


25.07.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Reply on behalf of respondent is still awaited. Learned AAG requested for adjournment in order to submit reply/comments. Opportunity is granted. To come up for reply/comments on 27.09.2022 before S.B.

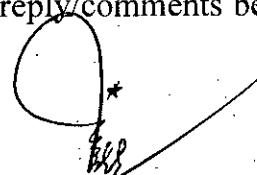


(Rozina Rehman)
Member (J)

27.09.2022

Clerk of learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General alongwith Main Ijaz Ahmad, Head Master and Mr. Arshad Ali, ADEO (Litigation) for the respondents present.


Reply/comments on behalf of respondents not submitted. Representative of the respondents requested for time to submit reply/comments. Adjourned. To come up for reply/comments before the S.B on 25.10.2022.


(Mian Muhammad)
Member (E)

25th Oct., 2022

Appellant present in person. Mr. Naseerud Din Shah, Asstt. Advocate General alongwith Arshad Ali, Litigation Officer for respondents present.

Reply/comments on behalf of respondents have been submitted which are placed on file. To come up for rejoinder/arguments on 15.11.2022 before the D.B.

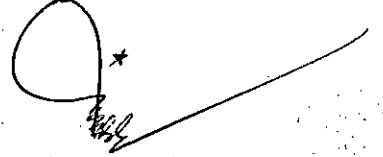

(Fareeha Paul)
Member(E)

Due to deletion of the case
to come up for 25/11/22



24.05.2022

Junior to counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 13.06.2022 before S.B.



(Mian Muhammad)
Member (E)

13th June, 2022

Clerk to counsel for the appellant present.

Counsel are on strike. To come up for preliminary hearing on 28.06.2022 before S.B.



(Kalim Arshad Khan)
Chairman

28.06.2022

Learned counsel for the appellant present. Preliminary arguments heard and record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for written reply/comments on 25.07.2022 before D.B.



(Fareeha Paul)
Member (E)

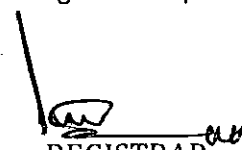



Rs 600/-
Appellant Deposited
Security & Process Fee
1/7/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7913/2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 22/12/2021 | <p>The appeal of Dr. Munir Ahmad presented today by Mr. Habib Anwar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p> |
| 2- | | <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>14/02/22</u>.</p> <p> CHAIRMAN</p> |
| | 14.02.2022 | <p>Due to retirement of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 09.05.2022. for the same as before.</p> <p> Reader</p> |
| | 09.05.2022 | <p>Appellant in person present.</p> <p>He made a request for adjournment on the ground that his counsel is out of station today. Adjourned. To come up for preliminary hearing on 24.05.2022 before S.B.</p> <p> (Rozina Rehman) Member (J)</p> |

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re: Service Appeal No. 7913/2021.

Dr. Munir Ahmaad Vs. Director Elementary & Secondary Education etc.

INDEX

| S. No. | Description of Documents | Annex | Page No. |
|--------|---|-------|----------|
| 1. | <i>Appeal</i> | | 1-5 |
| 2. | <i>Affidavit</i> | | 6 |
| 3. | <i>Addresses of the Parties</i> | | 7 |
| 4. | <i>Copies of: Educational Documents relevant record and attendance register</i> | A | 8-28 |
| 5. | <i>Copies of: Resignation letter</i> | B | 29 |
| 6. | <i>Copies of: withdrawal of his resignation on 24.05.2019</i> | C | 30 |
| 7. | <i>Copies of: Letter of Head Master to DEO on 24.05.2019</i> | D | 31 |
| 8. | <i>Copies of: Application Dated. 13/06/2019</i> | E | 32 |
| 9. | <i>Copies of: Letter of Head Master to DEO on 13.06.2019</i> | F | 33 |
| 10. | <i>Copies of: DEO response vide impugned letter dated 03/07/2019</i> | G | 34 |
| 11. | <i>Copies of: Impugned Office Order dated. 31.05.2012</i> | H | 35 |
| 12. | <i>Copies of: Departmental Appeal</i> | I | 36 |
| 13. | <i>Copies of: Impugned Decision dated. 22.11.2021</i> | J | 37 |
| 14. | <i>Vakalatnama</i> | | 38 |

HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282

①

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re: Service Appeal No. _____/2021.

Dr. Munir Ahmad S/O Abdullah Jan R/O PatwarBala, Warsak Road, Peshawar.

.....Appellant.

VERSUS

1. Director Elementary and Secondary Education,

Directorate of Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.

2. District Education Officer (Male), Peshawar.

3. Head Master,

Government Middle School, LakaraiKaniza, Peshawar.

4. Regional Director, Higher Education Commission, Peshawar.

.....Respondents

Service Appeal Under Section 4 of KP Service Tribunal Act.

Respectfully Sheweth,

Brief but relevant facts warranting this Appeal:

1. That the appellants herein was early appointed as Arabic Teacher by the respondents and was posted at Government Middle School, LakaraiKaniza, Peshawar. Ever since appointment, the appellant is performing his duties to his zeal and zest and has never been complained of regarding his duties which the appellant is performing since entering into service. It is pertinent to mention here that the appellant acquired further qualification and completed his PhD degree back in 2017. The appellant remained and continued his duties till 14/06/2019 as evident from the duly maintained attendance register. (Copies of Educational Documents/ relevant record and attendance register are Annex-A)

2

2. In the meanwhile, the Higher Education Commission (hereinafter referred to as Respondent Commission) offered project positions of Assistant Professors, for a period of One Year to all PhD Scholars. The appellant, being eligible in all respect, applied for the said position while tendering his resignation from services which was necessary for induction in the said project. However, it was pointed out by the respondent commission that since Phase 1 of the project has been completed therefore, the candidates can only apply when the next phase of the said project commence. (Copy of Resignation letter is Annex-B)
3. It was in these circumstances that as the appellant was performing his duties as previous routine and as his resignation was not accepted till that time, therefore, he submitted an application through proper channel for withdrawal of his resignation on 24.05.2019, (Annex-C) This application was forwarded by the Head Master/ Respondent No. 3 along with covering letter to the Respondent DEO with request for withdrawal of his resignation keeping in view his track-record, punctuality and dutifulness in his entire tenure of service. (Annex-D) However, no head was paid to the said application by the respondent DEO.
4. The appellant then submitted yet another application on 13/06/2019 (Annex-E) which too, was forwarded by the Head Master concerned along with covering letter on the same day. (Annex-F) However, this time, the respondent DEO responded vide letter dated 03/07/2019 (Annex-G) that his application/ request has been regretted by the competent authority. it is pertinent to mention here that the record indicates that the resignation so tendered by the appellant on 29.04.2019 is stated to have been accepted with effect from 03.06.2019 vide **Office Order bearing endorsement No. 2132-34 dated. 31.05.2019, (Annex-H)**
5. Being constrained with situations, a Departmental Representation was forwarded vide an application dated. 3.6.2019. (Annex-I) this appeal was followed by sequel of reminders, however, finally the respondent No. 1 vide letter dated. 22.11.2021 (Annex-J) addressed to the Respondent DEO that the said appeal has been rejected.

3

6. As the respondent No. 1 has regretted his departmental appeal on 22.11.2021 therefore, the appellant has now left with no other option except to approach this hon'ble tribunal on the grounds inter alia;

Ground:

- a. **Because** the Respondents have not followed the due course while passing the impugned order dated. 31.05.2019 by ignoring the withdrawal requests of the appellant and that of respondent/ head master therefore, is illegal, unlawful, without lawful authority and of no legal effect.
- b. **Because** the respondents are under obligation to entertain the requests so made by the appellant as well as respondent/ Head Master till acceptance of resignation.
- c. **Because** the appellant remained punctual and dutiful towards his duties and never been complained of regarding his duties, therefore, the treatment so inflicted upon the appellant is harsh, discriminatory and above law.
- d. **Because** the appellant requests submitted through Respondent/ Head Master were duly dispatched and conveyed to the Respondent/ DEO will before passing the impugned orders.
- e. **Because** the appellant remained in active duty till 14th of June and duly conveyed his letter through Respondent/ Head Master to the DEO concerned which clearly establishes that the Respondent/ DEO has not responded his withdrawal request till 14th June 2019.
- f. **Because** the respondent commission has introduced a project for hiring PhD Scholars for a period of One Year as Assistant Professor with requirement of resignation from previous government servants.

41

- g. *Because* the first phase of the project was winded up by the respondent commission therefore, all the aspirants/ Ph.D Scholars of 2019 intake were directed to kept on waiting till the commencement of next phase
- h. *Because* the resignation was accepted by the respondent/ DEO in absence of the appellant without confirming from the appellant.
- i. *Because* the appellant has unblemished track record with advance degrees in the relevant discipline up to Ph.D, therefore, the respondent/ DEO has ignored this fact altogether while passing the impugned orders.
- j. *Because* the treatment so inflicted upon the appellant including but not limited to the impugned order speaks volume about high handiness, mala fide and biasedness towards the appellant therefore, the impugned order is liable to be set at naught.
- k. *Because* the Appellant seek leave to furnish further grounds at the main hearing of the instant Service Appeal.

In view of the aforesaid submissions, it is very humbly prayed that on acceptance of this Appeal, this Hon'ble Tribunal may graciously be pleased to:

1. *To allow the departmental Appeal of the Appellant as prayed and set aside the impugned order dated. 22.11.2021*
2. *Direct the respondent No. 2 to recall their impugned Office Order on 31.05.2019 as the same was issued without taking into consideration the withdrawal requests so submitted to him via Respondent/ Head Master and in absence of the appellant; and further,*

5

3. To direct the respondent No. 1 & 2 to re-instate the appellant into his service keeping in view his application for withdrawal of resignation submitted and duly forwarded to the respondent/ DEO well before their acceptance on 31.05.2019;
4. to Grant Any other relief, not specifically prayed, may also graciously be granted, if appears just, necessary and appropriate.
5. Cost throughout


APPELLANT

Through

HABIB ANWAR
Advocate High Court, Peshawar.

CERTIFICATE

It is certified that no such Appeal has earlier been filed by the petitioner on this subject matter before this or any other Hon'ble Court.

Counsel

6

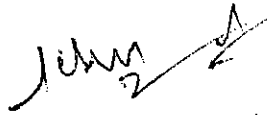
IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re: Service Appeal No. _____/2021.

Dr. Munir Ahmaad Vs. Director Elementary & Secondary Education etc.

AFFIDAVIT

IDr. Munir Ahmad S/O Abdullah Jan R/O PatwarBala, Warsak Road, Peshawar,
do hereby solemnly affirm on Oath that the contents of this Service Appeal are true and
correct to the best of my knowledge and belief and that nothing has been kept concealed
from this honorable court.



Deponent

CNIC No.

Cell No.

Identified by:

Habib Anwar

Advocate, Peshawar.

7

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re: Service Appeal No. _____/2021.

Dr. Munir Ahmaad Vs. Director Elementary & Secondary Education etc.

Addresses of the Parties:

A. Appellant:

**Dr. Munir Ahmad S/O Abdullah Jan
R/O PatwarBala, Warsak Road, Peshawar.**

B. Respondents:

- 1. Director Elementary and Secondary Education,
Directorate of Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar.**
- 2. District Education Officer (Male), Peshawar.**
- 3. Head Master,
Government Middle School, LakaraiKaniza, Peshawar.**
- 4. Regional Director, Higher Education Commission, Peshawar.**

HABIB ANWAR

Advocate High Court, Peshawar.

0336-9987282



University of Peshawar Pakistan

This certifies that

Munir Ahmad son of Abdullah Jan

having fulfilled all the requirements is hereby admitted to the degree of

Doctor of Philosophy in Arabic

and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 27th day of September, 2017.

Roll No: 14

Session: 2005-2006

Reg. No: 2001-PC-9125



140612

Registrar

Vice Chancellor

ATTESTED

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar (Pakistan)

Session ANNUAL 2002

Son / Daughter of ABDULLAH JAN

MUNIR AHMAD

DISTRICT PESHAWAR

and a Student / private candidate of

JUNE 2002

having passed the prescribed examination held in

is this day admitted by the University of Peshawar to the Degree of

AWESTED

Bachelor of Arts

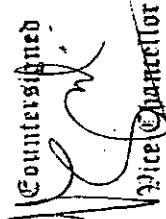
in SECOND Division

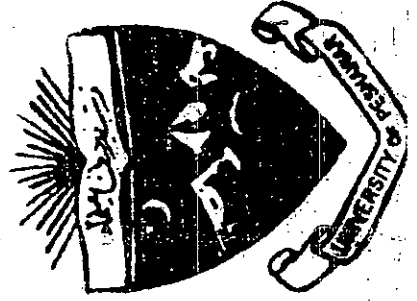
The Examination was taken as a whole / in parts

(3)

Serial No 096390


Registrar


Countersigned
Vice-Chancellor



Registration No- 2002-1942

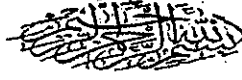
Roll Number 9575

Result declared on SEPTEMBER 2002

S.No. 68170

Roll No. 61168

Group. Pre-Engineering



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2000 - ANNUAL



This is to Certify that Munir Ahmad Son of Abdullah Jan
and a resident of Peshawar District. Registered No. 134-B/GP-97
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May/June, 2000 as a Private Candidate. He obtained 614 Marks out of 1100
and has been placed in Grade C Representing Good. He has been awarded Grade - on the
basis of internal assessment by the institution concerned. The Examination was taken in parts.


Asst. Secretary


Secretary

S. No. PBR- 007007



Roll No. 125269

11

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION 1997 (ANNUAL)
(SCIENCE GROUP)

THIS IS TO CERTIFY THAT Munir Ahmad

Son/Daughter of Abdullah Jan

and a student of Govt Higher Secondary School Mathra Peshawar.

has passed the Secondary School Certificate Examination

of the Board of Intermediate and Secondary Education, Peshawar held in April 1997

as a *Regular candidate*. He/She obtained 581 Marks out of 850

and has been placed in Grade B A Representing Very Good

The Candidate passed in the following subjects.

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He/She has been awarded Grade B A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Fifteenth November,
one thousand nine hundred and Eighty One (15-11-1981)

Lyonsal
Assjt. Secretary
27th July, 1997

This certificate is issued without alteration or erasure.

Tesshanif
Secretary

ATTESTED

S. No. PB 038366

12

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)

Session 19 97 (Annual/Supplementary)

Name Munir Ahmad

Father's Name Abdullah Jan.

Roll No. 125269

| SUBJECT | Total Number of marks allotted | MARKS OBTAINED | | | |
|---------------------|--------------------------------|----------------|-----------|--------------|-------------------------|
| | | Theory | Practical | In Figure | In Words |
| 1. English | 150 | | | 116 | |
| 2. Urdu | 150 | | | 89 | |
| 3. Islamiyat | 75 | | | 53 | |
| 4. Pakistan Studies | 75 | | | 25 | |
| 5. Mathematics | 100 | | | 89 | |
| 6. Physics | 100 | 51 | 19 | 70 | |
| 7. Chemistry | 100 | 49 | 19 | 68 | |
| 8. Biology | 100 | 52 | 19 | 71 | |
| Total | 850 | | | 581-B | Five Hundred eighty one |

Note: Errors/Omissions excepted
F: Failed in the paper (s)

Prepared by: [Signature]

Checked by: [Signature]

Date _____ 19__

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

[Signature]
TESTED

12

Board of Intermediate & Secondary Education PESHAWAR

DUPLICATE DETAILED MARKS CERTIFICATE
Intermediate Examination (Pre-Engineering Group)



S. No: PBPE-II 93245 Part - II

Session ~~2006~~ 2006 (Annual / Supplementary)

Name M. Umar Ahmad
Father's Name Abdullah Jan Roll No. 61168

| SUBJECT | Marks Allotted | | | Marks Obtained | | | | | REMARKS |
|---------------------|----------------|------------|-------------|----------------|--------|-----------|--------|------------|---------|
| | Part-I | Part-II | | Part-I | | Part-II | | | |
| | | Theory | Practical | Total | Theory | Practical | Theory | Practical | |
| 1 English | 100 | 100 | 200 | | | | | 105 | |
| 2 Urdu | 100 | 100 | 200 | | | | | 129 | |
| 3 Islamic Education | 50 | | 50 | | | | | 58 | |
| 4 Pakistan Studies | | 50 | 50 | | | | | | |
| 5 Mathematics | 100 | 100 | 200 | | | | | 105 | |
| 6 Physics | 100 | 75 | 200 | | | | | 107 | |
| 7 Chemistry | 100 | 75 | 200 | | | | | 110 | |
| Total | 550 | 500 | 1100 | | | | | 619 | |

Note: Errors/Omissions excepted

Total Marks in Words Six hundred & nineteen
Pakistan

Date 13 NOV 2007

Prepared by [Signature]

Checked by _____

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

ATTESTED

**UNIVERSITY OF PESHAWAR
(PAKISTAN)**

No. 095785



Detail Marks Certificate

B.A. Part-II Examination, 2002 (Annual)

Name Munir Ahmad

ROLL No. 95785

Father's Name Abdullah Jan

Certified that the subjects offered and marks obtained by the candidate are as under and placed in II division.

TESTED

| SUBJECTS | MAXIMUM MARKS | MARKS OBTAINED | |
|----------------------------------|---------------|----------------|------------------------------------|
| | | IN FIGURES | IN WORDS |
| 1. English | 75 | 25 | Twenty five |
| 2. Urdu | 75 | 41 | Forty one |
| 3. Arabic | 75 | 31 | Thirty one |
| 4. Pakistan Studies (Compulsory) | 40 | 13 | Thirteen |
| B.A. Part-I Marks | 285 | 162 | One hundred and Sixty Two |
| Total | 550 | 272 | Two hundred and Seventy Two |

Errors & omissions are subject to subsequent rectification.

The examination was taken as a **WHOLE / IN PARTS.**

Prepared by: _____

14 SEP 2002

CONTROLLER OF EXAMINATIONS



UNIVERSITY OF PESHAWAR
(Pakistan)

15

Detailed Marks Certificate
Master of Arts in Arabic (Final)
Annual Examination 2004

Private Candidate from Pesh-City

Name: Munir Ahmad

Gender: Male Roll No. 27366

Father's Name: Abdullah Jan

Registration No. 2001-PC-9125

| Papers/Subjects | Marks Obtained | | |
|--|----------------|------------|-----------------------------------|
| | Maximum Marks | in Figures | in Words |
| Religious Literature "Al-Hadith" (VI) | 100 | 57 | Fifty Seven |
| Modern Literature "Poetry & Prose" (VII) | 100 | 68 | Sixty Eight |
| Literary History of Arabs (VIII) | 100 | 60 | Sixty only |
| Rhetoric (IX) | 100 | 78 | Seventy Eight |
| Essay Writing (X) | 100 | 66 | Sixty Six |
| Viva Voce | 100 | 52 | Fifty Two |
| M.A Previous Marks | 500 | 338 | Three Hundred and Thirty Eight |
| Total: | 1100 | 719 | Seven Hundred and Nineteen |

Verified & Found Correct

Signature
Controller of Examinations
University of Peshawar

Signature
Computer Section
Controller of Examinations
University of Peshawar

Errors and omissions are subject to subsequent rectification

The examination was passed as a Whole in First division.

Commenced on 11th May 2004 at 10:00 AM and ended on 12th May 2004 at 12:00 PM

Signature
Controller of Examinations
University of Peshawar

DMC issued on: 02/01/05 at 14:32:07
M.A. in Arabic, Very Particular in History of Peshawar University

No 017454

Signature
REQUESTED

University of Peshawar

(Pakistan)

Session ANNUAL 2004

MUNIR AHMAD SON OF ABDULLAH JAN and a student

of DISTRICT PESHAWAR habing passed the prescribed examination held in August 2004 is this day admitted by the University of Peshawar to the Degree of

Master of Arts

in FIRST Division

The Subject of Examination being ARABIC

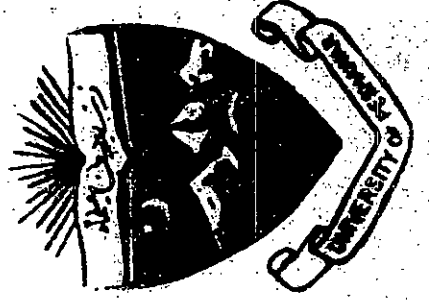
The Examination was taken as a whole / in parts

ATTESTED

16

Registrar

Countersigned
Vice-Chancellor



Serial No: 045993

Registration No. 2001-PC-9125

Roll No. 27566

Result declared on JANUARY 01, 2005

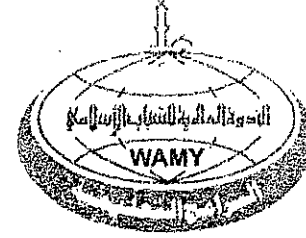


كلية أصول الدين
Faculty of Usoluddin
International Islamic University – Islamabad



شهادة حضور

Participation Certificate



الندوة العالمية للشباب الإسلامي
World Assembly of Muslim Youth
مكتب باكستان
Pakistan Office

تشهد إدارة الدورة التربوية أن المدرس: منير أحمد عبدالله جان باكستاني الجنسية، قد حضر الدورة التربوية الخامسة للمدرسين التي عقدت بمقر الجامعة الإسلامية العالمية بإسلام آباد. بالإشتراك مع كلية أصول الدين بالجامعة في الفترة من ١٧ إلى ١٨ ربيع الثاني ١٤٣١ هـ. الموافق ٠٢ إلى ٠٣ ابريل من عام ٢٠١٠ م. وقد حاضر في الدورة أساتذة جامعيون من ذوي الخبرة والإختصاص، والإدارة إذ تمنح المشارك هذه الشهادة ترحوا له التوفيق والسداد.

إدارة الدورة

مدير مكتب الندوة بباكستان
هـ إبراهيم أنور إبراهيم

مفتاح الدورة

عميد كلية أصول الدين في الجامعة الإسلامية
الدكتور ظفر بك

مفتوح الدورة

رئيس قسم اللغويات في الجامعة الإسلامية
الدكتور محمد حماد

18



DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in N.W.F.P having been born in this Province.

I was born at Village/Mohallah Patawar Bala

Tehsil Peshawar District Peshawar

Munir Ahmed
Signature of the applicant

Date 14-7-1992

631/PAT
15/2/92

Pursuance to the declaration dated _____

filed by Munir Ahmed S/O of Abdullah Jan

of Village Patawar Bala Mohallah _____

domiciled in N.W.F.P. It is, hereby certified that the said Munir Ahmed's parents are permanent residents of the N.W.F.P. having born with in it.

I have satisfied myself from personal/my own knowledge / verification that the above declaration is true and certify accordingly.

Given under my hand and the seal of the Court.

this 14th day of July 1992

[Signature]
MAGISTRATE 1ST CLASS

COUNTERSIGNED BY

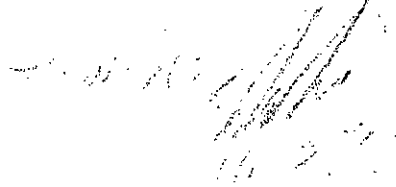
[Signature]
DEPUTY COMMISSIONER

(19)

it is verified that Munir Ahmad
S/o Abdulla Jan is Permanent Resident
of Village PATWAR BALA Tehsil
and District Peshawar by birth,
his parents are also Permanent
Resident of this village by birth.

Aftab Ahmad Khan
Aftab

تعمیراتی کاموں کے لیے زمین کی تفصیلات
میں درج ہے۔ زمین کی پیمائش کی گئی ہے
اور اس کے مطابق زمین کی تفصیلات
میں درج ہے۔ زمین کی پیمائش کی گئی ہے
اور اس کے مطابق زمین کی تفصیلات
میں درج ہے۔ زمین کی پیمائش کی گئی ہے



REGISTER OF LETTERS DESPATCHED (رجسٹرڈ اک اجراء)

FOLIO _____
(نمبر)

| ISSUE NO. (نمبر) | DATE (تاریخ) | NAME & DESIGNATION (نام اور عہدہ) | PLACE (جگہ) | SUBJECT (موضوع) | FILE HEAD & NO. (فائل نمبر) | STAMPS RECEIVED (کیس وصول شدہ) | | STAMPS USED (کیس استعمال ہوئے) | | REMARKS (تفصیلات) |
|---------------------|-----------------|--------------------------------------|----------------|--|--------------------------------|-----------------------------------|------------------|-----------------------------------|----|----------------------|
| | | | | | | RS. | P. | RS. | P. | |
| 01 | 15-02-19 | DEO Male Peshawar | PWR | Staff statement | 21/19/PSS 15 | By hand | By hand | | | |
| 02 | 18/3/19 | " " " | " | Joining Report Mr. Kiramat Shah T.T | | | | | | |
| 03 | 22-03-19 | " " " | " | verification request Mr. Kiramat Shah | 3/19/PWR 22 | " | " | | | |
| 04 | 20-03-19 | " " " | " | Staff statement | 3/19/LK PSS/22 | " | " | | | |
| 05 | 13-04-19 | " " " | " | " " | 4/19/LK PSS/25-05 | " | " | | | |
| 06 | 29-04-19 | " " " | " | " " | 05/19/LK PSS/02 | " | " | | | |
| 06 | " | " " " | " | Application for resignation Municipality | 05/19/LK PSS/02 | 05/19/LK | 05/02/15 | | | |
| 07 | " | " " " | " | official consent for resignation | 05/19/LK PSS/02 | 05/19/LK | 05/02/15-3 | | | |
| 08 | 24-05-19 | " " " | " | App for reinstatement service of NOC | Reinstat NOC | 05/19/LK | Reinstat/05/15-4 | | | |
| 09 | " | " " " | " | unsuccessful reinstatement of NOC | Reinstat NOC | 05/19/LK | Reinstat/05/15-5 | | | |
| 10 | 13-06-19 | " " " | " | Request 2nd time for Reinstatement | 06/19/LK | PSS/13/06/5 | | | | |
| 11 | " | " " " | " | Staff statement July | 06/19/LK | PSS/13/06/6 | | | | |

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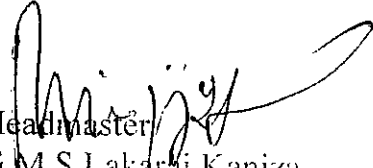
26

DUTY CERTIFICATE

22

To whom It May Concern

This is hereby certified that Mr. Munir Ahmad s/o Abdullah Jan bearing CNIC No 17301-1457036-9 is working at the undersigned office since 21-11-2017 as Arabic teacher.


Headmaster
G.M.S Lakarai Kaniza
Peshawar **Head Master**
G.M.S. Lakarai Kaniza
Peshawar

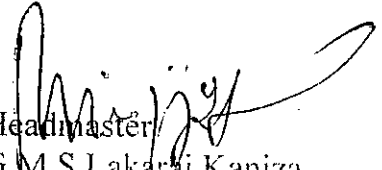

ATTESTED

DUTY CERTIFICATE

22

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This is hereby certified that Mr. Munir Ahmad s/o Abdullah Jan bearing CNIC No 17301-1457036-9 is working at the undersigned office since 21-11-2017 as Arabic teacher.


Headmaster
G.M.S Lakarai Kaniza
Peshawar **Head Master**
G.M.S. Lakarai Kaniza
Peshawar


ATTESTED

**List of CT/PET/DM/AT/TT/QARI Teachers Appointed upto 7/01/2018 and Still working Against the said post on 8/01/2018 FOR
REGULARIZATION**

| Sr | R.No | Name | Father Name | Domicile | Date of Birth | Permanent Address with Cnic | Academic Marks (out of 100) | NTS marks out of 100) | Total Marks (out of 200) J=H+1 | School where posted | Appointment Order No. and Dated | Personnel no |
|----|------------------------|----------------|-----------------|----------|--------------------|--|-----------------------------|-----------------------|-----------------------------------|--------------------------|---------------------------------|--------------|
| 1 | 601 300 054 4 | Munir Ahmad | Abdullah Jan | Peshawar | 15.1 1.19 81 | Patwar Bala, Warsak Road Peshawar 17301- 1457036-9 | 47.91 | 74 | 121.91 | GMS Lakaria Kaniza | 1310-18 Dated 18/11/2017 | 00738438 |

52

APPROVED
[Signature]

[Signature]
HEAD MASTER

Govt Middle School

Lakarai Kaniza, Peshawar

Head Master
G.M.S. Lakarai Kaniza
Peshawar

List of CT/PET/DM/AT/TT/QARI Teachers Appointed upto 7/01/2018 and Still working Against the said post on 8/01/2018 FOR
REGULARIZATION

hg

| Sr | R.No | Name | Father Name | Domicile | Date of Birth | Permanent Address with Cnic | Academic Marks (out of 100) | NTS marks out of 100) | Total Marks (out of 200) J=H+1 | School where posted | Appointment Order No. and Dated | Extension Order No and dated if any |
|----|----------------|----------------|--------------|----------|----------------|-----------------------------|-----------------------------|-----------------------|--------------------------------|-----------------------|---------------------------------|-------------------------------------|
| 1 | 60130 00544 | Munir Ahmad | Abdullah Jan | Peshawar | 15.11. 1981 | As Above | 47.91 | 74 | 121.91 | GMS Lakaria Kaniza | 1310-18 Dated 18/11/2017 | |

Duty Certification From Head Master Concerned


HEAD MASTER
NAME: MIAN IJAZ AHMAD

H/M PHONE NO
Head Master
G.M.S. Lakaria Kaniza
Peshawar

ATTESTED

Dist. Govt. NWFP-Provincial
District Accounts Office Peshawar Dist.
Monthly Salary Statement (June-2019)

25



Personal Information of Mr MUNIR AHMAD d/w/s of ABDULLAH JAN

Personnel Number: 00738438 CNIC: 1730114570369
 Date of Birth: 15.11.1981 Entry into Govt. Service: 06.06.2014

NTN:
 Length of Service: 05 Years 00 Months 026 Days

Employment Category: Vocational Temporary

Designation: ARABIC TEACHER 80004160-DISTRICT GOVERNMENT KHYBE
 DDO Code: PW6017-DISTRICT EDUCATION OFFICER (M) PESHAWAR.
 Payroll Section: 003 GPF Section: 001 Cash Center:
 GPF A/C No: 738438 Interest Applied: Yes **GPF Balance:** 31,790.00

Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 1

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|---------------------------|----------|
| 0001 | Basic Pay | 17,450.00 | 1000 | House Rent Allowance | 2,349.00 |
| 1210 | Convey Allowance 2005 | 2,856.00 | 1300 | Medical Allowance | 1,500.00 |
| 2148 | 15% Adhoc Relief All-2013 | 425.00 | 2199 | Adhoc Relief Allow @10% | 275.00 |
| 2211 | Adhoc Relief All 2016 10% | 1,351.00 | 2224 | Adhoc Relief All 2017 10% | 1,745.00 |
| 2247 | Adhoc Relief All 2018 10% | 1,745.00 | | | 0.00 |

Deductions - General

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|---------------------------|-----------|
| 3015 | GPF Subscription - Rs2890 | -2,890.00 | 3501 | Benevolent Fund | -600.00 |
| 3990 | Emp.Edu. Fund KPK | -125.00 | 4004 | R. Benefits & Death Comp: | -1,052.00 |
| 5011 | Adj Conveyance Allowance | -1,428.00 | | | 0.00 |

Deductions - Loans and Advances

| Loan | Description | Principal amount | Deduction | Balance |
|------|-------------|------------------|-----------|---------|
| | | | | |

Deductions - Income Tax

Payable: 0.00 Recovered till JUN-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 29,696.00 Deductions: (Rs.): -6,095.00 Net Pay: (Rs.): 23,601.00

Payee Name: MUNIR AHMAD
 Account Number: 0050027901296703
 Bank Details: HABIB BANK LIMITED, 225002 Saddar Road Br.Pesh cantt. (Islamic Bak) Saddar Road Br. Peshawar Cantt, PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: City: PESHAWAR Domicile: - Housing Status: No Official
 Temp. Address: City: Email: munirahmad1465@gmail.com

کوئٹہ ہائیڈرو پاور پراجیکٹ کے سٹریٹری بلڈ سٹاف
 بابت ماہ ستمبر 2019

| نمبر انجمن | | | | اسرار | | | | مہینہ | | | |
|------------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| T.T | | | | P.E.T | | | | A.T | | | |
| تاریخ | آئیڈ | روائی | مستحق | تاریخ | آئیڈ | روائی | مستحق | تاریخ | آئیڈ | روائی | مستحق |
| 1 | | | | | | | | | | | |
| 2 | 7:00 | M.A | 1:30 | 7/15 | 1/05 | JA | 7/15 | 7/15 | 1:30 | M.A | 7:00 |
| 3 | 7:00 | M.A | 12:00 | 7/15 | 1/100 | JA | 7/15 | 7/15 | 12:00 | M.A | 7:00 |
| 4 | 7:15 | M.A | 1:35 | 7/15 | 1/15 | JA | 7/15 | 7/15 | 1:35 | M.A | 7:15 |
| 5 | 7:00 | M.A | | | | | | | | | |
| 6 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 7 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 8 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 9 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 10 | 7:00 | M.A | 12:00 | 7:00 | 11:30 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 11 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 12 | | | | | | | | | | | |
| 13 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 14 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 15 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 16 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 17 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 18 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
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| 20 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 21 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 22 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 23 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 24 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 25 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 26 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 27 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 28 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 29 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 30 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |
| 31 | 7:00 | M.A | 12:00 | 7:00 | 12:00 | JA | 7:00 | 7:00 | 12:00 | M.A | 7:00 |

حقنوں کی تفصیل

| تقریرت | بیماری | انتاقہ | استقامت | میزان | بیماری | انتاقہ | استقامت | میزان | بیماری | انتاقہ | استقامت | میزان |
|--------|--------|--------|---------|-------|--------|--------|---------|-------|--------|--------|---------|-------|
| 1 | - | - | - | - | - | - | - | - | - | - | - | - |
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دستخط سربراہ

REGISTERED

| آئیڈ | ممبر ایگزیکٹو | | | | ایس ایس ٹی | | | | ایس ایس ڈی | | | | |
|------|---------------|------|-------|------|------------|-------|------|-------|------------|------|-------|-------|------|
| | آئیڈ | کسٹم | روائی | آئیڈ | کسٹم | روائی | آئیڈ | کسٹم | روائی | آئیڈ | کسٹم | روائی | آئیڈ |
| 1 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
| 2 | | | | | | | | | | | | | |
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| 8 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
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| 10 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
| 11 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
| 12 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
| 13 | 7:00 | MA | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 | 11/11 | 12/10 | 7/20 |
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چھٹیوں کی تفصیل

| نمبر | بیماری | استقامت | بیماری | استقامت | بیماری | استقامت | بیماری | استقامت | بیماری | استقامت | بیماری | استقامت |
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دستخط سربراہ ادارہ

37358912, 37310463

ATTESTED

گورنمنٹ ہسپتال، کراچی، پاکستان
 جسٹس حاضری پرانے رٹاف

28

بابت ماہ ستمبر ۱۹۶۷ء

| کراچی ہسپتال | | | | اسٹریٹ ہسپتال | | | | ۱۱ منبر لکھنؤ | | | | آئی |
|--------------|------|-------|-------|---------------|------|-------|-------|---------------|------|-------|-------|-----|
| T.T | | | | P.E.T | | | | A.T | | | | |
| آئی | روٹی | مستحق | مستحق | آئی | روٹی | مستحق | مستحق | آئی | روٹی | مستحق | مستحق | آئی |
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Post
 Vacant
 (فصلیہ)
 Case under
 Director of
 the office
 of
 Government
 of
 Sindh

چھٹیوں کی تفصیل

| قررت | بیاری | اتفاقہ | استحقاق | بیماری | قررت | بیاری | اتفاقہ | استحقاق | بیماری | قررت | بیاری | اتفاقہ | استحقاق | بیماری |
|-----------|-------|--------|---------|--------|------|-------|--------|---------|--------|------|-------|--------|---------|--------|
| خالی ماہ | | | | | | | | | | | | | | |
| گزشتہ ماہ | | | | | | | | | | | | | | |
| بیماری | | | | | | | | | | | | | | |

دستخط سربراہانہ

M-10762

To,

The District Education Officer (Male)
Peshawar.

Munir Ahmad
29/3

Subject: **Resignation from duty**

Sir,

With due respect, I Mr. Munir Ahmad s/o Abdullah Jan, working as Arabic Teacher at GMS Lakarai Kaniza solemnly convey my intention of resignation from duty by making this statement.

My resignation my please be acknowledged and I may be declared as relieved from service since Monday June 3, 2019 onwards.

I may please be issued resignation acceptance letter. I am bound to perform my duty until my resignation is officially accepted.

Regards,

Dated: 29-04-2019

NO: 05/19/LKAB3/02/05-2

Munir Ahmad
Yours Obediently
Munir Ahmad (A.T)
GMS Lakarai Kaniza, Peshawar.

Munir Ahmad

10

The District Education Officer (Male)
Peshawar

30

Subject: **Application for canceling Resignation request/ Reinstating Service and issuance of NOC**

Dear Sir,

With due respect it is stated that I Mr. Munir Ahmad s/o Abdullah Jan working as Arabic Teacher at GMS Lakarai Kaniza had forwarded an application 05/19/LK-RES/02/05-2 dated 29-04-2019 stating resignation from service. The reason for which I sought resignation was a project position offered by HEC. As a matter of fact the time limit allowed to me furnishing HEC with necessary documents has expired and I was termed as ineligible by HEC.

Sir, since I am deprived of the opportunity, so your earnest cooperation is sought in reinstating me on service if the resignation has formally been communicated. I have been regular to my duty through the entire period. Otherwise my application may please be disregarded.

Moreover, I seek your permission to apply for fresh teaching position of SST General offered by Directorate of Elementary & Secondary Education, Peshawar dated 23-05-2019. An NOC may please be issued in this regard so as my previous service may also be reckoned accordingly.

Thanking you in anticipation

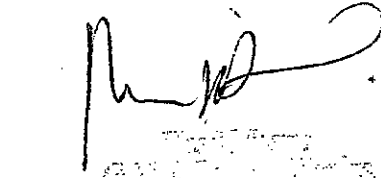


Yours Obediently
Munir Ahmad
Arabic Teacher
GMS Lakarai Kaniza,
Peshawar

Dated: 24-05-2019

NO: 05/19/LK-RBS/NOC/24/5-4

Recommended for N/A Place




ESTED

Office of the Headmaster
Government Middle School
Lakarai Kaniza, Peshawar.

Dated: 24-05-2019

Letter NO: 05/19/LK-RES.NOC/24/05/5

Handwritten signature and initials "A. Munir" and "D" with a circled number "31".

To

The District Education Officer (Male)
Peshawar.

Subject: **Cancelation of Resignation/Reinstating service & Issuance of NOC**

Sir,

Refer to the application no ⁰⁵05/19/LK.RES/02/05/03⁰² submitted by Mr. Munir Ahmad s/o Abdullah Jan, Arabic Teacher at this station, this is to intimate that applicant seeks may please be reinstated on duty if his resignation has been communicated formally otherwise his Resignation application Dated 29-04-2019 bearing No: 05/19/LKRES/02/05-3 may please be deemed as withdrawn.

There are no liabilities on his part. He has been punctual & dutiful throughout his service tenure till this date. Moreover he may please be issued NOC for applying to the post of SST General recently advertised.

Dated: 24-05-2019

Regards,
Headmaster
GMS Lakarai Kaniza,
Peshawar

Handwritten signature and stamp of the Headmaster.

Handwritten signature and stamp "ATTESTED".

Munir Ahmad
E
32

To:

The District Education Officer (Male),
Peshawar.

Subject: APPLICATION FOR REINSTATING THE SERVICE

Respected Sir,

With due respect it is stated that I **Mr. Munir Ahmad s/o Abdullah Jan** working as **Arabic Teacher** at **GMS Lakarai Kaniza** had forwarded an application 05/19/LK-RES/02/05-2 dated 29-04-2019 stating resignation from service. The reason for which I sought resignation was a project position offered by HEC. As a matter of fact the time limit allowed to me furnishing HEC with necessary documents has expired and I was termed as ineligible by HEC.

Sir, since I am deprived of the opportunity, I humbly seek your earnest cooperation in reinstating my service if the resignation has formally been communicated. I have been regular to the duties assigned to me.

Thanking in anticipation

Yours Obediently
Munir Ahmad
Arabic Teacher
GMS Lakarai Kaniza,
Peshawar.

Munir Ahmad

Dated: 13-06-2019

Recorded for N/A please
[Signature]

[Signature]

Head Master
G.M.S. Lakarai Kaniza
Peshawar

Annex F⁷

33

Office of the Headmaster
Government Middle School
Lakarai Kaniza, Peshawar.
Dated: 13-06-2019
Letter NO: 06/19/LK-RES/13/06/-5

To

The District Education Officer (Male),
Peshawar.

Subject: **REQUEST FOR REINSTATING SERVICE**

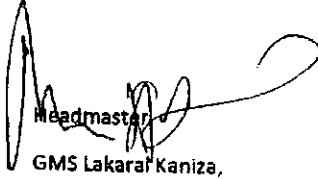
Respected Sir,

Refer to the application No 05/19/LK.RES/02/05-02 submitted by Mr. Munir Ahmad s/o Abdullah Jan, Arabic Teacher at this station, this is to intimate that the applicant has been regular to his duty despite of his resignation request dated 29-04-2019. He never gave up his services even a single day nor did he left the school. The attempt to resign from service was pitiful of him and as per his dutifulness & good will he may please be reinstated on duty if his resignation has not been communicated.

There are no liabilities on his part. He has been punctual, dutiful and determined to excel among our working team.

Regards,

Dated: 13-06-2019


Headmaster
GMS Lakarai Kaniza,
Peshawar
Head Master
G.M.S. Lakarai Kaniza
Peshawar


ATTESTED

Scanned by CamScanner

OFFICE OF THE DISTRICT EDUCATION OFFICER

(MALE) PESHAWAR

To

Dated Peshawar the 21/06/2018

689

ALB

N G Y

Amir

34

The Headmaster
Girls' Lokarai Kanika Peshawar

Subject: REQUEST FOR RE-INSTATEMENT IN SERVICE.

Memo.

I am directed to refer your letter No AB (dated 17/6/2018) on the subject cited above and to state that the request for re-instatement in i/o Mune Ahmad Ex-AT of your is rejected by the competent authority under the rule

The teacher concerned may be informed accordingly.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Encl. No 6190

Copy forwarded to the:

- 1. Cashier Local Office.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

[Signature]
ATTESTED

[Handwritten mark]

Handwritten signature and initials "H" with a circled "35" below it.

OFFICE OF THE DISTRICT EDUCATION OFFICER (Male) PESHAWAR

OFFICE ORDER.

The resignation tendered by Mr. Munir Ahmad AT GMS Lakarai Kaniza Peshawar is hereby accepted w.e.f 3/6/2019.

Note:

- 1 Necessary entry to this effect should be made in his service which is returned herewith with serial No 2.
- 2 This order final and will not be revoked at any stage at any time

(MOHAMMAD DREES AZAM)
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Endst: No. 2132-34 dated 31/05/2019

Copy of the above is forwarded to the 4/5/2019

1. Accountant General Khyber Pakhtoon khwa Peshawar.
2. Headmaster GMS Lakarai Kaniza Peshawar
3. P/File.

BY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Handwritten signature and a faint stamp.

Munir Ahmad I
36

To

The worthy Director
Elementary & Secondary Education, Peshawar
Government of Khyber Pukhtunkhwa

Subject: Appeal for reconsideration

Respected Sir,

This is to bring into your kind notice that I Mr. Munir Ahmad, Arabic Teacher at GMS Lakarai Kaniza had resigned from duty on April 29, 2019 due to some serious domestic constraints. I could not consult anyone what to do at that time and that was my worst mistake. I was badly suffering from mental torture and stress due to some disputed land issue as well.

Sir, but soon before the resignation could be tendered to me, I requested the competent authority for cancellation but that request was not entertained at all.

I, then submitted an appeal to your good office for reinstatement of my service on June 3, 2019.

Another appeal bearing diary no 234, was submitted to your good office but bearing no fruit.

I did not stop here but continued submitting applications up till now.

Sir, I was working as regular servant of your esteemed department. What I did was not good but my miseries may also be taken into notice. I have five years regular service. I am eligible for further competitive examinations in Education. If my service is not restored, I would obviously lose such chances for advancement and above all, survival of my family.

I beseech to reconsider this appeal and restore my service saving thus a family who would pray for you all times.

Dated: 18/10/2021

98
18/10/2021

Yours Obediently
Munir Ahmad
Ex-Arabic Teacher
GMS Lakarai Kaniza
Peshawar
Cell: 0333-9233206

میر احمد

Munir Ahmad

Munir Ahmad



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

No. _____ /F.No.P.F/Mr. Riaz Hussain SCT

Dated Peshawar the 22/11 /2021

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

✓
District Education Officer
(Male) Peshawar

Ames J
37

Subject: **APPEAL FOR RECONSIDERATION**

Memo:

I am directed to refer on the subject cited above and to ask you that appeal in r/o Mr. Munir Ahmad AT GMS Iakarai Kaniza Peshawar have been rejected.

La i
Assistant Director (Estab)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. _____/

Copy forwarded to the:-

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Master File.

Assistant Director (Estab)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

AM
ATTESTED

38

POWER OF ATTORNEY/VAKALATNAMA
IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re: Service Appeal No. _____/2021.

Dr. Munir Ahmaad Vs. Director Elementary & Secondary Education etc.

On behalf of APPELLANT.


I/ we the APPELLANT hereby appoint **Mr. Habib Anwar** Advocate in the above-mentioned case, to do all or any of the following acts, deeds things.

1. To appear, act, sign, record Statement and plead for me/us in the above-mentioned case in this court /Tribunal or any other Court /Tribunal in which the same may be tried or heard, and other proceedings arising out of or connected therewith.
2. To sign, verify compromise and file or withdraw all proceedings, petitions, appeals, affidavits, and any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at its stages.
3. To receive payments of, and issue receipts for, all money that may be or become due and payable to us during the course or on the conclusion of the proceedings.
4. To do all other acts and things which may be deemed necessary or advisable during the proceedings.

AND HEREBY AGREE:

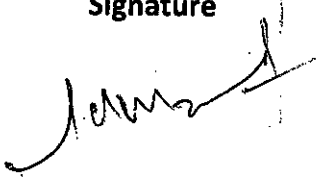
- a. To ratify whatever the said advocate may do in the proceedings.
- b. Not to hold the Advocate responsible if the said case be proceeded ex-parte or dismissed in default in consequence of absence from the Court/Tribunal when it is called for hearing.
- c. That the Advocate shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fees remains unpaid.

In witness whereof, I/We have signed this power of Attorney/ Vakalatnama hereunder, the contents of which have been read/ explained to me us and fully understood by me/ us this 21st day of December 2021, at Peshawar.

Accepted & Attested

Habib Anwar

Terms Accepted

Signature


DR. Munir Ahmad

بعد الت

موسم ریسروئیل لیسور

3 ذوالحجہ 1432ھ
2 جناب بنام محکمہ انعام

موزعہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں بائیں طرف سے واسطے پیروی و جواب دی وکل کاروائی متعلقہ
آن مقام کشیور کیلئے جمہور مسل خان
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موسوم کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقررات ہاں فیصلہ برحلف دیے جواب دی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک درو پیسہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برادگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کسی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جات التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
ڈگری کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

Accepted
[Signature]

الرقوم _____ ہ _____ 20 _____
واہ الع

بہتمام کے لئے منظور ہے۔

[Signature]
Cnic: 17301-1457026-9
Cell: 0333-9233206

"A"

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

No.

APPEAL No. 7913 of 20 22

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director, E&SE Peshawar.

RESPONDENT(S)

Respondent (4)
Notice to Appellant/Petitioner: Regional Director, Higher Education
Commission Peshawar.

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

25/07/2022 at 9:00 AM

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

For Reply

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 7913 ^{DB} of 20 21

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director EGSE Peshawar

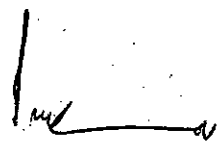
RESPONDENT(S)

Respondent (4)
Notice to Appellant/Petitioner Regional Director, Higher Education
Commission Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 26/07/2022 at 9:00am

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

For Reply



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

7913

22

APPEAL No..... of 20

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director ESSE Peshawar.

RESPONDENT(S)

Respondent (2)

DEO (Male) Peshawar.

Notice to Appellant/Petitioner.....

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *25/07/2022* at *1:00 PM*

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

For Reply

(Signature)

22-7-22

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

7913

APPEAL No. of 20 ..

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director ESSE KPK Peshawar.

RESPONDENT(S)

Respondent (1)

Director ESSE KPK Peshawar.

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 25/07/2022 at 9:00 AM

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

for reply

[Signature]

[Signature]
22-7-22

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No. *202*

7913

SB

21

APPEAL No..... of 20 ..

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director ESSE KMC Peshawar.

RESPONDENT(S)

Respondent (3) Head Master, Govt Middle School

Notice to Appellant/Petitioner

Lakarai Kaniza, Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *27/09/2022* at *9:00am*

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

For Reply

[Signature]

*Opportunity was granted
On Previous Date*

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

Recd

SB

APPEAL No..... *7913* of *2021* .

Dr. Munir Ahmad

Appellant/Petitioner

Versus

Director EGSE KPK Peshawar.

RESPONDENT(S)

Respondent (1)
Notice to Appellant/Petitioner

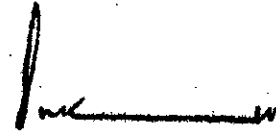
*Regional Director, Higher
Education Commission Peshawar.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *27/09/2022* at *9:00am*

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

For Reply

*Opportunity was granted
on previous Date*



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

P-1

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR SERVICE APPEAL No.7913/2021

Mr.: DR MUNEER vs. DIRECTOR (E&SE) education
Reply on behalf of respondents No, 1, 2, & 3.

Respectfully Sheweth:

The respondents submit below:-

Preliminary Objection:-

1. That the Appellant has got no cause of action /locus standi.
2. That the Appellant has concealed material facts from this Hon'ble Tribunal.
3. That the Appellant has been estopped by his own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant Appeal is badly time barred.
5. That the instant Appeal is not maintainable in its present form.
6. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary and proper parties.
7. That the Appellant has not come with clean hands to this Hon'ble Tribunal.

REPLY ON FACTS:

1. That Para No-1 is correct to the instant that the applicant was appointed as Arabic teacher in Education department while rest of the Para pertains to the record.
2. That Reply to Para No-02 it is submitted that the applicant joined the post of Assistant Professor and submitted application for resignation on dated 29-04-2019 and the department accepted resignation of the applicant.(resignation of the applicant is annexed as annexure A and B).
3. Para No-03 is misleading and against the facts. The applicant submitted his resignation application through school Head Master and the Head Master sent the same to the competent authority DEO and the DEO accepted the resignation of the applicant. Which has already annexed as annexure A & B of the reply.
4. That reply to Para No-4 has already been given in the above Para.
5. That Para No-05 is pertains to record.
6. That reply to Para No-06 it is submitted that the appellant has no cause of action to file the instant appeal in this Hon'ble tribunal.

REPLY ON GROUND:

- A. That Ground A is incorrect and misleading and against the facts, the order dated 31-5-2019 is according to rules and law.
- B. That Ground B is also incorrect and misleading and against the facts. The appellant its self resignation from his service.


- C. That Ground C is incorrect. The detail reply has been given in the above Para.
- D. That reply of Ground D has already been given in the above Para.
- E. That Ground E is incorrect and misleading.
- F. That Ground F is related to respondent No-04 Hence no comments.
- G. That Ground G is related to respondent No-04 Hence no comments.
- H. That Ground H is incorrect and misleading.
- I. That Ground I is misleading the DEO bound to acted upon the exciting law and rules.
- J. That Ground J is incorrect, misleading and against to the facts the said order is according to law and rules.
- K. That Ground K the responding also seeks leave to advance proof and other grounds at the time arguments.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.

District Education Officer
(Male) Peshawar

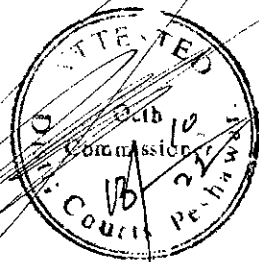


(DIRECTOR)
Elementary & Secondary, Education,
Khyber Pakhtunkhwa, Peshawar.


Hd (Head Master)
GMS LAKARAI KANIZ
Peshawar.

Affidavit

Stated on Oath the content of the reply is correct to the best of my knowledge and nothing has been concealed from this Honorable service tribunal.



District Education Officer
(Male) Peshawar

'A'

P-3

OFFICE OF THE DISTRICT EDUCATION OFFICER (Male) PESHAWAR

OFFICE ORDER.

The resignation tendered by Mr. Munir Ahmad AT GMS Lakarai Kaniza Peshawar is hereby accepted w.e.f 3/6/2019.

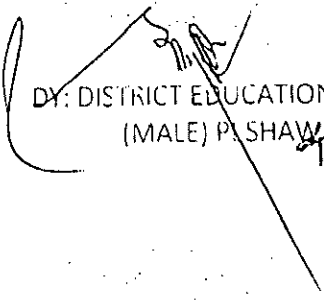
Note:


- 1 Necessary entry to this effect should be made in his service which is returned herewith with serial No 2.
- 2 This order final and will not be revoked at any stage at any time

(MOHAMMAD IDREES AZAM)
DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Endst: No. 2132-34 dated 31/05/2019
Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtoon khwa Peshawar.
2. Headmaster GMS Lakarai Kaniza Peshawar
3. P/File.


DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR


17301-1457036-9

P-4

Office of the Headmaster Government Middle School Lakarai Kaniza, Peshawar.

(90)

No: 65/LK/RSS/02/18-3

Dated: 29-04-2019.

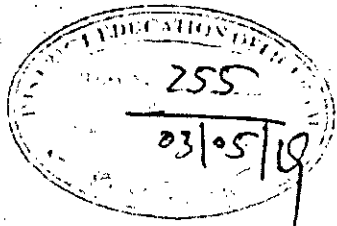
To

The District Education Officer (Male)
Peshawar

Subject: Resignation Acknowledgement & Acceptance intimation.

Sir,

Consequent upon the subject statement made by Mr. Munir Ahmad working at this station as Arabic Teacher vide letter No: 65/A/LK/RSS/02/18-3 hereby put forward his case for further necessary action please.



[Signature]
Head Master
G.M.S. Lakarai Kaniza
Peshawar

GMS Lakarai Kaniza

Peshawar.

"B"

P-5

(89)

To

The District Education Officer (Male)
Peshawar.

Subject: Resignation from duty

Sir,

With due respect, I Mr. Munir Ahmad s/o Abdullah Jan, working as Arabic Teacher at GMS Lakarai Kaniza solemnly convey my intention of resignation from duty by making this statement.

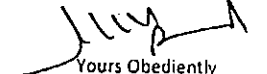
My resignation my please be acknowledged and I may be declared as relieved from service since Monday June 3, 2019 onwards.

I may please be issued resignation acceptance letter. I am bound to perform my duty until my resignation is officially accepted.

Regards

Dated: 29-04-2019

No: 05/19/LK/RGS/02/05-2


Yours Obediently
Munir Ahmad (A.T)
GMS Lakarai Kaniza, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No. 7913/2021

Dr. Munir Ahmad

VERSUS

Elementary and Secondary Education

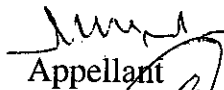
**APPLICATION FOR DELETION OF RESPONDENT
NO. 4 (REGIONAL DIRECTOR HIGHER EDUCATION
COMMISSION FROM THE PENAL OF RESPONDENTS
BEING UNNECESSARY PARTY.**

Respectfully Sheweth

1. That the appellant has filed the instant appeal against the order dated 31/05/2019 passed by respondent No. 2 and against order dated 22-11-2021 passed by respondent No. 1.
2. That the appellant has also made Regional Director Higher Education Commission as respondent No. 4 who has no role in the instant appeal and being irrelevant and unnecessary party, the applicant wants to delete Respondent No. 4 (Regional Director Higher Education Commission) from the panel of respondents.

It is therefore, most humbly prayed that on acceptance of this applicant, the respondent No. 4 (Regional Director Higher Education Commission) may kindly be deleted from the penal of respondent.

Dated 27/09/2022


Appellant

Through


Taimur Ali Khan

Advocate High Court Peshawar

AFFIDAVIT

It is solemnly affirmed that the contents of this application are true and correct.


Deponent

Dr. Munir Ahmad

