### FORM OF ORDER SHEET

Court of		
	1.	
Case No		1689/2022

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. Israrullah resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary			
	·	hearing before Single Bench at Peshawar on			
		Notices be issued to appellant and his counsel for the date			
		fixed.			
		By the order of Chairman			
		REGISTRAR			
2					

This is an appeal filed by Mr. Israr 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. 3079/ST,

Dt. 28/10/2022.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

#### Mr. Yasir Saleem Adv. Peshawar.

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# IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 689/2022

Israr Ullah

...Appellant

### **VERSUS**

Government of Khyber Pakhtunkhwa & others

.....Respondents

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4.	Copies of inquiry Report dated 05.04.2014	С	11
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Through:

Appellant

YASÍR SALEEM

Advocate High Court

&

Afarsyab Wazir

Advocate High Court

(2)

# IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2022

Israr Ullah TT, Government Primary School Zarjanan Kot North Waziristan R/O Afridi Abad Warsak Road Peshawar.

**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.

### <u>Prayer-in-Appeal:</u>

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

- 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 recease 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)

(4)

- 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 00.12.2022. (Copy of appeal and office order dated 11.08.2022 are attached as annexure H & 1).
- 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.

(5)

- 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:

Appellant

YASIR SALEEM

**Advocate High Court** 

&

Afarsyab Wazir

**Advocate High Court** 

### CERTIFICATE:

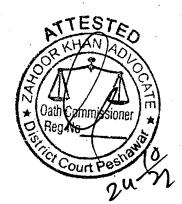
It is certified that that appellant has not previously moved any service appeal regarding the instant matter.

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.

DÉPONENT



(6)

# IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No/2022	
Israr Ullah	Appellant
<u>VERSUS</u>	,
Government of Khyber Pakhtunkhwa & others	·
	Respondents

### **ADDRESSES OF PARTIES**

### **APPELLANT:**

Israr Ullah TT, Government Primary School Zarjanan Kot North Waziristan R/O Afridi Abad Warsak Road Peshawar.

### **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.

Through:

Appellant

YÁSIR SALEEM

Advocate High Court

&

**Afarsyab Wazir** Advocate High Court

Comment of the state of the sta Correction of the good don't good post world and the forest of the contraction of the con المروى استنت اورك إلى ( ١١١: ١٥) كا فال اوحرق أساس و بخرول مجليا الل دومينان كريم ل مراود الدي اوري والدي وال على دينده ادانساسادة في شاك ادا اداد وباكراك در دندفول يك مراد ۱۵، ۱۵ و تف اي من دار داروان ايكي دوانا 11 من (min) كافروك و (paga bayan) كالإرباء معرك فرو إن كارا إداري الكافي الورك في أورك بن المراسة والمع ا به به دارد ۱۰ با مرد ۱۳۰۷ (۱۳۰۵ ۱۳۰۷) ۱۰ بادید از میرن برد این سد باده از این سی در در بی پرتشاری از این ارای برد این توکیف که باده از از در در این کام ۱۳۷۷ تا ۱۳۱۵ ( میلیانداد کی کام ۱۳۱۱ میلی سازد بید در شاید سی بازی به سیاس و با بازید به کی دو این این در در دارد این بازی این از در کام بازداد این برد برد بید در شاید سیاس بازی مال در در بازی این این 1411/11-1501/mil defente Ithou Charportion Julian Journa Frederica (1100 - William Charles) ارتوان والرواويان بي شار المساوان الدوادوات كالمرزرة كل كارواد المالان كاروان كاروان المالان المراوات كالمراوال المالان المراوال (20) (20) المهدل لاستراد ا (مردانه) 11/4/6 بوك بربهاد تاليل المراس عادهم يخداد ين الدة المالماري 10/4/03 1015 11021 على المار المار والمار المار المرادة (1) 11/4/08 الدام المراب المرام المرام المام المراب المر مرد مرد المرد الم ווויאניוטטל. 13/4/07 1/4/09 13/4/09 מטאל לומיליווו להיושריינויטות ומונו ויוויים (2) ט לי נית ניהי (4) ر هر مالها و مرور د ما و ر به مهر مرد المدور د ما د ر به ما مرد د المدور د ما المرد د الم 1.94/09 (mra-v) 1.11494 Harve turs-sulful (A) : 1:4414) messifical 14/403 (4) 16/1/07 าเกะระมดฤป יל ביוויצים ביו איני שווים של איני של איני 17)\_ (1113-7)0,0 وبزك وأخادى لاستعندوا أراه وم messyrid: Constitute ب اردی سند Strang Grant De mexin(45:11.57). ور زارزارن ال ك إيمولاله كراد

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### درخواستین مطلوب هیں

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11/4/09	10/4/09	ميكوك بمعيثها وتالهاليدني المطوم العربيدواسلامية يكنذ وويرن ازوقاق المدارس ا	(BPS-14)04-1	(1)
		معظیم المعارس إام اسم في كيند اويون (معورشده يونورش)	Santana da s	
11/4/09	10/4/09	منزك بمعيثها وت العالمية في أحلوم العربية اسلامية يكنز ووج ن ازوقاق المدارس/	(BPS14)ਹੈਂਹੋ	(2)
		تعظیم المغانات یا با سے سینٹر اور جن بمعداسلامیات دحر بی اور شہادت الجامدوقاق المعار <sup>س عظی</sup> م المداوس		1
13/4/09	12/4/09	الغاسان المريش المراكل محدي في مرها كميت الطيور الاسان المريش	(BPS-9)UZUU	(3)
13/4/09		الفي استانف الحراك بوايك مال مرفع كم يد ماه لي كرُّ حالَ	ك في الإسر لي الم	(4)
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13/4/09	12/4/09	اللساك لالساك لاستان كالمعسبة الكاني المراجكيك	(BPS-ಉಭರಕ್ಷ	(5)
13/4/09	12/4/09	الليار علافي المسل مدوى المهر المكيد	(BPS_9)(E)()	(6)
15/4/09	14/4/69	معلمك بعد لي في ي مرهكيد البياران الكويش	(BPS-7)UJU	(7)
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# IN THE PESHAWAR HIGH COURT, PESHAWAR JUDICIAL DEPARTMENT

Annexuse B

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YAHYA AFRIDI, J:- Insanullah 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 lated 13.7.2009, issued by respondent No.1 (Additional Chief Secretary FATA) may kindly be declared illegal, without jurisdiction, without lawful authority and of no legal effect and the respondents be directed to make appointment of the petitioners according to merit list already issued by the respondents."

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

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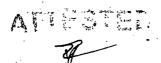
ATTESTED

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 BPS i to 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 20<sup>th</sup> 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 20<sup>th</sup> March 2009 shall not be affected by the changes introduced in the recruitment

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recruitment as stated therein. મન કાલાએ તામ જાણા મુખ્ય સ્વાલા દ્વારામાં માના માત્રામાં માત્ર તાલામાં મન

death (2002, 7.51, band notherhold od 25,7,2009, fresh persons in accordance with the recruitment policy turther held that in case the respondents wants to appoint ai it .0000.X.X.I battle Motification dated 13.X.2009, It its

Annexuse C

### OFFICE OF THE AGENCY EDUCATION OFFICER NW AGENCY

From

The enquiry committee

To -

The Agency Education Officer Nath Waziristan Agency

Subject:

ENOURY 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 lhsanullah 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:

Alternative Commence 2. Taj Muhammad AAEO

3. Akhtar Nawaz

Member

Agreed and physically checked

Attested

# OFFICE OF THE AGENCY EDUC

## 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 as admissible to them under the rules with effect from the date of announcement of the Honourable Court decision i.e. 01-11-2011, as per Supreme decision in the interest of public & justice.

• • • •	or 11 2011 as per Suprem	e decision	
decisio	n i = 01-11-2011, as per Suprem		Remarks
.04	Name of Feacher	Place of Posting	Against the vacant post
S#	Ihsan Ullah T.T	1 GPS Zaillia Juli Kat	-do-
1.	Sajid Ur Rehman T.T	GPS Pepali Pecket	-do-
2.	Sajid Of Renthan 4.	GPS Mirat Khan Kot	-do-
∫ 3.	Rehmat Noor T.T	GPS Zar Janan Kot	1
4.	Israr Ullah T.T	CPS Wakil Khan Kot	-do-
5.	Gul Rauf T.T	GPS, Shamal Khan Kot	-do-
6.	Hameed Ullah T.T.	CUS Spalga	-do-
7.	Aliq ur Rehman T.T	GPS Badshah Mir Khan	-do-
8.	Muhammad Din T.T	Kot	
1		GPS, Shna Khwara	-do-
9.	Shamsul Haq T.T.	GPS, Shahmat Kot	-do-
10.	The state of the s	GPS, Ghamhar 1,03	
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## Terms & Conditions

- 1. Their appointments are made on temporary basis and liable to be terminated any
- 2 They should being their medical certificate from Medical Supdt AHQ Hospital 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.
- 4. Their services will be terminated if they found absent for days continuously from the date or taking over.

Agency Education officer Horth Wazifistan Agency

Dated 2015 /2014

Lindst No. 1286 - 9

### Copy to their

- 1. Honourable Registrar Peshawar High Court Peshawar w/r to writ petition 2293/2010.
- 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.
- Candidates Concerned.

Agency Education Officer Horth Waziristan Agency

Allula.

Annexuse 12 (12) the worthy Deriello Edu NT! Jo Jo warsail road peshan au Appeal for Adjustmet/Relieve of Pag. Kubjul. Man, Most Rumbly it is stated that the Ex ABO NINA En been breed order en light of the honorte Pesh. High court pesh decision in will petition No22, Lated 1 11 in 1/0 Itsamullah To adollars. But our pays were without any Cognit reasons. As per GPR stoppege 3 pay. any logue reason is illegal (Copy attached) In this Connection your good office has already listened a char direction to DEO NWD but 1951 min the Same ad using delay tallus -If is worthly meulcined that the DEO North may be diriched to Release our pays with out frish delay of the case which have already been delay allay the case which - have already been delay . 9 de nere lev minalit men grun ter minalien ord ig we are not then treliese the pay for the las intirest of Justice. If you issue order & stor we sade pray For your good health and long. Man Vous 56.

Chsanucial The others. Showing July July

List of appellants. Manullar WI Wall Sgjidula Jane 2 Christ Não 13 = 21 - 3 Israbulla - W/1/1 - 4 Snikay - 9918.5 Hamdalli W/W - 6 Aligni Police : The Fire -7 M. Dru - Ciss - 8 Shaisulay ... Codin - 9 Meeril. CVN/0 6-10 Allested Albertal

To

The worthy Director Education NTD Warsak Road, Peshawar

## APPEAL FOR ADJUSTMENT/RELEASE OF PAY. Subject:-

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

Annexure (E.) (B)

## DIRECTORATE OF EDUCATION NEWLY MERGED TIRBAL DISTRICTS

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

Τо

The District Education Officer, Merged Tribal District North Waziristan

Subject:

N.M.D

Appeal for Adjustment / Release of Pay

I am directed to enclose herewith an application lodged by Mr. Ihsan Ullah T.T Memo: & others resident of North Waziristan 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

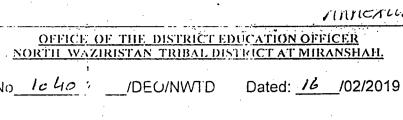
Deputy Director (F/A)

2150-5 Endst: No.\_\_\_

Copy forwarded to the:-

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

Deputy





10:

The Director Education

Newly Merged District KPK I shawar.

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 if there is no termination order and cogent reason in this connection the Ex.District Education Officer submitted a detail report along with enquiry report yide 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 furn or necessary action please.

Shild

DISTRICT EDUCATION OFFICER North Waziristan Miranshah.

Ph; No: 0928-313045, Email Add: pakmrn123@gmail.com Add: Bachelor Hostel Civil Colony Miranshah

A

B

نگر ایمینوری ایند سیندری ایمویشن کے منے میم شده قبائی تاری وزیرستان کے زیر انتظام (مرداند از تان) سیکول می درد والی اسمیال پر کر سند امیدوارول سے جوزہ فارم بر مورد سے ، دری 2019 م سے 30 جنوری 2019 ، تک ورخواشی مطاوب بین - درخواست فارم اسامیوں کی تعلیل ایمو برار ایر مشتل نمانید میل ایمر مشتل نمانید پیدروں سے درووں میں اور میں کا معامل کا معامل کا معامل کا معامل کا معامل کا معامل کا المام کا معامل کا المام ک (ETEA) کے ویب سائٹ (www.elea.edu.pk) پردستان سے مقررہ کا دی گزرنے کے بعد موصول بنونے والی درخواستوں پر بورٹین کیا جائے کا میڈنا کا میڈنا کا میڈنا کی سائٹ پرموجود وطریقہ کا داہرایات کے مطابق آن لاکن بھے کرائیں۔ فونٹ (کسی مجل میانٹ پرموجود وطریقہ کا داہرایات کے مطابق آن لاکن بھے کرائیں۔ فونٹ (کسی مجل میانٹ پرموجود وطریقہ کا داہرایات کے مطابق آن لاکن بھے کرائیں۔ فونٹ (کسی مجل آمان کیلئے پیشرورا نہ تابلیانہ لائی میشن مى تسايم تدوي ادرش ف المراكرى (ii) سليك راور ترون ك بعد واوك اوى اونى فرينك متوس ادارو FITE/GCET ماس ار ىن(ct) (BPS-15) برنادارای 35019 (۱) کی کی ایرون اورال سے نام اورال (ii) سليكش اورتقر رق يربيد والم كالازي فرينك منوش اوارو FITE/GCET ما مل كرفي اول (DM) KIU: 350 19 20/20/2 (BPS 15) Silver Section 19 18 ديد ديارين بال (BPS-15)/رانداز): ant lu (ف) ايس ايس ي سيند وويون كي جي شليم شده وروز بده شباو دانعالي في العلوم العربي والاسلام وه رابطوم میدوشریف سوات، دارانعلوم چار یاخ ، دارانعلوم دروش چرال یا کوئی دیگر دارانعلوم بو کورنمنٹ کے زیرانشام جوادراس د مینی است بال لل(٢٢) :::/::15) (۱) انهي ائيس کي سيانند ؤ ويژن سي مين تعليم ثهده زور و بره ثنباه ته العالم به أل العلوم العربي والاستامية السي من منه تعليم و فال المدارس إ 355 19 وار الطومية وشريك مواسده واراطوم جاريا ني دوارالعلوم درات باتراك فا كوف و كار واراطوم او كوفرن نيسته زيرا الكام واوراك ا واراطومية وشريك مواسده واراطوم جاريا ني دوارالعلوم درات باتراك فا كوف و كار واراطوم او كوفرن نيسته زيرا الكام واوراك ا - بال (AT) ۱۷۰۰ میران میران میران میران میران در در در این بادر این بادر این بادر این بادر این میران میران میران در در در در این میران م (۱۱) میلیشن دادر تقر رک سرد میران کی از میران میران میران دادر FITE/GCET سے ماسل محربی بوری (BPS-15) مردان ازات 35719 (۱) ې مسليم شده و نورن سه نيکرو کري سال (ii) سکیشن اور ترری سے بعد و ماوی لازی فرینگ مکوسی ادار و FITE/GCET سے سامل کرنی دول مِ الْمُركَ سُولَ عَبِر (FST) 35€19 (BPS. 12) مرداندازات (۱) س بن کشنیم شد لللیمی اور ذیر می از کم سیند زویون مینزک یا مساوی تعلیم (ة) آمريزيء أنبك 30الفاظ أمنت كالبينية (875-11) (١) ي مى تىنىم شدوى رو إدوار \_ سائنرمىدىن وساوئ عليم -(ii) سمى يكنيل دوز = اكي سال زيو سانناريشن يكنااوني (OIT) أ ل في المان (BPS-07) مرداند سلیکشش کوانینیویا اما تذہ سے سیکش کیلے کریز آدرڈ ڈیل سے کل 200 فبرات کی تشیرا صفرت سے کہ جائے گی۔ من كى مزيد تشيم اس طريز وك -. تقليمي قابليت=100 نمبر 1 سكرينك نميت بزرييه ETEA=100 نسر تعليم قابنيت مامل زرونمبر 20x تنسيرا بالأسر لىءبت عاصل كردونمبر×20 تنشيم كل نمبر FA/F.Sc مامل كردونسر 20x تنشيم أن نمبر SSC ماسل كر: ونبر 20 تشييرُق نبر MA/MSC مامل رودنبير يذؤ لنشيم الأمبر BAiB.Sc M Ed/MA, Edu جامل کر: ونسرx5 تقسیم کل نمبر 8 Ed مامل كرد ونمبر 10x تنسيم لل نمبر مسلیکشن کوانیٹیویا: آگی لیبانچاری کے ملکیش کیلے کریزیادری ایس کل 200 نبرات کھیماس فرع سے ک بات گ M.PhiVP.HO جس کی مزیقتیم اس مرت بوگی. و تعلیم تابیت =100 نبیر 1 يم فينت أيت بأربي ETEA=100 أنير عكين قابليت مامل كرده نبر×25 تنتيم كل نبر لىن ئىل تابنىت **FA/FSC** مامل كر: ونبر ×30 نقسيم كل نبر مامل كرد ونبسر x 10 التشير كال SSC MAVMSC ماسل كرد ونبر 20x تنشيم كل نبر UD BAIBSC 12071 حاصل كردونسر x5x تنسير كل نبس Computer Operator(DIT) بی ایس جا دیسالدگوری کی صورت میرنیم وی کنتشیم اس طرت توگی ماصل کرده نیسر 40x تنشیم کی نبر ، بیکیه چیژوراندایم ا ا موت ETEAنسن يمي 40 يسدت منسرك والااميدوار باللي تصور وكاوري بند سامان مناع بارتهدوز برستان كابونا باب در ندور فواست برفور بسر شعل سكونت مناع بارتهدوز برستان كابونا باب بدر ندور فواست برفور بسر بأل در شنافت كارؤيس ئے کے سلابق ہوگ۔ (4) ـ (6) انروع كيك آيدا كاميد دارول كول TA/DA شي وإبايكا كردت . . (9) آثرامی اشتهار مل فارم إمعلومات كي صورت ليك است مركادك لما زمت كيك كاال تسودكما بايكا - (14) نام \_(15)اناراع کیلے الگ م كى تهديك قابل تبول نه بوكى \_ (18) خواتين اميد وارا -

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Allelid

ATTESTER

in sourous nous or y can know. icp Jeshawar. Subject: Appeal for trelease of Pay Stopped without any logust reason/illegally with great respect it is brought into your thind notice that our pays were slopped without any argent reason/ellegally. We have already lodged appeal to Director Edu merged Dist. The DE'(M) Dist was Kind enough and issued order vide 115 1666 de 30/1/2019 and NO 2149-51 de 7/2/019 (Copy attached) The Districe Edu officer Conducted enquiry in this hegard (copy all a ched). After enguring Bills were prepared and bubmilled & the Dist. Accoudingteen, but relived due to Some observation, then the same was removed and resubmitted to the DAO Office. (Copy associal) The Ex DAO Desposed the process and we fulled appeal to A GILP. The AG 100 was land enough and issued direction & process the claim (Copy attached) when a new DEO was posted and slopped all the length | Correspendence without my ligal reason. Therefore it is fumbly requisted in your gracious honbar that a necessary order may thirdly be Parsed de DEO North for release the Balanties without Mopped by the Ex Des: for unich we are alongs! Dalid 11/8/02 2. Nesimud du 77 of others. Copy to the worthy AG lep pena. ia, The DE (M) Dist 100 13) Dist - Accords officer MAIK SO(PE) Made noth Delined 1118 Kepart trem Delined (The Allered ATTESTED

List of appellants. 11 Sandlar WI Wall Sgidula - PN1020-2 Chinal Não Israsulla - W/1/1-4 Smilay - 33/18:5 -Amedalle ill w - 6 Aligni Polis . The Fire . -7 M. Dru - Cis 3 - 8 Shaisulay 63 din - 9 Meent. (NN/0 6-10 Allested Albertal Alleld



### 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 11<sup>th</sup>, 2022

To

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 OPPICER (PE)

Copy forwarded to the S to Section, E&SE Department Klyber Pakhtunkhwa.

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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. Shamsui inay iri 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:

Samiullah.

ایک روپیت ایک رو مورده مقدمه امسرارالله کی کی ينام الكيوليث عرباراند باعثاراك مقدمه مندرجه بالاعنوان بالاميس اپن طرف سے واسطے بیروی وجواب دہی وکل کارروائی عج متعلدان مقام سخدر کے لئے افرامی مان وزار لا ماسر کی مقرر کرے اقر ارکیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کار دوائی کا کامل اختیار ہوگا منيز وين صاحب كوراضي نامه ومقرر ثالث وفيصله برحلف ديئے جواب دہي اورا قبال دعويٰ اور بصورت ڈ گری کرانے اجراءاور وصولی چک روپیداورعرضیٰ دعویٰ اور درخواست ہرسم کی تقردیق زراس بردستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری میکطرفہ یا پیل کی برآ مدگی اورمنسوخی دائر کرنے اپیل نگرانی ونظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمه فركور ككل ياجزوى كارروائي كواسط اوروكيل يامختار قانوني كواييخ بمراه يااين بجائة تقرر كااختيار موكااورصاحب مقررشده كوبهى وبي جمله مذكوره بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختہ منظور وقبول ہوگا اور دورانِ مقدمہ میں جوفرچہ وہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔اس کے سمحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا وخرچہ کی صولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ بیشی مقام دورہ پر موگا تھانہ باہر موتو وکیل صاحب یا بند ہوں گے کہ پیروی مقدمہ ندکورکریں ۔ لہذا و کالت نامہ لکے دیا کہ سندر ہے۔ James Land Jasu Valeem Advance Mranias Chan Waze Adverte HCM. 0312-9888752