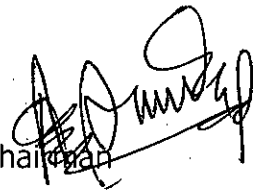


09.11.2021

Counsel for the appellant present.

Learned counsel for the appellant has submitted an application for withdrawal of the appeal at hands with permission to file fresh one. Application is placed on file. The appeal is dismissed as withdrawn with permission to the appellant to file fresh one, if so advised, subject to all just and legal objections. File be consigned to the record room.


Chairman

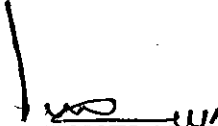

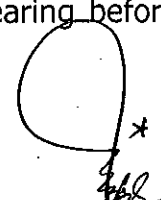

ANNOUNCED
09.11.2021

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7200 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/08/2021	<p>The appeal of Mr. Akbar Khan presented today by Mr. Munfat Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/09/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	17.09.2021	<p>None for the appellant present.</p> <p>Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing before the S.B on 09.11.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>
	<p style="text-align: center;"> 27/9/21</p>	

Before The Chief Patents and Trademark Tribunal, Patna.

Appeal No.

C.M No.

Harbansh Chandra

vs

Education Deptt.

Application for withdrawal of the instant appeal No. for amendment of the prayer, with the permission of this Hon'ble Tribunal.

R/sheweta

appeal

- 1) The instant is pending adjudication before this Hon'ble Tribunal fixed today on dated 9/11/2021.
- 2) The appellant filed the abovementioned appeal against the impugned order dated 15.08.2014 whereby major pendency of termination has been imposed on the appellant w.e.f 1/1/2014 retrospectively.
- 3) That the appellant want to withdraw the abovementioned appeal with the permission of this Hon'ble Tribunal to amend the appeal and its prayer.

It is therefore most humbly prayed that the abovementioned appeal fixed today dated 9/11/21 may very kindly be withdrawn for certain other amendments/additions in appeal and its prayer.

Yours sincerely

(M)

Dated: 9-11-2021

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: AK Barikha vs Education Dept

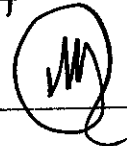
S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Munfat Ali Advocate</u>	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?		✓
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?		✓
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on		
26.	Whether copies of comments/reply/rejoinder submitted? on		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Munfat Ali Advocate

Signature:



Dated:

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. _____/2021

Mr. Akbar Khan

VS

Education Deptt

INDEX OF DOCUMENTS

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Memo of appeal	1-3
2.	Affidavit	A	4
3.	Service Book	B	5-14
4.	Impugned Order	C	15
5.	Departmental Appeal	D	16
6.	Wakalatnama		17

APPELLANT

Through



MUNFAT ALI YOUSAFZAI
ADVOCATE

Cell No. 0344-9213367

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 7209/2021

**Khyber Pakhtunkhwa
Service Tribunal**

Mr. Akber Khan, Ex-Lab Assistant,
GHSS Doaba, District Hangu.

Diary No. 7416

Dated 06/8/2021

.....**APPELLANT**

VERSUS

- 1- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (Male), District Hangu.

.....**RESPONDENT**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 15.08.2014 WHEREBY THE MAJOR PENALTY OF TERMINATION HAS BEEN IMPOSED UPON THE APPELLANT w.e.f 01.01.2014 RETROSPECTIVELY AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this service appeal of the appellant the impugned order dated 15.08.2014 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be granted in favor of the appellant.

Filed to-day

no. 110
Registrar

6/8/2021 R/SHEWETH:
ON FACTS:

- 1- That the appellant was serving in the respondent department as Lab Assistant and since from his appointment he was performing his duty with all zeal and zest. Copy of the service book is attached as annexure.....**A.**
- 2- That during service the appellant had been absented from his lawful duty due to some domestic problems and after resolving the said problems the appellant time and again visited the respondent Department for joining of his duty but the respondents were not agreed upon him.
- 3- That later on the respondent No.1 issued the impugned order dated 15.08.2014 whereby the appellant has been terminated from his service without fulfilling the codal formalities as per law and rules. Copy of the termination order is attached as annexure.....**B.**

- 4- That feeling aggrieved from the impugned order dated 15.04.2014 the appellant preferred Departmental appeal but no reply has been received so far from the quarter concerned. Copy of the Departmental appeal is attached as annexure.....C.
- 5- That the appellant feeling aggrieved and having no other remedy but to file this instant service appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 15.08.2014 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- C- That no absence notice has been served on the appellant before issuing the impugned order dated 15.08.2014.
- D- That no publication has whatsoever been made by the respondent Department before issuing the impugned order dated 15.08.2014.
- E- That neither final show cause notice has been served upon the appellant nor any opportunity of personal hearing provided to the appellant.
- F- That the respondents acted in Arbitrary and Malafide manner while issuing impugned order dated 15.08.2014 which is necessary as per judgment of the Apex Court before taking any punitive action against the Civil Servant.
- G- That the appellant seeks permission to advance any other ground and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated: 06.08.2021.

APPELLANT

AKBER KHAN

THROUGH:


MUNFAT ALI
ADVOCATE

CERTIFICATE:

It is certified that no other earlier appeal was filed between the parties.



DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. ____/2021

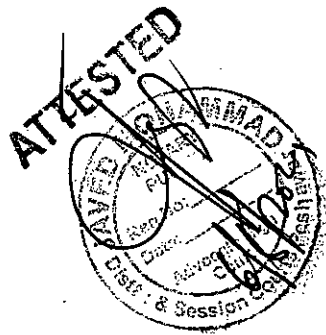
AKBER KHAN


VS

EDUCATION DEPTT:

AFFIDAVIT

I Munfat Ali, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.




MUNFAT ALI,
Advocate
High Court, Peshawar

A. 5

1. Name (نام) AKBAR KHAN BANGASH
2. Nationality and Religion Pakistani & Islam
(قومیت اور مذہب)
3. Residence Village P.O. Doaba, Teh. Hangu (16/10/11)
(مستقل رہائش)
4. Father's name and residence: S.P. DILLI
(پدر کا نام اور رہائش) (9.1.1925)
5. Date of birth by Christian era as nearly as can be ascertained Ninth January N.H. 2 Seventy Five
(تاریخ پیدائش تقریباً جیسی کہ ہو سکے)
6. Exact height by measurement 1.65 m
(قد کا پیمانہ)
7. Personal mark of identification wound mark on Rt leg
(شخصی نشان) (2.0.1950 - 126 - 113 - 016614)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(بمردی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (بھنگلیا) Ring Finger (بھنگلیا کے ساتھ کی انگلی) Middle Finger (انگلیت میان)

Fore Finger (انگلیت شہوت) Thumb (انگلیت)

Handwritten signature: *Hand*

9. Signature of Govt. Servent (سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور نام)

[Signature]

Principal
H.S.S Doaba
(Kohat)

[Signature]

Principal
H.S.S Doaba
(Hangu)

12 / 2011

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے اندر درج کم از کم پانچ سال بعد تصدیق ہونا ضروری ہے اور ہفتہ وار اور 10 سالہ تجدید کے لیے تاریخ گنتی ہونی چاہیگی۔ انگلیوں کے نشانات کے لیے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں ہے۔

M

6

1	2	3	4	5	6	7	8
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment? or (ii) whether service counts for pension under rule 3-29 of C.S.R. (Pb.)	Pay to substantive post? (Rs.)	Additional pay for officiating (Rs.)	Other emoluments falling under the term pay (Rs.)	Date of appointment	Signature of Government servant
درجہ ملازمت	مارسی تمل یا عام	اگر مارسی ہے تو میل کے ساتھ ہے؟ سچی؟	1149/-	2495/-	149/- 162/- 1842/-	12/4/99	مرکاری ملازم
Substantive posts							
L.H.S.S. posts	Pr/Jan					12/4/99	Pr/Jan
do	do				1723/-	12/1/99	
do	do				1804/-	12/1/99	Pr/Jan
Revised entries in 1988-89 (480-81-2495)							
do	do				1480/- + 2 add'l lines 1642/- P.M.	12/4/99	Pr/Jan
do	do				1723/- P.M.	12/1/99	Pr/Jan
do	do				1885/- P.M.	4/2/99	Pr/Jan
do	do				1966/- P.M.	12/2/99	Pr/Jan

M

1 Name of Post	2 Whether Substantive or officiating and whether permanent or temporary	3 If officiating state- (i) substantive appointment or (ii) whether service pension under rule 3-20 of C.S.R (Pb.) Volume II	4 Pay in substantive position		5 Additional pay for unutilizing		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the head of the office or authority
			Rs.	Pc.	Rs.	Pc.				
دورہ ملازمت	ماریٹن سٹیل عام	ماریٹن سٹیل عام	2047/-	P.M			1-12-2001	Handwritten Signature		
Lab. Asst.										
		Revised entries PPS-OT (2220-120-5820)								
- Do -	- Do -	Rs-3060/- P.M					1-12-2001	Handwritten Signature		
- do -	- do -	Rs-3180/- P.M					1-12-2002	Handwritten Signature		
- do -	- do -	Rs-3300/- P.M					01-12-2003	Handwritten Signature		
- Do -	- do -	Rs-3420/- P.M					01-12-2004	Handwritten Signature		

2004
 PAY FIXE
 2220-120-5820
 3060
 3180
 3300
 3420
 PAY MAXIMUM PERMITTED
 PAY MAXIMUM PERMITTED

PRI
 D
 PRI
 D

10	11	12	13	14	15	16
Date of termination or appointment	Reason of termination (such as promotion, transfer, etc.)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) in which leave salary is debitable to another Government	Signature of the head of the office or other Attesting Officer	Signature of the head of the office or other Attesting Officer
Principal G.S.S. Doaba (Kohat)	12/11/2001	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]
Principal G.S.S. Doaba (Kohat)	3/11/2008	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]
Principal G.H.S.S. Doaba (Hangu)	30/11/2003	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]
Principal G.H.S.S. Doaba (Hangu)	30/11/2001	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]
Principal G.S.S. Doaba (Hangu)	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]	[Signature]

Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) in which leave salary is debitable to another Government

Period Government to which debitable

Passed BA exam; from University of Peshawar under R. No. 34392 and obtained marks 233/550 result declared on 4-2-2000.

Service verified w. e. f. 1-12-2000 To 30-11-2001 from the acquittance Roll and other office record.

Service verified w. e. f. 1-12-2001 To 30-11-2002 from the acquittance Roll and other office record.

Principal
G.H.S.S. Doaba
(Hangu)

1 Name of Post	2 Whether Substantive or officiating and whether permanent or temporary	3 If officiating state (a) substance appointment or (b) whether service counts for pension under C.S.R. (Pn) Volume II	4 Pay to substantive position		5 Additional pay for officiating		6 Other amounts payable under the rules	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or unit (in attestation column 1 to)
			Pm	Pn	Pm	Pn				
GHS5 00009	Off-Temp	Revised			BP 77 07					
Lab IASTI		(2555-	140-	6755)						
- do -	- do -	Rs: 3955/-		PM			01-07-2005			
- do -	- do -	Rs 4095/-		PM			01-12-2005			
- do -	- do -	Rs 4235/-		PM			01-12-2005			
- do -	- do -	Revised Pay Scale w.e.f: 01-7-07								
- do -	- do -	BP 07 (2340-	160-	7740)						
- do -	- do -	Rs 4860/-		PM			01-07-2007			
- do -	- do -	Rs 5020/-		PM			01-12-2007			
- do -	- do -	Revised Pay Scale w.e.f: 01-07-2008								
- do -	- do -	BP 07 (3530-	190-	4230)			01-07-2008			
- do -	- do -	Rs 6000/-		PM						
- do -	- do -	Rs 6120/-		PM			01-12-2008			

11

1 Name of Post	2 Whether Substantive or officiating and whether temporary	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	4 Pay is substantive		5 Additional pay for		6 Other emoluments under the term pay	7 Date of appointment	8 Signature Government
			Fa.	Pa.	Ho.	Pa.			
درج ملازمت	ماریس سٹیل کا مقام	میل کے مطابق ڈی پی سٹی	ف	م	ڈا	پا	م	تقریب	سرکاری ملازم
G.H.S.S. Doda									
dob: / PH:			Rs.		6380/- PM			01-12-09	APC
-do-			Rs.		6570/- PM			01-12-2010	APC
		Revised Pay Scale of 01-11-11 BPS-07 (5800-370-15400)							
-do-			Rs.		10927/- PM			01-07-2011	APC
			Rs.		11240/- PM			01-12-2011	APC

11

12

9	10	11	12	13	14	15	
Signature and designation of the head of the office or other attending officer in illustration of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attending officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the head of the office or other attending officer	Reference to any recorded punishment or award or award or granted of the Government servants
Signature of Government دخلا سرکاری ملازم	دخلا الہ آباد	دخلا انتقال لاہور	دخلا انتقال لاہور نئی لاہور لاہور	دخلا الہ آباد	رضت دین دینار	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government دخلا دینار دینار	دخلا دینار دینار
PRINCIPAL G.H.S.S. Doaba (Hangu)	09/11/2008	Promotion	PRINCIPAL G.H.S.S. Doaba (Hangu)	Promotion	Service Verified from the record	Principal G.H.S.S. Doaba (Hangu)	Reference to any recorded punishment or award or award or granted of the Government servants
PRINCIPAL G.H.S.S. Doaba (Hangu)	02/11/2008	Promotion	PRINCIPAL G.H.S.S. Doaba (Hangu)	Promotion	Foreward leave Sanction	Principal G.H.S.S. Doaba (Hangu)	Reference to any recorded punishment or award or award or granted of the Government servants
PRINCIPAL G.H.S.S. Doaba (Hangu)	11/11/2008	Promotion	PRINCIPAL G.H.S.S. Doaba (Hangu)	Promotion	Foreward leave Sanction	Principal G.H.S.S. Doaba (Hangu)	Reference to any recorded punishment or award or award or granted of the Government servants
PRINCIPAL G.H.S.S. Doaba (Hangu)	11/11/2008	Promotion	PRINCIPAL G.H.S.S. Doaba (Hangu)	Promotion	Foreward leave Sanction	Principal G.H.S.S. Doaba (Hangu)	Reference to any recorded punishment or award or award or granted of the Government servants

M

13 Signature and designation of the Head of the office or other affecting offices in attestation of	14 Date of termination or appointment	15 Reason of termination (such as promotion, transfer, dismissal)	16 Signature of the head of the office or other Attesting officer	17 Nature and duration of leave taken	18 Allocation of period of leave of average pay up to leave months (or earned leave not exceeding 125 days) to which leave salary is debitable to	19 Signature of the head of the office or other affecting officer	20 Reference to any recorded punishment or censure, or reward or praise of the Government servants
					Period Government to which debitable		
دھلا اشراف	تاریخ اختتام ملازمت	وجوہات تعلق ملازمت ترقی پوار باعفی	دھلا اشراف	رخصت کی نوعیت و مدت	پارہ ایک کی رخصت ۲۰۰۲ سے ۲۰۰۳ تک	دھلا اشراف	کوئی سزا کا کارکن کا ہونا
					Service Verified W.S.I. 2/12/2004 (W.S.I. 2/12/2004)		
					Record & Acq. Rule		
					PRINCIPAL G.H.S.S. Doaba (Hangu)		
					Passed B.A Exam: 2004 from A.I.O.U Islamabad under Roll No. 266734 obtained 528 out of 900 marks in Grade. "B"		
					G.H.S.S. Doaba (Hangu)		
					Service verified with 01-12-2010 to 30-11-2001 From the office record & Acq. Rule.		
					Principal G.H.S.S. Doaba (Hangu)		

(M)

14

9 Signature and designation of the Head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment	11 reason of termination (such as promotion, transfer, dismissal etc.)	12 Signature of the head of the office or other Attesting officer	13 Nature and duration of leave taken	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	14 Signature of the Head of the office or other attesting Officer	15 Reference to any recorded punishment or censure, or reward or praised of the Government
[Signature]	[Date]	[Reason]	[Signature]	[Nature]	[Allocation]	[Signature]	[Reference]

Termination order

Mrs. Akbar Khan L.H.A.T.

is hereby Terminated From his Service w.e.f. 01-01-2014.

Vide D.E.C (A) Hangu Order No - 2509 - 14 dated 15-08-2014

[Signature]

Principal
G.H.S. Danda
(Hangu)

13



B-15

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DISTRICT HANGU.**

Termination Order:-

Consequent upon the enquiry report constituted under the Chairmanship of Dy. DEO (M) Hangu vide DEO (M) office order No. 2247-51, dated 17-7-2014, and final show cause notice through News paper the daily Mashriq Dated 30-06-2014.

The following Junior Clerks and Lab Assistants are hereby terminated from services w.e.f the date noted against each below for all codal formalities for termination have been observed by this office. They are still absent and the Principals/ Head Masters are directed to made recovery of over payment under head pay & allowances, made them.

S. No	Name of Officials	Name of Schools	D/o Absent/Termination	Recovery
1.	Mr Roshan Gul J/c	GHS M. Banda	13-5-2014	Rs. 67621/- over payment w.e.f 13-5-2014 to 30-9-2014. (Rs. 12678 for 5/2014. Rs. 13596x4 = 54384/-for 6/13 to 9/13
2.	Mr. Raib Gul J/c	GHS Mainje Khel	1-12-2013	
3.	Mr. Akber Khan Lab Asstt	GHSS Doaba	01-01-2014	Rs. 18719/- Pay of 1/12
4.	Mr. Abdur Rehman Lab Asstt	GHSS Doaba	01-09-2013	

Note:-

1. Necessary entry to this effect should be made in their S.Book with intimation to this office.
2. Principal GHSS Doaba & Head Master GHS Mamoon Banda are advised to issue notices of recovery to S.No. 1 & 3 respectively with intimation to this office.

DISTRICT EDUCATION OFFICER
MALE DISTRICT HANGU

Endst No. 2507/14 /Dated 15/08 /2014

Copy to the:-

- 1) Director E&S, Edu: Govt: of KP, Peshawar.
- 2) Deputy Commissioner Hangu
- 3) D.A.O, Hangu
- ✓ 4) Principal, GHSS Doaba Hangu.
- 5) Head Master, GHS Mamoon Banda & Mainji Khel Hangu.
- 6) All terminated officials in home address.
- 7) Office Copy.

DISTRICT EDUCATION OFFICER
MALE DISTRICT HANGU

ATTACHED

To,

The Director (E&SE) Department,
Khyber Pakhtunkhwa, Peshawar

C- 16

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED
ORDER DATED 15.08.2014 WHEREBY THE APPLICANT
HAS BEEN TERMINATED FROM HIS SERVICE**

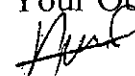
Respected Sir,

Most humbly it is stated that the applicant was the employee of your good self-Department and was serving as Lab Assistant quite efficiently and upto the entire satisfaction of his superiors. That during service no complaint whatsoever been received to the high ups against the applicant and the applicant has served the department with full devotion and with all zeal and zest. That during service the applicant was absented from his duty due to some domestic problems and after resolving the said problems the applicant came to re-join his duty. But the concerned authority despite accepting arrival of the applicant, handed over the impugned order dated 15.08.2014 whereby the applicant was terminated from service alongwith the directions of recovery of Rs. 18719/- from the applicant. That applicant time and again visited the concerned quarter for setting aside the impugned order dated 15.08.2014 and allow the applicant to join his duty but of no avail. That applicant feeling aggrieved from the impugned order dated 15.08.2014 preferred the instant Departmental appeal before your good self for redressal of his grievances.


It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 15.08.2014 may very kindly be set aside and the applicant be re-instated into service with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the applicant.

Dated: 07.04.2021.

Your Obediently



AKBAR KHAN, Ex-Lab Asstt:
GHSS Doaba, District Hangu

ATTACHED


VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2021

Mr. Akbar Khan

VS

Education Deptt

I/We Mr. Akbar Khan _____ do hereby appoint and constitute **MUNFAT ALI YOUSAFZAI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsel / Advocate in the above noted matter, without any liability for his default and with the authority to engage / appoint any other Advocate Counsel on my / our cost. I / we authorize the said Advocate to deposit; withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter.



Mr. Akbar Khan

CLIENT



ACCEPTED

MUNFAT ALI YOUSAFZAI

ADVOCATE