


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. - 166/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/1/2023	<p>The appeal of Mr. Qamar Ali presented today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____, Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Appeal No. 1166 of 2023

Mr. Qamar Ali Gardener (Mali) GHS Baka Khel Sub  
Division Wazir District Bannu.

..... Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

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9.	Copy of application	E	20
10.	Copy of application and office letter dated 05/11/2022	F&G	21-22
11.	Wakalat Nama		

Appellant

Through

  
Kabir Ullah Khattak

&

  
Roeda Khan

Advocate, High Court,  
Peshawar

(1)

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

Appeal No. 166 of 2023

Mr. Qamar Ali Ex-Gardener (Mali) GHS Baka Khel  
Sub Division Wazir District Bannu.

..... Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK  
SERVICE TRIBUNAL ACT, 1974, AGAINST  
THE IMPUGNED ORDER DATED  
20/05/2022 WHEREBY MAJOR PENALTY  
OF REMOVAL FROM SERVICE WAS  
IMPOSED TO THE APPELLANT AGAINST  
WHICH THE APPELLANT FILED  
DEPARTMENTAL APPEAL ON 15.06.2022  
WHICH HAS NOT BEEN DECIDED  
WITHIN THE STATUTORY PERIOD IN 20**

(2)  
Respectfully Sheweth:

FACTS

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as Chowkider with respondent Department on 2018.
- 2) That after appointment the appellant performed his duty regularly with full devotion and hard work and no complaint whatsoever has been made against the appellant. (Copy Attendance Register is annexed as A).
- 3) That on 19/05/2022 a surprise visit was conducted by respondent No. 03 at GHS Baka Khel, at about 12:15 AM during Matric Board Examination.
- 4) That after conducting of the said meeting the respondent No. 3 sent a letter to respondent No. 1 on 20.05.2022. Copy of letter 20/05/2022 is attached as Annexure-B).
- 5) That the appellant has been removed from service on 20/05/2022 by the respondent Department. (Copy of impugned order is attached as Annexure-C).
- 6) That the appellant submitted a Departmental Appeal on 15/06/2022 against the impugned order dated 20/05/2022. (Copy of Departmental Appeal is attached as Annexure-D).

7) That the appellant submitted an application to the respondent Department for the response of Departmental Appeal dated 15/06/2022 on 20/12/2022 but no response has been given by the respondent Department. (Copy of application is attached as Annexure-E).

8) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

**GROUND**

A). That the impugned order dated 20/05/2022 comes under the definition of void order because it has been passed without fulfilling the codal formalities.

B) That no charge sheet, no statement of allegation and show cause notice has been issued/served to the appellant by the respondent Department.

C). That no publication has been made in two leading newspapers against the appellant and no regular and Departmental inquiry has been conducted against the appellant.

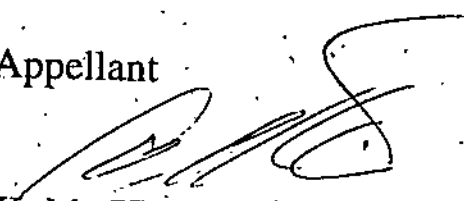

D). That no statement of witness has been recorded and no opportunity of cross examination has been provided to the appellant.

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- E) That the order has been passed by incompetent authority.
  - F) That there is no absentia on part of the appellant which has also been clarified from the application submitted by the principal GHS Baka khel Bannu to respondent No. 4. (Copy of application and office letter dated 05/11/2022 are attached as Annexure F & G).
  - G) That the penalty has come under the definition of harsh one.
  - H) That the appellant has a poor person and the only earning hand of the family there for he also entitled to reinstatement.
  - I) That no opportunity of personal hearing and defense has been provided to the appellant.
  - J). Any other grounds will be raised at the time of arguments with prior permission of this Hon' able Tribunal.

It is therefore most humbly prayed that on acceptance of this appeal the impugned order dated 20.05.2022 may please be set aside and the appellant may kindly be reinstated on his service with all back benefits.

5  
Any other remedy which this august tribunal  
deems fit that may also onward granted in favor  
of appellant.

Appellant  
Through

  
**Kabir Ullah Khattak**  
&  
  
**Roeda Khan**  
Advocates, High Court,  
Peshawar.

(b)

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

Appeal No. \_\_\_\_\_ of 2023

Mr. Qamar Ali Ex-Gardener (Mali) GHS Baka Khel  
Sub Division Wazir District Bannu.

..... Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
2. Director Elementary and Secondary Education Peshawar.
3. Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
4. District Education Officer (Male) Bannu.

..... Respondents

**APPLICATION FOR CONDONATION  
OF DELAY (IF ANY).**

**Respectfully Sheweth:**

- 1) That the petitioner/appellant has filed the accompanied appeal today in which no date has yet been fixed.
- 2) That petitioner/appellant has a good prima facie case and is hopeful for its success and the grounds mentioned in appeal may be treated as integral part of this application.
- 3) That the appellant submitted a Departmental Appeal on 15/06/2022 against the impugned order dated 20/05/2022.
- 4) That the appellant submitted an application to the respondent Department for the response of Departmental Appeal dated 15/06/2022 on



20/12/2022 but no response has been given by the respondent Department.

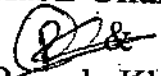
- 5) That the impugned order has been passed by incompetent authority as well as passed without fulfilling the codal formalities which comes under the definition of void order against which no limitation has been counted according to the Judgment passed by the Supreme Court.
- 6) That there are many Judgment of the superior court that cases should be decided on merit rather than on technicality and there are also so many Judgments of the Supreme Court that if the respondents have no case on merit limitation has not becomes a hurdle in way of justice.

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

Petitioner /Appellant

Through

  
Kabir Ullah Khattak

  
Roeda Khan

Advocates, High Court  
Peshawar

8)

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

Appeal No. \_\_\_\_\_ of 2023

Mr. Qamar Ali Ex-Gardener (Mali) GHS Baka Khel  
Sub Division Wazir District Bannu.

..... Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
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4. District Education Officer (Male) Bannu.

..... Respondents

**AFFIDAVIT**

I, Mr. Qamar Ali Ex Chowkider GHS Baka Khel Sub Division Wazir District Bannu do hereby solemnly affirm and declare on oath that the content of the above application are true and correct to the best of my knowledge and belief and nothing has been kept secret and concealed from this Hon'ble Tribunal.

  
DEPONENT

(9)

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

Appeal No. \_\_\_\_\_ of 2023

Mr. Qamar Ali Ex-Gardener (Mali) GHS Baka Khel Sub  
Division Wazir District Bannu.

..... Appellant

**VERSUS**

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4. District Education Officer (Male) Bannu.

..... Respondents

**ADDRESSES OF THE PARTIES**

**Appellant**

Mr. Qamar Ali Ex Chowkider GHS Baka Khel Sub Division  
Wazir District Bannu.

**Respondents**

- 1) Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2) Director Elementary and Secondary Education Peshawar.
- 3) Assistant Director (Establishment) Directorate Elementary and Secondary Education Peshawar.
- 4) District Education Officer (Male) Bannu.

Appellant  
Through   
**Kabir Ullah Khattak**

  
**Roooda Khan**

**Advocates, High Court, Peshawar**

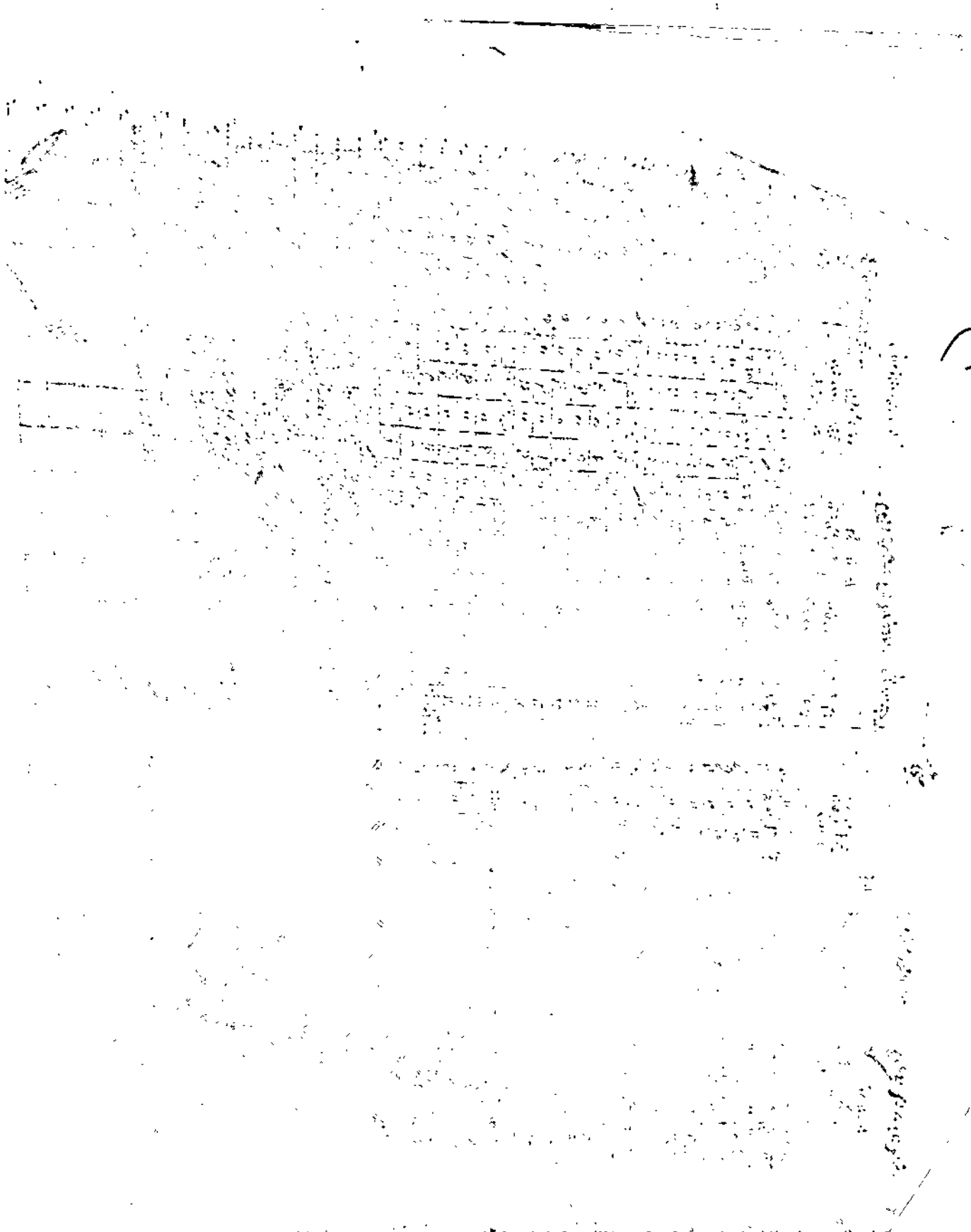


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رجسٹر حاضری اندر موجود

Handwritten signature: *Shahid*

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**Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar**

No: 5049

Dated: 20/5/2022



(B<sup>3</sup>) (17)

To:

The Secretary,  
Elementary & Secondary Education Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: SURPRISE VISIT / DISCIPLINARY ACTION

Memo:

I am directed to refer to the subject cited above and to state that, during the course of a surprise visit to GHS Haka Khel, Sub-Division Wazir Bannu, by the Worthy Director E&SE Khyber Pakhtunkhwa Peshawar, it was noted that the Principal was not present at the school, due to his engagement in inspection of SSC-Examination Halls, with school presenting a deserted look on following grounds:

- i. Loose Administration and Poor Academic Performance.
- ii. Teachers Absenteeism.
- ✓ iii. Absence of Class-IV's.
- iv. No students were found in school at 12.10 AM although the closing time was 12.30 PM.
- v. Two Class Rooms were found filled with old furniture which were supposed to be auctioned.
- vi. School was presenting poor look due to garbage and dirt.
- vii. Principal Office was looking like a horse-stable.
- viii. SGT was working as in-charge despite the availability of 3 T SGTs.
- ix. Non-availability of Class-IVs Attendance Register.

I am further directed to request your good self to kindly conduct an inquiry into the above mentioned points for further necessary action, please.

*AW*  
20/5/2022  
ASSISTANT DIRECTOR (ESTAB.)  
DIRECTORATE OF ESSE KP PESHAWAR

Encl. No: \_\_\_\_\_

Date: \_\_\_\_\_

Copies forwarded for information:

1. Deputy Commissioner, Bannu.
2. District Education Officer, Bannu
3. PA to Director E&SE KP Peshawar.
4. PA to Addl. Director E&SE KP Peshawar.
5. Office record.

*sd*  
ASSISTANT DIRECTOR (ESTAB.)  
DIRECTORATE OF E&SE KP PESHAWAR

(12) (18)



Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar



No:

Dated:

**NOTIFICATION**

Consequent upon the surprise visit by the Competent Authority and finding therein, Mr. Qamar Ali, Gardener (Muli), absent at the school, GHS Baka Khel Sub-Division Wazir Bannu, on 19-05-2022, and confirmed as permanent absent from his duty since his appointment by the In-charge of the school along-with all staff members, without any sanction of leave, is hereby removed from service with immediate effect.

*AD*  
*20/5/2022*

ASSISTANT DIRECTOR (ESTAB.)  
DIRECTORATE OF E&SE KP PESHAWAR

(Dated: *20/05/2022*)

Endst No: *4989-94*

Copy forwarded for information:

1. Deputy Commissioner, Bannu.
2. District Education Officer, Bannu
3. District Account Officer, Bannu.
4. PA to Director E&SE KP Peshawar
5. PA to Addl: Director E&SE KP Peshawar.
6. Office record.

*sd*

ASSISTANT DIRECTOR (ESTAB.)  
DIRECTORATE OF E&SE KP PESHAWAR

۱۹ ۱۵۶  
خدمت جہان سیکریٹری ایجنٹری ایمر سٹارڈ ری ایجوکیشن  
KPIK - کشاوری

دیپارٹمنٹل ایپل ٹو ایسٹی سرکل

جہان عالی ا۔  
کہ کہ ایپلٹ علیہ تعلیم میں اپنی دیوٹی بطور مالی

مہرندہ دراز سے سرانجام دے رہا ہے۔  
مہرندہ دراز دیوٹی کے دوران دیوٹی کے دوران دیوٹی کے دوران  
ایپلٹ کو پڑھائی کی بنیاد پر نوٹری سے درخواست  
مورفہ کے 20 کو آگیا۔

کہ کہ ایپلٹ دیوٹی سے پڑھائی میں تھا۔ اور پائیدگی  
سے اپنی دیوٹی سرانجام دے رہا تھا۔

لہذا استدعا ہے کہ ایپلٹ کو نوٹری پر بحال  
کرنے کا حکم صادر فرمایا جائے۔

15-6-2022

قبول ایپلٹ  
قمر علی

درخواست برآمد معلومات فراہم کرنے برائے ڈیپارٹمنٹل اپیل مورخہ 15/06/2022

جناب عالی: سائل حسب ذیل عرض رساں ہے۔

1. یہ کہ سائل کو محکمہ ایجوکیشن نے مورخہ 20/05/2022 کو نوکری سے برخاست کیا تھا۔
2. یہ کہ سائل نے نوکری بحالی کے لیے ڈیپارٹمنٹل اپیل مورخہ 15/06/2022 کو دائر کیا تھا جسکی معلومات مہیا کرنے کے لیے سائل نے اس سے پہلے بھی دو درخواستیں دی تھی لیکن تاحال اس درخواست پر کوئی عمل درآمد نہ ہوا۔

لہذا استدعا کی جاتی ہے کہ بمنظوری درخواست ہذا سائل کو ڈیپارٹمنٹل اپیل کی معلومات فراہم کرنے کا حکم صادر فرمائی جائے۔

مورخہ 20/12/2022

سائل: قمر علی

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Third main section of handwritten text, possibly a closing or signature area.

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Handwritten word or name, possibly 'Hameed'.

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Office of the Principal GHS Baka Khel SDW Bannu DDO Code 6541 EMIS Code 63363

S.No	Name	F/Name	Design	BPS	DOB	Domicile	Personal No	CNIC	Contact No
1	Muhammad Saeed	Amir Qabool Khan	Chowkidar	03	1/01/1984	SDW Bannu	175592	22201-1158790-9	0332-7909156
2	Aslam Nawaz	Mir Alam Khan	W/C	03	1/01/1987	SDW Bannu	285816	22201-6509037-9	0335-8363427
3	Habib Rahman	Akbar Zaman	W/C	03	1/01/1965	SDW Bannu	182009	22201-3989546-7	0333-9732404
4	Abdus Samad	Taradad Khan	Sweeper	03	1/01/1979	SDW Bannu	50379176	11101-6860762-7	0333-9743286
5	Qamar Ali Khan	Shah Wali Kha	Mail	03	1/01/1976	SDW Bannu	50411683	22201-6389514-9	0333-9765265
6	Sher Khan	Ardali Khan	Chowkidar	03		SDW Bannu	50411546	11101-3365665-9	0332-7884187
7	Majeed Ullah	Radad Khan	N/Oasid	03 SSC	28/02/1998	SDW Bannu			

WZ  
G 222

PRINT JPAI

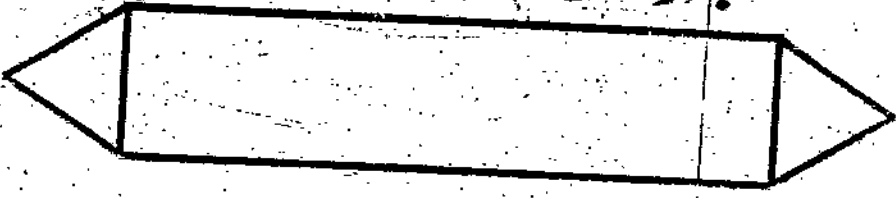
GHS BAKA KHIL

SDW BANNU

28/02/1998



بعدالت صاحب اس کے اصول



3 لاکھ 2 مخانب  
قمر علی بنام

مورخہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام

کیا ہے مگر اللہ ضرر

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برابری

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور 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 بھی وہی جملہ مذکور یا اختیارات حاصل ہوں گے

اور اس کا ساختہ پر داخستہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

20

ماہ

المرقوم

واہ العبد

Acular  
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