

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 59/2019

Date of Institution ... 14.01.2019

Date of Decision ... 29.04.2019

Mr. Imran Khan, Ex-PST (BPS-12), GMPS Beghum Banda, Tehsil Dargai, District Malakand. ... (Appellant)

VERSUS

The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar and two others. ... (Respondents)

MR. MIR ZAMAN SAFI,  
Advocate.

... For appellant

---

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved from order dated 21.06.2016, whereby, he was removed from service w.e.f. 01.09.2015 on account of willful absence.
2. I have heard learned counsel for the appellant and have also considered the available record.

It was the contention of learned counsel that the impugned order was void having been given retrospective effect, therefore, any delay on the part of appellant in submission of departmental appeal or appeal in hand was to be disregarded. It was further stated that the notice for rejoining of duty issued against the appellant was published in only one newspaper which was violative of Rule 9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011.

3. The record suggests that the appellant, while serving as PST at GMPS Beghum Banda absented himself from duty w.e.f. 01.09.2015. The matter was reported by the SDEO(Male) at Dargai. Proceedings were taken against the appellant and notices for resumption of duty were sent to him through registered post at his residential address on 03.11.2015 and 26.01.2016. The notices though bore no fruit. Consequently, similar notice was published in 'Daily Mashriq' on 09.04.2016 directing the appellant to resume the duty and appear before the competent authority within 15 days. The impugned order was consequently passed on 21.06.2016. The appellant submitted a departmental appeal to the Director, Elementary & Secondary Education Peshawar/respondent No. 2 on 21.09.2018 i.e. after loss of more than two years. The said appeal remained un-responded.

4. On record there is copy of an application by appellant addressed to the SDEO (Male) Dargai, District Malakand, wherein, request for two years long leave w.e.f. 01.09.2015 upto 01.09.2017 was made. Learned counsel for the appellant could not controvert the fact that the request of appellant for long leave, without pay, was not acceded to nor any order/sanction was issued in the said regard. On the contrary, in the departmental appeal the appellant had pleaded that he had submitted an application for long leave on account of domestic problems as well as his illness.

In the case in hand there is admitted absence of appellant from duty for a period of more than two years and in view of judgment of Apex Court reported as 1998-SCMR-1890 , the retrospective effect given to an order imposing penalty in case of prolonged absence from duty by a civil servant would not render the same void. Reliance is also placed on 2006-SCMR-453.

For the foregoing reasons the appeal in hand is without any merits calling for its admission to regular hearing. It is, therefore, dismissed in limine. File be consigned to the record room.



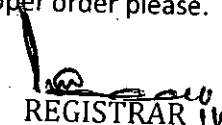



(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
29.04.2019

Form- A  
FORM OF ORDER SHEET

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

Case No. 59/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/1/2019	<p>The appeal of Mr. Imran Khan presented today by Mr. Noor Muhammad Khattak 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 14/1/19</p>
2-	16-1-19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14-2-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	14.02.2019	<p>Due to general strike of the bar, the case is adjourned. To come up for preliminary hearing on 28.03.2019 before S.B.</p> <p style="text-align: right;"> Member</p>
	28.03.2019	<p>Lawyers community is on strike therefore the case is adjourned. To come up for preliminary hearing on 29.04.2019 before S.B.</p> <p style="text-align: right;"> Member</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 59 /2019

IMRAN KHAN

VS

EDUCATION DEPTT:

**INDEX**

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	.....	1- 3.
2	Appointment order	<b>A</b>	4- 8.
3	Medical certificate	<b>B</b>	9.
4	Charge report	<b>C</b>	10.
5	Order	<b>D</b>	11.
6	Relieving	<b>E</b>	12.
7	Application	<b>F</b>	13.
8	Medical prescriptions	<b>G</b>	14- 15.
9	Impugned order	<b>H</b>	16.
10	Departmental appeal	<b>I</b>	17.
11	Vakalat nama	.....	18.

**APPELLANT**

THROUGH:

**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

APPEAL NO. 59 /2019

Diary No. 57

Dated 14-01-2019

Mr. Imran Khan, Ex-PST (BPS-12),  
GMPS Beghum Banda, Tehsil Dargai, District Malakand.....**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, District Malakand at Batkhela.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 21.06.2018 COMMUNICATED TO THE APPELLANT ON 18.09.2018 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

**That on acceptance of this appeal the impugned order dated 21.06.2018 may very kindly be set aside and the respondents may be directed to re-instate the appellant into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.**

Filed to-day  
14/11/19  
Registrar

**R/SHEWETH:**

**ON FACTS:**

- 1- That the appellant was initially inducted in the respondent Department as PST (BPS-12) vide order dated 02.06.2012. That in response to the appointment order dated 2.6.2018 the appellant submitted arrival report and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copies of the appointment order, medical certificate and charge report are attached as annexure.....**A, B & C.**
- 2- That during service the appellant was transferred from GPS No.2 Ghari Usmani Khel to GMPS, Beghum Banda vide order dated 16.5.2014. That in pursuance of the above mentioned order the appellant submitted his charge report and started performing his duty at the new station. Copies of the order and relieving are attached as annexure.....**D & E.**

- 3- That during service the appellant submitted an application for two years leave on the basis of some domestic problems/illness but the same was refused to the appellant on the reason best known to the authority/respondents. Copy of the application is attached as annexure..... F.
- 4- That after recovery from the said illness the appellant visited the concerned quarter for joining of his duty while the respondent No.3 instead of acceptance of arrival report handed over the impugned order dated 21.06.2016 to the appellant on 18.09.2018 whereby the appellant was removed from service without fulfilling the codal formalities. Copies of the medical prescriptions and impugned order are attached as annexure..... E & H.
- 5- That feeling aggrieved from the impugned order dated 21.06.2016 communicated to the appellant on 18.9.2018 preferred Departmental appeal before the respondent No.2 but no reply has been received so far. Copy of the Departmental appeal is attached as annexure..... I.
- 6- That appellant feeling aggrieved and having no other remedy filed the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned order dated 21.06.2016 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 the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That no charge sheet and statement of allegation has been served on the appellant before issuing the impugned order dated 21.06.2016.
- D- That no show cause notice has been served on the appellant before issuing the impugned order dated 21.06.2016.
- E- That no publication whatsoever has been made by the respondents which is necessary as per Rule 9 of the E&D Rules 2011 before issuance of any adverse order against the Civil servant.
- F- That no chance of personal hearing has been provided to the appellant which is necessary as per Supreme Court Judgment before taking any punitive action against the Civil Servant.

G- That the impugned order dated 04.01.2018 is void-ab-initio on the score that the punishment imposed on the appellant with retrospective effect, therefore the same is not tenable and liable to be set aside.

H- That the absence of the appellant is not willful but caused due to illness.

I- That appellant seeks permission to advance other grounds 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: 09.01.2019

**APPELLANT**



**IMRAN KHAN**

**THROUGH:**



**NOOR MOHAMMAD KHATTAK**



**SHAHZULLAH KHAN YOUSAFZAI**



**MIR ZAMAN SAFI  
ADVOCATES**



**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S-Edu:) MALAKAND**  
**PROMOTION /APPOINTMENT**

A-4

Consequent upon the recommendation of the Departmental Promotion/Selection Committee Malakand in its meeting held on 25.5.2012, the EDO(E&S), Malakand, being the competent authority is pleased to approve and promote the following existing PSTs as C.Ts and to appoint the fresh eligible candidates (Male & Female) against the post of C.T (General)/DM/Qaria in BPS No.09 (Rs.6200-380-17600) and PSTs in BPS No.07 (Rs.5800-320-15400) plus usual allowances as due and admissible to them under the rules from the date of their taking over charge against the posts at the schools noted against their names in the interest of public service with the following terms and conditions.

**(1) PROMOTION OF PST (MALE) AGAINST THE 60% VACANCIES**

C	Name	Father's name	Seniority No.	Present School	School where posted as C.T
1.	Abdus Salam	Sherin Zada	254	GPS Faisal Abad	GHS No.1 Dheri Alladand
2.	Sher Ali	Toti Rahman	283	GPS Kharki	GHSS, Palai
3.	Noor Zada	Azim Khan	331	GPS Ghawar Kall	GHSS, Palai
4.	Abdul Wadood	Ghulam Muhammad	347	GPS No.2 Dargal	GHSS, Palai
5.	Nazar Muhammad	Hazrat Muhammad	363	GPS No.2 Malkhawala	GHS, Bazdara Bala

**(2) PROMOTION OF PST (FEMALE) AGAINST THE 60% VACANCIES**

S#	Name	Father's name	Seniority No.	Present School	School where posted as C.T
1.	Robina Akbar	Ghulam Akbar	194	GGPS No.2 Batkhela	GGMS, Piran (Julagram)
2.	Bacha Zamina	Khanzad Gul	425	GGPS Total	GGMS, Nehr Banglow
3.	Fahmida	Sultan Mehmood	455	GGPS Dheri Julagram	GGHS, Dheri
4.	Sajida	Taj Muhammad	501	GGMS Agra	GGMS, Piran (Julagram)

**(3) APPOINTMENT OF THE LEFT OVER CANDIDATES AGAINST THE POST OF CT (MALE) BPS NO.09 WHICH LEFT VACANT DUE TO NON-ASSUMPTION OF CHARGE BY THE APPOINTEES**

S#	Name	Father's name	Residence	Score	Merit Position	School where posted As C.T
1.	Karam Muhammad	Wall Muhammad	Dheri Alladand	56.95	13	GHSS, Palai
2.	Fazl Wahid	Amir Zaman	Kot	56.66	14	GHS, Bazdara Payan

**(3) APPOINTMENT OF THE LEFT OVER CANDIDATES AGAINST THE POST OF DM (MALE) BPS NO.09 WHICH LEFT VACANT DUE TO NON-ASSUMPTION OF CHARGE BY THE APPOINTEES**

S#	Name	Father's name	Residence	Score	Merit Position	School where posted As DM
1.	Shahid Khalig	Fazl Khalig	Thana	47.31	4	GHS, Bazdara Bala
2.	Muhammad Ishfaq Hussain	Muhammad Sherien Badshah	Alladand	46.86	5	GMS, Heroshah

**(4) APPOINTMENT OF QARI (FEMALE) BPS NO.09**

S#	Name	Father's name	Residence	Score	Merit Position	School where posted As Qaria
1.	Amina Bibi	Umar Rahman	Thana Malakand Agency	56.06481	1	GGHS No.2 Batkhela
2.	Shahana Gul	Nek Muhammad	Thana Malakand Agency	49.70266	2	GGHS, Bazdara Bala
3.	Madina Zaman	Shah Zaman	Village & P.O Malkanal	48.1128	3	GGHS, Matkani
4.	Laila Nisar	Muhammad Nisar Khatak	Village Mcherdi	45.19153	4	GGHS, Wartair
5.	Husnat Begum	Muhammad Pervez	Village & P.O Agra	44.5899	5	GGHS, Agra
6.	Sapna Kamran	Sher Muhammad	Village Heroshah	43.46515	6	GGHS, G.U.Khel
7.	Roshni Bibi	Fazl Rahman	Dheri Julagram	36.23658	7	GGHS, Totakan
8.	Hajira Bibi	Shahabud Din	Dheri Julagram	35.16465	8	GGHS, Pirkhel
9.	Zainab	Mukhtar Ahmad	Thana	33.05882	9	GGHS, Malna
10.	Safia Bibi	Fazal Waris	Agra	31.92727	10	GGHS, Kot

**(6) APPOINTMENT OF PST (FEMALE) BPS NO.07**

S#	Name/Father's Name	Residence	Union Council	Score	Merit Position	School Where Posted	Union Council Where posted as PST
1	Tasneem Sani D/O Mushtaq Ahmad	Ghund Agra	Agra	49.629	1	GGPS, Sargaro	Agra
2	Seeda Begum D/O Nek Muhammad	Agra	Agra	49.096	2	GGPS, Margho	Agra
3	Zafra Begum D/O Said Muhammad	Agra	Agra	48.818	3	GGPS, Kuz Naranjal	Agra
4	Safia Bibi D/O Yaqoob Khan	Sarkawal	Agra	39.843	4	GGPS, Thand	Agra
5	Husna D/O Muhammad Ismail	Alladand	Alladand	57.406	1	GGPS No.2 Batkhela	Batkhela Upper (Adjacent)
6	Shamim Begum D/O Gul Hakim	Abbas Kall	Badragga	40.119	1	GGPS Badragga	Badragga

*[Handwritten Signature]*

7	Nousheen Kiran D/O Saeed Khan	Batkheela Lower	Batkheela Lower	51.361	1	GGPS, No.1 Batkheela	Batkheela (M) adjacent
8	Shagufta D/O Khan Muhammad	Dargal	Dargal	54.541	1	GGPS, Dargal Patak	Dargal
9	Naseem Begum D/O Faqir Muhammad	Dheri (Alladand)	Dheri (Alladand)	50.116	1	GGPS, Baghdadara	Dheri (Alladand)
10	Samina Bibi D/O Khadim Muhammad	Dheri (Alladand)	Dheri (Alladand)	48.784	2	GGPS, Baghdadara	Dheri (Alladand)
11	Zainab Bibi D/O Sher Ali Khan	Khatak Abad	Garhi Usmani Kheh	50.735	1	GGPS, Naro Ubo	Heroshah adjacent
12	Salma D/O Habib Khan	Haryan Kot	Hero Shah	51.945	1	GGPS, H/Shah Kalan	Heroshah
13	Ghazala Bibi D/O Habib Rasool	Amir Akbar Shah Kall	Heroshah	51.061	2	GGPS, Zarif Shah Baba	Heroshah
14	Habsha Saleem D/O Muhammad Saleem	Palonow	Heroshah	46.312	3	GGPS, Zarif Shah Baba	Heroshah
15	Fozia Begum D/O Muhammad Saeed	Haryan Kot	Heroshah	38.897	4	GGPS, Naro Ubo	Heroshah
16	Tahira Bibi D/O Fazil Akbar	Kotkay Khar	Khar	46.031	1	GGPS, Dheri	Dheri Dulagram (Adjacent)
17	Anila D/O Amir Khan	Kharid	Kharid	48.973	1	GGPS, Pirkehal	Pirkehal (Adjacent)
18	Rahat D/O Rahmatullah	Kharid	Kharid	44.966	2	GGPS, Sholawal	Pirkehal (Adjacent)
19	Nazish Rahim D/O Rahimdad	Koper	Koper	52.069	1	GGPS, Ashakal	Koper
20	Asia Zahir Shah D/O Zahir Shah	Qadar Kall	Koper	51.182	2	GGPS, H/Patal	Koper
21	Ghazala Jamal D/O Nasir Ali Shah	Koper	Koper	44.271	3	GGPS, Aghi Garh	Hero Shah (Adjacent)
22	Mehdia D/O Hayat Nabi	Kot	Kot	55.368	1	GGPS, D/Kot	Selai Patty (Adjacent)
23	Yasmeen Bibi D/O Mian Sald	Kot	Kot	53.324	2	GGPS, S/Patal	Selai Patty (Adjacent)
24	Parveen D/O Muhammad Ali	Malna	Kot	50.887	3	GGPS, Khanoori No.2	Selai Patty (Adjacent)
25	Madeeha Bano D/O Zalwar Khan	Kot	Kot	50.347	4	GGPS, Khanoori No.2	Selai Patty (Adjacent)
26	Seema Bibi D/O Masihullah	Kot	Kot	48.076	5	GGPS, Dad Dheri	Selai Patty (Adjacent)
27	Nizakat Begum D/O Abdullah Shah	Kot	Kot	48.052	6	GGPS, Dad Dheri	Selai Patty (Adjacent)
28	Asima Bibi D/O Zalwar Khan	Kot	Kot	47.187	7	GGPS, Dara Total	Selai Patty (Adjacent)
29	Saima Bibi D/O Muhammad Azam	Malna	Kot	46.031	8	GGPS, Nararaji Total	Selai Patty (Adjacent)
30	Salma Nawab D/O Sald Nawab	Piran	Malakand	47.695	1	GGPS, Jehangir Abad	Malakand
31	Tawseef Iqbal D/O Muhammad Iqbal	Piran	Malakand	47.377	2	GGPS, Jehangir Abad	Malakand
32	Shabnam Sultan D/O Sultanul Haq	Malakand	Malakand	45.239	3	GGPS, Hatam Banda	Malakand
33	Nazla Gul D/O Rahmat Shah	Malakand	Malakand	43.749	4	GGPS, Hatam Banda	Malakand
34	Naveeda D/O Jamshaid	Palai	Palai	47.266	1	GGPS, Palai No.1	Palai
35	Khursheeda D/O Fazal Ghafoor	Dawa Khan Kall	S/KOT BANDA JAT	42.734	1	GGPS, Arab Danda.	S/KOT BANDA JAT
36	Necam Aman D/O Amanullah	Sakhakot	S/Kot Jaded	55.971	1	GGPS, Pataw	S/Kot Jaded
37	Ayesha Bibi D/O Muzammil Shah	Latifay Kalay	S/Kot Jaded	52.855	2	GGPS, Pataw	S/Kot Jaded
38	Farzana Gul D/O Ithar Gul	Baghicha Kall	S/Kot Jaded	49.99	3	GGPS, Khadoo	S/Kot Jaded
39	Sumaira Imran D/O Muhammad Imran	Khan Garhi	S/Kot Khas	51.933	1	GGPS, Khan Garhi	S/Kot Khas
40	Ummi Kalsoom D/O Khan Lali	CC Thana	Thana Bandajat	51.96	1	GGPS, Shahkot	Palai (Adjacent)
41	Robina Begum D/O Saif Ur Rahman	Bakhta	Thana Bandajat	51.098	2	GGPS, Gandiro Sharif	Palai (Adjacent)
42	Salma Naz D/O Sher Ali	Sorana	Wartair	51.464	1	GGPS, Pindara	Wartair
43	Nahaz D/O Isal Muhammad	Wartair	Wartair	47.859	2	GGPS, Pindara	Wartair
44	Safia D/O Tahir	Dobandi	Wartair	46.859	3	GGPS, Nekar Dera	Wartair
45	Madeeha Ahmed D/O Ahmad Khan	Dobandi	Wartair	46.464	4	GGPS, B/Bala	Palai (Adjacent)

## (7) Appointment Against 2 % Disable quota against PST post BPS No.07

S#	Name/ Father Name	Residence	Union Council	Score	Merit Position	School Where Posted	Union Council where posted as PST
1	Rafi Ullah S/O ZaminGul	Wartair	Wartiar	46.926	1	GPS, Gardai	Bajaur Agency

## (8) APPOINTMENT OF PST (MALE BPS-07)

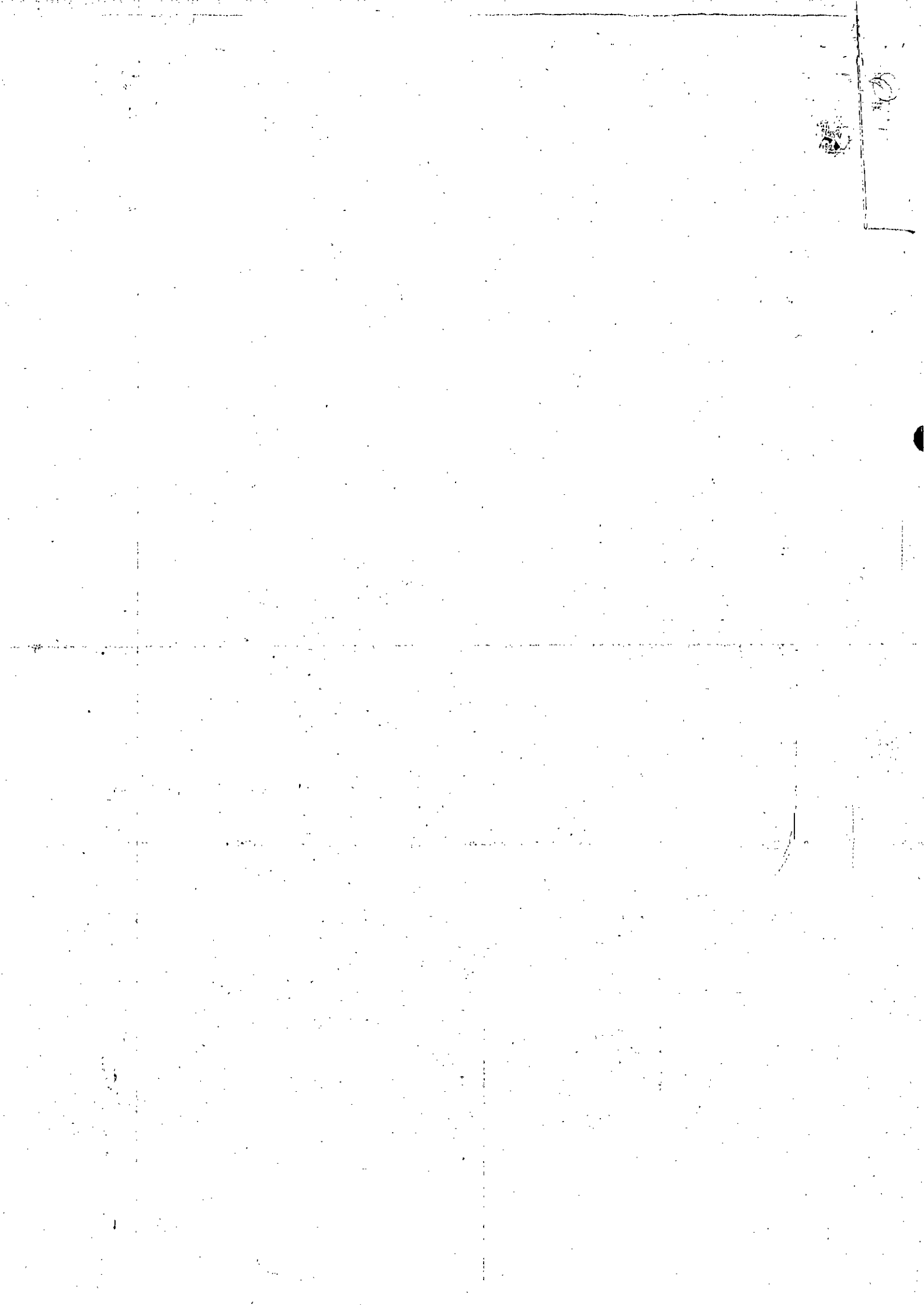
S#	Name/Father's Name	Residence	Union Council	Score	Merit Position	School Where Posted	Union Council Where posted as PST
1	Inamullah S/O Dyrwadani	Alladand	Alladand	57.15517	1	GPS Fazal Abad	Alladand
2	Muhammad Faraz S/O Akbar Khan	Alladand	Alladand	45.33966	2	GPS Sahib Zada Baba	Alladand
3	Arsala Khan S/O Mumtaz Khan	Alladand	Alladand	43.0549	3	GPS No.2 Batkhela	Upper Batkhela (Adjacent)
4	KhaistaRahman S/O Abu-Bakkar Sadiq	Badragga	Badragga	54.89378	1	GPS Zahoor Abad	Badragga
5	Shahab S/O Ikram Said	Badragga	Badragga	54.22513	2	GPS Shingrai	Badragga
6	Shahid Ali S/O HabibGul	Badragga	Badragga	53.88217	3	GPS Shingrai	Badragga
7	RiazUllah S/O Amin Ullah	Kachay Ghawar Kalii	Badragga	53.17143	4	GPS Zahoor Abad	Badragga
8	Adnan Ahmad Khan S/O Rahman Gul	Akbar Abad Batkhela	Batkhela Lower	48.38485	1	GPS Chinar Koto	Batkhela Lower
9	Nasar Khan S/O Bahramand	Batkhela	Batkhela Middle	42.877	1	GPS Upper Batkhela	Batkhela Middle
10	IrfanUllah S/O Fazal Khaliq	Batkhela	Batkhela Upper	53.63806	1	GPS Gulshan Abad	Batkhela Upper
11	Javaid S/O Faiz Muhammad	Batkhela	Batkhela upper	50.42353	2	GPS Gulshan Abad	Batkhela Upper
12	Abid Khan S/O Rahim Gul	Khatako Shah	Dargai	55.66034	1	GPS No.2 Dargai	Dargai
13	Tariq Anwar S/O Wali Rahman	Dargai	Dargai	53.35722	2	GPS Jabban power House	Dargai
14	Noor Islam S/O Akram Khan	Petaw	Dargai	52.74026	3	GPS Gul Moqam	Dargai
15	Kamran Khan S/O Wahid Gul	Dargai	Dargai	51.03734	4	GPS Sharif Abad	Dargai
16	Muhammad Arshad S/O Muhammad Wali	Dargai	Dargai	50.0148	5	GPS No.1 Dargai	Kharkai (Adjacent)
17	Rahim Ullah Khan S/O Haq Nawaz Khan	DheriAlladand	Dheri	52.15116	1	GPS Oray Sari	Dheri
18	Muhammad Iyas S/O Muhammad Ismail	Julagram	DheriJulagram	57.06881	1	GPS Julagram	DheriJulagram
19	GhulamSher S/O Muhammad Sher	Julagram	DheriJulagram	41.01488	2	GPS Geto Ghoundi	DheriJulagram
20	Imran Khan S/O Sher Bahadar	GU Khail	GU Khail	52.83983	1	GPS Nop.1 G.U.Khel	GU Khel
21	Imran Khan S/O Muhammad Farooq	Sra Shah Banda	GU Khail	51.16364	2	GPS No.2 G.U.Khel	GuKhail
22	Adnan Khan S/O Dilaram Khan	GU Khail	GuKhail	50.59654	3	GPS ghamgeen Abad	GuKhail
23	Sufiman Khan S/O Nowbat Khan	Umar Abad	Heroshah	57.16289	1	GPS Hero Shah Kalan	Heroshah
24	Zakir Mahmood S/O Fagir Gul	HaryanKot	Heroshah	53.53627	2	GPS Janat Abad	Heroshah
25	Rafique Ahmad S/O Lal Karim	Palonaw	Heroshah	53.49911	3	GPS No.1 Haryan Kot	Heroshah
26	Kachkol Khan S/O Fateh Muhammad	Zormandi	Heroshah	53.42549	4	GPS Hero Shah	Heroshah
27	Abdul Ali Khan S/O Muhammad Said	MulaMesri	Heroshah	49.81943	5	GPS Gulzada Kali	Heroshah
28	Umar ayaz S/O NiiazGul	HaryanKot	Heroshah	49.58913	6	GPS Janat Abad	Heroshah
29	Muhammad Iesar S/O Hussain Muhammad	Haji GulZadakalay	Heroshah	48.76684	7	GPS Haryan kot	Heroshah
30	Ghulam Farooq S/O Said Ghafoor	Zormandi	Heroshah	42.16016	8	GPS Zormandi	Heroshah
31	Asfandyar S/O Zubair Shah	Kharki	Kharki	45.98752	1	GPS Kharkai	Kharki

32	Wiqar Hussain S/O Noor Muhammad	Kharkl	Kharkl	43.10948	2	GPS Kass Korona	Kharkl
33	Ubaid Ullah S/O Dost Muhammad	Koper	Koper	50.8402	1	GPS Rahdad Kall	Koper
34	Abdus Salam S/O Hussain Dad	Kot	Kot	54.0852	1	GPS Asghar Shah	Kot
35	Muhammad Idress S/O Ajoon Khan	Kot	Kot	52.62406	2	GPS Faizghi	Kot
36	Zahir Shah S/O Rahmat Shah	Brah	Kot	51.41292	3	GPS Bagh Dara	Kot
37	Maqsood Gul S/O Khan Badshah	Kot	Kot	50.85597	4	GPS Dara Maina	Kot
38	Mehbab Gul S/O FaridGul	Kot	Kot	49.11283	5	GPS Maina	Kot
39	Iftikhar Ahmad S/O Inzar Gul	Malakand Khas	Malakand	46.57201	1	GMPS Kulyar	Malakand
40	Syed Atiq Ahmad S/O Muhammad Farid Bacha	Piran	Malakand	45.6776	2	GPS Jalal Kot	Malakand
41	Nazir Ahmad S/O Gul Zamin Khan	Malakand	Malakand	39.06453	3	GPS Banjo	Malakand
42	Abid Ali S/O Khan Muhammad	Makhnawala	Meherdi	49.90891	1	GPS No.2 Makhnawala	Meherdi
43	Sana Ullah S/O Aziz Ullah	Sarogal	Mcherdi	49.82086	2	GPS Salgaro	Meherdi
44	Muhammad Dawood S/O Muhammad Rafiq	Meherdi	Meherdi	49.45178	3	GPS No.1 Dargal	Kharkal (Adjacent)
45	Muhammad Wisal S/O Muhammad Saleem	Palal	Palal	48.48111	1	GPS Bazdara Bala	Palal
46	Tahirud din S/O Qiyamud Din	Sherkhana	Palal	47.60435	2	GPS Rashagai	Palal
47	Sabir Muhammad S/O Gul Muhammad	BazdarPayan	Palal	44.64064	3	GPS Rashagai	Palal
48	Bahri Karam S/O Fazil Khaliq	Palal	Palal	42.39376	4	GPS Bazdara Payeen	
49	Zakrullah S/O Bahramand	LaloPatay	Pirkhel	54.02015	1	GMPS Khalista Khan Korona	Pirkhel
50	Muhammad Khaliq S/O Wazir Khaliq	Malkhand	Pirkhel	49.65062	2	GPS Qulangl	Pirkhel
51	Said Malik S/O Gul Malik	Nari Tangl	Pirkhel	49.2672	3	GPS Gero Shah	Malakand (Adjacent)
52	Ikrumulah S/O Bahadar Khan	Yar Muhammad Kall	S/KotBandaajat	52.20036	1	GPS Darwa Khan Kall	S/KotBandaajat
53	Naeem Ahmad S/O Bashir Ahmad	Palotal	S/KotJadeed	57.39037	1	GPS Barakat Shah Korona	S/KotJadeed
54	Muhammad Rizaz S/O Muhammad Ajan	Alif Kall	S/KotJadeed	52.90285	2	GPS Barakat Shah Korona	S/KotJadeed
55	Sajjad Ahmad S/O Hazrat Khan	Palotal	S/KotJadeed	50.13066	3	GPS No.2 Prangal	S/KotJadeed
56	Mushtaq Hussain S/O Fazil Hadl	Baghicha kall	S/KotJadeed	49.9156	4	GPS No.2 Prangal	S/KotJadeed
57	Azam Khan S/O Ajab Khan	Palotal	S/KotJadeed	49.47941	5	GPS Mayar	S/KotJadeed
58	All Roz Khan S/O Waris Khan	Sakhakot	S/KotJadeed	45.96827	6	GPS Kharkal Dheri	S/KotJadeed
59	Sirajud Din S/O Azam Khan	Musa Baba	S/KotKhas	51.9697	1	GPS No.1 Sakhakot	S/KotKhas
60	Muhammad Shahzad Khan S/O Muhammad Shehriyar	Towheed Abad Colony	S/KotKhas	50.63685	2	GPS No.1 Sakhakot	S/KotKhas
61	Shahzeb S/O Awasl Din	S/KotKhas	S/KotKhas	49.79064	3	GPS Ahmad Seld Banda	S/KotKhas
62	MuhamamdIqbal S/O Seraj Muhammad	KhanGarhl	S/KotKhas	49.75196	4	GPS No.1 Gulo Shah	S/KotKhas
63	Imran Khan S/O Bashir Khan	Total	SelalPatay	57.43556	1	GPS Dheri Banda	SelalPatay
64	Haroonur Rashid S/O Gul Muhammad	SelalPatay	SelalPatay	52.92768	2	GPS Khanori	SelalPatay
65	Fazal Karim S/O Lal Badshah	Total	SelalPatay	49.88048	3	GPS Sorl Ghara	SelalPatay
66	Hameed-ur-rahman S/O Aziz Ur Rahman	Thana	Thana Bandaajat	53.36578	1	GPS CC Thana	Thana Bandaajat
67	Momin Khan S/O Munwar Ali	Jalala	Thana Jadeed	46.06075	1	GPS No.2 Jalala	Thana Jadeed

7

69

*[Handwritten signature]*



68	Shoukat Ali S/O Muhammad Aziz	Gulbahar Colony Thana	Thana Khas	46.53324	1	GPS No.2 Jalala	Thana Jadeed (Adjacent)
69	Fazal Raziq S/O Sher Afzal	Thana	Thana Khas	46.23975	2	GPS Haibat Gram	Thana Jadeed (Adjacent)
70	Fazlullah S/O Sakhi Ahman	KhawarGaray	Thana Khas	45.07201	3	GPS No.1 Jalala	Thana Jadeed (Adjacent)
71	Waris Khan S/O Hakim Khan	Totakan	Totakan	49.10856	1	GPS Sheikh Hassan Baba	Totakan

### TERMS AND CONDITIONS

1. Their services will be considered regular, but without pension and gratuity in terms of Section-19 of the Civil servants Act 1973 amended vide NWFP Civil servants (Amendment) Act 2005. They will however be entitled to contributory provident fund in such a manner and at such rates as prescribed by the government.
2. Their appointment is purely on temporary basis and is liable to termination at any time without notice. In case of resignation they shall be required to submit one month's prior notice OR deposit one month's pay into Government treasury in lieu thereof.
3. They will be governed by such rules and regulation as may be prescribed by the Government from time to time for the category of government servants to which they belong.
4. They should produce health and age certificate from the medical Superintendent District Head quarter Hospital Batkhela, Malakand Agency.
5. The appointment of the aforesaid selected candidates is subject to the condition that they are domiciled in Malakand.
6. No TA/DA is allowed in case of initial recruitment.
7. In case of fresh candidate they should not be handed over charge if their age exceed 38 years (for being related to backward areas of Tehsil Swat and Sama Ranizal) or below 18 years.
8. The drawing and disbursing officer concerned shall have to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institution concerned.
9. Their salary should not be drawn unless and until a clearance certificate regarding verification of documents and release of pay is issued by this office.
10. In case of non availability of vacancy the last one of the relevant category according to their merit position will loss the job.
11. The fresh appointees shall be on probation for the period of two years which is extendable to one year more while in the case of promotion the probation will be one year and shall be extendable for the next one year.
12. The appointees should join their posts within 15 days of the issue of this order, failing which the order shall stand automatically cancelled.
13. Those fresh candidates except in-service candidates, who have been posted in the schools which are closed for summer vacation, will be entitled for their salaries from the date of reopening of the schools on the expiry of summer vacation.
14. The appointment of any candidate if challenged on any grounds in any court of law and the case if decided in favour of the challenger/ appellant/ plaintiff, the appointment of the concerned challenged appointee shall stand null and void.
15. Charge report should be submitted to all concerned.

**MUSHTAQ AHMAD**  
EXECUTIVE DISTRICT OFFICER(E&SE)  
MALAKAND

**Endst: No.6122-6414/Rectt:/CT/DM/QARI/PST(M&F)/EDO(E&SE) MKD Dated 02/06/2012**

- Copy forwarded for information and necessary action to:-
1. The Secretary, E&SE Department, Govt of Khyber Pakhtunkhwa, Peshawar.
  2. The Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
  3. PS to Minister for Education Khyber Pakhtunkhwa, Peshawar.
  4. The District Coordination Officer Malakand
  - 5-6. The District Officer (M&F) local office.
  - 7-25. The Principals/Headmasters/Headmistress of the concerned schools.
  - 26-29. Dy: District Officer Edu: (M&F) in Malakand
  30. The Agency Account Officer Malakand.
  31. The Budget & Account Officer local office
  32. The Assistant Programmer DEMIS Cell Local Office.
  - 33-149. The Head Teachers GPS/GMPS/GGPS of concerned Schools.
  - 150-289. The Candidates concerned.
  - 290-293. D.A Concerned.

**EXECUTIVE DISTRICT OFFICER (E&SE)**  
MALAKAND

**S.MULKI**

B-9

MEDICAL CERTIFICATE

- Name of Official. Jonoran Khan
- State or Race. Musl. Pakistan
- Official Name. Muhammed Farooq
- Residence. District Malakand.
- Date of Birth. 20/02/1983
- Exact Height by Measurement. 15-19
- Personal mark of identification. A black mark on top of left shoulder
- Signature of the Official. [Signature]
- Signature of head of office. \_\_\_\_\_

Seal of office

I do hereby certify that I have examined Mr. Jonoran Khan  
 Candidate for employment in the office of the Education Deptt.  
 and cannot discover that he had any disease communicable or other constitutional defect or  
 bodily infirmity except. None

I do not consider this as disqualification for employment in the office of Education Deptt.  
 his/her age according to his/her own statement 23 Years, and by appearance/  
 general development is about 23-24 years.

Thumb Impressions

Small Finger	Ring Finger	3 <sup>rd</sup> Finger	4 <sup>th</sup> Finger	Thumb

Dated: 02/06/2012

Medical Superintendent  
 DHQ: Hospital Batakela  
 [Signature]  
 [Stamp]

چارز رپورٹ

میں نے بمطابق آرڈر نمبر 6414-6122 حوف 2012-6-2  
 امدہ از دفتر اینٹرنیشنل ضلعی افسسہ (ای اینڈ ایس ای)  
 ملائند 2 بجورخہ 2012-6-2 کو قبل از دوپہر  
 گورنمنٹ پرائمری سکول نجی گڑھی عثمانی حنف میں  
 بحیثیت جی ایس ٹی ایب عبد کا چارز سنبالا  
 چارز رپورٹ ارسال خدمت ہے۔

مران خان PST ولد محمد فاروق  
 چارز نرسدہ

چارز دھندہ

محمد

- کالی بزرگ الملاح و ہزوری کاروئی حفر ذیل نو ارسال خدمت ہے۔
- 1- اینٹرنیشنل ضلعی افسسہ (ای اینڈ ایس ای) ملائند
  - 2- ڈپٹی ڈی او (مردانہ) سمرانی بنگام درانی۔

2012  
 4



ADJUSTMENT ORDER.

D-11

Consequent upon the recommendation/ proposal submitted by the scrutiny committee constituted vide this office memo No. 1931-33/F.No.Rationalization/SPSTs (M) dated 10-05-2014, the transfer /adjustment order issued under this office endst: No.1371-1428 dated 22-04-2014 and corrigendum order issued under this office endst: No.1445- 50 dated 23-04-2014, corrigendum endst: No. 1610- 30 dated 28-04-2014 and corrigendum endst: No. 1700- 12 dated 30-04-2014 are hereby cancelled and the following SPSTs BPS-14 working at G.M.P.Ss are hereby adjusted/transferred to the schools noted against each their names on their own pay and scales in the interest of public service with immediate effect.

S.No	Name of teacher and Designation.	From	To	Remarks.
1	Mr. Fayaz Muhammad SPST BPS-14	GMPS,Umar Din Kalli.	GPS,Nasimullah kalli	V.S.No.02
2	Mr.Ghufranullah. PST BPS-12	GPS,Nasimullah Kalli	GMPS,Umar Din kalli	V.S.No.01
3.	Mr.Nasar khan. SPST BPS-14	GMPS, Begham Banda	GPS, No.02 Ghari Usmani Khel	V.S.No.04
4.	Mr.Imran khan. PST BPS-12	GPS, No.02 Ghari Usmani khel	GMPS,Beghum Banda	V.S.No.03
5	Mr.Ghafoor Rahman. SPST BPS-14	GMPS,Zarghun Gul Banda	GPS, Kharkai	V.S.No.06
6	Mr.Ihsan ullah PST BPS-12	GPS, Kharki	GMPS,Zarghun Gul Koroona	V.S.No.05
7.	Mr.Naqeeb Ahmad. SPST BPS-12	GMPS,Hassan Abad.	GPS, No.01 Bararo sar	V.S.No.08
8.	Mr. Saeed Khan PST BPS-12	GPS, No.01 Bararo sar	GMPS,Hassan Abad	V.S.No.07
9.	Mr.Saeedullah SPST BPS-14	GMPS,No.01 Mundai	GPS, Inzargai	V.S.No.10
10	Mr. Tajbar khan PST BPS-12	GPS, Inzargai	GMPS,No.01 Mundai	V.S.No.09
11.	Mr.Noor Muhammad. SPST BPS-14	GMPS,Sarkawai	GPS, Landai AGRA	V.S.No.12
12.	Mr. Noshad Ali PST BPS-12	GPS, Landai Agra	GMPS, Sarkawai	V.S.No.11
13	Mr.Fazal Qayum. SPST BPS-14	GMPS, Shagal	GPS, Kandow Birkhel	V.S.No.14
14	Mr. Tahir Rahman PST BPS-12	GPS,Kandow Birkhel	GMPS, Shagal	V.S.No.13
15.	Mr. Fazal Hadi. SPST BPS-14	GMPS,. Orab Banda	GPS,Gharib Abad Matkani	V.S.No.16
	Continued	Page No.02		

## ریلونگ چٹ

مسٹر عمران خان P.57 آپ کا تبادلہ G.P.S No. 2  
 گڑھی عثمانی پل سے G.M.P.S بیگم یادزہ گڑھی عثمانی پل  
 کو حکم EDO ملاکنڈ ایٹ بٹ چٹہ گوالہ حکم نامہ  
 نمبر 2121-78 مورخہ 20-05-2014 ہو گیا ہے  
 آپ کو تاکید کی جاتی ہے کہ آپ صر کورہ سرکول  
 میں بروقت چارج سنبھال لیں۔  
 آپ کو 20-05-2014 پر ریلو کیا جائے

ذستخط پید پشیر

Gul  
 HEAD MASTER  
 GPS No. 2 GU Khan  
 Dargal Malakani

RECEIVED

4

To

The S.D.E.O (Male),  
Dargai, District Malakand,  
Khyber Pakhtunkhwa, Pakistan.

Sir,

With great respect, it is stated that due to some personal obligations & domestic problems I need Two Years long leave as mentioned below.

Kindly grant me long leave without pay from; Tuesday, September 01, 2015 till Friday, September 01, 2017.

I'll be very grateful to you for this act of kindness.

Dated: 5<sup>th</sup> August, 2015

Your Obedient Teacher,

Imran Khan, P.S.T,

GMPS Begham Banda,

G.U. Khel, District Malakand

Cell No: 0333-9491518



HEAD TEACHER  
GMPS BEGHAM B.  
MKD AGENCY

Forwarded in original to SDEO (M) Te  
Dargai with the remarks that date  
of appointment of the concerned  
teacher is ...

15  
Asstt. Sub Div.  
Officer (E&SE) Deptt I  
Teh: Dargai MKD

15  
Asstt. Sub Div.  
Officer (E&SE) Deptt I  
Teh: Dargai MKD

G-14

**ORTHOPAEDIC TRAUMA AND SPINE CARE CLINIC**

**Dr. Muhammad Imran Khan**

FCPS (Orthopedic Surgery)  
Fellowship in Spine Surgery  
Senior Registrar Orthopaedic  
Gajju Khan Medical College/  
Bacha Khan Complex Hospital Swabi



ڈاکٹر محمد عمران خان

ایف سی پی ایس (آرٹھو پیڈیک سرجری)

فلوشپ ان سپائن سرجری

سینئر رجسٹرار آرٹھو پیڈیک

گججھ خان میڈیکل کالج / باچا خان کمپلیکس ہسپتال سوابی

Name Imran Khan Age 28 Sex M Date 12.10.2017

2BA ± 4 radiculopathy

SLR ↓ on 4

Neuro. OK

Adv. Vest for 2 weeks.

Tab. Pyrex 2mg  
TWO

Tab. Zuleacet  
TWO

Tab. Dextro 6mg  
TWO

Tab. Mucogin  
15

Tab. Mac-F  
15

3 سے

**Dr. Muhammad Imran Khan**  
FCPS (Ortho & Trauma)  
Senior Registrar  
Orthopaedic

0307-8137034: کلینک: بہاول خان ایڈووکیٹ خان ہسپتال بٹ خیلہ رابطہ نمبر اکبر علی: 0307-8137034

**ORTHOPAEDIC TRAUMA AND SPINE CARE CLINIC**

**Dr. Muhammad Imran Khan**

FCPS (Orthopedic Surgery)  
Fellowship in Spine Surgery  
Senior Registrar Orthopaedic  
Gajjhu Khan Medical College/  
Bacha Khan Complex Hospital Swabi



ڈاکٹر محمد عمران خان

ایف سی پی ایس (آرٹھو پیڈک سرجری)

فلوشپ ان سپائن سرجری

سینئر رجسٹرار آرٹھو پیڈک

گججھو خان میڈیکل کالج اہلچان خان کیمپس ہسپتال سوابی

Name Imran Khan Age 27 Sex M Date 28.06.2016

LBA

SLR ±

Nehro-ok

13

Tab. Pyrex 20mg

Cap. ~~600mg~~ 60mg mltng  
روزانہ ۱ بار

Tab. Tramal-Plus  
① دن تک

Tab. Muscoril  
1-1

Tab. Mac-f.  
1-1

ATTESTED

**Dr. Muhammad Imran Khan**  
FCPS (Ortho & Trauma)  
Senior Registrar  
Orthopaedic  
GKMC, Swabi

H-16  
①

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) MALAKAND AT BATKHELA**

**OFFICE ORDER /**

WHEREAS Mr. Imran Khan PST GMPS Beghum Banda (G.U.Khel) was proceeded against under the KPK servants (E&D) rules 2011 on the Charges of willful absence from duties w.e.f. 1-09-2015 reported by the SDEO (Male) Sama Ranizai At Dargai vide his memo: No.1727 dated 10-10-2015.

1. AND WHEREAS, Attendance notice as required under rules-9 of KPK Govt: servants (E&D) Rules 2011 was issued to the said PST through registered cover on his home address vide DEO (M) Malakand At Batkhela memo No.7078/Notice dated 3-11-2015, memo No.81/Notice Dated 4-1-2016, and memo No.613 dated 26-01-2016 but he did not resume his duty and did not appear before the competent authority for personal hearing.

1. AND WHEREAS, Mr. Imran Khan, PST GMPS Beghum Banda (GU Khel) was given reasonable opportunity of showing casuse of his absence and resumption of duties through advertisement published in daily Mashriq News Paper on 09-04-2016 directing him to resume his duties and appear before the competent authority with in fifteen days, but he failed to resume his duties within stipulated time.

3. AND WHEREAS, The competent authority DEO (M) Malakand at Batkhela after having considered the charges, evidence on record, report of SDEO (M) Sama Ranizai At Dargai and failure of the delinquent P.S.T. in resumption of his duties in the stipulated period as shown in the show cause notice published in the News Papers under rules-9 of the E&D rules 2011 is pleased to impose major penalty of " Removal from service" as specified under rules-4(b)(iii) upon Mr. Imran Khan PST GMPS Beghum Banda G.U. Khel District Malakand w.e.f. from 1-09-2015.

( SYED MANZAR JAN SAJID )  
DISTRICT EDUCATION OFFICER (MALE)  
MALAKAND AT BATKHELA.

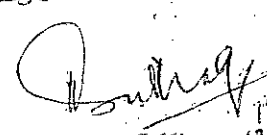
Endst: No. 6442-45

Dated 21/6/2016

- Copy forwarded for information and necessary action to :-
- 1 The Director, E&SE Khyber Pakhtunkhwa Peshawar.
  - 2 The Sub Divisional Edu: Officer (Male) Dargai w/r to his office letter No.1727 dated 10-10-2015 and repeated verbal reports in the matter.
  - 3 Head Teacher, GMPS Beghum Banda (G.U.Khel) Tehsil Dargai.
  - 4 Mr. Imran Khan Ex-PST Vill: & PO Sra Banda Garhi Usmani Khel, District Malakand.

DISTRICT EDUCATION OFFICER (MALE)  
MALAKAND AT BATKHELA.

Attested

  
18/9/2018  
Distt: Edu: Officer (M)  
Malakand at Batkhela

ATTESTED  




مفتی محمد شفیع رحمہ اللہ دہلی دارالعلوم دیوبند کے ایگزیکٹو ڈائریکٹر

درخواست نمبر: یس ایس ایل 2

ضلع خانیوال

صدر بازار ٹور اڈیشن میں کہہ میں نے وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے  
مگر یہ اس میں لکھا ہے کہ وہی سہ ماہی پی پی ایچ سے پی ایچ کے معنی میں لکھا ہے

۱۸/۱۱/۲۰۱۸ء جمعیہ ہذا کا سٹائل چلکے درجہ ۲۰۱۸ء/۶/۱۱/۲۱ قیام دار

ضلع خانیوال ضلع خانیوال ضلع خانیوال ضلع خانیوال ضلع خانیوال ضلع خانیوال ضلع خانیوال  
ڈی ایچ سی کے معنی میں لکھا ہے۔

لکھنؤ دارالعلوم خانیوال سے داخلہ کے معنی میں دوبارہ نوٹس لکھا ہے  
یہاں کوئی کتا لکھا ہے۔ اور مشورہ فرمائیں کہ تمام ٹرمس کو پورا کیا جائے

۲۱/۹/۲۰۱۸ء

~~محمد شفیع~~

P.S.T

محمد شفیع رحمانی ضلع خانیوال ضلع خانیوال ضلع خانیوال ضلع خانیوال



**VAKALATNAMA**

*Before the KP Service Tribunal, Peshawar*

No. \_\_\_\_\_/2019

*Imran Khan*

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

*Education Deptt.*

(RESPONDENT)  
(DEFENDANT)

I/We *Imran Khan*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, 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.

Dated. \_\_\_\_/\_\_\_\_/2019



**CLIENT**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**

**SHAHZULLAH KHAN YOUSAFZAI**

**MIR ZAMAN SAFI  
ADVOCATES**

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.  
Phone: 091-2211391