheikh Amjad s/o Taj Muhammad	Shakooki	GPS Bat Dogra.
4.	Muhammad Sajjad s/o Ali Akbar	Thakar Mera	Msq Pojdara
5.	Zulfaqar s/o Fazal -ur-Rehman	Shergarh	GPS Seri Gorla
6.	Sarfaraz s/o Muhammad jan	Moorat Mera	Msq Hathra
7.	Khalid s/o Sher Muhammad	Mera Khurd	
8.	Sain Ahmed s/o Muhammad Zaman	Naryala	Msq Loharbanda
9.	Muhammad Aslam s/o Fazal Rehman	Chansair	GPS Seri Gorla
10.	Haider Zaman s/o Muhammad Suleman	Karori	GPS Beenian
11.	Amjad Hussain s/o Anwar Shah	Dhaman Dheri	GPS Batdoga
12.	Sardar Rehman s/o Haidar Zaman	Gali Badrai	GPS Daroo
13.	Muhammad Pervaz s/o Muhammad Akbar	Kala Mera	Msq:Sinjelijala
14.	Mushtaq s/o Muhammad Sher Muhammad	Pancorhi	Msq: Khamari
15.	Muhammad Arfan s/o Muhammad Zaman	Gali Badral	GPS Lubar
16.	Muhammad Saeed s/o Muhammad Ayub	Shakooki	GPS Sinjal Bandi
17.	Muhammad Younus s/o Fazal ur-Rehman	Mando	Msq Tunimar
18.	Muhammad Riaz s/o Kala Khan	Hard Dogra	GPS Chamial
19.	Muhammad Taraq s/o Abdur Rehman	Chamsair	GPS Sunj
20.	Muhammad Haroon s/o Ghulam Haider	Moorat Mera	GPS Sunj
21.	Lal Khan s/o Fazal -ur-Rehman	Tarmang	GPS Tarmang
22.	Abdus Satar s/o Haroof	Kalas	GPS Seri Gali
23.	Niaz Ali shah s/o Farman Ali shah	Darband	GPS Chakli Miangan
24.	Muhammad Ishaq s/o Ghulam Qadar	Makan Gali	GPS Chatta
25.	Aftab Ahmed s/o Abdul Jalil	Hari dogra	GPS Chatta
26.	Abdul Malik s/o Rehmatullah	Chansair	GPS Bai
27.	Muhammad Shameer s/o omar Zaman	Jasgran	GPS Sokal
28.	Naheem Anwar s/o Muhammad Anwar	Shangli	GPS Neel Batla
29.	Muhammad Haroon s/o Khalil-ur-Rehman	Kutaira	GPS Neel Batia

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30.	Abid Hussain Shah s/o Hussain Shah	Ismail Bandi	GPS Nawan Sher
31.	Shakeel s/o Abdul Jabar	Sokal	GPS Sokal
32.	Rashid Manan s/o Abdul Manan	Lassan Nawab	GPS Sokal
33.	Taj Muhammad s/o Sher Dil	Chakil	GPS Namshera
34.	Shuakat Ali s/o Gohar Rehman	Darband	GPS Namshera
35.	Abdul Rashid s/o Abdul Khaliq	Jan Seri	GPS Namshera
36.	Javid s/o Fazal ur-Rehman	Sharotta	GPS Khudian
37.	Muhammad Arshad s/o Sher Muhammad	Sahki	GPS Khudian
38.	Muhammad Fayaz s/o Niaz Muhammad	Bandi Mera	GPS Garwal
39.	Muhammad Riaz s/o Wali Muhammad	Gandan	Msq :Jabba Balrian
40.	Muhammad Gulab s/o Skindar Khan	Rarri	Msq Jorian
41.	Abdus Sadiq s/o Behram	Kalas	GPS Minjahani
42.	Muhammad Ali s/o Taj Muhammad	Taqia Shahmiskeen	GPS Dham Nallah
43.	Naheem Kusar s/o Ghullam Sarwar	Lassan Nawab	GPS Haillan
44.	Muhammad Hamayun s/o Habibi ur-Rehman	Bandian	GPS Matserian
45.	Muhammad Pervaz s/o Muhammad Zaman	Darband	GPS Miana Gali
46.	Zulfqar s/o Muhammad Ghulum Sarwar	Darband	Msq :Karam
47.	Habib-ur-Rehman s/o Jamil-ur-Rehman	Gali Badral	GPS Chuntran
48.	Muhammad Saeed s/o Muhammad Israil	Kalas	Msq Mohar Khurd
49.	Muhammad Bukhtiar s/o Khani Zaman	Roria	GPS Miana Gali
50.	Iftikhar s/o Ghulam Haider	Gojra	GPS Kahawa
51.	Fida Hussain s/o Aziz Muhammad	Chor Bandi	GPS Mad Serian
52.	Ghulam Mustafa s/o Hafizullah	Chamial	GPS Nikka Pant
53.	Zulfiqar s/o Duri Aman	Sinjliyal	Msq :Doga
54.	Muhammad Bashir s/o Abdul Akbar	Machral	Msq :Harj Doga
55.	Sher Muhammad s/o Taj Muhammad	Fateh Bandi	Msq :Kaloo Basthi
56.	Shah Feroz s/o Ferdoss	Jaman Moori	Msq : Thakkra Pain
57.	Munawar s/o Masood	Lassan Nawab	GPS Tarmang
58.	Ghulam Abas s/o Abdus Satar	Dehgri	Msq :Batangi
59.	Muhammad Azam s/o Khawaj Muhammad	Khalian Arian	GPS Karka
60.	Anwar Zeb s/o Sikandar khan	Sharotta	GPS Hallan
61.	Akram s/o Suleman	Sharotta	GPS Mera Khairoo
62.	Nazir Muhammad s/o Sher Muhammad	Phuildhar	Msq :Nalbori
63.	Chiria Khan s/o Abdur Rehman	Jhangi	GPS Sinjliyal
64.	Muhammad Tariq s/o Parvez	Sokal	GPS :Shanaya Payeen
65.	Dost Muhammad s/o Mir Muhammad	Khair Abad	Msq :Dolarian
66.	Jehangir s/o Fazal Karim	Hal Kaloo	GPS HariyaLa
67.	Marzoor Ahmed s/o Maqbool -ur-Rehman	Chandoor	Msq : Chandoor
68.	Lal Khan s/o Sher Muhammad	Jhanda	Msq : Chandoor
69.	Sultan s/o Rehmatullah	Nara Doga	GPS Gora
70.	Duri Aman s/o Wazir Muhammad	Sharotta	Msq :Kamari
71.	Salar Khan s/o Abdul Akbar	Karrori	GPS Akhun Bandi
72.	Aftikhar Ahmed s/o Ali Zaman	Shakokki	GPS Kandai
73.	Mubarak s/o Haider Zaman	Pakoona	GPS Maserian
74.	Sahir s/o Muhammad Yaqoob	Pakoona	GPS Ghazi Kot

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75.	Dildar s/o Fiaqar Muhammad	Mohar	Msq :Belan
76.	Rafique s/o Sikandar	Bandian	GPS Bandi Khan Khel
77.	Shakeel Ahmed s/o Ayub	Khalwal	Msq :Kotla darwaza
78.	Sadique s/o Farid	Jahand	Msq : Gud
79.	Khurshid s/o Faqir Muhammad	Chitti Moori	GPS Chontra
80.	Muhammad Farooq s/o Kala Khan	Kajla	GPS Kajla
81.	Nazar Hussain s/o Ghulam Haider	Nikka Pani	Msq : Gali Tendki
82.	Sarwar s/o Abdul Nabi	Thanda	GPS Chaniyal
83.	Muhammad Hanif s/o Ghulam Sarwar	Sokal	Mera Khairoo
84.	Nazir Ahmed s/o Ghulam Sarwar	Batal Pain	Msq : Khajambar
85.	Ali Munsaf s/o Ali Zaman	Doga	GPS Bradarh
86.	Sarfraz s/o Ali Zaman	Jangi	GPS Thathi Kalan
87.	Iqbal S/o Yaqoob	Larri	Msq :Shanaya Pain
88.	Muhammad Afzal s/o Ayub	Tangarh	Msq :Kharan
89.	Hakim Khan s/o Gohar Rehman	Khaliaia	GPS Mera Khairoo
90.	Zaman Shah s/o Gulab Shah	Shergarh	GPS Seri Gorta
91.	Saleem s/o Samandar	Shanaya	Msq :Bradar
92.	Munib Rehman s/o Muhammad Zaman	Kandar	GPS Kandar
93.	Sajid s/o Habib-ur-Rehman	Phulra	GPS Kajla
94.	Muhammad Haroon s/o Ali Zaman	Bai Buhai	GPS Batdoga
95.	Muhammad Javaid s/o Aurang Zeb	Thanda	GPS Gali Bandral
96.	Muhammad Ismail s/o Muhammad Zaman	Gorha	GPS Their
97.	Muhammad Riaz s/o Rafiullah	Bandi Mera	Msq : Khamian
98.	Naveed Shah s/o Muhammad Shah	Shah Kot	GPS Dam Nuria
99.	Muhammad Nazir s/o Muhammad Aseem	Nikka Pani	GPS Naei Batia
100.	Muhammad Azam s/o Sher Muhammad	Bandian	GPS Nara Doga
101.	Abid Hussain s/o Abdur Rehman	Pakoona	GPS Chaniyai
102.	Muhammad Asif s/o Wali Jan	Munda Gucha	GPS Chtiyan
103.	Nahib Ahmad s/o Ghulam Nabi	Jabori	GPS Sundi
104.	Muhammad Naeem s/o Attai Khan	Phalai	GPS Neel Ban
105.	Muhammad Naveed s/o Muhammad Ayub	Sachan Kalan	GPS Bahadra
106.	Muhammad Shakeel s/o Muhammad Mussa	Sachan Kalan	GPS Said Abad
107.	Ghulam Hassan s/o Muhammad Ishaq	Nalia Jabbar	GPS Nalia Jabbar
108.	Muhammad Khalid Aziz ur-Rehman	Munda Gocha	GPS Munda Gocha
109.	Gul Dad s/o Mughal dad	Punjool	GPS Sukian
110.	Muhammad Aslam s/o Muhammad Alam	Gali Jabbar	GPS Jabbar
111.	Ghulam Nabi s/o Arsala Khan	Keeri Bala	GPS Sattan Gali
112.	Akhtar Nawaz Khan s/o Haq Nawaz Khan	Sucha Kalan	GPS Kodar
113.	Gul Niaz s/o Sarfaraz Khan	Buz Bela	GPS Banda Geesach
114.	Gulam Nabi s/o Qadai	Chotta Bala	GPS Mohri
115.	Javed Iqbal s/o Ahmad Jee	Punjool	GPS Mohri
116.	Ashiq Hussain shah s/o Mumtaz Ali Shah	Bai Bala	GPS thatta
117.	Sajid Hussain Shah s/o Hayat Shah	Kot Chattar	GPS Dheri Nambardaran
118.	Muhammad Fayaz s/o Abdul Wahab	Hilkot	GPS Dheri Haleem
119.	Javed Hussian Shah s/o Nawab Said Shah	Lachi Mang	GPS Dheri Nambardaran
120.	Zulfiqar Ali Shah s/o Sadiq Shah	Bai Bala	GPS Shangrela
121.	Abdul Ghaffar Ali Shah s/o Pir.Badshah	Saloon	GPS Chinarkot
122.	Ijaz Hussain Shah s/o Shah Said Shah	Shumla Chattan	GPS Khotri
123.	Qaisar Rauf s/o Abdur Rauf Khan	Sachan Kala	GPS Keeri Nawazab
124.	Dahshat Khan s/o Haji Farid Khan	Sharkool	GPS Dheri Haleem

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125.	Muhammad Saeed S/o Miskeen	Karan	GPS Matser Jan
126.	Abdur Razaq s/o Mir Hussain	Makan Gali	GPS Dokal
127.	Muhammad Ijaz s/o Omar Zaman	Dhanaka	Msq : Pagora
128.	Muhammad Aslam s/o Omar Zaman	Gundan	GPS Battain
129.	Abdus Sattar s/o Abdur Rehman	Dhaman	GPS Chatta
130.	Muhammad Yousaf s/o Aurang Zeb	Seri Gali	GPS Shanaya
131.	Farid -ur Din s/o Abdul Hai	Matseri	GPS Jiggi
132.	Sadique s/o Haider Zaman	Purni	GPS Hariyala
133.	Azmat Ayub s/o Muhammad Ayub	Naryala	GPS Chameyari Ghazi Kot
134.	Said Badshah s/o Mudassar Shah	Sarori (K.D)	Msq : Cheer
135.	Muhammad Mustara s/o Yasin Khan	Judb	Msq ; Kalala
136.	Abdul Bashir s/o Gul Raiz	Uthlair	Msq : Mohri Danna
137.	Fanoos Shah s/o Syed Azcem Shah	Rongaly	Msq : Soormal Madda Khail
138.	Syed Wahab s/o Muhammad Mustala	Jatka	Msq : Laka Tiga
139.	Pir Muhammad Shah s/o Pir Ahmed Shah	Jatka	Msq : Tara Madda Khail
140.	Liaqat Ali s/o Sher Muhammad Khan	Shikiari	Msq : Jhangri
141.	Sardar Zaman s/o Shah Izat Khan	Deri Kaka Khail	Msq : Markharain

SD/-
(Haq Nawaz Khan)
District Education Officer
(Male) Primary Mansehra.

Endst: No.217-367-----/Dated Mansehra the February 13, 1997

Copy forwarded to the:-

1. P.S to Secretary to Government of N.W.F.P Education Department Peshawar.
2. P.A to Director Primary Education of N.W.F.P Peshawar
3. District Accounts Officer Mansehra.
4. Sub-Divisional Education Officer (Male) Mansehra.
- 5-10. ASDEO Circle Pulra, Shergarh Oghi Battal Jabori & Kala Dhaka.
- 11-151. All Concerned.

SD/-
(Haq Nawaz Khan)
District Education Officer
(Male) Primary Mansehra.

P-22-A

P-208

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No. 7097-0290

Divisional Directorate of Edu:
Hazara Division Abbottabad
O.O No. 12
Dated: 05/04/1997

To,

All the D.E.Os (M&F),
Hazara Division, Abbottabad.
All the Principals/ Headmasters/ Headmistresses,
GHSS, GGHSS, GHS, & GGHS in Hazara Division.

Subject: IRREGULAR APPOINTMENTS.

I am directed to refer Director of Education, (secy) NWFP, Peshawar's No. 4392-438 dated 31/03/1997 and to say that all the irregular appointments made from 01/11/1993 to date have been terminated by this office and as well as pointed out by the enquiry committees and inspite of this if any irregular appointee has been left and detected later on, the concerned will be held responsible for the consequences. In case there is any ambiguity regarding regular or irregular appointee, the fact can be verified from this office within a week time.

Therefore, after all such efforts made by this office/ depart: if any irregular appointee is detected the concerned DDO will be held personally responsible for the consequences.

Sd/-
ASSISTANT DIRECTOR (ESTT)
DIVISIONAL DIRECTOR OF EDU: ATD.

Endst: No. 8297-99 / Dated 05/04/1997

Copy of:-

1. The Director of Edu: (Secy) NWFP, Peshawar w/r to his No. mentioned above.
2. ADE Local Directorate.
3. O.O File.

Sd/-
ASSISTANT DIRECTOR (ESTT)
DIVISIONAL DIRECTOR OF EDU: ATD.

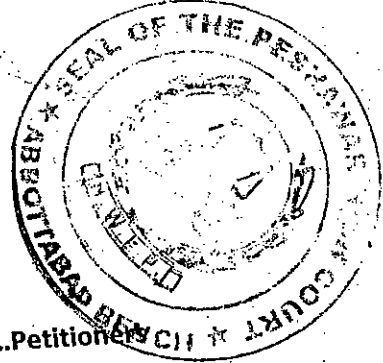
BEFORE THE PESHAWAR HIGH COURT
ABBOTTABAD BENCH

Annex-C

CM No. 669-A/15
Writ Petition No 368-A/2013

P-23

1. Muhamamd Ishtiaq son of Muhammad Maroof PST
2. Jehanzaib son of Abdur Rehman PST
3. Khan Muhammad son of Muhammad Akbar PST
4. Muhammad Riaz son of Wali Muhammad PST
5. Muhammad Aslam son of Bagh Ali PST
6. Mst. Nasreen D/O Rehmat Ullah PST
7. Mst. Bibi Gul Shazia D/O Ayub Shah DM
8. Mst. Shahida Bano D/O Wali Muhammad CT
9. Farzana Bibi D/O Muhammad Zaman PT



VERSUS

1. District Education Officer (Male) Mansehra
 2. District Education Officer (Female) Mansehra
- Respondents

APPLICATION FOR IMPLEMENTATION OF JUDGMENT
DATED 14/5/2013 OF THIS HONOURABLE COURT IN W.P
NO 368-A/2013.

Respectfully Sheweth,

1. That, the petitioners filed writ petition No 368-A/2013 regarding their re-instatement in service under KPK sacked Employees Appointment Act 2012. Copy of Writ Petition No 368-A/2013 is attached as Annexure "A".
2. That, this Honorable Court decided the captioned writ petition in favour of the petitioners vide judgment dated 14/5/2013. Copy of judgment of this Honourable Court dated 14.5.2013 is attached as Annexure "B".

31/8/15
3651
31-8-15
Certified to be True Copy
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Section 479 of the Ordinance

P-24

- 3. That, Respondent No 1 as per direction of this Honourable Court in a similar writ petition No 497-A/2013 dated 25.6.2013, W.P 401-A/2013 dated 22.5.2013 & COC No 70-A/2013 has issued appointment orders of the employees in District Mansehra who are at par with the present petition. Copy of appointment orders of similar Employees/teachers dated 1.07.2015 issued by respondent No 1 are attached as Annexure "C".
- 4. That, the petitioners submitted judgment of this Honourable Court to respondents for implementation. Copy of application addressed to respondent is attached as Annexure "D". But respondents did not implement judgment of this Honourable Court which amounts to Contempt of Court on the part of respondents.

It is, prayed that respondents may graciously be directed to implement judgment of this Honourable Court on the analogy of employees who are similarly placed, have been appointed respondent No 1, failing which contempt of Court proceedings may be initiated against the respondent.

Dated: 31/8/2015

M. Arshad Khan Tanoli
Petitioner

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

31/8/15
Certified to be True Copy
Examiner
Peshawar High Court
Abbottabad Bench

BEFORE THE PESHAWAR HIGH COURT
BENCH ABBOTTABAD

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P-25

CM No 669 /2015
In
W.P 368-A/2013

Muhammad Ishtiaq & 8 others

.....Petitioners

VERSUS

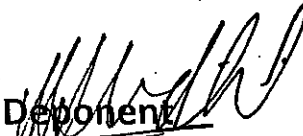
1. District Education Officer (Male) Mansehra
2. District Education Officer (Female) Mansehra

.....Respondents

Affidavit

I Muhammad Arshad Khan Tanoli Advocate High Court do hereby solemnly affirm and declare that the contents of foregoing application as furnished by my client are true and correct to best of my knowledge and belief and nothing has been concealed from this Honourable.

Dated: 31/5 /2015


Deponent 

3259/454

559

31 Mtd
1944 15
muhammad arshad khan
Tanoli Add Add.

h. illud


31/5/15

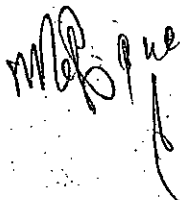
Certified to be True Copy

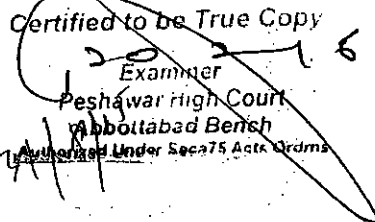
Examiner

Peshawar High Court

Abbottabad Bench

Authorized Under Sec 75 Act & Ordms

2




PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

P-26

FORM OF ORDER SHEET

Court of.....
Case No:.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
15.09.2015	<p><u>C.M.No. 669-A/2015 in W.P.No. 368-A/2013.</u></p> <p>Present: Mr. Muhammad Arshad Khan Tanoli, Advocate, for the applicants. ***</p> <p>Notice be issued to the respondents to show cause as to why the judgment of this court dated 14.05.2013 rendered in W.P.No. 368-A/2013 has not been implemented so far. Their reply shall reach the court positively within a fortnight.</p> <p style="text-align: right;"><i>So ordered</i></p>

Certified to be True Copy
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordms

/*Saif*/

P-27

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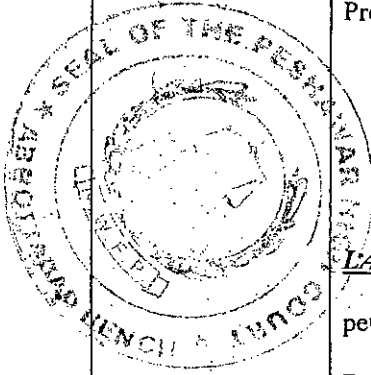
PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
19.01.2016	<p><u>C.M.No. 669-A/2015.</u></p> <p>Present: Mr. Muhammad Arshad Khan Tanoli, Advocate, for the petitioners.</p> <p>Mr. Muhammad Naeem Abbasi, Additional A.G alongwith Ms. Faiza, DEO (Female) Mansehra. ***</p> <p><u>LAL JAN KHATTAK, J.-</u> The latter stated that grievance of the petitioners will be redressed in the forthcoming meeting of the Departmental Selection Committee which is scheduled to be held on 02.02.2016, on which learned counsel for the petitioners did not want to press this petition any more.</p> <p>2. In view of the above, this petition stands disposed of with directions to the respondents to positively consider grievance of the petitioners in the forthcoming scheduled meeting of Department Selection Committee.</p> <p style="text-align: right;">SO JUDGE S</p>



Certified to be True Copy
 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Act & Ordns.

Amey - B

(15)

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P-28

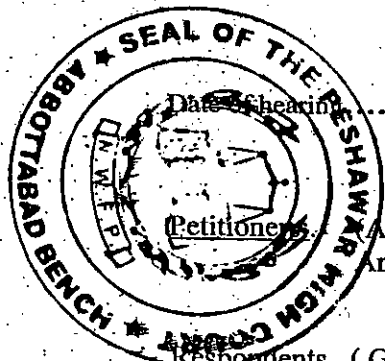
Judgment Sheet

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

JUDICIAL DEPARTMENT

WP. No. 368-A/2013.

JUDGMENT



Date of hearing14.5.2013.....

Petitioners. (Abdul Razaq & others) By: Mr. Mr. Muhammad Arshad Khan Tanoli, advocate

Respondents. (Govt of Khyber Pakhtunkhwa & others)Mr. Muhammad Nawaz Khan, Additional Advocate General)

YAHYA AFRIDI J. Abdul Razzaq and 13 others, seek

constitutional jurisdiction of this Court praying that:-

“On acceptance of the instant writ petition, the respondents may be directed to reinstate the petitioner forthwith as more than seven months have elapsed after the promulgation of the said Act.”

Certified to
13.5.13
Peshawar High Court
Abbottabad Bench
Authorized Under Section 15 of the
Peshawar High Court Ordinance

Certified to be True Copy
Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Section 15 of the
Peshawar High Court Ordinance

P-10

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P-29

2. Mr. Muhammad Nawaz Khan Additional Advocate General present in Court accepts notice on behalf of the respondents.

3. This Court has earlier in WP No. 343-A/2013 held that:-

"3. Admittedly, all the employees in different departments have been reinstated as per the above said Act but respondent No. 3 has not acted upon the said Act in letter and spirit for the last seven months hence deprived the petitioners of their right under the said Act hence the petitioners are liable to re-appointed/reinstated in service. Previously, petitioners had filed WP No. 592/2010 which was sent to the respondents for appropriate action under the rules but even then the respondents did not bother to take notice of the said judgment passed by this Court on 03.5.2012.

4. Accordingly, the instant writ petition is sent to the respondent No. 3 for considering the case of petitioners as per Sacked Employees Act, 2012 and be finalized positively within one month."

certified to be true copy
13/8/13
Peshawar Court
Abbottabad Bench
Enacted Under Sec 75 Acts Ordins

In view of the judgment rendered by this Court in the aforementioned writ petition, this writ petition is

1-13

(48)

also disposed of in terms that the petitioners be treated at par with others '*similarly placed*' as is the command of the law.

Announced.
Dated: 14.5.2013.

SD JUDGE

Certified to
178-75
District Court
Abottabad
District Court, Abottabad



Annex-"D"

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA.

P-30

APPOINTMENT

In pursuance of Khyber Pakhtunkhwa Sacked Employees (Appointment) 2012 and Consolidate Judgment passed by Honorable Peshawar High Court Abbottabad vide Dated 24-05-2016, in W/P No 516-A/2013, 676-A/2015, 20-A/2014, 216-A/2015, 1155-A/2015, 702-A/2014, 115-A/2014, and orders of Honorable High Court in COC No.22-A/2016, COC No. 47-A/2016, COC No. 58-A/2016, COC No. 83-A/2016, consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of PST, School based and in BPS-12(Rs.13320-960-42120) plus usual allowances as admissible under the rules, under the existing policy of the Provincial Government, on the terms and condition given below with effect from the date of their taking over charge:-

S.#	Name	Father's Name	Date Of Birth	Permanent Address	Place of posting
1.	MUHAMMAD RASHEED	ABDUL KHALIQ	02-02-60	Village Karori Post Office Oghi Tehsil Oghi & Distt Mansehra	GMPS Doga
2.	SHER MUHAMMAD	TAJ MUHAMMAD	11-05-65	Village Fateh Bandi P/o Shergarh Tehsil Oghi & Distt Mansehra	GPS Ghagkar Harlan
3.	GHULAM HASSAN	M MUHAMMAD ISHAQUE	02-04-68	Village Nalla Jabbar Tehsil & District Mansehra	GPS Sundi
4.	MUHAMMAD HAROON	KHALIL UR REHMAN	03-04-68	Village Kotehra post office Phulra Tehsil & Distt Mansehra	GPS Phulra
5.	IFTIKHAR AHMED	GHULAM HAIDER	13-01-70	Village Gojra P/O Phulra Tehsil & District Mansehra	GPS Bandi Gulo No.1
6.	SYED ZULFIQAR HUSSAIN SHAH	SYED SADIQ SHAH	16-06-71	Village Bal Bala P/O Chiattar Plain Tehsil & District Mansehra	GPS Bali Mang
7.	NAEEM KOSAR	GHULAM SARWAR	07-01-72	Village Dub No.2 Mansehra Tehsil & Distt Mansehra	GPS Ogra
8.	JAVAID IQBAL	AHMAD JI	15-07-72	Village Panjool P/O Mandagacha Tehsil & District Mansehra	GPS Panjool Bala
9.	MUHAMMAD ASLAM	BHAG ALI	09-11-72	Village Takkia Perhinna Tehsil & Distt Mansehra	GPS Tarmang
10.	KALA KHAN	ARSALLAH	29-12-73	Village Perhinna Tehsil & District Mansehra	GPS sawan Mera
11.	MUHAMMAD SARFRAZ	ALI ZAMAN	22-01-74	Village Jhangi P/O Perhinna Tehsil & District Mansehra	GPS Balla Raqib
12.	MUHAMMAD AYUB	ABDUL UR REHMAN	06-02-74	Village Dhaman P/o Madserlan Tehsil & Distt Mansehra	GPS Murad Pur
13.	JEHANZAIB	ABDUL REHMAN	21-02-74	Village Ichrlan Perhinna Tehsil & Distt Mansehra	GPS Kalgan
14.	MUHAMMAD FARMAN	MUHAMMAD YOUNIS	28-12-74	Village Thakra Paein P/o Shergarh Tehsil Oghi & Distt Mansehra	GPS Chairan
15.	MUHAMMAD BASHIR	ABDUL AKBAR	08-01-76	Village Macchrul P/o Karori Tehsil Oghi & Distt Mansehra	GPS Shungli
16.	MUHAMMAD ISHTIAQ	MUHAMMAD MAROOF	09-12-76	Village Gojran Perhinna Tehsil & Distt Mansehra	GPS Thakar Maira
17.	MUHAMMAD HAMID	RAFI UD BIEN	01-03-77	Village Madina Colony Post Office Oghi Tehsil Oghi & Distt Mansehra	GPS Belian
18.	MUHAMMAD RIAZ	WALI MUHAMMAD	20-06-77	Village Gandan post office Lissan Nawab Tehsil & Distt Mansehra	GPS Kalwal
19.	SHAHID USMAN	MUHAMMAD AKRAM	20-11-78	Village Hari Maira P/O Khaki Tehsil & Distt Mansehra	GPS Hamsherlan

TERMS & CONDITIONS.

- NO TA/DA etc is allowed.
Charge reports should be submitted to all concerned in duplicate.
Their Appointment are subject are condition that, their certificates/document and domicile be verify from the concerned authority before releasing their salary in the light of Section 3 of the said ACT.
They will be governed by such rules & regulation enforce and as may be prescribed by the Government time to time for the category of the Government savant to which they belong.
Their appointment has been made in pursuance of Khyber Pakhtunkhawa, Sacked Employee (appointment) ACT 2012. Hence under Section 5 of the said ACT they shall not be entitled to any claim of the seniority, promotion and back benefits.
- Their appointment has been made in pursuance of Khyber Pakhtunkhawa, Sacked Employee (appointment) ACT 2012. Hence Section 4 of the said ACT period during which they remained dismissed removed or terminated from services, till the date of their appointment shall have been deemed atomically relaxed.

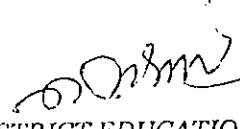
7. Their Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO. Anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
8. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
9. Their pay will not be drawn until and unless a certificate to the effect by DEO is issued that his certificates/degrees are verified from the concerned board/university.
10. The Principal / Headmaster School concern is directed to submit their Degrees /Certificates etc to this office for verification from Board /University/Institutions before any payment made to them.
11. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
12. Health and Age Certificate should be produced from the Medical Superintendent King Abdullah Teaching Hospital Mansehra before taking over charge.
13. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
14. Their services shall be terminated at any time, in case his performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
15. Their appointments are made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
16. In case of having less qualification whichever is prescribed Academic FA for PST as well as classical certificate as profession the candidate must be qualified the above prescribed qualification i.e Academic/Professional within 3 years after issue of this appointment order, failing which their appointment order shall stand terminated atomically, without any further notice.
17. Before handing over charge once again their documents may be checked if they have not the required qualifications they may not be handed over charge.
18. Before handing over charge they will sign an affidavit with the department, otherwise this order will not be valid.
19. The competent authority reserve to right to rectify the error / omission, if any noted /observed at any stage in instant order issued erroneously.

— Sd —
DISTRICT EDUCATION OFFICER,
(MALE)MANSEHRA

Encl: No. 20672-702 /File No./PST/Sacked Apptt:/2017/Dated Mansehra the 11/12 2017

Copy forwarded for information and necessary action to the: -

1. Registrar Honorable Peshawar High Court Abbottabad Bench.
2. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. PS to Secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
4. District Accounts Officer Mansehra.
5. All SDEO(Male) in District Mansehra.
6. Budget & Account Officer Local Office.
7. Officials Concerned.
8. Office Order File


DY: DISTRICT EDUCATION OFFICER
(MALE)MANSEHRA

Annex - E

P-32

NOTIFICATION

Mr. Muhammad Riaz S/O Wali Muhammad PST GPS Kalwal Mansehra, WHEREAS Mr. Muhammad Riaz PST GPS Kalwal Circle Mansehra was proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of fake and fabricated documents have been found in service record and tempering in documents was proved.

1. And WHEREAS after verification of documents/Service record, fake and fabricated documents have been found in service record of Mr. Muhammad Riaz PST GPS Kalwal.
2. AND WHEREAS an initial inquiry was initiated vide this office letter No 3638-41 dated 05-03-2018.
3. WHEREAS as per inquiry report vide dated 14-03-2018, fake and fabricated documents/Service records were found.
4. WHEREAS as per inquiry report, was provided opportunity to explain the matter on vide this office letter No.4585 dated 20-03-2018 & for provision of relevant record and explain actual position, after that the concerned provided documents in subject case.
5. WHEREAS the matter regarding appointments of Sacked Employee was re-inquired by the Competent Authority vide letter No.6500 dated 11-04-2018 for Authentication/Verification of Relevant Documents of Appointees of Sacked Employee.
6. WHEREAS the inquiry committee after conducting the detailed inquiry submitted report vide dated 13-04-2018, wherein the committee scrutinized documents/Service Record provided by concerned the Termination order has been found fake and fabricated. with the remarks /recommendations of the inquiry Committee that Appointment order may be withdrawn,
7. WHEREAS as per inquiry report dated 13-04-2018, a showcause notice was issued to concerned vide this office No. 7203 dated 27-04-2018 and received reply of show cause notice on 07-05-2018.
8. WHEREAS, he was heard in personal on 21-05-2018, while attending the office of undersigned on 11-06-2018.
9. AND WHEREAS the competent authority District Education Officer (M) E&SE Mansehra after having considered the charges and evidence on record, perusal of reply of show cause notice & Personal hearing, is of the view that the charges against the accused Teacher have been proved. Therefore the appointment order vide Endst No.20672-702 dated 4-12-2017 in r/o Mr. Muhammad Riaz PST GPS Kalwal Mansehra is hereby **WITHDRAWN** with immediate effect.

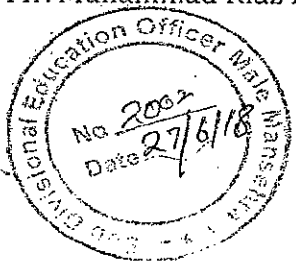
Sd/
DISTRICT EDUCATION OFFICER
(MALE) MANSEHR

Endst: No. 99822 /Lit: (M) // Dated 27/6 /2018

Copy forwarded for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (IMU) Mansehra.
3. District Account Officer Mansehra.
4. SDEO (M) Mansehra with the directions to do the needful.
5. Mr. Muhammad Riaz PST GPS Kalwal Circle Mansehra.

[Signature]
DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA



1
ANNEX - F

The Director Elementary & Secondary
Education Khyber Pakhtunkhwa,
Peshawar.

P-33

Subject: DEPARTMENTAL APPEAL AGAINST WITHDRAWAL
ORDER ENDORSEMENT NO. 918-22, DATED 27/06/2018

Respected Sir,

1. Reference is made to the impugned withdrawal order dated 27/06/2018. Copy of the impugned order dated 27/06/2018 is attached as Annexure "A".
2. It is submitted that the appellant got appointment as PST on 17/01/1996 vide order dated 17/01/1996. Copy of 1st appointment order is attached.
3. That after serving in the department the appellant got terminated on 24/11/1996 vide entry on page 5 of the service book. Copy of relevant page of service book is attached as annexure "B", Beside, that, the appellant received terminated order dated 13/02/1997 which was not properly legible, is annexed as Annexure "C".
4. That Govt. of KPK promulgated KPK sacked employee Act 2012, wherein it was stated that the sacked employees who got appointed w.e.f 01/11/1993 to 31/11/1996 were terminated w.e.f 01/11/1996 to 31/12/1998 are to be reinstated in service. Therefore, the appellant applied to the competent authority for reinstatement under the provision of the said act within the period prescribed by the provision of said act. But respondent department did not appoint the appellant on

the pretext that the appellant was untrained and still he is untrained.

5. Therefore, the appellant ^{filed} writ petition No. 368-A/2013 M. Ishtiaq and others V/s Govt. of KPK before Peshawar High Court, Abbottabad Bench for redressal of his grievance that the said writ petition of the petitioner was accepted accordingly. But even then the department with malafide intention did not bother to honor the judgment of Peshawar High Court. Following this, the appellant filed COC proceedings against District Education Officer (Male), District Mansehra as a result, the DEO issued appointment order of the appellant dated 05/12/2017 and submitted the same before the court, wherein the appellant was appointed as PST at serial No. 18 of the appointment order Endorsement No. 20672-702 dated 04/12/2017. Copy of the appointment letter is attached as Annexure "D".
6. That the competent authority i.e DEO (M) Mansehra issued appointment letter of the appellant after following prescribed procedure and thorough scrutiny of documents of the appellant via different high level committees. Now, the appointment letter of appellant has been withdrawn merely on ground that the termination order of the appellant is found tampered vide withdrawal order dated 27/06/2018 which is against the facts and without lawful justification. It is further submitted that the appellant has not been paid the salary w.e.f the date of appointment to the date of withdrawal which is against the principle of natural justice as employee are paid for the service rendered by him towards the department.

7. That it is indeed very sorrow state of affairs, that there are hell of employees serving in office of DEO who are responsible for keeping the record of the employees of department. Therefore to hide their negligence the appellant was time and again directed to submit his termination order which should have been in the record of the department.
8. That after thorough scrutiny of the record the appellant was appointed as PST on 04/12/2017, and now valuable rights of the appellant have been accrued which cannot be rescinded with one stroke of pen and without proper scrutiny. It is also submitted that some documents of the employees are accountable which are retained by the office i.e service book which is anchor sheet of the employees, appointment order and termination order.
9. That the withdrawal order of the appellant is arbitrary perverse and against the law, therefore, the same is liable to be set aside.

In view of the above, it is prayed that impugned order dated 27/06/2018 may be ordered to be set aside and appellant may be reinstated in service with all back benefits.

Dated: 30/06 - 2018



(MUHAMMAD RIAZ)
PST G.P.S Kalwal, Circle Phulra
District Mansehra

Recd

Annex. G



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

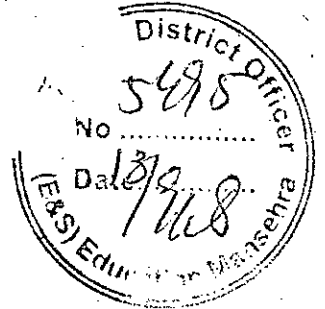
Registered.

No. 7274 F. No. 162/Vol:17/PST(M)
General.
Dated Peshawar the 7/9 /2018.

P-36

Security
To be referred to the
Commissioner
18/9/18

The District Education Officer (M)
Mansehra.



Subject: - APPEAL MUHAMMAD RIAZ (SACKED EMPLOYEE).

Memo:-

I am directed to refer to your letter No.11804 dated 17.08.2018 on the subject cited above and to state that the appeal of Muhammad Riaz PST GPS Kalwal District Mansehra in light of DEO (M) Mansehra report is hereby rejected.

I am further directed to ask you to inform the teacher concerned accordingly.

7/9/18
Deputy Director (Estab)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

7/9/18

Endst: No. _____

Copy forwarded to the:-

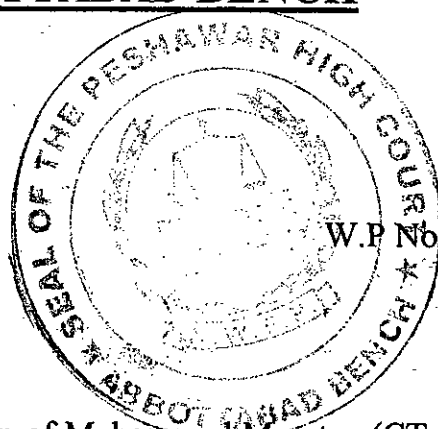
- 1. P.A to Director Elementary and Secondary Education local office.

Deputy Director (Estab)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

2-4-19

1

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH



W.P No 2/16 -A/2015

1. Muhammad Nawaz son of Muhammad Mumtaz (CT Teacher), resident of Dadar, P.O Dhodial, Tehsil & District, Mansehra.
2. Syed Zahoor Hussain Shah son of Syed Hazrat Ali Shah (CT Teacher), resident of Jabbar Devli, Tehsil & District, Mansehra.
3. Muhammad Saleem son of Umar Khitab (~~CT~~^{PST} Teacher), resident of Kamal Ban, Tehsil Balakot, District Mansehra.
4. Ishtiaq Ahmed son of Aziz ur Rehman (CT Teacher), resident of Bedadi, Tehsil & District, Mansehra.
5. Muhammad Alam (CT Teacher), GMS Dargah, Kohistan.
6. Matloob Ahmed (CT Teacher), GHS Sakhi Bala, Mnashera.
7. Shoukat Ali Khan (CT Teacher), GHS Khawari District, Mansehra.
8. Abdul Jalil son of Abdul Razzaq (CT Teacher), DEO Office Mansehra.
9. Wajid Ali Shah son of Rehman Shah (CT Teacher); resident of Village Khawari, Mansehra.
10. Muhammad Arshad son of Muhammad Yaqoob (CT Teacher), resident of Bai Bohal, District Mansehra.
11. Muhammad Farman son of Muhammad Younas (PST Teacher), resident of Thakra Pain, P.O Shergarh, Tehsil & District, Mansehra.
12. Shahid Usman on of Muhammad Akram (PST Teacher), resident of P.O Bari Maira, Tehsil & District, Mansehra.
13. Naeem Kousar son of Ghulam Sarwar (PST Teacher), resident of GPS Hallan, District Mansehra.
14. Syed Niaz Hussain Shah son of Sultan Shah (PST Teacher), Ghazikot, Tehsil & District, Mansehra.
15. Abdul Rasheed son of Kala Khan (PST Teacher), resident of Chinial, Tehsil & District, Mansehra.

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Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordms

27/5/16

9/3/15

16. Aziz ur Rehman son of Mian Ibrahim (PST Teacher), resident of Bhor Kund, Tehsil & District, Mansehra.
17. Muhammad Hamid son of Rafi ud Din (PST Teacher), resident of Oghi, Tehsil Oghi, District, Manshera.
18. Syed Zulfiqar Ali Shah son of Syed Sadiq Shah (PST Teacher), resident of District Mansehra.
19. Ghulam Hussan son of Muhammad Ishaq (PST Teacher), resident of District Mansehra.
20. Javed Iqbal son of Ahmed Jee (PST Teacher), Village Panjool, Tehsil & District, Mansehra.
21. Ayub son of Abdul Rehman (PST Teacher), GPS Chitta Batta, Mansehra.
22. Aftab Ahmed son of Abdul Jalil, (PST Teacher), GPS Chatta, Mansehra.
23. Sallar Khan son of Abdul Akbar, (PST Teacher), GPS Akhon Bandi.
24. Siddique son of Fareed, (PST Teacher), GPS Shangrita District Mansehra.
25. Muhammad Bashir son of Abdul Akbar, (PST Teacher), GPS Hari Doga.
26. Sher Muhammad son of Taj Muhammad, (PST Teacher), resident of Kalu Bashi.
27. Muhammad Saeed son of Syed Sardar Shah, (PST Teacher), GPS Borrian (K.D).
28. Muhammad Pervez son of Muhammad Zaman, (PST Teacher), GPS Miana Gali.
29. Abdul Rasheed son of Abdul Khaliq, (PST Teacher), GPS Jund Seri, Mansehra.
30. Muhammad Suleman son of Muhammad Yaqoob (PST Teacher) resident of Sohal Mahazullah, Tehsil Balakot District Mansehra.
31. Khurshid (PTC Teacher) GPS Mohar District Mansehra.
32. Muhammad Aslam (PTC Teacher), GPS Patian, District Mansehra.
33. Muhammad Shakeel (PTC Teacher), GPS Sokal, District Mansehra.
34. Liaqat Ali Khan (PTC Teacher), GPS Shinkiari, District Mansehra.

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 Peshawar High Court
 Abbottabad Bench 26
 Authorized Under Sec 75 Acts Ordms

27/5/16

FILED TODAY

Additional Registrar
 Peshawar High Court
 Abbottabad Bench
 9/3/15

35. Saqib son of Ghulam Mustafa (PST Teacher), resident of Reerh, P.O Attar Shesha, Mansehra.
36. Ghulam Nabi son of Arsla Khan (PST Teacher), resident of Kairi Bala, P.O Nawazabad, Tehsil & District, Mansehra.
37. Fida Muhammad (PST Teacher), resident of Village Karori Bala, P.O Shergarh, Tehsil & District, Mansehra.
38. Fazal ur Rehman son of Ghulam Hassan (PST Teacher), Village Meel Butt, Mansehra.
39. Amjad Raza son of Noor ul Islam (^{TT} PST Teacher), resident of Village Bajna, Tehsil & District, Mansehra.
40. Mansoor Ali son of Muhammad Ayaz Khan (PST Teacher), resident of Shohal Naaf Khan, District Mansehra.
41. Riaz son of Wali Muhammad (PST Teacher), resident of Village Gandam P.O Lissan Nawab, District Mansehra.
42. Naeem ul Haq son of Abdul Haq, (PST Teacher), resident of Banda Jageer, Tehsil Balakot, District Mansehra.
43. Muhammad Fiaz son of Muhammad Qazi, (T.T Teacher), GMS Jabori, Mansehra.
44. Syed Inayatullah son of Asghar Ali Shah, (T.T Teacher), resident of Village Panjool, District Mansehra.
45. Saeed ur Rehman son of Abdul Ghafoor, (T.T Teacher), GMS Kaiyan, Mansehra.
46. Irshad Ahmed son of Haji Hayat Ali, (DM), GMS Daral, Mansehra.
47. Muhammad Sajjad son of Ali Akbar, GPS Data, Mansehra.

...PETITIONERS

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education (E&SE), Peshawar.
2. Director Education (E&SE) Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) District Mansehra.
4. District Education Officer (Male), District Kohistan.

....RESPONDENTS

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 Exempted
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Act 1973 Ordms

27/5/16

No 937
 9.3.15

RECEIVED TODAY

Peshawar High Court
 Abbottabad Bench
 29/3/15

WRIT PETITION UNDER ARTICLE 199 READ WITH ARTICLE 25 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN, 1973 FOR A DECLARATION TO THE EFFECT THAT THE PETITIONERS WERE APPOINTED AS PST, C.T, T.T TEACHERS IN THE YEAR 1993 TO 1996 RESPECTIVELY. THEIR SERVICES WERE TERMINATED IN THE YEAR 1997-98 BY THE RESPONDENTS. LATER ON, GOVT. OF KHYBER PAKHTUNKHWA, PROMULGATED KHYBER PAKHTUNKHWA SACKED EMPLOYEES (APPOINTMENT) ACT, 2012 ON 20TH SEPTEMBER, 2012, WHEREIN ALL THE SACKED EMPLOYEES WHO WERE TERMINATED DURING THE PERIOD W.E.F NOVEMBER 1996 TO 31ST DECEMBER 1998 ARE TO BE RE-INSTATED AGAINST RESERVED 30% POSTS WHO POSSESS THE PRESCRIBED QUALIFICATION/ EXPERIENCE FOR THE SAID POST AT THE TIME OF THEIR APPOINTMENTS. THE PETITIONER NO. 1 TO 7 ARE TRAINED CT AND NO. 8 TO 10 ARE UNTRAINED C.T, PETITIONER NO. 11 TO 34 ARE TRAINED P.S.T, PETITIONER NO. 35 TO 42 ARE UNTRAINED P.S.T. SOME UNTRAINED/ TRAINED EMPLOYEES IN

(Certified to be true Copy)

Examine
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordms

27/5/18

19/3/15

EDUCATION DEPARTMENT HAVE BEEN RE-INSTATED UNDER THE CONTROL OF RESPONDENTS NO. 1 & 2 BUT RESPONDENTS ARE NOT APPOINTING THE PETITIONERS BEING UNTRAINED/ TRAINED WHO ARE AT PAR WITH THE EMPLOYEES HAVE BEEN APPOINTED IN OTHER DISTRICTS, WHICH IS DISCRIMINATORY, MALAFIDE, AGAINST THE ADVERTISEMENT POLICY IN VOGUE AT THE TIME, AS WELL AS AGAINST THE KHYBER PAKHTUNKHWA SACKED EMPLOYEES (APPOINTMENT) ACT, 2012.

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 Examined
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms

27/5/16

PRAYER: ON ACCEPTANCE OF THIS WRIT PETITION, RESPONDENTS MAY BE DIRECTED TO APPOINT THE PETITIONERS AS PER KHYBER PAKHTUNKHWA SACKED EMPLOYEES (APPOINTMENT) ACT, 2012 AS CT, PST, AT & TT TEACHERS AS WELL AS ON THE ANALOGY OF SIMILAR TRAINED, UNTRAINED EMPLOYEES WHO HAVE BEEN APPOINTED IN OTHER DISTRICTS UNDER THE CONTROL OF RESPONDENTS NO.1 & 2.

9/13/15

Respectfully Sheweth:-

Brief facts leading to the instant writ petition are arrayed as under:-

1. That the petitioners were appointed as CT, PST, AT & TT teachers in Education Department. Copies of appointment orders are attached as Annexure "A".
2. That as per policy in vogue at the time of appointment of the petitioners, requisite qualification for appointment as CT & PST teachers was Matric & F.A/ F.Sc. respectively.
3. That the petitioners were appointed as per rules, but they were illegally terminated from service in the year 1996-98.
4. That Govt. of Khyber Pakhtunkhwa, promulgated Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 in 20th September 2012 for appointment of sacked employees whose services were terminated in 1996-98 and had prescribed qualification at the time of their appointments. Copy of Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 is attached as Annexure "B".

(Certified to be True Copy)
 Examined
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms)

27/5/16

9/13/15

Judgment Sheet

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH
JUDICIAL DEPARTMENT

Writ Petition No. 216-A/2015

JUDGMENT

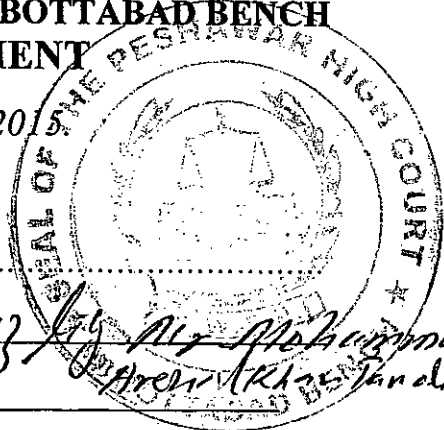
Date of hearing.....24.05.2016.....

Petitioner

Mohammad Nawaz *By Mr. Mohammad*

Respondents.

Govt etc AAG



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Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ord 1973

ROOH-UL-AMIN KHAN, J.- For the reasons and observations

recorded in our detailed judgment of even date in the connected

W.P.No. 516-A/2013 titled "Iftikhar Khan & 29 others Vs.

Government of Khyber Pakhtunkhwa through Secretary

Education (E&SE) Peshawar & 03 others", this petition stands

disposed of.

Announced:
24.05.2016

Self Judge
Self Judge

/*Saif*/

27/5/16

Judgment Sheet

IN THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH
JUDICIAL DEPARTMENT

Writ Petition No. 516-A/2013.

JUDGMENT

Date of hearing.....24.05.2016.....

Petitioners Iftikhar Khan by Mr. Arshad (Khan) Advocate

Respondents. Govt etc Mr. Mohammad Azeem Abbasi
AM

ROOH-UL-AMIN KHAN, J.- Through this single judgment

we intend to dispose of connected W.P.No. 20-A/2014 titled

"Akram Khan & 05 others Vs. Government of Khyber

Pakhtunkhwa through Secretary Education (E&SE) Peshawar

& 03 others", W.P.No. 546-A/2013 titled "Waseem Gul Khan

& 47 others Vs. Government of Khyber Pakhtunkhwa through

Secretary Education (E&SE) Peshawar & 14 others", W.P.No.

676-A/2015 titled "Abdul Razzaq Vs. Government of Khyber

Pakhtunkhwa through Secretary Education (E&SE) Peshawar

& 02 others", W.P.No.105-A/2015 titled "Mst. Saima Noreen

& 04 others Vs. Government of Khyber Pakhtunkhwa through

Secretary Education (E&SE) Peshawar & 03 others", W.P.No.

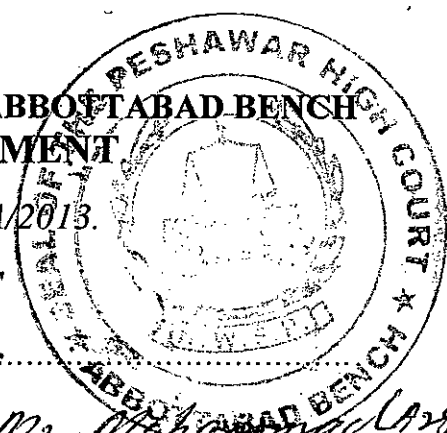
189-A/2015 titled "Muhammad Zafar Iqbal. Vs. Government of

Khyber. Pakhtunkhwa through Secretary Education (E&SE)

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Examiner
Peshawar High Court
Abbottabad Bench
Authorized Under Sec 75 Acts Ordms

27/5/16

Saima Noreen



Peshawar & 02 others", W.P.No. 216-A/2015 titled "*Muhammad Nawaz & 46 others Vs. Government of Khyber Pakhtunkhwa through Secretary Education (E&SE) Peshawar & 03 others*", W.P.No. 1155-A/2015 titled "*Rashid Iqbal & 14 others Vs. Government of Khyber Pakhtunkhwa through Secretary Education (E&SE) Peshawar & 02 others*", W.P.No. 702-A/2014 titled "*Shaheen Akhtar Vs. Government of Khyber Pakhtunkhwa through Secretary Education (E&SE) Peshawar & 02 others* and W.P.No. 115-A/2014 titled "*Khalid Khan & another Vs. Government of Khyber Pakhtunkhwa through Secretary Education (E&SE) Peshawar & 02 others*" as the petitioners of all these petitions have prayed for reinstatements in their services on the basis of "*Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012*".

2. Succinct facts leading to the instant petitions are that the petitioners were appointed by the respondents against their respective posts in accordance with the prescribed method of recruitment and later on their services were illegally terminated by the respondents, whereafter the Government of Khyber Pakhtunkhwa introduced "*Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012*" whereunder the

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 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms

27/5/16

Pass

respondents were bound to reinstate the petitioners as per criteria mentioned in the Act *ibid* but they did not appoint the petitioners inspite of the fact that more than hundreds posts were lying vacant in different cadres and were available in the establishment of respondent No.3, which conduct of the respondents towards the petitioners, being perverse, callous, malafide, is liable to be declared illegal and against the law. Initially comments of the respondents were called for, which

were submitted accordingly wherein the claim of petitioner was refuted on the grounds that at the time of initial appointment, petitioners were not qualified to be selected as teacher, as they were not possessing the requisite training certificates.

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 Abbotabad Bench
 (Authorized Under Sec 75 Acts Ordms)

27/5/16

3. In essence, grievance of the petitioners is that they were recruited by the respondents after fulfilling all the legal and codal formalities but their services were terminated in the year 1996-97 on the basis of political victimization, however, the Provincial Government promulgated the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 for reinstatement of the employees, who had been appointed on regular basis to a civil posts in the Province and equipped with the prescribed

qualification and experience of sacked employees at the time during the period from 01.11.1993 to 30.11.1996.

4. In pursuance of the enabling provisions of the Act, the petitioners approached the respondent-department but were refused the benefit of the Act *ibid* on the sole ground that at the time and during their initial service they were lacking the prescribed teaching training.

5. At the very outset, learned counsel for the petitioner produced a judgment of this court rendered in W.P.No. 1662-P/2013, whereby the respondents were directed to consider the untrained teachers for appointments against their respective posts, for the reason that at the time of initial appointments of the employees, under the laid down criteria, the untrained candidates were made eligible for appointment against the post of PTC.

6. The learned Additional Advocate General representing the respondent-department reiterated the same old arguments that the petitioners were lacking the requisite training certificate, therefore, under the Act *ibid* they cannot be considered for appointment.

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 Examiner
 Peshawar High Court
 Abbottabad Bench
 (Authorized Under Sec 75 Acts Ordms)

27/5/16

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7. We are not in consonance with the arguments advanced by the learned AAG for the reason that the respondent-department itself has considered numerous employees under the Act *ibid*, who were not in possession of the training certificate whereas they were provided opportunity to complete their training within three years. The relevant para of the reinstatement order / notification of various employees is reproduced below for ready reference: -

"16. In case of having less qualification which ever is prescribed intermediate / FA for PST as well as PST certificate as professional the candidate must be qualified both the academic / professional qualification within three years after issue of this appointment order, failing which their appointment order shall stand terminated automatically, without any further period."

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 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ord

27/5/16

8. It is golden principle of law that alike shall be treated alike which has further been elaborated by the apex court in the case of "*Hameed Akhtar Niazi Vs. The Secretary, Establishment Division, Government of Pakistan & others*" reported as 1996 SCMR 1185 and again in the case of "*Government of Punjab through Secretary Education & others*

Lawyer /

Vs. Sameena Parveen & others" reported as 2009 SCMR 01

where it has been held as under: -

"if a Tribunal or this Court, decides a point of law relating to the terms and conditions of a civil servant, who litigated, and there were other civil servants, who may not have taken any legal proceedings, in such a case, the dictates of justice and rule of good governance demand that the benefit of the same decision be extended to other civil servants also, who may not be parties to that litigation instead of compelling them to approach the Tribunal or any other legal forum."

9. In view of the above, all these petitions are disposed of in the following terms: -

- i. *That the petitioners though eligible for appointment but not equipped with training certificate, shall be considered for reinstatement against their respective posts under the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 immediately;*
- ii. *The concerned District Education Officer shall scrutinize the case of each individual petitioner independently;*
- iii. *Thereafter, the department shall arrange and manage the requisite training course for them and the petitioners shall be provided opportunity*

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 Examiner
 Peshawar High Court
 Abbottabad Bench
 Authorized Under Sec 75 Acts Ordms

27/5/16

2009 SCMR 01

to acquire the requisite training certificate;

- iv. In case the petitioner failed to acquire the requisite training certificate within the stipulate period, specified by the department, their services shall stand terminated automatically

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Exhibit

Peshawar High Court

Abbottabad Bench

Authorized Under Sec 75 Act 1973

Needless to remark, that the respective EDOs of each

27/5/16

district shall complete the process of reinstatement of the petitioners within one month positively.

Announced:
24.05.2016

/Saif/

Sd/ Judge,
Sd/ Judge,

کورت فیس

وکالت نامہ

بعدالت Servic Tribunal kple Peshawar

M. Riaz

عنوان: Court de ناممنجانب: Appellant

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام
 Muhammad Arshad Khan Tanoli
 Advocate High Court
 Office No: 33 Adjacent to

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 بر حلف 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 ناش 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۔

المترقوم:

Muhammad Arshad Khan Tanoli
 Advocate High Court
 Office No: 33 Adjacent to

“B”

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

No.

TB

Appeal No.....2088..... of 20 19

.....*Muhammad Riaz*.....Appellant/Petitioner
Versus

.....*Through Secy. Edn. U.P.K.*.....Respondent
Respondent No.....3.....

Notice to:

Distt. Education officer, ERSE (Male)
Distt. Mansehra.

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.....*14-7-2021*.....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.....*26/4*.....

Day of.....*March*.....20 21

at Camp Court A. Abad

[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.

713

No.

Appeal No. 1718 of 20 19

Umar Zaman Appellant/Petitioner

Versus

Through Secy: Edu: 12 Pk Pesh Respondent

Count: of 12 Pk through Secy: Edu: Respondent No. 1
Peshawar

Notice to:

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 12-7-2021 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 via this~~

office Notice No. dated:

Given under my hand and the seal of this Court, at Peshawar this 25th

Day of March 20 21

at Camp Court A-Block

Handwritten signature

Handwritten 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.

TB

No.

Appeal No.....1718..... of 2019

.....Amar Zaman.....Appellant/Petitioner

Versus

.....Sarg: Estab: 14 P 14 Peshawar.....Respondent

Respondent No.....2.....

Notice to:

Sarg: Establishment Deptt. Govt. of
14 P 14 Peshawar.

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.....12-7-2021.....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.....25/6.....

Day of.....March.....20 21

At Camp Court Peshawar

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.....2038..... of 2019

.....Muhammad Riaz..... Appellant/Petitioner

Versus

.....Through Secy. Edu. I.P.S. Pesh...... Respondent

Respondent No.....2.....

Notice to: Director, Ele: 2 Sec. Education Dept. of I.P.S. Peshawar.

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 14-7-2021.....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.....26th.....

Day of.....March.....20 1.

at Camp Court A Head

26/5/21

[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.