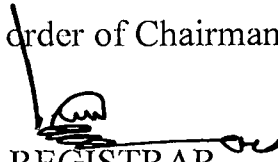


FORM OF ORDER SHEET

Court of _____

Case No.- 1656/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/11/2022	<p>The appeal of Mr. Muhammad Ayaz Khan presented today by Roeceda Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Appeal No. 1656 of 2022

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Batagram.

..... Appellant

VERSUS

- 1) District Education Officer Mardan.
- 2) Director Education Officer KPK Peshawar.
- 3) Secretary Education KPK Peshawar.

..... Respondents

INDEX

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Application for condonation of delay		6-7
3.	Addresses of the parties		8
4.	Affidavit		9
4.	Copy of CNIC and Service Book	A&B	10-15
5.	Copy of applications	C,D,E	16-18
6.	Copy of impugned order	F	19
7.	Copy Departmental Appeal, further proceeding order and rejection order	G,H,I	20- 22
8.	Wakalat Nama		

Dated 22/11/2022

Through


Appellant


Roqeda Khan

Advocate, High Court,
Peshawar

(1)

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

Appeal No. 1656 of 2022

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Battagram.

..... Appellant

VERSUS

- 1) Secretary Elementary and Secondary Education KPK Peshawar.
- 2) District Education Officer Male Battagram.
- 3) Director Elementary and Secondary Education KPK Peshawar.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK
SERVICE TRIBUNAL ACT, 1974, AGAINST
THE ORDER DATED 26/03/2015 WHEREBY
THE APPELLANT HAS BEEN REMOVED
FROM SERVICE AGAINST WHICH THE
APPELLANT FILED A DEPARTMENTAL
APPEAL ON 18.06.2015 WHICH HAS BEEN
REJECTED 05/07/2022 COMMUNICATED
TO THE APPELLANT ON 24/10/2022.**

Prayer:

On acceptance of the instant service appeal both the impugned order dated 26/03/2015 and 05.07.2022 may kindly be set aside and the appellant may kindly be reinstated in service along with all back benefits of service.

Respectfully Sheweth:

FACTS

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as PST on 14.10.1997 with respondent Department. (Copy of CNIC and Service Book are attached as Annexure A & B).
- 2) That after appointment the appellant performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
- 3) That on 15.11.2011 the appellant has applied for leave for house construction for a period one years which has been sanction with effect from 15.11.2011 to 30.09.2012.
- 4) That on expiry of the said leave the appellant visited to respondent Department for joining his duty on 27.09.2012, 12.06.2013 and 18.08.2014 and properly moved applications to Respondent Department for his adjustment but no response has been given to the appellant. (Copy of applications for adjustment is attached as Annexure-C, D & E).
- 5) That on 20.05.2015 on his personal efforts the appellant came to know that the appellant has

(3)
been removed from service by respondent Department on 26.03.2015. (Copy of impugned order is annexed as Annexure-F).

- 1) That on 18.06.2015 the appellant submitted a Departmental Appeal to respondent department for his reinstatement which has been forwarded for further proceeding on 12.03.2022 and last rejected on 05.07.2022 communicated to the appellant on 25.10.2022. (Copy of Departmental appeal, further proceeding order and rejection order are attached as Annexure- G, H,I).
- 2) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

GROUND

- A). That the impugned order dated 26.03.2015 and 05.07.2022 are come under the definition of vide order because it has been passed without fulfilling the codal formalities.
- C). That no charge sheet and no statement of Allegation has been issued or service to the appellant.

- (41)
- F. That the impugned order is also comes under the definition of vide order because it has been passed from retrospective effect.
- G. That one of the other colleagues mention to Serial No. 4 of the impugned order dated 26.03.2015 has already been reinstated by this Hon' able court in Service Appeal No. 1166/2016 dated 25.01.2018 and according to the Judgment of Supreme Court 2009 SCMR Page-1 and 2019 SCMR Page 1004 the appellant has also been entitled for the same treatment.
- H. That the punishment has also comes under the definition of harsh one.
- I. That no Departmental inquiry has been conducted against the appellant and no opportunity of defense has been provided to the appellant.
- J). Any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed On acceptance of the instant service appeal both the impugned order dated 26/03/2015 and 05.07.2022 may

51
kindly be set aside and the appellant may kindly be
reinstated in service along with all back benefits..

Any other remedy which this august tribunal
deems fit that may also onward granted in favor
of appellant.

Dated 22/11/2022

Through


Appellant

Roeda Khan

**Advocate, High Court,
Peshawar.**

(b)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. _____ of 2022

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Batagram.

VERSUS

- 1) District Education Officer Mardan.
- 2) Director Education Officer KPK Peshawar.
- 3) Secretary Education KPK Peshawar.

..... Respondents

APPLICATION FOR CONDONATION OF DELAY (IF ANY).

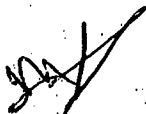

Respectfully Sheweth:

- 1) That the petitioner/appellant has filed the accompanied appeal today in which no date has yet been fixed.
- 2) That petitioner/appellant has a good prima facie case and is hopeful for its success and the grounds mentioned in appeal may be treated as integral part of this application.
- 3) That on 18.06.2015 the appellant submitted a Departmental Appeal to respondent department for his reinstatement which has been forwarded for further proceeding on 12.03.2022 and last rejected on 05.07.2022 communicated to the appellant on 25.10.2022.

- 7-
- 4) That there are many Judgment of the Supreme Court that cases should be decided on merit rather than on technicality.
 - 5) That the remove order dismissal order dated 26/03/2015 is come under the definition of void order because it has been passed without fulfilling the codal formalities.
 - 6) It is a well settled principle of law no one can be condemned unheard.
 - 7) That the impugned order is also come under the definition of void order because it has been passed from retrospective effect.
 - 8) That one of the other colleagues mention to Serial No. 4 of the impugned order dated 26.03.2015 has already been reinstated by this Hon' able court in Service Appeal No. 1166/2016 dated 25.01.2018 and according to the Judgment of Supreme Court 2009 SCMR Page-1 and 2019 SCMR Page 1004 the appellant has also been entitled for the same treatment.

It is, therefore, most humbly prayed that on acceptance of this application the delay if any may be condoned in the interest of justice.

Dated 22/11/2022


Petitioner /Appellant
Through 
Roeda Khan
Advocate, High Court
Peshawar

-8-

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

Appeal No. _____ of 2022.

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Batagram.

..... Appellant

VERSUS

- 1) District Education Officer Mardan.
- 2) Director Education Officer KPK Peshawar.
- 3) Secretary Education KPK Peshawar.

..... Respondents

ADDRESSES OF THE PARTIES

Appellant

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Batagram.


VERSUS

- 1) Secretary Elementary and Secondary Education KPK
Peshawar.
- 2) District Education Officer Male Battagram.
- 3) Director Elementary and Secondary Education KPK
Peshawar.

..... Respondents

Dated 22/11/2022


Appellant

Through 
Roeda Khan
Advocate, High Court,
Peshawar.

- 9 -

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

Appeal No. _____ of 2022

Muhammad Ayaz Khan S/o Namroz Khan R/o village Banda Bala
Wali Gadari District Batagram.

Appellant

VERSUS

- 1) District Education Officer Mardan.
- 2) Director Education Officer KPK Peshawar.
- 3) Secretary Education KPK Peshawar.

..... Respondents

AFFIDAVIT

I, Muhammad Ayaz Khan S/o Namroz Khan R/o village
Banda Bala Wali Gadari District Batagram. do hereby
solemnly affirm and declare on oath that the content of the
above application are true and correct to the best of my
knowledge and belief and nothing has been kept secret and
concealed from this Hon'ble Tribunal.


DEPONENT



PAKISTAN National Identity Card

Name: Muhammad Ayaz Khan



Father Name: Mansoor Khan

Gender: M

Identity Number: 13202-401117399

Date of Issue: 09-02-2022

Bank of Bank: 05-04-2022

Date of Expiry: 09-02-2022



Holder's Signature

سرکاری شناختی کارڈ، ڈاک خانہ خیر آباد، گیزی، تحصیل
ضلع گرام

13202-401117399



سرکاری شناختی کارڈ، ڈاک خانہ خیر آباد، گیزی، تحصیل
ضلع گرام

511381014046
124-64-030543

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

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

③ IIII (B) (11)

1. Name: MUHAMMAD-AYAZ
NIC No. 124-77-030502

2. Race: Swati

3. Residence: Village Banda Bala Poikhair Abad
Tehsil & District Ballagran

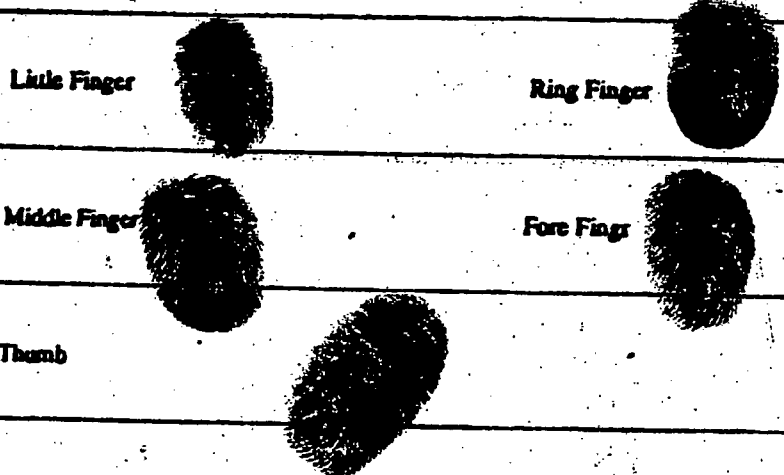
4. Father's name and residence: NAMROZE-KHAN of Banda
Bala, Khair Abad.

5. Date of birth by Christian era as nearly as can be ascertained: (05-04-1977) fifth April
N.H. 4 Seventy Seven only

6. Exact height by measurement: 5' 8"

7. Personal marks for identification

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



9. Signature of Government Servant

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

[Signature]
Sub. Divisional Education
Officer (Male) ~~Ballagran~~
Ballagran
Sub. Divisional Education
Officer (Male) Ballagran

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
Pte		Grads 1480	1480/-	81	2685	BPS-7	Pte
Caps Hill	off/tp		1480/-			18/10/97	A
Re-Adjusted at							
9ps Miran	do		1480/-			1/12/97	A
do	do		1561/-			1/12/98	A
do	do		1642/-			1/12/99	A
do	do		1723/-			1/12/00	A
do	do	Grads 2220	2700/-	120	5820	2000 BPS-7	do
do	do		2820/-			2001	do
do	do		2940/-			2002	do
do	do		3060/-			2003	do
do	do					2004	do

Office of the Accountant General
 N.W.F.P Peshawar
 Pay Fixed in the revised basis pay scales 2001
 of Rs 2790/- 20-5820-007.
 at Rs: 2700/- M.V.E.F 1-12-2001
 with next increment on 1-12-2002

Accounts Officer
 Pay Fixation Party, (NWFP) Peshawar

1
0
E
E
3

1	10	11	12	13		14	15
				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		
I.S.E.O. (P) Battagram							
S.D.E.O. (P) Battagram	30/11/98	Direct	S.D.E.O. (P) Battagram		Appointed as a PGT Teacher at Gps: Hill, vide DEO(M) PGT Battagram Endt. 427-514 - dated 14-10-97 & Adjusted at Gps: Miran vide SDEO(M) Battagram Endt No. 2438-58 dated 17-10-97.		
S.D.E.O. (P) Battagram	30/11/99	Direct	S.D.E.O. (P) Battagram				
S.D.E.O. (P) Battagram	30/11/2000	Direct	S.D.E.O. (P) Battagram				
S.D.E.O. (P) Battagram	30/11/01	Revision of Pay	S.D.E.O. (M) Pvt. Battagram				
S.D.E.O. (M) Pvt. Battagram	30/11/02	Direct	S.D.E.O. (M) Pvt. Battagram		Services Verified w.e.f. 18-10-97 to 30-11-98 from the acquittance rolls and other record kept in this office.		
S.D.E.O. (M) Pvt. Battagram	30/11/03	Direct	S.D.E.O. (M) Pvt. Battagram				
S.D.E.O. (M) Pvt. Battagram	30/11/04	Direct	S.D.E.O. (M) Pvt. Battagram		Services Verified w.e.f. 1-12-98 to 30-11-99 from the acquittance rolls and other record kept in this office.		
S.D.E.O. (M) Pvt. Battagram	28/05/05	Poolled on long leave	S.D.E.O. (M) Pvt. Battagram				
S.D.E.O. (M) Pvt. Battagram			S.D.E.O. (M) Pvt. Battagram		Services Verified w.e.f. 1-12-99 to 30-11-2000 from the acquittance rolls and other record kept in this office.		
Returned from long leave & Adjusted at Gps: Jabb. Feroz vide EDO (Sd) Battagram Endt No. 50-52 dated 16-3-2002.							
Leave Sanctioned 01-03-2005 To 27-05-05 (88 days) on full pay. W.F. 28-05-05 To 28-02-2007 (30-11-05) from the Acquittance roll & other record kept in this office.							

Sub. Divisional Education Officer (Male) Battagram

D.E.O. (M) Battagram

D.E.O. (M) Battagram

D.E.O. (M) Battagram

Dy. D.O. (M) Pvt. Battagram.

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
P.T.C. Adjunct as Sps. J. A. S. (Fero)	BPS-7	Grade	2555	140	6755		P.T.C.
B.A. S. H. P.		Grade: 2940	160	7740	27	BPS-7	P.T.C.
B.A. S. H. P.			4060/-			1/7/07	P.T.C.
B.A. S. H. P.			4060/-			1/12/07	P.T.C.
P.T.C. Sps. Char. S. M. A.		Grade: 3530	190	9230	BPS-7		P.T.C.
do			5050/-			1/12/08	P.T.C.
do			5240/-			1/12/09	P.T.C.
BPS: Beam Gaur			5430/-			1/12/10	P.T.C.

9	10	11	12	13		14	15
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government		
Signature and Designation of the officer attesting of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.		Period	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Government to which debitale:		
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-06-07	Revised of pay	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-11-07	A/Doc	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-06-08	Revised of pay	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
Returned from long leave and Adjusted at Gps, Jabba Fery vide E.D.O. (S&L) Battagram. Endt. 250-52-dated 16.03.2007.							
Leave Sanctioned W.P.F: 01-03-05 to 27-05-05 (88 days on Full pay) W.P.F: 28-05-05 to 28-02-07 (642 days) with out pay:							
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-11-08	Alignet	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-11-09	Drawn Rs. 1267/20	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-11-10	1/2 Salary for 13/05 to 27/05	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
<i>[Signature]</i> Dy. D.O. (M) Priy Battagram	30-11-07	29807	<i>[Signature]</i> Dy. D.O. (M) Priy Battagram				
Drawn Rs. 18786/- as pay and all for 13/05 to 31/05 in return from leave.							

Leave

Services Verified w.e.f. 30-11-02 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

Services Verified w.e.f. 30-11-03 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

Services Verified w.e.f. 30-11-04 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Battagram

Services Verified w.e.f. 30-11-05 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

Services Verified w.e.f. 30-11-06 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

Services Verified w.e.f. 30-11-07 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

Services Verified w.e.f. 30-11-08 from the Acquiance roll & other record kept in this office

Dy. D.O. (M) Priy Battagram

8	7	6	5	4	3	2	1
Signature of Government Servant	Date of Appointment	Other emolument being under the term pay	Additional Pay for officiating	Pay in officiating post	If officiating state (i) substantive appointment or (ii) whether service counts for pension under A. 371 C.S.R.	Whether substantive or officiating and whether permanent or temporary	Name of post
GPS- Beyram Baidar				3530 - 190 - 9230	B.P. 9		
4	4			5330		1 12 2008	off
				3630 - 260 - 11430	B-12		
4	0			4670		1 12 2007	off
				Revision of pay			
4	9			4355 - 310 - 13655			
4	9			5595		1 12 2008	off
4	4			5905		1 12 08	
4	4			6915		1 12 09	
4	7			6585		1 12 2010	
				Ref 7006 - 500 - 2200	B-12		
4				10500		1 7 2011	
				11000		1 12 2011	
<p>REMOVAL FROM SERVICE</p> <p>Removed from Service due to long absence from duty w.e.f 1-10-2012 DEO (M) B.S.B. Battagram under the No 1310-16 dated 26/1/2015</p> <p><i>[Signature]</i> Sub Divisional Education Officer (Male) Battagram</p>							

9	Signature and Designation of head of the office or other attesting officer in attestation of columns 1 to 8	10	Date of appointment or termination (such as dismissal, transfer, promotion, etc.)	11	Reason of termination (such as dismissal, transfer, promotion, etc.)	12	Signature of the head of the office or other attesting officer.	13	Nature and duration of leave taken	14	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government	15	Period Government to which debtible	Reference record punishment or praise Government Serna
	<i>[Signature]</i> (M) BARRISTER	2/07	Allowed	Approved	<i>[Signature]</i>	Adjusted at CDS: Government with ED (et al) Barrister Endt: H. 36.047	27-9-2008	Deputy District Officer (Male) Primary Ballroom	Art. of Pay & Allowance etc.	19-2008-30-11-09 RS-30722	<i>[Signature]</i> 12	Services rendered... 30/11/08 roll & other records...	<i>[Signature]</i> 30/11/08	<i>[Signature]</i>
	<i>[Signature]</i> (M) BARRISTER	30/6	Revised	Revised	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)	W.F. 12	Deputy District Officer (Male) Primary Ballroom	W.F. 12	31.8.2010 (5 months and 15 days)	W.F. 12	W.F. 12	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)
	<i>[Signature]</i> (M) BARRISTER	30/11	Allowed	Allowed	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)	W.F. 12	Deputy District Officer (Male) Primary Ballroom	31.8.2010 (5 months and 15 days)	31.8.2010 (5 months and 15 days)	W.F. 12	W.F. 12	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)
	<i>[Signature]</i> (M) BARRISTER	30/11	Allowed	Allowed	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)	W.F. 12	Deputy District Officer (Male) Primary Ballroom	31.8.2010 (5 months and 15 days)	31.8.2010 (5 months and 15 days)	W.F. 12	W.F. 12	<i>[Signature]</i>	31.8.2010 (5 months and 15 days)

SECTION OF LEAVED ADJUSTMENT

For STP doc I have
written 1.8.2010 to 30.11.10
with D.P. no 134
etc 25-3-11

(Male) Primary Ballroom

Deputy District Officer

District Accounts Officer

Barrister

Position held & adjusted at CDS - Barrister
Grant vide EPO (EAS) 14/10/08
Endt. No. 6770-35-DT-11-4-2011-WF-12

W.F. 12
1-8-2010-30-11-2010-
W.F. 12

11 *WJ* 115

9	10	11	12	13		14	15
Nature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	reference to recorded punishment, censure, or re-praise of 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>Pay & Allow of 1.12.2010 to 3.2.2011 were related with EPoS in 6708</i></p> <p><i>By order on 4/4/11</i></p> <p><i>Pay Roll</i></p>			
				<p><i>Allowed A year of Pay & HR W.E.F 01.12.2010 to 31.8.2011 Rs. 50923/3 Through S-II</i></p>			
				<p><i>Per signature of the member of the Board</i></p>			
<p><i>Leave termination from DEO</i></p> <p><i>(M) Banaganur Under Encl. No. 796-800</i></p> <p><i>Detail = 16-9-2011 W.E.F 15.9.11 To 6-10-11</i></p> <p><i>(21) days full pay = 4 7-10-11 To 30-9-2012.</i></p> <p><i>334 days without pay</i></p>							
				<p><i>Signature of the Head of the Office</i></p> <p><i>(M) Primary Battal.</i></p>			

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خدمت جناب DEO صاحب سکولز اینڈ لبریری سٹرڈام
بوسالت DEO صاحب پرائمری مدارس سٹرڈام
عنوان ادرواست براد (Adjustment) آ.بی. پیجر

جناب عالی!

نوٹدہا کہ تشریحی ارش ہے کہ سائل سال ۱۹۹۷ سے حکم تعلیم میں بطور

آ.بی. تعلیم ٹیناں ہے۔
یہ سائل نے فورضہ ۱۵۹ سے ۳۰۹ تک تھیں کان لہرے
۲۰۱۱

طویل اقصیت کی تھی۔

۳۰۹ کو سائل کی جھٹی ختم ہو رہی ہے لہذا

پہر بانی کر کے سائل کی (Adjustment) کسی نزدیک سکول

میں کر کے سائل کی سروس بحال کیا جائے۔

سائل مشکور رہے گا۔

عین فوارش ہوئی۔

الگار

سائل محمد آواز خان ولد مہروز خان + بی. پی. گورنمنٹ پرائمری سکول بہرہ گنتر سٹرڈام

Forwarded to the DEO (m)

Balagaur for necessary
action file

27/9/2012

Shweta
28/9/12

171 "D"

حکومت جناب ڈی ای او صاحب بوسا لیت SDRS صاحب صنایع و تحصیل سترام
درخواست برائے Adjustment (Adjustment) آڈی

جناب عالی

خود نام گزارش ہے کہ تقریباً سترہ سال سے حکم تعلیم میں
معلوم آڈی تعلیم لغزبان ہے۔

۱۵/۰۶/۲۰۱۱ سے ۳۰/۰۶/۲۰۱۲ تک طویل اصف
۱۵/۰۶/۲۰۱۱

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۱۵/۰۶/۲۰۱۱

کرنٹ چنا DEOC صاحب سکولز اینڈ کالجوں کی ضلعی سطح پر مشتمل

درخواست گزار ایڈجسٹمنٹ کی اینٹی حکم

چنا عالی

خود بائنڈ ٹرانس کے سائل نمبر 17 سے 16 تک کے سائلوں سے

یہ سکولز آئیڈیو حکم لکھنا تھا -

2011 سے 15/09/2012 تک سائلوں کی تصدیق

2012 سے 27/09/2012 تک سائلوں کی تصدیق

Adjustment کے سائلوں کی تصدیق کے متعلقہ دفاتر میں

درخواستوں میں جمع آئے رہے ہیں۔ اس کے علاوہ اس کے علاوہ

اس کے علاوہ اس کے علاوہ اس کے علاوہ اس کے علاوہ اس کے علاوہ

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18/8/2014

Forwarded to the DEO (M) for Messrs. [Signature]

7 'F' 191



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

Email: emisbattagram@yahoo.com **BATTAGRAM**

Phone # 0997311439 & 0997310

REMOVAL FROM SERVICE:-

1. Whereas this office served two show cause notices at your home address directing you to submitted reply of the absnee vide this office endst: No 1420 dated 19.09.2014 and 1757-66 dated 04.12.2014 respectively.
2. Whereas you were finally issued show cause notice published in the Daily AAJ Abbottabad dated 7th Dec: 2014 with direction to appear before the competent authority for submission of reply of your absence from duty within 15 days positively otherwise disciplinary action will be initiated under the relevant section E&D Rules 2011.
3. Whereas you failed to appear before the competent authority within stipulated period and nor submit your reply.
4. Whereas I as competent authority under rule-4(b) Khyber pukhtonkhwa Govt: servants (Efficiency & discipline) Rules, 2011, has been pleased to impose upon you major penalty of "REMOVAL FROM SERVICE" with effect from the date mention against each.

S.#	Name of teacher	Name of School	Absent from
1.	Mehraj Khalid PST ✓	GPS. Mala Bateela	01.04.2014
2.	Muhammad Ayyaz PST ✓	GPS. Beran Ganther	01.10.2012 ✓
3.	Muhammad Saleem PST ✓	GPS. Nerai	01.08.2013
4.	Sudeer Muhammad PST ✓	GPS. Ajlay Sharoom	01.08.2013
5.	Muhammad Irshad PST ✓	GPS. Soba Dheri	01.07.2014
6.	Pervez Khan PST ✓	GPS. Beran	Since Long.
7.	Abdul Malik PST ✓	GPS. Qaboola	20 th Nov 2014

MUHAMMAD SHAIKAT,
DISTRICT EDUCATION OFFICER (MALE)
BATTAGRAM.

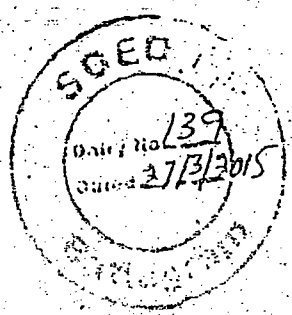
Endt: No 1310-16 / Dated 26/3 2015

Copy forwarded to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Battagram.
3. District Monitoring Officer IMU Battagram
4. P/S to Secretary of Govt: of Khyber Pakhtunkhwa E&SE Deptt: Peshawar
5. Sub Divisional Education Officer Battagram.
6. District Accounts Officer Battagram.
7. Officials concerned.

Shahab Suiyat Est Dny

DEPUTY DISTRICT EDUCATION OFFICER
(BATTAGRAM)



(2) 101

خدمت مناب DEO صاحب بوساقت اینڈ ڈی ای، او صاحب ضلع و تحصیل بھنگام
درخواست براد عالی سرویس آئی پی پیٹر

مناب عالی ا

تزارش بحضور انور ہے کہ مسائل فورم 1997 سے فورم

14⁰⁹/₂₀₁₁ تک مسائل نے حکیم تعلیم میں بیلور آئی پی حکیم اپنی
ڈیوٹی بنانا عدہ کور پر سرانجام دینا چاہیے۔

5 فورم 15⁹/₂₀₁₁ سے فورم 9⁹/₂₀₁₂ تک مسائل نے کئی مکان
کلیڈ کوٹل رخصت کی گئی تھی۔
24 مسائل کی رخصت کوٹل برائے مدت ایک سال منظور
ہو چکی تھی۔

27⁹/₂₀₁₂ سے مسائل دوبارہ Adjustment

کلیڈ متعلقہ آفس میں درخواستیں دے چکے ہیں۔
مسائل کو دھوا دیہی اور ٹان ٹول آئے ٹھکانا مسائل کو
آفس میں دے دیں فورم 26⁰³/₂₀₁₅ کو لیکچر کی اطلاع اور
تعلیم لبر ڈیوٹی کا صدر کے سرویس سے ہر طرف آدھا تھا۔

24 ایک 10 افراد کی واحد تفسیل کی نواری کو ضم کرنا ایک
خانڈان کی مگر ہر چھری چلانے کے برابر ہے۔

لہذا اپنی آئے مسائل کی نواری کو دوبارہ جان آئے ایک
خانڈان چھریا کو دوبارہ چلانا ہے۔

عین تزارش گوی

الصدار ہے

18/2015

مسائل محمد آواز خان و ملائرز خان آئی پی پیٹر سکول بہرن گنہ بھنگام

Forwarded to original to the
District Education Officer (M) Bhatnagar for further action pl

19/6/2015
Sd/-
District Education Officer (M) Bhatnagar



(H^y) (21)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
BATTAGRAM**

(Phone # 0997-543539/533540)

E-mail: emishattagram@gmail.com

NOTIFICATION

The Inquiry Committee consisting of the following Officers, are hereby constituted to conduct fact finding detail inquiry of Mr. Muhammad Ayyaz Ex-PST GPS Baeran Gantar (Allai) regarding re-instatement into Govt Service

1. Mr. Gul Badshah Dy DEO (M) Battagram (Chairman)
2. Mr. Uzair Ullah ASDEO (Allai) (Member)

The inquiry committee is requested, to conduct fact finding inquiry against the above named school teachers and submit comprehensive report within Week Time positively for further proceedings.

**DISTRICT EDUCATION OFFICER (M)
BATTAGRAM**

Emdstr. No. 1503-05

Dated 12/03/2012

Copy to the:-

1. Mr. Gul Badshah Dy DEO (M) Battagram. (application and other documents attached)
2. Mr. Uzair Ullah ASDEO (Allai).
3. Office Copy


**DISTRICT EDUCATION OFFICER (M)
BATTAGRAM**



(151) 277)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
BATTAGRAM

EMAIL: emisbattagram@gmail.com PHONE NO: 0997543540 & 539



No. 3906 Dated: 05/7/22

To

✓ Mr. Muhammad Ayaz
Ex-PST GPS Berin Gantar

Subject: **APPEAL FOR ADJUSTMENT:**

Memo:

Reference to your application regarding subject cited above and to state for your information that your application for re-instatement is time barred and regretted.

Muhammad Ayaz
05/07/2022
DISTRICT EDUCATION OFFICER (M)
BATTAGRAM

Endstt: No. _____ / Dated: _____

Copy forwarded:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Office Copy.

DISTRICT EDUCATION OFFICER (M)
BATTAGRAM

قیمت 50 روپے	43056			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: 09-2574				
رابطہ نمبر: 03330265755				

بعدالت جناب: سید محمد سعید ڈائریکٹر ایجوکیشن

منجانب: <u>ایڈوکیٹ</u>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام پشاور کیلئے روڈ کنکریٹ کے کوویل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز کوویل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کر کے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: محمد سعید

العبد محمد سعید العبد

مقام پشاور کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی نوٹ کاپی ناقابل قبول ہوگی۔