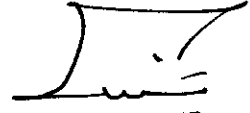


16.11.2022

Learned counsel for the appellant present. Mr. Sohail Ahmad Zeb, Superintendent for the respondents present.

Para-wise comments on behalf of respondents submitted, copy of which handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments on 23.01.2023 before the D.B at Camp Court Abbottabad.



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

21.12.2021

Clerk of learned counsel for the appellant present.
Mr. Asif Masood, DDA for respondents present.

Notices to the respondents have not been issued, therefore, notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments before S.B on 17.02.2022 at camp court Abbottabad.



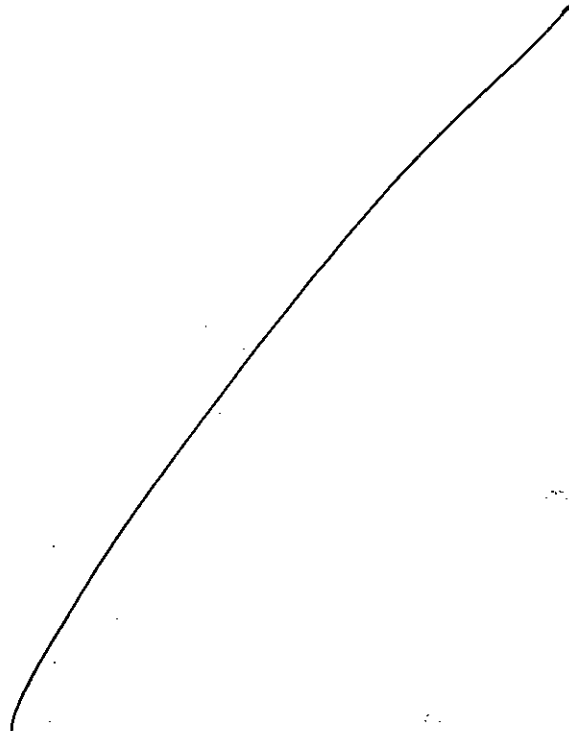
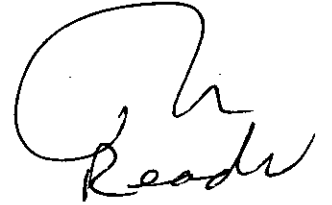
(Salah Ud Din)

Member(J)

Camp Court Abbottabad

17/2/22

Tour to camp court Abbottabad
has been cancelled to come up
for the same on 16/8/2022



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.4827/2021

Sakeem DadAppellant

VERSUS

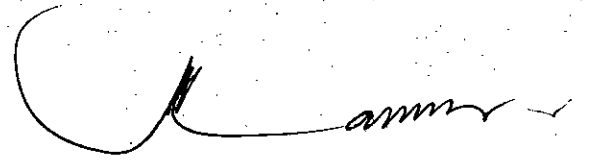
GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & OthersRespondents

SERVICE APPEAL

Joint Parawise Comments on behalf of Respondents

INDEX

Sr.No	Description	Page Nos	Annexures
1	Comments alongwith affidavit.	01 to 04	



**District Education Officer (M)
Abbottabad.**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No.4827/2021

Sakeem DadAppellant

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & Others.....Respondents

SERVICE APPEAL

Joint Parawise Comments on behalf of Respondents

Respectfully Sheweth:-

Comments on behalf of respondents are submitted as under:-

PRELIMINARY OBJECTION:-

1. That the appellant has no cause of action to file the instant service appeal.
2. That the appellant has no locus standi to file the present service appeal.
3. That the appellant did not come to this Honorable Tribunal with clean hands.
4. That the appellant concealed and distorted the material facts from this Honorable Tribunal.
5. That the present appeal has been filed just to pressurize and blackmail the respondents.
6. That instant appeal is hopelessly time barred.
7. That the instant appeal is not maintainable in its present form.
8. That the appellant has suppressed the material facts from this Honorable Tribunal, hence, not entitled for any relief and appeal is liable to be dismissed without any further proceedings.
9. That as per order dated 11-12-2019 of Honorable Special Judge Anti Corruption (Provincial) Camp Court Abbottabad appellant had already been dismissed from service whereas as per record no dismissal order is found.
10. That the instant service appeal is not maintainable as there is no final order in the instant appeal.
11. That as per order dated 11-12-2019 of Honorable Special Judge Anti Corruption (Provincial) Camp Court Abbottabad appellant facing trial had become absconder and challan under section 512 Cr.P.C was submitted against him and appellant declared as **Proclaimed offender** by court on 15-04-2003 later on appellant appeared before the court of law and filed Bail Before Arrest in the year 2017 and same was dismissed on 13-07-2017 and his physical custody was granted to Police and appellant remained in custody. Hence, appellant is not entitled for any relief.
12. That the respondents seek leave of this Honorable Tribunal to raise additional points at the time of arguments.

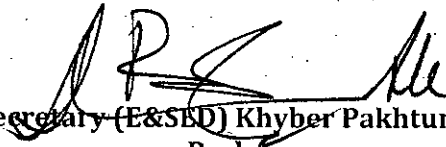
Factual objections:-

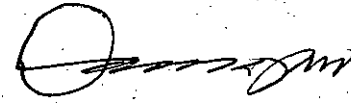
1. That Para No. 1, of the instant appeal relates with appellant's service record hence, need no further reply.
2. That Para No. 2, of the service appeal is subject to cogent proof.
3. That Para No. 3, of the service appeal relates to record.
4. That Para No. 4, of the service appeal is correct to the extent of initiation of inquiry while rest of the Para as composed is incorrect hence, denied and not admitted.
5. That Para No. 5, of the service appeal as composed is incorrect hence, denied and not admitted.
6. That Para No. 6, of the service appeal as composed is incorrect hence, denied and not admitted.
7. That the Para No. 7 of the service appeal relates to judicial record.
8. That the Para No. 8 of the service appeal as composed is incorrect hence, denied and not admitted.
9. That Para No. 9, of the service appeal relates to record.
10. That Para No. 10, of the service appeal is correct. As per order dated 11-12-2019 of Honorable Special Judge Anti Corruption (Provincial) Camp Court Abbottabad appellant had already been dismissed from service whereas, as per record of respondents no dismissal order is found.
11. That the Para No. 11, of the service appeal as composed is incorrect hence, denied and not admitted as appellant did not annex postal receipt alongwith his service appeal.


GROUND:-

- a. That ground a, as composed is incorrect hence, denied and not admitted.
- b. That ground b, as composed is incorrect hence, denied and not admitted.
- c. That ground c, as composed is incorrect hence, denied and not admitted.
- d. That ground d, as composed is incorrect hence, denied and not admitted.
- e. That ground e, as composed is incorrect hence, denied and not admitted.
- f. That ground f, as composed is incorrect hence, denied and not admitted.
- g. That ground g, as composed is incorrect hence, denied and not admitted.
- h. That ground h, as composed is incorrect hence, denied and not admitted.
- i. That ground i, as composed is incorrect hence, denied and not admitted.
- j. That respondents seek leave of this Honorable Tribunal to raise additional grounds / points during the course of arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the appeal in hand may graciously be dismissed with cost throughout.


Secretary (E&SED) Khyber Pakhtunkhwa
Peshawar
(Respondents No.01)


Director E&SE Khyber Pakhtunkhwa
Peshawar
(Respondent No. 02)


District Education Officer (M)
Abbottabad
(Respondent No. 03)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No.4827/2021

Sakeem DadAppellant

VERSUS

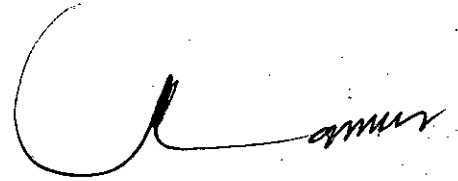
GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & OthersRespondents

SERVICE APPEAL

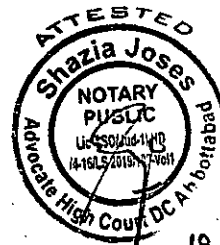
Joint Parawise Comments on behalf of Respondents

AFFIDAVIT

I, Mr. Muhammad Tanveer, District Education Officer (M) Abbottabad, do hereby affirm and declare that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



DEPONENT



19/7/22

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.4827/2021

Sakeem DadAppellant

VERSUS

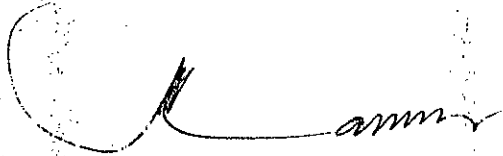
GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & OthersRespondents

SERVICE APPEAL

Joint Parawise Comments on behalf of Respondents

INDEX

Sr.No	Description	Page Nos	Annexures
1	Comments alongwith affidavit.	01 to 04	


District Education Officer (D)
Abbottabad.

Sakeem DadAppellant

VERSUS

GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & Others.....Respondents

SERVICE APPEAL

Joint Parawise Comments on behalf of Respondents

Respectfully Sheweth:-

Comments on behalf of respondents are submitted as under:-

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Factual objections:-

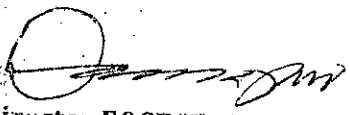
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- j. That respondents seek leave of this Honorable Tribunal to raise additional grounds / points during the course of arguments.

It is, therefore, very humbly prayed that in the light of forgoing comments the appeal in hand may graciously be dismissed with cost throughout.


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Peshawar
(Respondents No.01)


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(Respondent No. 02)


District Education Officer (M)
Abbottabad
(Respondent No. 03)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No.4827/2021

Sakeem DadAppellant

VERSUS

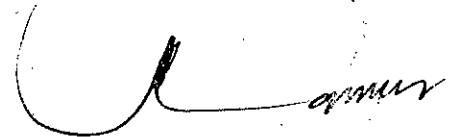
GOVERNMENT OF KHYBER PAKHTUNKHWA E&SE & OthersRespondents

SERVICE APPEAL

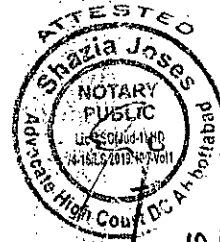
Joint Parawise Comments on behalf of Respondents

AFFIDAVIT

I, Mr. Muhammad Tanveer, District Education Officer (M) Abbottabad, do hereby affirm and declare that contents of forgoing comments are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



DEPONENT



19/7/22

12.10.2021

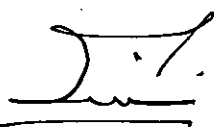
Mr. Hamayun Khan, Advocate, for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant was serving as PST, when he was falsely involved in case FIR No. 12 dated 30.11.2000 under sections 419/420/468/471 PPC read with Section 5 (2) PC Act, Police Station ACE Abbottabad; that the appellant was arrested in the said criminal case, who was released on bail and was ultimately acquitted by the learned Special Judge Anti-Corruption (Provincial) at Abbottabad vide order dated 11.12.2019; that the appellant submitted an application to the SDEO (Male) Havelian for reinstatement in service, however the same was rejected vide order dated 10.11.2020 without any legal and plausible reason; that the departmental appeal of the appellant was not responded within the statutory period, therefore, the appellant filed the instant service appeal for redressal of her grievance.

Points raised need consideration, hence the appeal is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments. File to come up for written reply/comments on 21.12.2021 before the S.B at Camp Court Abbottabad.

Applicant Deposited
Security & Process Fee

18/10/21

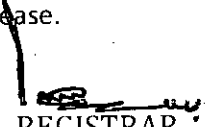



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4827/2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/04/2021	<p>The appeal of Mr. Sakeem Dad resubmitted today by post through Mr. Hamayun Khan 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>
2-	3-6-21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19-7-21</u>. Notices be issued to appellant/ counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
19.07.2021		<p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 12.10.2021 for hearing before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

The appeal of Mr. Sakeem Dad son of Mirdad resident of Bori Kehter Tehsil & District Abbottabad Ex-PST Teacher received today i.e. on 07/04/2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

Copy of impugned order dated 30.11.2000 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.

No. 674 /S.T,


Dt. 07/04/2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hamayun Khan Adv.
High Court A. Abad

Respected Sir.

It is submitted that I have annexed the impugned order dated 10-11-2020 available at page no 16 annexure 'P' in which respondent has made a reference of order dated 30-11-2000 which is not available in Black and white except the reference mentioned in order dated 10-11-2020. Please put the file for further proceeding.


Hamayun Khan
Advocate H-C
ATD

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP AT ABBOTTABAD

Service Appeal No. 4827 /2021

Sakeem Dad son of Mirdad, resident of Bori Kehter, Tehsil & District Abbottabad (Ex-PST Teacher).

...APPELLANT

VERSUS

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

....RESPONDENTS

SERVICE APPEAL

INDEX

<i>S.#</i>	<i>Descriptor</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Memo of Appeal	1 to 7	
2.	Copy of appoint order	8	"A"
3.	Copy of order	9	"B"
4.	Copy of FIR	10-11	"C"
5.	Copy of judgment	12-14	"D"
6.	Copy of Application	15	"E"
7.	Copy of impugned order	16-17	"F"
8.	Copy of Appeal	18-20	"G"
9.	Wakalatnama	21	

...APPELLANT

Dated: 3/4 /2021

Through


(FAZLULLAH KHAN)

&


(HAMAYUN KHAN)

Advocates High Court, Abbottabad

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR CAMP AT ABBOTTABAD

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4796

Dated 7/4/2021

Service Appeal No. 4827 /2021

Sakeem Dad son of Mirdad, resident of Bori Kehter, Tehsil & District Abbottabad (Ex-PST Teacher).

...APPELLANT

VERSUS

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

...RESPONDENTS

APPEAL UNDER ARTICLE 212 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973 READ WITH SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974. AGAINST THE IMPUGNED ORDER DATED 10.11.2020 PASSED BY RESPONDENT NO. 3 WHEREBY APPELLANT WAS DISMISSED/ REMOVED / TERMINATED, FROM SERVICE WITH EFFECT FROM 30/11/2020 WHICH IS ILLEGAL, AGAINST THE LAW, FACTS AND LIABLE TO BE SET-ASIDE.

Filed to-day

[Signature]
Registrar
7/04/2021

Re-submitted to-day
and in

[Signature]
Registrar
14/4/2021

PRAYER:- ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED ORDER DATED 30.11.2000 AND 10.11.2020 MAY KINDLY BE DECLARED NULL AND VOID, AGAINST THE LAW AND NATURAL JUSTICE AND APPELLANT BE RE-INSTATED IN SERVICE WITH ALL BACK BENEFITS.

Respectfully Sheweth;-

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

1. That on 10.11.1987 appellant was appointed as Chowkidar/ Class-IV in Government School Copy of appoint order is annexed as Annexure "A"
2. That thereafter appellant assumed charge and joined duty and performed duties with full devotion and liabilities and there had no complaint against the appellant.
3. That due to good performance, appellant applied for PST post through proper channel and after completion of all legal and codal formalities respondent No. 3 issued appointment order against

the post of PST. Copy of order is annexed as Annexure "B".

4. That in the year 2000 Anti-Corruption Establishment Provincial initiated so-called inquiry against the appellant on the basis of unknown application moved by the official of the office of respondent No. 3.
5. That thereafter Anti-corruption Provincial lodged so-called, baseless FIR No. 12, dated 30.11.2000 under Section 419, 420, 468, 471 PPC read with Section 5(2) PC Act, Police Station ACE, Abbottabad on the basis of political interference. Copy of FIR is annexed as Annexure "C".
6. That thereafter, appellant faced trial and prosecution (ACE) as well as respondent No. 3 miserably failed to prove the allegation leveled against the appellant during course of evidence.
7. That on 11.12.2019 the case was fixed for arguments and learned counsel for the prosecution and accused/ appellant argued the case, after hearing arguments, learned Special Judge Anti-

Corruption Provincial KPK Camp Court,
Abbottabad acquitted the accused from charges.

Copy of judgment is annexed as Annexure "D".

8. That after receiving attested copy of judgment appellant visited to office of respondent No. 3 and submitted. Copy of judgment and advanced verbal request for re-instatement, but respondent No. 3 refused.
9. That on 13.02.2020 appellant again Submitted Application alongwith Judgment, in the office of respondent No. 3. Copy of Application annexed as Annexure "E".
10. That on 10.11.2020 respondent No. 3 issued impugned order with remarks that since 30.11.2000 you are no more government servant order annexed as Annexure "F".
11. That on 10.12.2020 appellant filed departmental before the respondent No.2 Against the impugned order passed by respondent No.3. Copy of ~~order~~ *appeal* annexed as Annexure "G".
12. That till date respondent No.2 not given any response on the same and similarly not passed any

order on department appeal of the appellant hence this appeal on the following grounds.

GROUND:-

- a. That impugned order dated 10.11.2020 is against the law facts and liable to be set aside.
- b. That at the time of passing impugned order respondent No.3 ignored all legal and basic principle of natural Justice.
- c. That impugned order issued without inquiry, legal process, show cause notice, hence liable to be set aside.
- d. That at the time of passing impugned order respondent No.3 violated basic rules led down in E & D rules, and issued so called impugned order on political basic.
- e. That impugned order is against the fundamental rights of the appellant.
- f. That respondents failed to proved their case before the trial court which shows malafide of the respondents.

g. That respondents not provided any opportunity of defence to the appellant.

h. That order of the respondent No.3 is against the Judgment, of Superior Courts on the subject matter.

i. That the point would be argued at the time of argument with the permission of court.

It is therefore, most humbly prayed that on acceptance of the instant service appeal, impugned order dated 30.11.2000 and 10.11.2020 may kindly be declared null and void, against the law and natural justice and appellant be re-instated in service with all back benefits.


...APPELLANT

Dated: 3/4 /2021

Through


(FAZLULLAH KHAN)

&


(HAMAYUN KHAN)
Advocates High Court, Abbottabad

VERIFICATION:-

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


...APPELLANT

7

122

OFFICE ORDER NO. 206
DATED A.ABAD THE 11/10/87

^cA^u
ANNOUNCE

APPOINTMENT:

The appointment of the following Peon/cum Chowkidar are/is hereby ordered in the interest of public service against the school as noted against their/his name with effect from the date of taking-over charge in BPS.NO.I @ Rs.600/-P.M. plus usual allowances as admissible under the rules.

S.No.	Name/Father's name and address.	Place of where appointed	Remarks.
1.	Sekham Dad S/O Mir Abdul R/O Hari Khater	BPS Hari Khater	against Vacant Post

~~XXXX~~

W. S. H.
11/10/87

CONDITIONS:

1. Charge reports should be submitted to all concerned.
2. No Joining time is allowed to his/him what is absolutely necessary from transit
3. The appointment is purely temporary and subject to termination at any time without notice and assigning and reasons.
4. They/He are/is directed to produce Health and age certificate from the Civil Surgeon Abbottabad.
5. In case the candidate failed to take over the charge within 15 days from the date of issue of this order, appointment will stand automatically cancelled.
6. The candidate should not be handed over the charge if his age exceeds 40 years or below 18 years.
7. The appointment made under all services conditions laid down by the Government.

(MOHAMMAD ASHRAF)
SUB-DIVISIONAL EDUCATION
OFFICER(MALE) ABBOTTABAD.

Endst: No. 2737-40 Apptt: Peon/Chow: Dated _____/1987

1. Forwarded for information and necessary action to the:- District Education Officer(Male) Abbottabad.
2. Headmaster/Headteacher GPS Hari Khater.
3. Candidate concerned.
4. Local Accounts Branch.

[Signature]
SUB-DIVISIONAL EDUCATION
OFFICER(MALE) ABBOTTABAD.

Iftikhar

2

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
PRIMARY ABBOTTABAD DISTT: ABBOTTABAD.

Appointment

ANNEXURE "B"

Mr. Sakam Dad/Mir Ahmad Matriculate (Class-IV) GPS Batangi Khurd Abbottabad is hereby appointed P.T. Teacher against Vacant P.T. post at Govt. Primary School Battangi Khurd vice Mr. Sajjad Ahmad P.T. retired, in the interest of public Service with effect from the date of his taking over charge in EPS 7 @ Rs. 1480/- PM Fixed plus allowances as admissible under the rules.

Conditions. The appointment of the above noted person made under all services conditions, and subject to the Sanction of Age Relaxation from the Competent authority.

He is directed to submit charge reports to all concerned.

His age and Relaxation case should be prepared to sent to this office for onward transmission to authority concerned for proper Sanction to the Relaxation of Upper age limit.

His Services will be terminated if the Govt./Competent authority reject the case for Age relaxation.

Sd/ k k x x

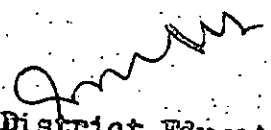
(SARDAR MOHAMMAD AYUB)
District Education Officer (M)
Primary Abbottabad.

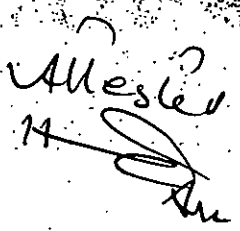
Endst. No. 4599-4601

/AE-I/PTCs /Dated Abbottabad the 28-12/1995

Copy for information and necessary action to the:-

1. S.D.E.O. (M) Abbottabad w/r to his recommendation dated 28.12.1995.
2. School Concerned.


District Education Officer (M)
Primary Abbottabad.



ANNEXURE 'C'

نام نمبر ۲۳-۵-۱۸

پولیس نمبر ۲۳-۵-۱۸

ابتدائی اطلاع رپورٹ

کوائف نمبر ۱۸

SPECIAL JUDGE
Anti-Corruption
Khyber Pakhtunkhwa
Peshawar
1998

فائل (ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ نمبر ۱۵۴ نمبر ۱۸) ضلع ۲۳-۵-۱۸
تاریخ دوست وقوع سال ۱۹۹۸

خانہ ACE ۴۹
نمبر ۱۲

1	تاریخ دوست رپورٹ ۲۳/۱/۱۸	وقت دوستی اوقات ۱۱:۰۰
2	نام دسکوت اطلاع دہندہ و مستفید	حاکم داد خان
3	مختصر کیفیت جرم (معدومہ) حال اگر کچھ لیا گیا ہو	درج ذیل
4	جائے وقوع فاصلہ خانہ سے اور سمت	۴۵۰ میل پشاور
5	نام دسکوت ملزم	۴۵۰ میل پشاور
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو۔	مہارت سے
7	خانہ سے روانگی کی تاریخ و وقت	۱۲

ابتدائی اطلاع نیچے درج کرو
 ۱۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۲۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۳۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۴۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۵۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۶۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔
 ۷۔ کہ وہ ایک ایسے شخص کی طرف سے ملوث ہے جس نے اس کے ساتھ ساتھ ایک اور شخص کو بھی ملوث کیا ہے۔

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CATION
RTMENT, AAF

۱۱/۱۱/۲۰۰۰
میں نے اپنے تمام جائیداد کو
میراثی بنانے کے لیے
کوئی رقم نہیں ہے


ATD
ACE
30

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against
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دستخط
عہدہ

اطمینان کے لیے اطلاع دیندہ کا دستخط ہو گا یا اسکی ہر بات نشان لگایا جائیگا اور اس پر تحریر کی گئیہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔
سابقہ تمام باتیں شرح و شرح کے بالمقابل نام لکھ کر تمام ہر شے علی الترتیب اس کے ہاتھ لگائی جائے گی اور اس کے بعد اس کے ہاتھ لگائی جائے گی۔

11
"D"
FORM "B"
ANNEXURE

Serial No. of Order or Proceedings 1	Date of Order or Proceedings 2	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary. 3
	<p style="text-align: center;"></p> <p><u>Order dated 11-12-2019.</u></p>	<p style="text-align: center;"><u>In the Court of Ikhtiar Khan, Special Judge, Anti-Corruption, (Provincial), Khyber Pakhtunkhwa, (Camp Court Abbottabad).</u></p> <p style="text-align: center;">Case No.68 of 2017. Date of Institution.27-11-2017. Date of Decision. 11-12-2019.</p> <p style="text-align: center;"><u>State..... Versus.</u></p> <p style="text-align: center;">Saikam Dad S/o Meer Ahmad, R/o Hari Khater District Abbottabad.</p> <p style="text-align: center;"><u>Case FIR No.12 dated 30-11-2000 u/s 419/420/468/471 PPC read with section 5(2) PC Act of P.S. ACE, Abbottabad.</u></p> <p>Deputy PP Azhar Ali for state and accused Saikam Dad on bail present.</p> <p>Arguments on the application filed by accused facing trial for his acquittal u/s 249-A Cr. PC already heard.</p> <p>It is the case of prosecution that in the year 1996 accused Saikam Dad had succeeded in securing government job in Education Department through fake and bogus PTC Certificate. The matter was reported through written application dated 02-12-1999, addressed to the ADC, ACE Hazara Division. Resultantly, an open inquiry bearing No.51 of 2000 was conducted. The PTC certificate of the accused facing trial was sent for verification to the Registrar, Departmental Examination and as per his report the same was found to be fake and bogus. Thus, instant case was registered vide FIR bearing No.12 dated 30-11-2000 u/s 419/420/468/471 PPC read with section 5(2) PC Act in P.S. ACE Abbottabad.</p> <p>Initially the accused facing trial had become absconder and challan u/s 512 Cr.PC was submitted against him. The prosecution was allowed to produce evidence in absence of accused and after recording the same the accused was declared</p>

4/2/2020

11-12-2019

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FORM "B"

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary
1	2	3

as proclaimed offender by this court on 15-04-2003. Later on, accused appeared before this court by filing BBA No.74 of 2017 which was dismissed on 13-07-2017, however the accused was released on post arrest bail on 20-07-2017. After completion of investigation supplementary challan was submitted against the accused for the purpose of trial before this court.

The accused was summoned, however it was reported that the original record was not traceable. The order sheet No.4 dated 09-02-2018 of this file suggests that the main record was consigned to the General Record Room Abbottabad on 16-04-2011 and the same had been burnt to ashes due to the fire on 10-06-2011. My predecessor-in-office vide same order directed the prosecution for reconstruction of the case file with intimation to the Honourable Peshawar High Court. Thereafter, the file was reconstructed in shape of case diaries and attested photo copies of available record.

The accused was charge sheeted on 26-04-2018 to which he pleaded not guilty and claimed trial.

The prosecution in support of its case has produced as many as 3 PWs and abandoned 5 PWs. Learned defence counsel on 13-06-2019 had submitted an application for acquittal of accused u/s 249-A Cr.PC and notice of the same was given to the state. Thereafter, various opportunities were also given to the state for production of remaining PWs but in vain. So, on 07-11-2019 the arguments of learned defence counsel in support of the application were heard and the case was adjourned to 28-11-2019 on the request of learned Dy: PP as he wanted to produce the remaining evidence. On the preceding date i.e. 28-11-2019 no witness was produced by the prosecution, so the arguments of learned Dy: PP in reply to the application filed by the accused were also heard.

It is admitted fact that instant case was registered on 30-11-2000 in P.S. ACE Abbottabad on the allegations that the accused facing trial had succeeded in getting of government job in Education Department on the basis of fake PTC certificate. It

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11-11-2019

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FORM "B"

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(10)

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary
1	2	3

is also admitted fact that the accused facing trial after registration of case had become absconder and remained fugitive of law till filing of his BBA petition bearing No.74 of 2017 before this court. It is also admitted fact that after registration of case the accused facing trial was dismissed from service and he is no more the government employee. It is also admitted fact that the original record of the case file has burnt to ashes and the reconstructed record is mainly consisting of copy of application for permission of open inquiry, copy of the letter Ex.PW3/1 through which permission for inquiry was granted, copy of letter Ex.PW3/3 vide which permission for registration of case was granted and the copy of FIR Ex.PA. The facts that the accused facing trial had succeeded in getting job through fake PTC certificate and his dismissal from service after registration of instant case may not be denied but to convict an accused on the charges of forgery it was incumbent upon the prosecution to produce at least such evidence which could support the fake certificate produced by the accused for obtaining his government job. Unfortunately, even the copy of the forged certificate is not available on the record while the rest of the reconstructed record are the photo copies and not attested by any officer of the police department.

The accused had appeared before this court in BBA No.74 of 2017 which was dismissed on 13-07-2017 and his physical custody was granted to the police. He had remained in police custody but he had not made any judicial confession.

Thus, the available record and the evidence produced by the prosecution are not sufficient to connect the accused facing trial in the commission of offence or to establish any criminal charges against the accused. The remaining PWs are Shakeel C.O. and Fida Muhammad C.O. who had conducted the proceeding against the accused after his arrest. Thus, if these two-witnesses are appeared and examined by the prosecution even then no criminal case could be established against the accused facing trial.

The accused has already been dismissed from service, so

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Handwritten date: 17-12-2019

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14

FORM "B"

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary
1	2	3
	<p>11/21/2019</p> <p>Attested to be true copy</p>	<p>keeping in view the above facts, I accept the application filed by the accused and acquit the accused-namely Saikam Dad from the charges leveled against him. He is on bail. He and his sureties are discharged from the liabilities of bail bonds.</p> <p>This file be consigned to the record room after completion and compilation.</p> <p>Announced. Abbottabad. 11-12-2019.</p> <p><i>[Signature]</i> Special Judge, Anti-Corruption, (Provincial), (Camp Court Abbottabad).</p> <p><i>[Seal: SEAL OF SPECIAL JUDGE ANTI-CORRUPTION CAMP COURT PESHAWAR]</i></p> <p><i>[Signature]</i></p>

خدمت صبا ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) ایٹ آباد

لوساطت - SDEO (رجانہ) ایٹ آباد

ذرا خواست طراد بحالی در ملازمت

Put up case alongwith original document for onward submission
JMS
15/7/2020

جناب عالی! درخواست ذیل ہے۔

1- یہ کہ مسائل سکیم داد ولد عبد احمد ساکنہ باڑی کھنڈر ایٹ آباد کا ریٹرن ہے۔

2- یہ کہ مسائل محکمہ تعلیم میں بطور حوالہ دار مورخہ 11/10/1987 کو تصنیات ہوا۔ اور ما بعد بطور پرائمری ٹیچر (PT) تحت گورنمنٹ اسکول (غیر تربیت یافتہ) مورخہ 28/12/1995 کو تصنیات ہوا۔
"تقدیرات لفت میں"

مسائل
15

3- یہ کہ ما بعد میں مسائل کے خلاف ایک غلط اور بے بنیاد FIR نمبری 12 مورخہ 30-11-2000 درج و سبھر ہوئی۔

4- یہ کہ FIR نمبری 12 مذکورہ ٹرائل ہونے کے بعد عدالت اپنی کریشی (صوبائی کمیٹی کورٹ ایٹ آباد) نے مورخہ 11-12-2019 کو مقدمہ پر خلاف مسائل خارج فرما دیا۔ "نورہ لفت میں"

5- یہ کہ اجرائی مقدمہ کسب کیے مسائل کا حق بحالی ملازمت قائم ہو کر جاری ہے۔

لہذا آپ جناب میں التماس مقدمہ مسائل کو فوری طور پر عدالت بحالی فرماتا جا کر واپسی فرمائی جائے۔
13/5
13/5/2020

03235214169
03431925826

سکھ داد ولد عبد احمد ساکنہ باڑی کھنڈر ایٹ آباد
مسائل

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) ABBOTTABAD

No. 16 /EB/PF Sehkamdad

Dated 10/11 /2020

To

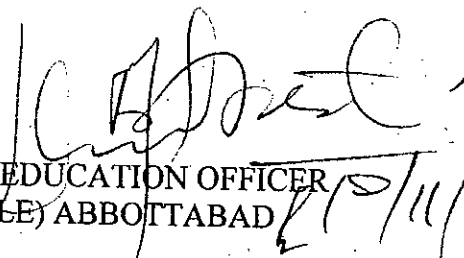
✓ Mr. Sehkamdad S/O Mir Ahmad
Ex-PST R/O Hari Khaiteer, Tehsil Havelian
District Abbottabad.

ANNEXURE

Subject: **APPLICATION FOR RE-INSTATEMENT IN SERVICE.**

Memo:


Reference your application received vide Diary No.1016 dated 14.02.2020 on the above noted subject and you are informed that as per judgment of the Honourable Special Judge, Anti-Corruption (Provincial) Khyber Pakhtunkhwa (Camp Court Abbottabad dated 11.12.2019 FIR No.12 dated 30.11.2000 u/s 419/420/468/471 PPC read with section 5(2)PC Act of ACE Abbottabad, you are no more in Government service since 30.11.2000 and hence, your application regarding re-instatement is hereby rejected.


DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

Endst: No. _____ /

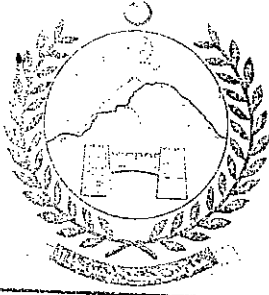
Copy of the above is forwarded for information and necessary action to:-

1. The Director, Elementary & Secondary Education, Khybr Pakhtunkhwa, Peshawar.
2. The Sub Divisional Education Officer (Male) Havelian.


DISTRICT EDUCATION OFFICER
(MALE) ABBOTTABAD

Attested
11/11/2020

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (M) ABBOTTABAD



No. 523

Dated: 18/07/2020

17

0992-330713

sdeomale1@gmail.com

To,

District Education Officer,
(Male) Abbottabad.

Subject:

APPLICATION FOR RE-INSTATEMENT IN SERVICE IN R/O
MR. SEHKAM DAD S/O MIR AHMED EX-PST GPS HARI KHAITEF
CIRCLE HAJIAGALI TEHSIL HAVELIAN DISTRICT ABBOTTABAD.

Memo:

Page 11 of 15

Reference your letter No. 1578/Sehkam Dad Dated 26.02.2020 and
reminder No. 2969/Sehkam Dad Dated 10.06.2020.

As per subject cited above and state that:

1. No any absent report found in the record due to shifting of office.
2. Copy of FIR is attached.
3. Not found suspension order in the record.
4. Copy of Court decision is attached.
5. Last pay slip is attached.

339
20-7-20

Sub Divisional Education Officer
(Male) Abbottabad

ADOLE

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19/7/20

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H. H. H.

خدمت جناب ڈائریکٹر ایگزیکیوٹو ایڈمنسٹریشن سیکرٹری ایجوکیشن
گسٹور

محکمہ ایڈیل بر خلاف حکم صدرہ 10¹¹ جاری کردہ DEO
2020
صدرہ ایب آباد کی رو سے سال کو نووری پر بحال کر
کی جائے 30¹¹ سے نووری سے نکال دیا گیا جو کہ سراسر
2000
غلط، خلاف قانون و خلاف واقعات، ناقابل بحالی و قابل
منسوخ ہے۔

جناب جناب ایڈیل ذیل میں ہے۔

1. یہ سال مطلع ایب آباد کا سیکونڈری ریالی ہے۔
2. یہ سال کی تعیناتی جسٹس جولدا 10¹¹ کو کی گئی اور اس
1987
3. یہ سال کی تعیناتی جسٹس جولدا 28¹² کو کی گئی اور اس کی
تعمیراتی ہوئی (تعدلات نہیں) 1995

4. یہ صدرہ 30¹¹ کو دفتر DEO کے اہلکاران اور سیکرٹری DEO
ذاتی عناد اور مقامی سیاسی اثر و رسوخ کی بنا پر اس غلط اور
بے بنیاد FIR جمع کیا گیا 12 صدرہ 30¹¹ کی اس سرسینٹی صوبائی میں
2000
رہنمائی کے تحت FIR لکھی ہے۔

5. یہ بعد ازیں مذکورہ FIR میں حالات و دیگر حکم سے بعد اس کی
عدالت میں شامل ہو گیا اور اس سال تک اس کی جاری نہیں ہے
استغناء کے خلاف کوئی الزام ثابت نہ ہو سکا اور آخر کار عدالت

لکھنؤ
11

استفادہ / DEO مخدوم FIR کو جسے بنیاد قرار دیتے ہوئے 12/11/2019

19 کو سامعہ تعقدہ میں جسے بناہ قرار دیتے ہوئے بری اسرار دیا
(نقل حکم / منیہ عدالت لفظیہ) حکم مذکورہ کا علم سید پرویز علی صاحب

6. یہ مذکورہ منیہ معترفہ حاصل کرنے کے بعد سامعہ 13/02/2020 کو
DEO صاحب ایف ایف ایف کو بحالی ملازمت کے لئے
درخواست گزارا. (نقل درخواست لفظیہ)

7. یہ 14 ماہ تک DEO نے مذکورہ درخواست کو زیر التعمیر
رہا اور آخر کار 10/11/2020 کو سامعہ کی درخواست کو مسترد کر
دیا۔ خبر فرمایا کہ سامعہ 10/11/2020 کے بعد سرکاری ملازم نہ ہے
اور ملازمت قائم ہو چکی ہے. (نقل لفظیہ)

8. یہ 30/11/2000 کا کوئی بھی حکم نامہ نہ تو سامعہ کو مفید
ہو سکا ہے اور نہ ہی سامعہ کے علم میں ہے.

9. یہ سامعہ کو بغیر کسی اطلاع کے / شوکار نوٹس کے نوٹریا سے
نکالا گیا ہے.

10. یہ سامعہ کو سنوئی کا کوئی موقع نہ دیا گیا ہے اور نہ ہی کوئی خارج
دست دیا گیا ہے اور نہ ہی کوئی انکم ٹیلا یا حکم
بنیاد پر سامعہ کو نوٹریا سے نکالا گیا ہے جو کہ قانون و انصاف
کے بنیادی اصولوں کے منافی ہے.

شکریہ
[Signature]

۱۱۔ یہ نام کو بغیر کچھ سے فوراً سے نکال دیئے D.E.O
اور آفس انچارج کے ذمے انتظام کا نشانہ بنایا ہے

یہاں سے حاصل نام کو جمع
تمام ساتھ رعایت اور تقوایم
کے فوراً سے رجحالی کے احکام مندر
فہرستہ جاتیں

10/12
2020.

العارضین

سعید داد ولد میر احمد
خان باغیچہ حضرت ائیسٹ آباد
سویا پور

میرزا علی
14

کورٹ فیس

وکالت نامہ

BEFORE THE PESHAWAR PUKHTON KHAWA SERVICE TRIBUNAL
پشاور کورٹ خواتین

SAKEEM DAD

پشاور

Govt

Appellant

جہاں

میان

دعویٰ یا جرم SERVICE Appeal باعث تحریر آئیکہ
Fazlullah Khan & Hamayun Khan

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجوہات میں مقام ATD/PESHAWAR میں
شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روز و عدالت حاضر ہونا ہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو
اطلاع دے کر حاضر کروں گا اگر کسی پیشی پر منظر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس
کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ کسی اور جگہ یا پشوری کے مقررہ اوقات سے پہلے یا بروز تعطیل
بیرونی کرنے کے مجاز نہ ہوں گے اگر مقدمہ مقام پشوری کے کسی اور جگہ سماعت ہونے پر یا بروز پشوری کے اوقات کے آگے یا پیچھے ہونے پر منظر کو
کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھے کل ساختہ
برداشتہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی واز کرنے نیز
ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل
کرانے کا ہر قسم کا بیان دینے اور سپرد دہائی و رضی نامہ و فیصلہ بر خلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اقبال اور برآمدگی مقدمہ یا منسوخی
ڈگری ایک طرف درخواست حکم انتہائی یا ڈگری نقل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا نیگی علیحدہ بیرونی مختار نامہ کرنے کا مجاز ہو
گا اور بصورت ضرورت اقبال یا اقبال کے واسطے کسی دوسرے وکیل یا پشور کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی
اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی
بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سند ہے۔ مضمون مختار نامہ سن لیا
ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ال

ال

3/4/2021

منظور شدہ

20

مورخہ

Fazlullah Khan

Hamayun Khan

w/argl
TSDM

الحکم

3/4/2021

"A"

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

No.

APPEAL No. 4827 of 2021.

Sakeem Dad

Appellant/Petitioner

Versus

Through Secy: Edm: K.P.K. Pesh:

RESPONDENT(S)

Counsel

Notice to Appellant/Petitioner

Fazlullah Khan &

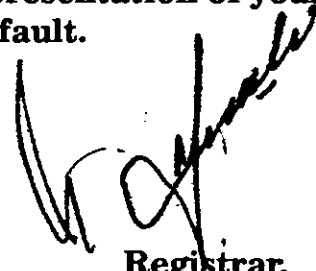
Hamayun Khan

Advocate High Court Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-7-2021 at 9:00 AM.

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

at Peshawar



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No.....4827..... of 20 21

Sakeem Dad

Appellant/Petitioner

Versus

Through Secy. Edar. mpt. Pesh.
RESPONDENT(S)

Notice to Appellant/Petitioner

Sakeem Dad S/o Mir Dae
R/o Bari Khoter / Tehsil 2 Dist
Mardan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-7-2021 at 9.00 AM

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

at Peshawar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No.....4827..... of 20

Sakeem Dad

Appellant/Petitioner

Versus

Through Sayyad Eddi KPP Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Sakeem Dad S/o Mirdad
R/o Bari Kattar Tehsil 2 Distt
Mohattabad

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

on 12/10/2021 at 9:00 AM

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

at Camp Court Peshawar

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

"A"

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

No.

TB

APPEAL No. 1827 of 2021

Sakram Dad

Appellant/Petitioner

Versus

through Secy. Edu. K.P.K. Pesh.

RESPONDENT(S)

Notice to ^{Counsel} Appellant/Petitioner

Fazlullah Khan
and Hamayun Khan
Advocate High Court A. Abad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 12/10/2021 at 9:00 AM

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

at Camp Court A. Abad

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

"B"

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

513

No.

4827

21

Appeal No..... of 20

Sakamdad

Appellant/Petitioner

Versus

Through Secy. Edn. Mr. Peshi

Respondent

Respondent No..... 3

Notice to: —

Distt. Education officer, (male) Adabkhalod

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.....¹⁷⁻⁰²⁻²⁰²² 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.....^{10/12}

Day of.....^{Sun}.....20 22

at Camp Court A. Akbar

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.

1B

Appeal No. 448327 of 20 22

Sarkeem Dad Appellant/Petitioner

Versus

Through Secy. Edna: Pesh. Respondent

Respondent No. 1

Notice to: Govt. of KP through Secy. Edna: Pesh.

[Handwritten signature and initials]

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 17-2-2022 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 18/2/22

Day of Jan 2022

at Camp Court A Road

[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.

4827

21

Appeal No. of 20 ..

Sabaam Dad

Appellant/Petitioner

Versus

Through Secy. Edn: K.P.K. Pesh.

Respondent

Ele. 2 Sec. Respondent No. 2

Director, Education, Govt. of K.P.K.

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..... 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 along with 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.....

10/11

Day of..... 20 ..

June 22

at Camp Court A-Block

[Signature]

[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.