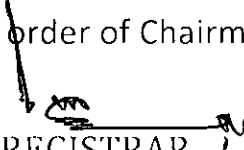


Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 755/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26.12.2022	<p>The execution petition of Mr. Azmatullah Khan submitted today by Mr. Arbab Kaleem Ullah Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p>By the order of Chairman  REGISTRAR</p>

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

AA9

E.P. No. 755/2022

Azmat Ullah Khan
Ex-Chief of Section (BPS-19) P&D Department
R/o House No.37, Sector G-4, Phase-II,
Hayatabad, Peshawar.....Petitioner

Versus

- 1) Chief Secretary Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Secretary P&D Department Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3) Chief Minister Khyber Pakhtunkhwa, C.M. House, Peshawar.
.... Respondents

PETITION FOR EXECUTION/
IMPLEMENTATION OF ORDER DATED
08.10.2021 PASSED BY THIS HON'BLE
TRIBUNAL IN S.A.NO.284/2016.

Respectfully Sheweth;

- 1) That the applicant/ appellant has been removed from service vide notification dated 12th October, 2015 issued by the worthy Chief Secretary Khyber Pakhtunkhwa.
- 2) That the applicant filed an appeal before this hon'ble Tribunal, which was accepted vide judgment dated 08.10.2021. (Copy of judgment is attached).

To

- 1) Chief Secretary Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Secretary P&D Department Govt. of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 3) Chief Minister Khyber Pakhtunkhwa, C.M. House, Peshawar.

**APPLICATION FOR IMPLEMENTATION
OF ORDER DATED 08.10.2021 PASSED BY
LEARNED KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR
PASSED IN S.A.No.284/2016 IN LETTER
AND SPIRIT.**

Respected Sir,

It is pleased to bring into your kind notice that the applicant has been removed from service vide notification dated 12th October, 2015 issued by the worthy Chief Secretary, Khyber Pakhtunkhwa.

That the applicant filed an appeal before the hon'ble Service Tribunal, Khyber Pakhtunkhwa, which was pleased to accept vide judgment dated 08.10.2021. (Copy of judgment is attached).

That the applicant request for the implementation of order/ judgment of Service Tribunal, Peshawar in toto.

It is, therefore, most humbly requested that on acceptance of this application, the order/ judgment may kindly be implemented in letter and spirit.

Dated: 05-9-2022

Applicant



Azmat Ullah Khan

Ex-Chief of Section (BPS-19) P&D Deptt:
R/o House No.37, Sector G-4, Phase-II
Hayatabad, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Service Appeal NO. 2184 / 2016



Mr. Azmatullah Khan
Ex- Chief of Section (BPS-19) P&D Department
R/O House No. 37, Sector G-4
Phase 2, Hayatabad Peshawar

W.F. PROVINCE
Service Tribunal

Diary No. 213

Dated 14-03-2016

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through the Chief Secretary Khyber Pakhtunkhwa at Civil Secretariat Peshawar
2. Additional Chief Secretary Government of Khyber Pakhtunkhwa at Peshawar
3. Secretary to the Government of Khyber Pakhtunkhwa Establishment Department at Civil Secretariat Peshawar
4. Secretary P&D Department Govt of Khyber Pakhtunkhwa Civil Secretariat Peshawar

..... Respondents

~~Filed to-day~~
~~Signature~~
14/3/16

SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT 1974 R/W
RULE 19 OF THE KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS
(EFFICIENCY AND DISCIPLINE) RULES 2011

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

RESPECTFULLY SHEWETH:

The appellant most earnestly craves permission of this Hon'ble Tribunal to submit as under;

Re-submitted to-day
and filed.

~~Signature~~
15/3/16

BRIEF FACTS:

1. That, the appellant, after having obtained a Degree in Engineering in the year 1979, and after having registered with the Pakistan Engineering Council on 01/08/1979, joined service with the Provincial Government in the year 1982 and reached the post of Chief of Section P&D Department in the BS-19. The appellant had throughout been an extremely committed, diligent and efficient civil servant and enjoyed outstanding career record.
2. That, the appellant received a letter dated 29/11/2012, from the Planning & Development Department Government of Khyber Pakhtunkhwa, signed by Mr. Muhammad Tahir Aurakzai, Additional Secretary P&D, whereby, he was informed that a complaint had been received regarding the genuineness of his academic credentials, particularly his Civil Engineering Degree from the United States of America and that he was required to provide the original documents and that as a consequence to his failure in submitting the original degree, the Competent Authority constituted a two members committee to investigate into the allegations contained in the mentioned complaint. The appellant was directed to appear before the committee in person, along-with all the relevant degrees, on 4th December 2012. It is to be, very kindly, noted that, at the relevant time, the appellant was on leave due to illness of his father, and his leave had been duly approved by the Department from 27/11/2012 for a week.

Copy of Casual Leave approval is annexure A

3. That, after having received the letter dated 29/11/2012, the appellant got hold of the order dated 18/10/2012, whereby an Inquiry Committee had been constituted to probe into the matter of "Degree Verification of Mr. Azmatullah Khan, Chief of Section (Industries), P&D Department".
4. That, subsequently, the appellant made a representation to the Additional Chief Secretary Khyber Pakhtunkhwa (P&D), wherein he explained the reason of not submitting the documents in original to the Committee. His representation contained that he was called to attend the proceedings of the Committee on 04/12/2012, but, unfortunately, at the relevant time his father was on death bed and was admitted in Shifa International Hospital Islamabad, who, later-on, passed away on 02/12/2012. The appellant submitted all the required documents along-with his representation.

Copy of the Representation is annexure B

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

5. That, on 27th May 2013, the appellant received a letter No. SO(E)P&D/087/1-19/2013, issued by the P&D Department, accompanied by the SHOW CAUSE NOTICE, signed by the Competent Authority, wherein he was required to submit his Reply to the Show Cause Notice within the stipulated period. The Show Cause Notice contained that a Preliminary Inquiry was conducted regarding the appellant's allegedly fake and bogus Engineering Degree and that the Competent Authority was satisfied, after perusing the record and the appellant's Reply, that he was 'Guilty of Misconduct'. The Competent Authority has tentatively decided to impose upon the appellant the Major Penalty of 'Dismissal from Service' under Rule 4 of the E&D Rules 2011. On the same day the appellant received his Suspension Order, issued by the Competent Authority on 27 May 2013, being found 'Guilty of Misconduct' under Rule 3(b) of the E&D Rules 2011. To the utter surprise and dismay of the appellant, he received another letter dated 27 May 2013, which was issued by the P&D Department to the District Police Officer Peshawar, for registration of Criminal Case against him, relating to the same subject matter.

Copy of the fake e-mail on which the said Show Cause was based is annexure C and the Order of suspension dated 27/05/2013 is D

6. That, being aggrieved of the Show Cause Notice and letter for registration of criminal case the appellant file Writ Petition No. 1563-P/ 2013 before the Hon'ble Peshawar High Court, which was disposed of, vide order dated 24/09/2013, with the direction that the Government should examine the documents of the appellant and if need be verify it from the concerned University within one month positively and if the degree is genuine then the whole proceedings against the appellant should be aborted, and if otherwise, then a formal regular enquiry as per the rules may be conducted. The appellant, after securing copy of the order, submitted his arrival report and resumed his duties on 14/10/2013.

Copies are annexure E and F

7. That, the respondents issued a Notification on 11/11/2013 whereby the appellant was directed to proceed on 120 days Earned Leave w.e.f. 29/08/2013 till 26/12/2013, pending the disciplinary proceedings against him.

Copy of the notification is annexure G

8. That, the appellant received a letter dated 10/12/2013 whereby he was served with the Charge Sheet and the Statement of Allegations dated 02/12/2013, and he was required to submit his reply to the Inquiry Officer within seven days. The appellant, accordingly,

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EXAMINER
Nayab Peshawar
Service Tribunal
Peshawar

submitted his reply to the Inquiry Officer on 30/12/2013, along-with all the relevant documents.

Copy of the Reply along-with the relevant documents submitted before the Inquiry Officer is annexure H

9. That, it is worth-mentioning that meanwhile the appellant was diagnosed with cancer and was hospitalized for Chemotherapy and Radiotherapy and eventually he was advised to go abroad for the treatment thereof. The appellant filed an application, dated 28/11/2013, before the Government for his early retirement on medical grounds, however, he was shocked to receive a reply from the Government on 27/06/2014 i.e. after around seven (07) months of his application, that his application for early retirement had been rejected due to pending proceedings against him. It may kindly be noted that at the time when the appellant submitted application for early retirement, there was no inquiry pending against him as the application was submitted on 28/11/2013 whereas the statement of allegation and the Charge Sheet was issued to him towards the end of December 2013.

Copies of the application and Government's reply are annexure I and J

10. That, the appellant kept waiting for his posting but he was not assigned any duties despite his arrival and resumption of duties after the decision of the Hon'ble Peshawar High Court for the reason that inquiry was pending against him nor did they complete the inquiry within the one month time given by the Hon'ble Peshawar High Court in order dated 24/09/2013. To the utter shock and dismay of the appellant, he received a notification dated 12/10/2015, whereby he was informed that the Competent Authority had been pleased to impose upon him a major penalty of 'Removal from Service' w.e.f. 15/07/2014 for his allegedly willful absence from official duties.

Copy of the Impugned Notification dated 12/10/2015 is annexure K

11. That, the appellant filed a Review petition before the Competent Authority on 09/11/2015 on the grounds mentioned therein and expressed his surprise because he never absented himself from duties rather it was the Government which did not give him any posting/ assignment due to the pendency of departmental proceedings. Since the appellant could not fetch a response on his Review, he submitted another application on 03/02/2016 for expeditious disposal of his Review. Finally, the appellant received a letter

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

dated 15/02/2016, whereby he was informed that his request was processed/ examined and regretted.


Copies of the Review, the request for expeditious disposal of the Review and the letter of Regret are annexure L, M and N

12. That, the appellant, being mortally aggrieved of the whole proceedings against him, the Notification dated 12th October 2015 and the decision on his Review, approaches this Hon'ble Tribunal to set aside the impugned order dated 12/10/2015 and the Order on his Review, on the following grounds amongst other;

GROUNDS

- A. Because, the whole proceedings are tainted with mala-fide and the impugned order has been passed in a clandestine manner, in total disregard of the available record, the law/ rules on the subject, the norms of justice and fair play. The impugned order is in glaring violation of the principles of natural justice and the principles of good governance.
- B. Because, neither any Show Cause Notice was issued to the appellant, nor any opportunity was offered to him to explain the position and a major penalty of 'Removal from Service' was imposed upon him, which is against the law and facts available on record.
- C. Because, major penalty cannot be imposed without conducting a formal enquiry into the allegations.
- D. Because, the appellant never absented himself from his duties rather it was the Government who did not assign any duties to him because of the enquiry pending against him since 22 December 2013 and which was never completed till the order of Removal on another charge, which was not even framed or served on the appellant.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

- E. Because, the mala-fide of the respondents is evident from the fact that the appellant's application for early retirement due to serious illness was also turned down on the pretext that enquiry was pending against him.
- F. Because, the ill-will of the respondents can be easily judged from the fact that the so-called enquiry was not completed within one and a half year despite clear directions from the High Court for its completion within one month.
- G. Because, the actions of the respondents are not justifiable against any standard of justice, fairness and reasonableness rather it appears that the respondents were adamant in any case to throw the appellant out of service and deprive him of his pensionary benefits.
- H. Because, the impugned notification is irrational as it says the appellant was required through advertisements in the newspapers to resume duty within 15 days, whereas he was due to retire within 15 days. It may graciously be noted that the impugned order has been passed on 12/10/2015 whereas the appellant had already reached superannuation on 15/08/2015 and was deemed retired.
- I. The appellant seeks prior permission of this Hon'ble Tribunal to take additional grounds at the time of hearing of the instant petition.

PRAYER

It is, therefore, most humbly submitted that this Hon'ble Tribunal may very graciously be pleased to;

- i. Set aside the impugned order dated 12/10/2015, and the Order on the appellant's Review before the Competent Authority, being illegal and a nullity in the eyes of law.
- ii. Declare all the actions of the respondents and the proceedings against the appellant as void ab-initio.
- iii. Direct the respondents to pay the appellant all his pensionary benefits since the date of his retirement on reaching superannuation.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

iv. Grant any other relief deemed appropriate in the circumstances.

INTERIM RELIEF

It is submitted with profound respect that the appellant is sanguine about the success of the instant appeal and the balance of convenience also lies in his favour, therefore, it is requested that the operation of the impugned order dated 12/10/2015 may kindly be suspended till the final disposal of the instant service appeal.

Azizullah

Appellant

Through

Waqar Ali

Barrister Waqar Ali

&

Amir Ali

Amir Ali Advocate

Date: 14/03/2016

CERTIFICATE

It is certified that no such other appeal on the same subject matter has earlier been filed by the appellant before this Hon'ble Tribunal.

Waqar Ali

Advocate

LIST OF BOOKS

1. Constitution of the Islamic Republic of Pakistan 1973.
2. Case Law and relevant Rules regarding the subject matter.

ATTESTED
[Signature]
EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

Date of Presentation of Application 21/10/24
 Number of 3200
 Copies 34
 Us 34
 Total 34
 No. of 1
 Date of Completion of Copy 27/10/24
 Date of Delivery of Copy 29/10/24

Waqar Ali
 Advocate

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Service Appeal NO. _____ / 2016

Mr. Azmatullah Khan VERSUS Govt. of Khyber Pakhtunkhwa

AFFIDAVIT

I, Azmatullah Khan, R/O House No. 37 Sector G-4, Phase II, Hayatabad Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge, information and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

Azmatullah Khan

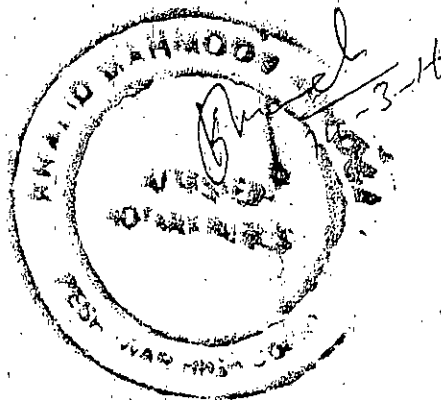
Azmatullah Khan

NIC

Identified By.

Amir Ali

Amir Ali Advocate, High Court Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 284/2016

Date of institution ... 14.03.2016
Date of judgment ... 08.10.2021



Mr. Azmatullah Khan, Ex-Chief of Section (BPS-19) P&D Department
R/O House No.37, Sector G-4 Phase 2, Hayatabad Peshawar,
... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber
Pakhtunkhwa at Civil Secretariat Peshawar and three others.

... (Respondents)

Present:

Mr. Waqar Ali Khan,
Barrister

... For appellant.

MR. MUHAMMAD ADEEL BUTT,
Additional Advocate General

... For respondents.

MR. AHMAD SULTAN TAREEN,
MIAN MUHAMMAD

... CHAIRMAN
... MEMBER (EXECUTIVE)

JUDGEMENT

MIAN MUHAMMAD, MEMBER (E):- The appellant is aggrieved of the original impugned order dated 12.10.2015 whereby he was awarded major penalty of "removal from service" w.e.f 15.07.2014. His review petition dated 09.11.2015 was also regretted on 15.02.2016. Both the impugned orders have been challenged in the instant service appeal for adjudication.

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

02. Brief facts of the service appeal are that the appellant joined P&D Department as Research Officer (BS-17) in 1982 and elevated to the post of Chief of Section (BS-19) through promotion in his cadre. It was on 29.11.2012 that the appellant received a letter containing a complaint regarding genuineness of his academic credentials i.e Civil Engineering Degree obtained from South Dekota State University USA in 1979. Enquiry proceedings were also initiated against the appellant in this connection. On receipt of show cause notice on 27.05.2013, the appellant approached the Peshawar High Court, Peshawar in writ petition which was disposed of on 24.09.2013 in the manner to let the appellant appear before Secretary Planning and Development alongwith original degree of Engineering and if need be, get it verified from the concerned university and the process be completed within one month positively. The appellant was then issued charge sheet and statement of allegations on 02.12.2013 to which he replied on 28.12.2013. After having diagnosed with cancer (stage-III) the appellant submitted an application dated 28.11.2013 for early retirement on medical grounds. However, he was informed on 27.06.2014 that his application for early retirement had been rejected due to pending proceedings against him. He was proceeded against for willful absence from duty w.e.f 15.07.2014 and finally, the impugned order awarding him the major penalty of "removal from service" was issued on 12.10.2015 but w.e.f 15.07.2014

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Member Planning and
Service Tribunal
Peshawar

i.e from the date of his willful absence from official duty. His review petition dated 09.11.2015 was regretted and communicated on 15.02.2016. The appellant thereafter approached the Service Tribunal on 14.03.2016.

03. Parties were heard and available record perused thoroughly with assistance of their respective learned counsel.

04. Learned counsel for the appellant argued that the appellant had been in service for the last almost 32 years in respondent-department and during course of his service he was promoted as Chief of Section (BS-19). It was in the year 2012 that fake email complaint of 2001 was received raising objection on the genuineness of his Civil Engineering Degree obtained from South Dekota State University USA in 1979. He was subjected to departmental enquiry when suspended for misconduct under Rule 3 (b) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and show cause notice dated 27.05.2013 issued to him which was challenged in writ petition No. 1563-P/2013 before Peshawar High Court. On expiry of suspension period, he was sent on 120 days forced leave (on full pay) w.e.f 29.08.2013 to 26.12.2013 vide notification dated 11.11.2013. Learned counsel for the appellant further contended that the appellant had been in attendance of his duties regularly and did not remain absent. Rather, the department did not post him after expiry of the forced leave. On expiry of his forced leave, he submitted arrival

ATTESTED

report but he was not properly posted. Respondents did neither complete the enquiry nor could verify degree of the appellant from the concerned University within a period of one month, as per directions of Peshawar High Court, Peshawar dated 24.09.2013. In the meanwhile, he was diagnosed with Cancer owing to which he submitted application for early retirement on 28.11.2013 but it was rejected after seven months on 27.06.2014 "due to pending proceedings against him" though there was no enquiry pending at that time and charge sheet/statement of allegations was issued on 02.12.2013. It is quite astonishing that proceedings for willful absence against the appellant were initiated at the verge of his retirement who was to attain the age of superannuation on 15.08.2015. Notices were published in news papers on 31.07.2015 directing him to resume duties within 15 days. The impugned order dated 12.10.2015 issued after his retirement, with retrospective effect from 15.07.2014 is based on malafide, issued in haste and in a whimsical and arbitrary manner just to cover up the lapses and inefficiency of the respondent-department. The service appeal may therefore, be accepted and impugned order dated 12.10.2015 and rejection of review petition dated 15.02.2016 being not maintainable, are liable to be set aside.

05. Learned AAG on the other hand contended that the appellant failed to submit his original documents. He submitted unattested photocopies of the testimonials after lapse of 05 months of his father

ATTESTED

death (02.12.2012) on 24.05.2013. Moreover, the E-mail regarding genuineness of his Civil Engineering Degree from USA, was not fake and the matter had been confirmed by the Khyber Pakhtunkhwa Public Service Commission through E-mail dated 03.04.2013. Higher Education Commission was approached on 27.01.2014 for verification of fake/bogus degree and the HEC reminded South Dakota State University USA on 24.07.2014 but reply was still awaited. Similarly, Pakistan Engineering Council was also consulted for verification of his Civil Engineering degree, on 13.01.2015 but no response received despite several reminders. The appellant on the expiry of his suspension period absented himself from duties. He was therefore, directed on 27.06.2014 to attend the office within 15 days. The appellant submitted arrival report on 14.07.2014 but again remained absent since then. The appellant was again directed on 8.05.2015 to provide certain documents for the purpose of verification of his degree but he did not respond. He was again reminded on 26.05.2015 but he did not turn up. Therefore, notices in two Dailies were published on 31.07.2015 directing him to report within 15 days of the publication. The competent authority has rightly exercised his power under the law and rules and no arbitrary or whimsical action taken against the appellant. He has been treated according to law and rules. The Service appeal being devoid of merits may be dismissed.

06. Record shows that the appellant was proceeded against under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 when notices were issued in two dailies on 31.07.2015 which culminated on issuance of the impugned

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

notification dated 12.10.2015 but giving effect from 15.07.2014. However, it is beyond comprehension that when the appellant submitted application on 28.11.2013 seeking early retirement on medical grounds (He was diagnosed cutaneous T-Cell Lymphoma i.e skin cancer stage-III) then the department regretted his request and replied after lapse of 07 months on 27.06.2014 that "keeping in view the under process of your alleged/fake degree of Engineering". The department admits and acknowledges the arrival reports of appellant dated 14.10.2013 and 14.07.2014 meaning thereby that the appellant was very much in attendance of office and the department was aware of it. Then how could he absent himself willfully w.e.f 15.07.2014, as per impugned order dated 12.10.2015 when he had attained the age of superannuation on 15.08.2015 i.e two months before the impugned notification was issued? Was the respondent department in a state of deep slumber since his willful absence i.e 15.07.2014 and could awake all of a sudden to start proceedings against him under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 on 08.05.2015?

07. There was no pending enquiry proceedings against the appellant at the time of his application for early retirement on 28.11.2013. If at all, there was any pending enquiry against the appellant, the charge sheet/statement of allegations dated 02.12.2013 was actually issued on 10.12.2013. But here too, the directions of Peshawar High Court, Peshawar in his writ petition No. 1563-P/2013 dated 24.09.2013 were not implemented in letter and spirit. Peshawar High Court, Peshawar had issued specific directions as follows:-

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal




"the petitioner shall appear before the Secretary P&D alongwith his original degree of Engineering, obtained from South Dakota State University USA and shall hand over it to the Secretary P&D, who would then be responsible for its careful handling and if need be, after consulting the Chief Minister to get it verified from the university authorities concerned, as to whether it is genuine or not and in the former case, if it is found genuine, then the enquiry proceedings pending against the petitioner, shall be dropped immediately. The entire process be completed positively within one month from the date the original degree is presented which shall be presented to the Secretary P&D on 26.09.2013"


08. Quite contrary to the directions of Peshawar High Court, Peshawar the respondent-department approached Higher Education Commission for verification of his Engineering Degree on 27.01.2014 and Pakistan Engineering Council on 13.01.2015. The verification process could not be completed till issuance of the impugned order dated 12.10.2015 and precious time was wasted due to the negligence, sluggish and half hearted action by the respondent-Department despite the fact that original documents were in the custody of department as is evident from letter No. SO(E) P&D/087/PF/1-19/2013 dated 27.01.2014.

09. It is also an established practice in government departments that all testimonials of a new entrant into service, are verified at the initial stage of his service. Taking cognizance of an e-mail dated back to 2001 after 13 years, is not without suspension and doubts. Question arises whether the civil engineering degree of the appellant had not been verified at the time of his entry into service in 1982? If not then the respondent-department as well as recruiting entity i.e Khyber Pakhtunkhwa Public Service Commission are at fault? How


ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

قیمت 50 روپے	4038			
ایڈوکیٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: 61-11-11-11				
راہ نمبر: 0341501118				
Email: aobab/calceen@yahoo.com				
		بعدالت جناب: سرور ایڈووکیٹ میرزا پشاور		

مخانب: Petitioner	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعث تحریر آنکہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام کے قریب آگیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست ازہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مستثنیٰ، نیز
 دائرہ کے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو کوئی جملہ مذکورہ با اختیار اذیت حاصل ہوں گے اور اپیل کا سزاخستہ پروا خستہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب یا ہندسہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 

العبد العبد

مقام کے لیے منظور ہے

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔

Attest
