FORM OF ORDER SHEET

| Court of | | |
|----------|---|-----------|
| | | |
| Case No | • | 1690/2022 |

| | Case | o <u>1690/2022</u> | | | | | |
|-------|---------------------------|---|--------|--|--|--|--|
| S.No. | Date of order proceedings | Order or other proceedings with signature of judge | | | | | |
| 1 | . 2 | 3 | | | | | |
| 1- | 28/11/2022 | The appeal of Mr. Ihsan Ullah resubmitted toda Mr. Yasir Saleem Advocate. It is fixed for prelim | • | | | | |
| | | hearing before Single Bench at Peshawar on | . · . | | | | |
| | | Notices be issued to appellant and his counsel for the | date | | | | |
| | | fixed. | | | | | |
| | | By the order of Chairman | ; ; | | | | |
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| | | REGISTRAR | : | | | | |
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This is an appeal filed by Mr. Ihsan Ullah today on 27/10/2022 for release of salaries against which he show his departmental appeal/ representation in the present appeal which was made on 11.08.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Copy of enquiry report mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.
- 5- Copy of departmental appeal and adjustment application in respect of appellant are not attached with the appeal which may be placed on it.
- 6- Annexure-A & G of the appeal are illegible which may be replaced by legible/better one.

No. 3. 5/4 /ST,
Dt. 38/10/2022.

REGISTRAR SERVICE TRIBUNÁL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Yasir Saleem Adv. Peshawar.

- Object NO 1, 2,3 are removed.

Object NO 4 eigning report is attached as some c.

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IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 10902022

Ihsan UllahAppellant

<u>VERSUS</u>

Government of Khyber Pakhtunkhwa & others

.....Respondents

INDEX

| S.No | Description of Documents | Annex | Pages |
|------|--|-------|--------|
| 1. | Service Appeal alongwith affidavit | | 1-5 |
| 2. | Address of Parties | | 6 . |
| 3. | Copy of advertisement dated 20.03.2009 and | A&B | 7-10 |
| | Order and Judgment dated 01.11.2011 | | , |
| 4. | Copies of inquiry Report dated 05.04.2014 | С | 11 |
| | and notification letter dated 20.05.2014 | | . , |
| 5. | Copy of appeal dated 19.01.2019 | D | 12 |
| 6. | Copy of letter dated 07.02.2019 | E | 13 |
| 7. | Copies of the letter dated 16.02.2019 & | F&G | 14-1,- |
| | advertisement dated 21.12.2018 | | , ,, |
| 8. | Copy of appeal and office order dated | H & I | 16-17 |
| | 11.08.2022 | | . / |
| 9. | Copy of report of inquiry committee dated | J | 18 |
| | 08.09.2022 | | U |
| 10. | Wakalatnama | | 19 |

Through:

Appellant

YÁSIR SALEEM

Advocate High Court

&

Afarsyab Wazir

Advocate High Court

IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 491 12022

Ihsan Ullhah, TT Government Primary School Zarmajan Kot North Waziristan District.

.....Appellant

VERSUS

- 1. **Government of Khyber Pakhtunkhwa**, through the Secretary Elementary & Secondary Education, Peshawar.
- 2. **Secretary Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar.
- 3. **Director Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar
- 4. **District Education Officer,** North Waziristan.Respondents

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT AGAINST INACTION OF THE RESPONDENTS REGARDING THE RELEASE OF SALARIES OF THE APPELLANT DESPITE THE FACT THAT HE IS STILL ON THE ROLL OF THE DEPARTMENT AS PERFORMING HIS DUTIES AND HAS NOT RESPONDED THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.

Prayer-in-Appeal:

On acceptance of this Service Appeal, respondents may kindly be directed to release the salaries of the appellant from the date of stoppage.

Respectfully Sheweth:-

- 1. That initially the appellant applied for the posts of Theology Teacher duly advertised on 20.03.2009. However they were not appointed despite of their being fit and eligible and top of the merit. The Appellant were constrained to file writ petition NO. 2293/2010 before this honorable court which was allowed vide order and judgment dated 01.11.2011. (Copy of advertisement dated 20.03.2009 and Order and Judgment dated 01.11.2011 is attached as Annexure A & B)
- 2. That Respondent No. 4 also constituted inquiry committee to scrutinize the matter. The inquiry committee submitted its report on 05.04.2014 and thereafter the Appellant was appointed on their post vide notification letter dated 20.05.2014. (Copies of inquiry Report dated 05.04.2014 and notification letter dated 20.05.2014 are attached as Annexure C)
- 3. That the Appellant took charge of his post and started performing his duties. Ever since his appointment as TT had been performing his duties without any complaint, albeit he had been denied his salaries.
- 4. That therefore when the law and order situation got worsen due to militancy, the appellant along with his families migrated being IDPs in June 2014 to Peshawar.
- 5. That the Appellant throughout agitated the matter of release of their salaries with the Respondents. The petitioner also submitted appeal dated 19.01.2019 to the Respondent No. 3 for the redressel of his grievances, the appeal was processed and the then Agency Education Officer (NWA)/ District Education Officer was asked as to why his salary was stopped without any reason vide his remarks on the body of the said appeal. (Copy of appeal dated 19.01.2019 is attached as Annexure D).
- 6. That the above cited appeal was further processed and the Respondent No. 4 was again directed that if the appellant has not been terminated then his pay be released forthwith under intimation to the office vide letter dated 07.02.2019. (Copy of letter dated 07.02.2019 is attached as Annexure E)
- 7. That the letter dated 07.02.2019 was replied by the Respondent No. 4 vide his letter dated 16.02.2019 wherein he admitted that Appellant was never terminated. Astonishingly he added that the many posts including the posts of the Appellant have been advertised published in newspaper dated 21.12.2018. (Copies of the letter dated 16.02.2019 & advertisement dated 21.12.2018 are attached as Annexure F & G)

- 8. That Respondents instead of releasing of his pay on already occupied post, the respondent are filling the subject posts along-with many other posts through advertisement.
- 9. That still the appellant is pursuing the case and lastly filed his appeal to respondent No. 2 for redressal of his grievances vide his appeal dated 11.08.2022 which was forwarded to DEO North Waziristan with directions to resolve the issue under intimation to this office vide order dated Co.2.1.2022. (Copy of appeal and office order dated 11.08.2022 are attached as annexure H & I).
- 10. That in response the DEO referred the matter to already constituted inquiry committee to probe the matter in hand, where-after the inquiry committee submitted his report to the DEO on 08.09.2022. (Copy of report of inquiry committee dated 08.09.2022 is attached as annexure J).
- 11. That the acts and omissions of the respondents regarding stoppage of salaries of the appellant is illegal and unconstitutional inter alia on the following grounds.

GROUNDS:

- A. That the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated
- B. **That** since the issue relates to the monthly salaries and adjustment of the appellant in service, therefore the matter being recurring, hence no time limitation runs in the instant matter.
- C. That withholding of salary amounts to punishment albeit without any charge sheet or show cause notice his salary has been stopped.
- D. That ever since promotion as TT in 2014, the Appellant has been on the roll of the department and has not been terminated yet.
- E. That the appellant has been denied of their livelihood, which amounts to violation of Article-4 of the constitution of Islamic republic of Pakistan, 1973, it is the fundamental right of the Appellant that he must be paid his salaries for the services he is rendering for the respondents.
- F. That since his services has not been terminated, therefore he is on the strength of the department, thus being civil servants, the appellant is entitled for salary of his post.

- G. That from the reply/letter dated 16.02.2019 of the Respondent No. 4, it is quite clear that the Posts against which the Appellant has been appointed is still in field meaning thereby the Appellant is still on the roll of the department, so it is in the interest of justice not to readvertise the posts but to adjust the Appellant on their posts and to release their pay also.
- H. That the appellant has been appointed by the competent authority, duly took over charge of his posts and performed has duties thus valuable right has been created in his favour the same cannot be undone or snatched away from him illegally.
- I. That the appellant seek the permission of this Honourable Court to rely on additional grounds at the hearing of this appeal.

It is, therefore prayed that the service appeal may please be allowed in favour of appellant as prayed for.

Through:

Msau. Appellant

YASIR SALEEM

Advocate High Court

&

Afarsyab Wazir

Advocate High Court

CERTIFICATE:

It is certified that that appellant has not previously moved any service appeal regarding the instant matter.

ADVOCATE

AFFIDAVIT:

It is do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon; able Tribunal.

DEPONENT

(6)

IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

| Service Appeal No | /2022 |
|-----------------------------|----------------|
| Ihsan Ullah | Appellant |
| <u>v</u> | <u>ERSUS</u> |
| Government of Khyber Pakhtu | nkhwa & others |
| | Respondents |
| ADDRES | SES OF PARTIES |

APPELLANT:

Ihsan Ullhah, TT Government Primary School Zarmajan Kot North Waziristan District.

RESPONDENTS:

- 1. **Government of Khyber Pakhtunkhwa**, through the Secretary Elementary & Secondary Education, Peshawar.
- 2. **Secretary Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar.
- 3. **Director Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar
- 4. District Education Officer, North Waziristan.

Appellant

Through:

YASIR SALEEM
Advocate High Court

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المسال

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| | 13/4/09 | 12/4/09 | الضائب البياليماك بمعرى في مركيكيد الأبلوسان البركش | (BPS-9)しまむむ | (3) |
| | 13/4/09 | | المناف استاني المداكية بالدموليك الدموليك المالي كوحال | ى فى الأسرى مهم | (4) |
| | 25/3/4 | ! | | (BPS-0) | |
| | 13/4/09 | 12/4/09 | سيليا ساليا المان المستعدن ساليان المسلمة | (BPS-9)ನ್ನಲ್ಲಿ | (5) |
| | [3/4/09 | 12/4/09 | الليسا المساليس المراس معداي المراسي يدا | (BPS-0)Ebj1 | (6) |
| | [5/4/09 | 14/4/69 | ميلاك بمعد في في سم ملكيد ، (لي مران المبريش | ા ભાર-ગુપ્રતિને | (m) |
| | 16/4/09 | 16/4/09 | معلوك يبطط اوجان بمعظم الوقال المدارس استعراد يقرات | (BPS-7x3# | (8) |
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IN THE PESHAWAR HIGH COURT, PESHAWAR JUDICIAL DEPARTMENT

Annexuse B.

| | 02 | Of | , (| CHCLET | 2010. |
|------|----------|-----------------|-------|------------------------|-------|
| WP.N | lo 2295. | _; O1 | | G <u>M</u> E <u>NT</u> | |
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Date of hearing. In Malin Africh Act Appellant ... Des Malin Marie Africh Act Appellant ... Des Millian Africh All Respondent . C. Action Chief Mary 19 12/11 Lal Jan Watter Africation

YAHYA AFRIDI, J:- Ihsanullah alongwith nine others have invoked the constitutional jurisdiction of this Court seeking:

"It is, therefore, humbly prayed that on acceptance of this writ petition, the notification impugned herein Endst No.PS/E 100-19 (Vol. 27) 6497-6500 herein Endst No.PS/E 100-19 (Vol. 27) 6497-6500 dated 13.7.2009, issued by respondent No.I (Additional Chief Secretary FATA) may kindly be (Additional Chief Secretary FATA) may kindly be declared illegal, without jurisdiction, without lawful declared illegal, without jurisdiction, without jurisdiction in the respondents.

2. The brief and essential facts leading to the present petition are that the respondents invited applications for appointment on various posts including Teachers on contract basis vide advertisement appearing in Daily Mashriq on 20.3.2009. In pursuance thereof, the present petitioners alongwith others applied for the posts advertised. The respondents vide order dated 11.6.2009 made certain

ATTESTES

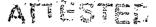
appointments of Teachers on contract basis, while the petitioners' applications were not positively considered. The respondents vide Notification dated 13.7.2009 brought out certain changes in the recruitment policy of appointments in EPS into 15.

- The grievance of the present petitioners is that the change in the recruitment policy introduced vide Notification dated 13.7.2009 should not affect the selection process initiated vide advertisement dated 20th March 2009.
- There is no cavil to the proposition that the selection process once initiated cannot be altered to the disadvantage of the applicants due to any change in terms of appointment introduced after the last date for submitting applications under the advertisement. The learned AAG representing the respondents also did not resist the said proposition of settled principle of law. Reliance can be placed on Raza Hassan Vs. Chairman Joint Admission Committee (1999 MLD 1469), Ghulam Mustafa's case (1986 CLC 1056) and Syed Munib Nazir Shah's case (PLD 1985 AJK 17).
- Accordingly, for the reasons stated hereinabove, it is declared that appointments to be made in pursuance of the advertisement dated 20th March 2009 shall not be affected by the changes introduced in the recruitment









policy initiated vide Notification dated 13.7.2009. It is further held that in case the respondents wants to appoint persons in accordance with the recruitment policy introduced under the Notification dated 13.7.2009, fresh advertisement has to be made clearly specifying the terms of recruitment as stated therein.

The present petition is disposed of in the above

<u> Minounced,</u> Dt:[1,11,201]. JUDGE

Officer "

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ATTESTE

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OFFICE OF THE AGENCY EDUCATION OFFICER **NW AGENCY**

From

The enquiry committee

То

The Agency Education Officer North Waziristan Agency

Subject:

ENQUIRY REPORT

Memo,

Kindly refer to your order dated 25-02-2014 on the subject noted above and to state that we the undersigned checked the record and merit list in writ petition no. 2293/2010 in respect of Ihsanullah TT and others.

They have come on the top of the merit list and they are deserved for salary in the light of hon: of court decision passed by the High court Peshawar,

it is further added that they have also right for salary from the date of announcement of the Hon: Court decision dated 01-11-2011 as per Supreme court decision

Report submitted for further perusal and necessary action, please.

1. Mr. Umer Khan Supdt:

Chairman

2. Taj Muhammad AAEO

Member

3. Akhtar Nawaz

Member

Agreed and physically checked

Attested



OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

Appointment Order / Court Decision

In the light of Reshawar High Peshawar decision in writ Petition No. 2293/2010 dated 01-11-2011 and Director Education FATA implementation order dated 16-12-2013, the following candidates are hereby appointed against the vacant post of T.T in BPS-14 (Rs. 8000-610-26300) PM plus usual allowances admissible to them under the rules with effect from the date of announcement of the Honourable Court decision i.e. 01-14-2011, as per Supreme decision in the interest of public & justice.

| | | Place of Posting | Remarks |
|--------------------|---------------------|----------------------|---------------------------------------|
| \ S# | Name of Teacher | GPS Zarma Jan Kot | Against the vacant post |
| 1. | Ihsan Ullah T.T | GPS Pepali Pecket | -do- |
| 2. | Sajid Ur Rehman T.T | GPS Mirat Khan Kot | -do- |
| 3. | Rehmat Noor T.T | GPS, Zar Janan Kot | -do- |
| 4. | Israr Ullah T.T | GPS, Zai Jahan Kot | -do- |
| 5. | Gul Rauf T.J | GPS, Wakil Khan Kot | -do- |
| 6. | I-lameed Ullah T.T? | GPS, Shamal Khan Kot | -do- |
| 7 | Atiq ur Rehman T.T | GHS, Spalga | · · · · · · · · · · · · · · · · · · · |
| 7 <u>.</u> 8. | Muhammad Din T.T. | GPS Badshah Mir Khan | -uo- |
| . | | Kot | da |
| 9. | Shamsul Haq T.T. | GPS, Shna Khwara | -do- |
| 10. | Nasir ud Din T.T | GPS, Shahmat Kot | -do- |

Terms & Conditions

1. Their appointments are made on temporary basis and liable to be terminated any time and without any notice.

2 They should being their medical certificate from Medical Supdt AHQ Flospital Miranshah. If they fail to assume their charges within 15 days, their orders will be treated as cancelled.

3 Their original CNICs should be produced to the accountant local office.

1. Their services will be terminated if they found absent for days continuously from the date of taking over.

Ayency Education Officer North Waziristan Ayency

Dated 20 1 5 /2014

Lindst: No. 1786 - 91

Copy to the:-

- 1. Honourable Registrar Peshawar High Court Peshawar w/r to writ petition 2293/2019
- 2. Director Education FATA, Peshawar w/r to his direction dated 16-12-2013
- 3. Agency Accounts Officer, Miranshah NWA.
- 4. Political agent NWA Miranshah.
- 5. The Agency Accounts Officer Miranshah.
- 6. AAEO concerned.
- 7. Candidates Concerned.

Ayoncy Education Officer North Waziristan Agency

ATTEME



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the worldy Director Edu NTD wars are word peshan ar

Eugel. Appeal for Adjustmet/Reliated) Page

NEWA Les been blued order in light 3 lin honorte NEWA Les been blued order in light 3 lin honorte Pesh. High Court pesh decision in writ petition NO223 Lated 1911 in 4/0 1h samullah To chothis. But our pays were without any Coguit reasons. As per GER stoppege 3 pays, any Coguit reason is illigal. (Copy attached)

In this Connection your grood office - Ross already issued a clier direction to DEO NWD but Most tous, the Same ad using delay tackers.

If is worthly meulcined that the DEO North may to deriched to Release our pays with out junton be deriched to Release our pays with out junton delay delay in - Case which have already been delay by we were terminalit then quin termination order of we are not their release the pay for the large of we are not their release the pay for the large we shall be a long in the shall pray for your good health and long in

hear Join Stores Stores of the Sancieur of the

And the same of th

To

The worthy Director Education NTD Warsak Road, Peshawar

Subject:- APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Respected Sir,

Most humbly it is stated that the Ex AC NWA has been issued order in light of the Hon'ble Peshawar High court Peshawar decision in writ petition No. 2 dated 01/11/2011 R/o Ihsan Ullah and others. But our pays were without any cogent reasons. As per GFR stoppage of pay to any cogent reason is illegal. (Copy attached)

In this connection your good office has already issued a char direction to DEO NWD but not the same and using delay tactics.

It is worthy mentioned that the DEO north may be directed to release our pays without further delay the case which have already been delay if we were terminated then given termination order if we are not then release the pay for large interest of justice. If you issue order to DEO order we shall pray for your good health and long life.

Thank

Your Obediently

Ihsanullah TT & others

Date: 03/04/2019

ATTESTEE

Annexure (E.)

N.M.D

DIRECTORATE OF EDUCATION NEWLY MERGED TIRBAL DISTRICTS

OF KHYBER PAKHTUNKHWA WARSAK ROAD PESHAWAR, PAKISTAN PHONE: 091-9210166 FAX 091-921021

То

The District Education Officer, Merged Tribal District North Waziristan

Subject:

Appeal for Adjustment / Release of Pay

Memo:

I am directed to enclose herewith an application lodged by Mr. Ihsan Ullah T.T & others resident of North Ważiristan District on the subject cited above and to state that Director Education erstwhile FATA is directed your good self on the body of application that why the salaries of the applicants were stopped without any cogent reason. So, if they are not terminated, then release their salaries / pays without further delay, under intimation to this office, please.

Encl. A.A

Deputy Director (F/A)

Endst: No.

Copy forwarded to the:-

1. District Accounts Officer, NWD

2. P.A to Director Education Merged Tribal Districts of Khyber Pakhtunkhwa.

MINICALLIC

OFFICE OF THE DISTRICT EDUCATION OFFICER
ORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH.

No 1040 : 10

Dated: 16 10:



1():

The Director Education And Newly Merged District KPK Fushawar.

Subject:

APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Memo:

Reference your letter No:2149 dated 7/2/2019 the undersigned was directed to release the salaries and adjust the applicants at there is no termination order and cogent reason in this connection the Ex.District Education Officer submitted a detail report along with enquiry report vide letter No:4347 dated 7/06/2018.

This office searched a lot, but we found no termination order on the record of this office. Moreover, this office has advertised the posts of all categories for filling up through ETEA. Hence this office is unable to release/adjust the applicants as they need vacancies.

Report is submitted for your perusal and further necessary action please.

.

DISTRICT EDUCATION OFFICER
North Waziristan Miranshah.

Fh: No: 0928-313045, Email Add: pakmrn123@gmail.com Add: Bachelor Flostel Civil Colony Miranshah

APPER

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| | | The Control of the Co | The state of the s | THE RESERVE TO SERVE | 号為 |
| | المن المن المن المن المن المن المن المن | | | | 灍 |
| | و من من المروزوات والموالي | درخواست فارم اسامیوں کی جسیل اسبو درخواست فارم اسامیوں | کدوز مرستان ہے رمزامطا ہو کرد. روز نے 2010 کی ورنواشیں مطاوب ہیں۔ا | کی اینڈ سیکنڈری ایجویشن سے میٹ مشرو تراکی تار رہے جوزہ فارم ہر مورید ہم جنوری 2019ء ہے 30 رہے جوزہ فارم ہر کارسید) کے دیب سائن (www.elea.edu.pk) ہر دستہ سائنہ مرسو جورو طریقہ کارابوایات | موجعه ارائیمنو |
| | | ل ہنو نے والی ورمواستوں می ^{ر ہور بیش می} یا میں میں اور میں میں اور مواستوں میں اور بیش میں | ، ہوری اور دیار ہے اور کی استعمار ہے۔ است مقررہ تاریخ کرزرنے کے بعد موسوا | ے جوزہ فارم بر مورید میم جنوری 2019 مے 00 | سدوارول سدوارول |
| | | ن آمان کیلئے میڈرراز قابلین کا م ^{ن د} | یات میشند. روه در این جو کرانیمی نویت: (کسی جو می میارند آن در این جو کرانیمی نویت: (کسی جو | ں ہے کوزہ فائم پر موری کم بھوری 2018ء سے 50) کے ویب سائٹ (www.etea.edu.pk) پر دستہ ETEA کے ویب سائٹ پر موجودہ طریقہ کارام ایات | ETEA |
| | 35519 | | | CANADA TO THE PARTY OF THE PART | روا س |
| | 11 21-12 | - 1 K | | | A) |
| | 35019 | FITE/GCE - John J. U. S. FITE/GCE | روم ایدرش نیکرا کری رق سے بعد 19 میل از کی نرینگ سوش اداره ۲۳ رق سے بعد 19 میل از کی نرینگ سوش اداره ۲۳ | (CT)US | |
| | العربين الماليان | | رن خرار داران الراب | (۱۵،۱۵ مرداد الرام (۱۱) محمل ادرام | + - |
| | 1 1 | ۴۱۲E/GC/ | ندوایا له رش نه نگراه کری زری سند بهد ۹۵ یک لازم نه نیک نفونتی اداره ۲: از می سند ۹۵ یک نور | (۱) سائر (DM) (۱) المائية الم | - |
| | 350 10 10 | 1 | ر ری نے بندواہ لازی رینگ میں اردارا۔ مرابع | (۱۲) ۱۳۹۱) مرانداز تاند ((ii) مليكن اورانة | 2 |
| | JI. M | | والمراجع والمنافق والمالية | 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | . 1 |
| | مهر الله المراد الله الله الله الله الله الله الله ال | ماليك والمأوم العربية والاسلامي لاكون | قررن بدلاما دن امراه ما من شادندا ^ر کمر نورن براه کار می شادندا ^ر | (8PS-15) مرداندازی (۱۱) معلمن ادر | 7 |
| | يرزيان وبرازان والمال | حِرِّ الْ مَا كُوكَ وَيُعِرُ وَارِ الْعَلُومُ بِمِوْ كُورِ مُنتَ | هر رن به بعد دا ماه ل اوری او به نیاسه من اور و ما میکنند و ویژن کسی مجمع تشکیم شده مورد و بدیشها و چه از زرنی سوات و دارالعلوم جاریا می و دارالعلوم دروش مربع می میسیم میکند میسیم میسیم تشکیم شده میسیم | (۲۲) ایمالیما (۲۲) ایمالیما | _ |
| • | كلاس ذكرت- | : مني - ايم ايناسلامات من سكيند | ر منی سوات دوارا سوم چار بان اروپر سر است. مریف سوات دوارا سوم چار کار می محد مثله به | ا (عد 200) مراندازی ا دارانعلوم سیروش | " [[|
| | | - 1 Sec. 3 S. 30 - 51 - 51 - 51 | ے نے رواز کا ہاری کا ایک کا ایک کا ایک کا | ا ره المهار رفاوه | - 11 |
| | 1 100 19 | | | 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | |
| | ي تنبية زيرا ألكا م: والدراك ا | و الماري أيس والعلوم ومحود المنت | ې سايندو و يون ک جي کام مرتده وروز جيمه مار ته | Si. Si(1) | -11 |
| | 1 1 - | من تو ته مراج بسنند ۱۵ ساز دری | شرائب سواسته واراعلوم كالرياس وزوز | والطومسدا | · |
| | 35 19 | FITE/GCET _ مامل كرلى بولى. | ت نے دخالو خاجاری کیا ہویا کا کا میکا است. عبد میں میں میں میں اور کی بھوتی ادار | اروان الله الله | - 11 |
| ě | 1 1 | | ارتقر ر <u>ی آب</u> عد قامان قارق و بعد | ا (ند) معلوتهن ا | - 11 |
| - 1 | 35019 | . FITE/GCFT سے حاصل کر کی وہ کی | مایم شده بر ندرس سے بیگرا کری اور تقرری کے بعد 19 ہا کی لازی ٹریڈنگ مکو تکی ادا اور تقرری کے بعد 19 ہا کہ کسی مزین میشرک | 6 ما المرى سول يمير (FST) (۱) سي مي | -11 |
| - 1 | ا مال مال | اه او کانعایی | | | Ш |
| | 00- | | شنبير شده فليلي ورذت محاربهم سيكردوج حاصور | 5500 | 41 |
| , , | नेत्रीयं । | | م ما به هم الادارية في منت في عليه | | H |
| <i>}</i> | 021 | ن تيم. در در (۲۷۲) | 1 | 10151111 | 11 |
| | S. 1. C. | ار بی (۱۱۱) | ں سلیم شدہ ربر دو اوار سے مطام رسید ہائی۔ می میکنیکل ور دو ہے ایک سال دو جو مسائنا رمیشن کیئن | الله المرابع الله الله الله الله الله الله الله الل | . |
| į | ن بات ماری از ماری می است. رفت ماری طریخ دو کی - | | والمنازين والمناز مسترهم فياتشن كملكة لوريتر أأبرت والميا | (BPS-07) رائے (ii) ک | . |
| į | 30,0,0,7 | بليت=100 نمبر بمثمل كمنز: | ميري بما مراب تشكرانا | سليكشن كواني | |
| | 7.0 | تعليمي قابنيت | 7. TOU=ETE | 1 يشكرينك نبيت بذربيدا | 1 |
| l | ماصل كرد ونهبر 20 تشيرنا بالبر | FA/F.Sc | 7.0 | ا - تعلی تا بیت | 1 |
| | مامل كردونبنر 20x تشير أن نبير | MA/MSC | مامل كردونمبر×20 تشييركل نبر | SSC | 1., |
| | ماسل برودنبهر بدقالتشيئه فالمبر | | ماسل کر ، ونسر ۲۵۸ مشیم قل نسر | BA/B.Sc | |
| | | M.Ed/MA, Edu | مامل کرد ذنبر×5 گفتیم کل نبر · | | |
| , | | | | 8 Ed . | |
| | ل المرين سنة كل ميات ف ما يمين | ر بن فر مسيح لل 200 نبرات كالتسيما | حاصل کرده نمبر x10 تشیم کل نمبر مدیدا تاک فی ایب امیاری سرسلیکش کیلید کریز یا مدیدا | M.PhiVP.HO | 1 |
| | مزيدتنيم اس نفرت ولي | ں نابیہ = 100 نہبر | ريا آل في بب الحيارات ما التي مسيم عليه المارية المارية التي الميارية المارية المارية المارية المارية المارية المارية | سليكشن كرانيني | |
| | ا ا | ن د بیت است معلمی تا بیت | يـ 100≠ETEA لب. | 1 يترينك ميت بزود | 1 |
| | مامل كرده فبر ×25 تنتيم كل أ | The second second | کل نبیر | تعليم تابليت | 1 |
| <u> </u> | ماس کرد ونبر×10 کنشیزالی نا | FAFSC | حاصل كرد ونسر × 30 كنتيم كل نسر | , | 1 |
| ~ | ONTO FOLK | | مامس کرده نبر 20x تشبیرگل نبر | SSC | |
| / | | 28/103/11 | ٥ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ ١٠ | BA/BSC | |
| | مورت میں تبسیم بلسریفیه ذیمی اول- مورت میں تبسری تنسیم بلسریفیه ذیمی اول- | نْ يَرِي وَمِينَ الْجُمَا الْسُلَامُ لِيَّمِنَ كُلِّ | ماس کرد ونبر ۱5 تشیم کل نبسیا نیم اس طرت:وگ - مامل کرد ونبر ۸۵ تشیم کا نیم نوت ETEA شنست می 40 آید نیم شوت ETEA شنست می 40 آید | Computer Operator(DIT) | |
| مث | دوگاه رمیری ^ن لب میماشال تیم اوگا- به | ن نمبر، بینیه پیشدوراندایم اسان نیست ک سدے منبر کینے والا اسپیڈوام ڈاکسائسور منلع وجس نرستان کا ہونا مات درنہ | نسيراس طرت: ولي ماصل كرد وتمبر×40 مسيم ال | State of the state | • |
| . کاک | درخوبست رخورمبس ثميا جان ^ي ا - (2) تمام المرم | سدے مبریے والا میدوار اور است نے صلع نار جھ وزیر ستان کا ہونا ما ہے ورنہ | نير في خوت ETEAنت يمي ⁴⁰ وي | بی ایس ما دساله کورش کی صورت می میرون انبی ایم ایم کیشن ماصل کردونسر ۱۵۸ تعسیم طر | |
| ت ب دادان | اسا معلمی اساد نمیدانشل شاک ۵ رو اور سی | ات ن ارهرار در مان ۱۰۰۰ بار ۱۰۰۰ | ۱۰ سر و انظر در ۱۰ وقتی محارز مین تستیم سطو | اليرايدا كويتان ما سيردو برمه | |
| رادران | مران ما بن جس برام الرامات المساء مران ما بن جس برام الما ما في مدار | | | | |
| رورد. سرن | (7) (| سريق المكني في المناوجية الناساك | 1010 - 1010 - 1010 C | المسترسب لا المراقب عن المراز المسرساب لا | |
| 1.00 | | ニャ・ナケ いんこうかいたいしょう | | | |
| ير ملا بو | | - A | | m'E12.1.2(f) . 4 III | |
| ت بيبراً | م م م م م م م م م م م م م م م م م م م | ر فرمت رک سر سر سر | والأراف المستحد | المالية المرازر مراسول ووادال الأعلام المراس | |
| سامي | くい システムしんた しんしゅん | | all of the first the state of t | المام المجتري والشال المراس المراس | · <i>"</i> |
| | | | | | ′ ′\ |
| ئەد ئىپ | را به مولاد به مرامول می مستقل اکتا انا س | الزمت مينية الهام الأبياء فالماء | ت المعلى المراكي المراكب المسلم المراهد كالوق ا | ラクベックバルボリカノブ トート・コー | |
| 161-A | الريمة المراق والرعق بي | ال کی جانگی ۔ (16) در دراست دیست رہے، ال کی جانگی ۔ (16) در دراست دیست رہے، | ادیند شینندری انجویستان دواها بردس می (۱۵) آ طابق خالصنا میری کی بنیاد بر موسک می (12) آ پاره مرزگ می به نیل اور آننده میلید است سرگادگ، ول جاری میا جائزه جمس مین تکسی اسادک جائث پُر که بعد پیدیم می شم ک تهدینی قابل آمدل نیده دک | الماريمل إئ من تراس منالاف قالون | × - |
| | | (18) خواتمن اسيدوارات داسې مرد | ول جاری ریاجاره است. مراسم منسم مندی تایل قرل نه درگ | الماريركار (15) العام كيان الكانية | 远冷 |
| | THE KIND OF THE | A MATERIAL DESIGNATION OF THE PARTY OF THE P | الريد المال المالية | - 2019 جريوا ي - (17) 30 جوري 2019 | ٠. |
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ATTITUTE

www.khyberpakhtunkhwa.gov.pk

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the tronourable Secy Edu Exses. Subject: Appeal for treliese of pay Stopped without any loguet reason/illegally with great respect it is brought into your thind notice that our pays were supped without any avgent reason/illigally. We have already lodged appeal to Director Edu merged Dist. The DE'INDUST was Kind enough and issued order vide No 1666 de 30/1/2019 and NO 2149-51 de 7/2/019 (Copy assacled) The Districe Edu officer Conducted enquiry in this Regard (copy attached). After enguring Bills were prepared and bubmilled & the DISH. Accounts officer, but relivered due to Some observation, then the same was removed and resubmitted to the DAO Office. (Copy attacked) The Ex DAO Serpped the process and we filled appeal to A GILP. The AGICP was land enough and issued direction & process the claim (Copy attached) when a new DEO was posted and Stopped all the length f Correspondence without my ligal reason. Therefore it is fundly requisted in your gracious honden that a necessary order may andly be for release the Salarties ing-in the last year DED: for unich we are alongs! This yours obedity Copy to the Worthy AG cop perha) Jugio Nesirud dui 77 4 ollien. Rugiapsi and others. (a) The DE (M) Dist 100 13) Dist - Accords officer Night

Agus H

SO (PE) Many ash DBOWL.

list of appellants. 11 Sanullar . WI Wall @ Sgjodula - Janes w - 2 Chmat 1150 13 = 21 - 3 Israeulla Wije 1-4 . Smay - 93/8.5 Ahmdulle ill we - 6 Alignifight. i Till Juis -7 M. Dru - Cirs 3 - 8 Sharsulay - 63 2 in - 9 Maeri. - 10 Alles Cel

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Ama I (17)



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar Phone No. 091-9223587

> No. SO(PE)/E&SED/5-1/ Gen Misc/2022 Dated Peshawar the August 11th, 2022

То

The District Education Officer (Male) District North Waziristan.

Subject: ~

APPEAL FOR RELEASE OF PAYS IN R/O NASIRUDDINTT RUOIA PSTAND OTHERS

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Mr. Nasiruddin TT and others along with its enclosure, for further necessary action.

2 You are therefore, directed to resolved the issued under intimation to this office.

Encl. As above.

(MUHAMMAD ISHAQ) SECTION OFFICER (PE)

Copy forwarded to the S to See Day, E&SE Department Killber Pakhtunkhwa.

SECTION OFFICER (*

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Am J (18)

The District Education Officer,

North Waziristan District.

Subject: PHYSICAL VERIFICATION FOR IMPLEMENTATION OF DIRECTOR EDUCATION MERGED DISTRICT

Kindly refer your office No30410-12 dated 23-07-2022 on the subject noted that and to state in pursuance of director Education FATA order No. 2149-51 dated 07-02-2019 and reminder dated 29-02-2019 on the subject noted above. We the following committee members thoroughly checked and verified the teachers whose salaries were stooped without any cogent reason and they are performing their duties regularly to the entire satisfaction of their superiors and they are regular employees of this department.

In view of the above facts we the enquiry committee members recommended for releasing the outstanding salaries of the following teachers.

Report is submitted for further necessary action being low paid Government servants.

- 1. Naseer uddin TT at GPS shamat kot
- 2. Gul raouf TT at GPS wakeelkhan kot
- 3. Ihsanullah TT at GPS zarmajan kot
- 4. Rahmat Noor TT at GPS miratkhan kot
- 5. Muhammad deen TT at GPS badshah mir khan kot
- 6. Ateeq ur rahman TT at GPS spalga
- 7. Shamsul haq TT atGPS shna khwara
- 8. Hameedullah TT at GPS shamalkhan kot
- 9. Israrullah TT at GPS zar janan kot
- 10. Sajid ur rahman TT at GPS pepali pecket

Enquiry Committee Members:

1. Sami ullah V/Principal GHSS Idak:

2. Habib Ullah H/Master GHS Tall Village:

3. Mr. Shanabaz Khan S/Clerk DEO Office:

4. Mr. Arbab Khan J/Clerk DEO Office:

ATTESTED.

Que ?

Zan RIDDEUSA

the above plysical very calin soport is correct and hence vereripial by the engunry officers and submitted for

ferther fracen plans

A1715 - 20 (8)

Osto 25 8/9.

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ایک روپیم مورده اصلان الله ألى الله الكراك المراك المرك المراك المراك المراك المرا اعتار ا مقدمه مندرجه بالاعنوان بالاميس ابني طرف سے واسطے پيروي وجواب دہي وکل کارروائي 🖳 معلمان مقام سخماد ر کے لئے افرامی کافوزار لا ماسسلم اللہ مقرر کرے اقر ارکیا جاتا ہے کہ صاحب موصوف کومقدمہ کی کل کارروائی کا کامل اختیار ہوگا - نیز وکیل صاحب کوراضی نامه دمقرر ثالث و فیصله برحلف دینے جواب دہی اورا قبال دعویٰ اور بصورت ڈ گری کرانے اجراءاور وصولی چک روپیاورعرضیٰ دعویٰ اور درخواست ہرسم کی تقرریق زراس پردستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری میطرفہ یا بیل کی برآ مدگی اور منسوخی دائر کرنے اپیل نگرانی ونظر ثانی و بیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمه مذكور ككل ياجزوى كارروائي كواسطے اور وكيل يا مخارقانوني كوايينه مراه يااين بجائة تفرركا ختيار موكا اورصاحب مقررشده كوبهى ومي جمله مذكوره بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختہ منظور دقبول ہوگا اور دورانِ مقدمہ میں جوٹر چہ قبر جاندالتوائے مقدمہ کے سبب سے ہوگا۔اس کے ستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایاوخر چہ کی صولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ بیثی مقام دورہ پر موگا تھانہ باہر موتو وکیل صاحب یا بند ہوں گے کہ پیروی مقدمہ ند کورکریں ۔ البذاو کالت نامہ لکھ دیا کہ سندر ہے۔ الرقوم James Land Jasu Valeem Advance Mrarias Chan Wazi Adverde Adverde Lell. No. 0312-9888752