Counsel for the appellant present.

Learned counsel argued the case at some length but when confronted with the fact that upon appeals by similarly placed persons the impugned order dated 18.02.2016 was set aside by the Tribunal on 31.07.2018 in favour of appellants therein, while the respondents were allowed to conduct denovo enquiry, she requested for withdrawal of instant appeal for filing of implementation application regarding the judgment in appeal No. 603/2016.

In view of request of learned counsel, the appeal is dismissed as withdrawn. File be consigned to the record room.

Chairman

ANNOUNCED

Form- A

FORM OF ORDER SHEET

Court of		
Case No	5 /2019	

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/1/2019 :	The appeal of Mst. Shehnaz presented today by Roeeda Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-		This case is entrusted to S. Bench for preliminary hearing to be
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باعث تحريرآنك مقدمه مندرجه بالاعتوان ميسابي طرف واسطه بيروى وجوابدي برائة بيثى ياتصفيه مقدمه بمقاء كوسب ذيل شراكط بروكيل مقرركميا ب كميس مريدش برخود بابذرايي فتارخاس روبرو عدالت حاضر بوتار بول كا ور برونت يكارے جانے مقدمه وكيل صاحب موصوف كواطلاع ديكر حاضر عدالت كرول كا-أكريش يرمظهر حاضرنه وااور مقدمه بيرى غيرحاضرى كي وجد سے كسى طور يرمير برخلاف ہوگیا توصاحب موصوف اس کے سی طرح پر د مدارند ہول کے۔ نیز وکیل صاحب موصوف صدرمقام پجبری کے علاوہ کی جگدیا کجبری کے اوقات ے پہلے یا پیچے یار در تعطیل پیروی کرنے کے دمدار ندموں مے اور مقدمه صدر کچبری کے علاوہ کی اور جگہ ساعت ہونے پر بروز تعطیل یا کچبری کے اوقات کے آھے چیچے پیش ہونے پرمظمر کوکوئی نقصان مہنچے تو اس کے ذمہ داریا اس کے داسطے کی معاوضے کے اداکرنے یا مخا نہ کے والمس کرنے ے بھی صاحب موصوف ذمددارندہوں مے تہ مجھ کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خودمنظور و تبول ہوگا۔اورصاحب موصوف کوعرضی دعوے یا جوابدعوے یا ورخواست اجرائے ڈگری ونظر تانی اپل محرانی و ہرتتم درخواست پردسخنا ونصدیق کرنے کا بھی اختیار ہوگا۔ اورکی تھم یا ڈگری کرانے اور ہرتم کارد پیدوسول کرنے اوررسیدویے اورداخل کرنے اور ہرتم کے بیان دیے اوراس پر تالثی ورائنی نامدوفیصلہ برصلف کرنے ، اتبال دعو کی کا بھی اختيار بوگا۔ اوربصورت مقرر ہونے تاریخ پیشی مقدمہ ندکورہ بیرون از پچیری صدر بیروی مقدمہ ندکورہ درخواست نظر تائی واپیل دکھرانی و برآمدگی مقدمہ یامنسوخی ڈگری کیطرف یا درخواست عم امتاعی یا قرتی یا گرفتاری قبل از فیعلہ واجرائے ڈگری بھی صاحب موصوف کوبشر طادا میگی علیحدہ مختانہ بیروی کا اختيار بهوكا اورتمام ساخته برداخته صاحب موصوف مثل كرده ذات خود منظور وقبول بوكا اوربصورت ضروبت صاحب موصوف كوييمى اختياره وكاكم مقدمه ندکوره یااس کے کسی جزوکی کاروائی یابصورت درخواست نظر ثانی ایپل یا تکرانی یادیگرمعا مله مقد مد ندکورکهی دوسرے دکیل یا بیرسرکوا یع بجائے یالیتے ہمراہ مقرركري _ادراييےمشيرقانون كوبھى ہرامريس وبى اوروييے بى اختيارهاصل بونكے جيےصاحب وصوف كوحاصل ہيں اور دوزان مقدمسين جو يجي ہرجانہ النوايزيكاره صاحب موصوف كاحق موكا اكرصاحب موصوف كولورى فيس تالريخ بيثى سے يسل اداندكر فكار وصاحب موصوف كولوراا فقيار موكاكذه مقدمه کی پیروی ندکریں۔اورایی صورت میں میراکوئی مطالبہ کمی تم کاصاحب موصوف کے برخلاف نہیں ہوگا۔ البذا وکالت نامد کھندیا ہے کہ سند رہے۔ <u>201</u>مضمون وکالت نامة ن ليا ہے اوراچھي طرح سمجھ ليا ہے۔ اور منظور ہے۔ Shahny

As a sequel to above, the appeals are accepted, the impugned order is set aside and the appellant is reinstated in service. However, the respondents are at liberty to conduct de-novo inquiry within a period of three months from the date of receipt of this judgment. The intervening period may be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

Announced

Sdf-Ahmad Hassan Member Sdf-M. Hamid Mughal, Neumber



(24)

absent. Various requirements prescribed in the rules were not observed, so the impugned order was void ab-initio.

5. Learned Additional Advocate General argued that all the affected civil servants were required to file separate departmental appeal but in the instant case joint departmental appeal was filed in violation of rules. Major penalty of removal from service was imposed on the appellant and others after observance all codal formalities.

CONCLUSION.

On the allegations of willful absence from duty, the appellant and others were proceeded departmentally and upon conclusion, major penalty of removal from service was imposed on them vide impugned order dated 18.02.2016. It is strange that the respondents failed to mention the exact date from which the appellant was absent from duty. Learned Additional AG when confronted on this point, candidly conceded that the record was silent on this score. He was further confronted on the point that the impugned order was issued and the period of absence showed in the impugned order related to winter vacations but he was unable to give an convincing reply. Despite opportunities on the previous date of hearing the respondents failed to produce record about service of notices at the home address of the appellant and others employees. It has also not been clarified that why action were taken against only 17 employees whereas names of 53 employees were mentioned in the notice published in daily "Mashriq" on 02.02.2016. Action taken by the respondents appeared discriminatory and violative of Article-25 of the Constitution of Islamic Republic of Pakistan. It can be stated safely inferred that the procedure laid down in the rules was not followed by the respondents before issuing the impugned order and as such the appellant and others were condemned-unheard.



(25)

others", Service Appeal No. 609/2016 titled "Awal Shah Versus Additional Agency Education Officer. Lower & Central Kurram, Sadda, Kurram Agency and three others" and Service Appeal No. 604/2016 titled "Samad Hussain Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others" as common question of law and facts are involved in all the appeals.

2. Arguments of the learned counsel for the parties heard and record perused.

FACTS

3. The brief facts of the cases are that the appellant and others while serving in Education Department were proceeded departmentally and major penalty of removal from service was imposed on them vide impugned order dated 18.02.2016. Feeling aggrieved an undated joint departmental appeal was filed by them, which was not responded within the stipulated period, hence, the instant service appeal.

ARGUMENTS

4. Learned counsel for the appellant argued that on the allegations of absence from duty a notice was published in daily "Mashriq" on 02.02.2016 directing the appellant and others to assume the duty. Its merits to mention here that the notice was published during the winter vacations in Kurram Agency. He further clarified that all the educational institutions were closed for winter vacations from 25th December 2015 to 29th February 2016, in Kurram Agency, as it evident from the attendance register available on record. He further contended that in the aforementioned notice name of 53 employees were mentioned but in the impugned order major penalty of removal from service was imposed on only 17 employees, hence, the impugned order was discriminatory and against the spirit of Article-25 of the Constitution of Islamic Republic of Pakistan. The respondents have failed to correctly mention the exact date from which the appellant and others were

ENABLISMO
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 603/2013

Date of Institution

... 07.06.2016

Date of Decision

Mst. Shamia Bibi D/O Isam Khan, Ex-PST Teacher, Government Girls Middle School, Baddama, Central Kurram, Kurram Ageneye

(Appellant)

VERSUS:

Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others.

(Respondents)

MR. MIAN ASIF AMAN, Advocate

For appellant.

MR. KABIRULLAH KHATTAK. Additional Advocate General

For respondents

MR. AHMAD HASSAN, MR. MUHAMMAD HAMID MUGHAL MEMBER (Executive)

MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Our this judgment shall also dispose of instant service appeal as well as Service Appeal No. 604/2016 titled "Mst. Abida Nawaz Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 605/2016 titled "Sher Muhammad Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 606/2016 titled "Fazal Ur Rehman Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others". Service Appeal No. 607/2016 titled "Mst. Maryaum Farooq Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others". Service Appeal No. 608/2016 titled "Muzaffar Daud Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three

ATTESTET

MST. SHAMIA BIBI DIO ISAM KHAN, EX-PST TEACHER,
GOVERNMENT GIRLS MIDDLE SCHOOL, BADDAMA, CENTRAL
KURRAM, KURRAM AGENCY.

APPELLANT

Diary No. 587

VERSUS

1) ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & CENTRAL KURRAM, SADDA, KURRAM AGENCY.

- 2) DIRECTOR OF EDUCATION FATA, FATA SECRETARIAT, PESHAWAR.
- 3) AGENCY ACCOUNT OFFICER KURRAM AGENCY.
- 4) GOVERNMENT OF KHYBER PUKHTOON KHWA, THROUGH SECRETARY EDUCATION, CIVIL SECRETARIAT, PESHAWAR.

...... RESPONDENTS.

APPEAL AGAINST THE office ORDER No 3374-78

DATED 18-02-2016 PASSED BY RESPONDENT NO.1

WHEREBY THE APPELLANT HAS BEEN REMOVED

FROM SERVICE DUE TO LONG ABSENCE FROM DUTY.

PRAYER

ON ACCEPTANCE OF THIS APPEAL. THE IMPUGNED OFFICE ORDER NO 3374-78 DATED 18-02-2016 OF RESPONDENT NO.1 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE ORDERED TO BE REINSTATE IN SERVICE WITH ALL BACK BENEFITS ACCORDING TO HER SENIORITY.

Respectfully Sheweth:

1) That initially appointed on contract bases as PTC Teacher, Government Girls Primary School, Mir Bagh vide order dated 15-05-20104, Central Kurram, Kurram Agency and regularized her on 22-05-2013, Government Girls Middle School Baddama, and since then performed her duties with honesty and full

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In view of the foregoing submissions, the I may graciously be reinstated into service with all back benefits by setting aside the impugned removal from service order.

Yours Humble Appellant

Shahny Bibi

Di. <u>08</u>.04.2016

SHAHNAZ BIBI
Wife of Zahid Iqbal, r/o
Islamia Colony, D.I.Khan.
(TT GGPS Barari)
Sadda Kurram Agaency
Cell # (husband)
0333-997-8996
0304-501-5859

CERTIFICATE: I, the appellant, do hereby certify that all the contents of this appeal are true & correct and no appeal on the subject has earlier been filed.

Shahned Bibi

Appellant

AFFIDAVIT: I, the Appellant, do hereby solemnly affirm and declare on oath that all the Para-wise contents of above Appeal are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed.

Shamili3ibi

DEPONENT

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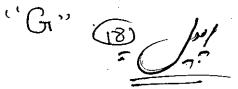
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No.3374-78/Edu dated 18.02.2016 which is illegal, unlawful and is liable to be set aside to my extent for the following reasons:

- a. I never remained absent from my official duties rather performed the same regularly and in this regard sufficient proof in shape of attendance register and statements of the Maliks of area are available.
- b. No proper and legal procedure has been adopted regarding issuance of alleged notice about my alleged absence and no any sincere efforts were made for the service of said alleged notice.
- c. I have not been given a fair chance to defend my valuable rights and as such I have been condemned un-heard.
- d. The notice of absence issued in the newspaper is also not in accordance with law and procedure laid down in this regard.
- e. I have wrongly and malafidely been shown absent from duties.
- f. I was present on my duties and even performed duties during the month of March 2016 as impugned letter had not communicated to me. Thus after getting into the knowledge of impugned letter on 21.03.2016, the present appeal is within time; however, separation application to condone the delay is being filed along with this appeal.
- g. No notice, prior to issuance of publication in Daily Mashriq, was issued and communicated to me at my home address.
- h. There is flagrant violation of the law & rules dealing the matters pertaining to civil servants and no proper procedure as provided under the law governing matters of civil servants, was adopted.
- i. The impugned letter is hit by the doctrine of audi alteram partem which is thus liable to be set aside.





To:

The Director Education, FATA, Peshawar.

Subject:

APPEAL AGAINST REMOVAL FROM SERVICE ORDER BEARING NO.3374-78/EDU DATED 18.02.2016 OF THE ADDITIONAL AGENCY EDUCATION OFFICER, LOWER & 8.4.2016

CENTRAL KURRAM, SADDA.

Respected Sir,

The appellant humbly submits as under:

- 1. I was serving as Theology Teacher in Govt. Girls Primary School Barari, in Sadda Kurram Agency and was performing my duties efficiently, regularly, punctually, devotedly with zeal and care.
- 2. I performed my duties regularly till 22.12.2015 as thereafter winter vacations in the area commenced and due to said reason I went to D.I.Khan as I am married lady and am residing there with my husband and family. Copy of the attendance register showing my attendance is enclosed herewith.
- 3. In the meanwhile, when I was availing winger vacations, the Additional Agency Education Officer, Lower & Central Kurram Sadda, due to malafide and for the reasons best known to him got published a notice of absence in the Daily Mashriq dated 02.02.2016 despite the fact that I fully performed my duties. Thereafter on the basis of said notice published in the newspaper, I was removed from service by the Additional Agency Education Officer, Lower & Central Kurram Sadda, vide letter No.3374-78/Edu dated 18.02.2016; however, this letter was not communicated to me.
- Sir, even I after the end of winter vacations, resumed my duties and 4. performed duties in the month of March-2016 and during performing duties I tried to draw my salary of February -2016, it came to my notice that my salary was stopped and upon inquiry from the Agency Education Office on 21.03.216.I came into the knowledge of letter







ADD: AGENCY EDUCATION

OFFICE SADDA KURRAM AGENCY

No: 3374-78 /Edu;

Dated Sadda:the: 18/02/2016

REMOVAL FROM SERVICE.

On the fulfilling of all codal formalities the following teachers/Class Ivs are hereby removed from their service due to their long absence from duty with immediate effect.

Note: Entry to this effect should be made in their service books.

5#	Name.	Desig:	Schoo!
1	Sadiga	PET	GGMS Bilyamin
2	Maryam Faroog	CT/	IHC Gogani
	Shehnaz	TT 🗸	GGPS Barari
4	Abida Nawaz	AT'	GGMS.Tindo
5	Farah Deeba	PST	GGPS Bagzai
6	Shamia Bibi	PST	GGMS Badaina
7	Irfanullah	PST	GPS Hamish Gul Kali
5	Latif Shah	PST	GPS Had Mella
9	Igbal Hussain	PST	GHS Bilyamin
19	Jasim Khan	Peon	GHS Shah Ibrahim
11	Samad Hussain	Ch	GPS Talo Kunj
1,2	Muzafar Dawood	Ch:	GGPS Muzafar Kot
13	Sher Muharnmad	Ch:	GHS Dogar
14	Fazal Rehman	Behish:	GHS Dogar
15	Awal Shah	Ch:	GPS Mirdo Tang
16	Zainullah	Swp: .	GHS Paloseen
17	Sulaiman	N/Q ·	GHS Paloseen

Add: Agency Education Officer Lower & Contral Kurran Sadda

NO_ <u>3374-78</u> /Edu dated <u>18/02/2016</u>

Copy for information to the

1. Director of Education FATA Peshawar.

2. Political Agent Kurram Agency.

3. Agency Account Officer Kurram Agency.

4. Head Masters / Teachers Concerned.

Add: Agency Education Officer Lower & Central Kurram Sadda

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ا کے لات کے اس رورت دون کرائے ہوئے تاہا کہ وصد کردی میکننسٹ میں تعدادان سے میں ہوئی ہوئی۔ کا اس کا اس کا اس کی تھے کے اپنے اور کی میں میں اورل اپنے کھر جدائی جب سے ایران کھرائی رائیں رائیں۔ ان کی فررہ سے دوم مقد میں مکا و پیدیٹنے کے افزائن فازار بیٹے آوال ووران کا کئی کیا تھا آمس سے دیم کس سے خیور نے کہا کہ 10 ۔ کورن کی میرک مر کانسیات بدع میلایک مالیشرک با کری دربای نے اور موقع با کو کو موت إسامنا مواجس كم يعد فومان دوزي خان ولدم إن خان ما مورت واللي تكومت تحييد ويستميد والمثن في المدينون العرفاليان ترعان وكالشهاب في على دمد مل كالعاردوس احرار الم مري ين نے ہم ہا عرصاد مندفا رُک کردی جس کے بیٹم علی وہ نے کہا کہ ملک علی ایس دانان اور ا آج ہے اور ا لِاگُل لیل کرتے مد وی کی ہے کہ دالیاں سے فرال سے المیوں نے معلقہ مکام کو جانب کی کر الماك راء كري شديدنى موك كروس كولى الداركية عارين كالمرت والحك كالس كاران ع والمك خدا مل ادرے ولی کے وفر کے سامنے فود کو رہ جوں کیلے بجت بادار منسوسے بال ورا ماکو تھا ميتال على من المي يتي اس كا بدائ بال بال فاح مي اوراب كد 8 الك مناثرين قبا في واحد على المناف سونس فنر دانسري EMERGENCY RESCUE SERVICE (RESCUE - 1122), GOVERNMENT OF INMEER PARKHTUNGUNA آب امان مَانَ إِلَى أَنْ كَا كُورَمْسَتْ يَهِ مَرَى كُولَ فِيمِ سِيرَيْنَ خَلِي مِنْ مِنْ 1 اكْوَرِ 5 20 شَعْسَ مركاري وي في المركا اطلاح فير ماخر ب آب كوكمر كم يدي وقاف قا الزادي في قر ماخرى مى سے من میں آ کے جلد از جلدا ہے گئے ماصر ہوئے اور فرما مری کی دسیان کر نے کا کہا گیا ہے۔ اي چنى ديسكي مردس (ديسكي 1122) سك يجوارا فتها دفير 1NF(P)3412 " كساميان خال ژن كين ما مال آ بهذي متعند سكول كذي أي ما مربع في بدئ ب كالرف ع كولى بوار بموسرا بوارا إنه (يولكن يتشاق ، مومان أيونۇشطوه)" يمل بمالات الاين يهيج سكالانات بم اب بذريد افياد بيرا فري إمظل كرباع بكران ولى كاشاعت كم بعده وركا الماعد الما وي لي ما مراويا كل الدوي والتلى كدويد وقت الدكروي فيرو مرى في وجوات يدب -ut Efricannikh) herpakhtunkima gov.pk آ ب سے خلاف میر می تواطا دمت سے دخاتی (خصوص احتیادات) آ وا یکس المسائے ردمت 2016 www.khy berpakhtunkhwa.gov.pk برفاست جي كيايا ملك سيدر بعدش كولى عارقول بس كيايات كا-يشاد فها أرهال الوكن يرض آخر الدمسى اخر وكور لمدم الوادرك 2016 انجادنا فرأنه درستنس إسيكوه الربير ليكنيعن و مي بهي المستعلق كيهوالم فاردازليم آيرا والمثلث الإمن أأنمن ەزدىنىموالىلىلىكارانىد+دارانىگىنىد. 10 أربيك 10 2 شارشها فرهال منذمهره الى لى و كالدوا تعديد التحالية التحالميت محوضت كالمخلفية بادجادر الد(ا) فيده GGMS 'PET لماين (2) مدية GGMS بايش (3) ما نَدَ HC'CT المرادة المر برستر 8.00 ه يج ing Stous pro 20165.../11 شاهلهاش عبال فيذيم دو (6) مركم قدوق HC 'OT كاف (7) ميلة في MO' BMS والراعة (8) عبداد الإركار المال المراكات المسلمة بماليان محد من الجالم أوية مر ندرو)موز الله GGPS TT معرار (9) موروال GGPS AT مشيرك والمحرك فميست المغيران كالشيزكان المنت مع 00:4 4 (11) هرت يم GGPS'TT الماكل مان كلے(12) مثل ارمان GS'S'TT مرمت تكل (13) ال نحاکم شیست پرجشی سونی مديد وليد HC 'PST لميانك (14) مش المليف GGPS'PST ق في المر (15)2 من تيكر الشيش إدر الجارة اليذة وريمكم راقس الميلان 12 فررى 201 شاه نسيال عليه يمره الرياي (17) الرياية GGPS'PST بهلك (16) والمنافقة (GGPS'PST) محد مست الأنفيرة بادج در GGPS 'PST الزول (18) رفيده لي أن PST (جي أول ل (19) لن 4.4 00 500 MAN SUL GASPS POT SULVED SHE GODO THE TEST مسليفن كالمريقه اويقو اعدوضوام! The GGMS'PST والمراد (22) عبد إلى GGPS'PST LJUS GGF STANDIS (25) CULIGPS PSTUDON Y (24) (En لل مثلاث لمعذ الهيده اوفز يكل أيرت كينت تجيره يموسّ أو اكر ديب سائت MS'PST المرابخ (25) المركب MS'PST المرابخ (27) لل GGPS'PST المرابخ (26) www.khyberpakhttrakhwa.gov.pk مرسوعي واستري باديار (29) الإل حسين GHS'PST بلياعي (30) حية الرحان النظام GPS كال بنياعي ميرن و و المالك ليار المالك المالك المالك المالك المالك المالك المالك (31) دوان قان مویی GHS کو کی (32) جام قان چڑائی GHS کی ایم (33) عرصین اميده دران اينا اص كيروائز اقرى شاخق كارا نميت . اعرد يره فيره سكاس في بالسينة عرف ح كيدار GPS على في (34) فروالد ع كيدار GPS كاس لمن عن (35) يُزَرُّ ف ع كيدار Fcs بورثل لاتم ساميدهان اعروع سكافت إلى اسل اسناد الحكريال ماتعالما كريار (36) منافردالد چكيدار GGPS منظفركات (37) شير في يؤكيدار HS ووكر (38) لفنل الرحن عادعام مينتم كرده اميده دران كول مرجى وليس بالادت ميذ يكل العس مراملك GHSW/C وكر (39) فيسيك ميم GMS اوك (40) زوست شامة GTV قود عاد و (41) ميليم خان چکيدار GPS درجي فبر 1 (44) حاقل وزير چکيدار GPS دريانس 2 (45) ميال خان ئاد كام كى امدود كاس كى كابيت ادما ليت كى بنياد ي كى كى مده ي تينات كريحة چ كيدار GPS شيخاند (46) كاب كي كيدار GPS شروده (47) خالدان الأبي يوكيداد GPS مرك (48) سيداعن چيكيدار GPS الدوادي (49) سيداعد شاه چيكيدار S افي كوال (50) ادل شاه يُحكِدارْ GPS مردوع مك (51) إلى في تكدار GGPS يروند (62) أن السوير GHS في كان ل م كام يسيد المال كوي يس كينوفس مي كيد فرايم ك العكار (53) سلمان انب قامد GHS باس الى الافوال سيامال فيرما فرا من كل عامرة بسب كو آب كرون اسكون سكيلارش بطيعه عليمه الرواية فن البيت البيت التي الم المحاطدم إرااتر فرواللهميد الرائكو وفياب اير المن الروم الكوكى لا الديم السي الدي الم وكم الم عداد المراسعة المراس ا جن ين آب س كو جايت كا في في كر چدره دلول كافر المدوفتر زير النا الله وكر فير ما خرك كا ويد بتائم يكن اس كے وجوداب ما خرضوكم فيذا آخري إر بدريدولس فيدا آسا أنى متفركوا جانا ہے كما ال الميدداران كومتعلقة أساك يرافيهات كياجانيك a) مام الدويران كي جرائي خاله على مرك بالم كالم الأم المهد أوان كبور بالم كل كل مل من تعينا عنه الأنتا المنتاحة بِيلَيْ (E&D) رور عرب 2011 م كفت تا فولى كارو للمن عمد لال جا المجدّ إلى المناصف 10) وزيكل فيت عن كامياب اميد المان توري استمان ادرا عروم كيكية بعد عمل الأوكم المانيكا

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appeal and the removal order has never been communicated to the appellant in time and no limitation run against the void orders.

B. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.

Dated: 01/01/2019

Appellant

Through

Roeeda Khan

Advocates High Court Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

	In	Re	S.A	No.	1	/20	1	8
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Mst. Shehnaz

$\mathbf{V}_{\mathtt{ersus}}$

Additional Agency Education Officer and Others

APPLICATION FOR CONDONATION OF DELAY Respectfully Sheweth,

Petitioner submits as under:

- 1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
- 2. That the final impugned order was communicated to the appellant in the year 2016 because there is no absentee on part of the Appellant

Grounds:

A. That the impugned orders are void order because the Appellant was never remained absent which has been clarified from the attendance register of the Respondent department which is already annexed with the

BEFORE THE HONBLE SERVICE TRIBUNAL PESHAWAR

In Re	S.A	No.	/2018

Mst. Shehnaz

V_{ersus}

Additional Agency Education Officer and Others

ADDRESSES OF PARTIES

PETITIONER.

Mst. Shehnaz Ex Theology teacher Government Girls Primary School Barai Sadda District Kurram.

ADDRESSES OF RESPONDENTS

- 1. Additional Agency Education Officer, Lower, and Central Kurram, Sadda, District Kurram
- 2. Director Of Education FATA, FATA Secretariat Peshawar.
- 3. Agency Account Officer District Kurram.
- 4. Government of Khyber Pakhtunkhwa, through Secretary Education, Civil Secretariat Peshawar.

APPELLANT

Through

Roeeda Khan Advocate, High Court

Dated: 01/01/2019 Peshawar.

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In	Re	S.A	No.	 /2018

Mst. Shehnaz

V_{ersus}

Additional Agency Education Officer and Others

AFFIDAVIT

I, Mst. Shehnaz Ex Theology teacher Government Girls Primary School Barai Sadda District Kurram, do hereby solemnly affirm and declare that all the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.

Identified by:

Roeeda Khan

Advocate High Court

Peshawar.

DEPONENT

HYSTBGHATULLAH SHAH ATA

Notary Public/Oath Commissioner
Peshawar High Court Peshawar

It is therefore, most humbly prayed that on acceptance of this appeal the impugned office order No. 3374-78 dated 18/02/2016 of respondent No.1 may kindly be set aside and the appellant may kindly be ordered to be reinstate in service with all back benefits

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

APPELIANT.

Through

Roeeda Khan

Advocate, High Court

Peshawar.

NOTE:-

Dated: 01/01/2019

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

Advocate.

- D. That the impugned order is void and illegal and clear cut violation of article 25 of the constitution of Islamic Republic of Pakistan because the show cause notice has been issued on the name of 53 employee while the impugned order major penalty of removal from service was imposed on only 17 employees.
- E. That no charge sheet no statement of allegation has been issued and not provided opportunity of personal hearing to the Appellant no final show cause notice was issued by the Respondent department.
- F. That no notice was published on home address of the Appellant and not published in two leading news paper.
- G. That no legal inquiry has been conducted and not provide opportunity of cross examination.
- H. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

order dated 08/04/2016 the Appellant preferred the department appeal but no response has been given by the Respondent department. (Copy of Departmental appeal is annexed as annexure "G")

GROUNDS:-

- A. That the appellant has not been treated according to law and rules because there is no absentee on part of the Appellant.
- B. That the other employee of the impugned order has been reinstated in this Hon'ble Tribunal. (Copy of decision is annexed as annexure "H")
- C. That the impugned order is also void and illegal because the exact date of absence were not mentioned in the impugned order and it is also mentioned that the show cause notice dated 02/02/2016 has been issued on winter vacation the winter vacation has been started on 25/12/2015 to 29/02/2016.

attendance register is annexed as annexure "B")

- 4. That the Appellant was unaware regarding the impugned order and performed his duty after winter vacations till 15/03/2016 and received her monthly salary till January, 2016. (Copy of attendance Register and pay slip is annexed as annexure "C" & "D")
- 5. That even after the end of winter vacation the Appellant tried to draw the salary of February, 2016 on 21/03/2016 where the appellant came to know that the salary was stopped and upon inquiry from the agency Education officer and a show cause notice was issued on 02/02/2016 the Appellant knowledge of letter the into No.3374-78/Edu dated 18/02/2016 which is void and illegal. (Copy of the show cause notice and impugned order are annexed as annexure "E" & "F")

RESPONDENT NO.1 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATE IN SERVICE WITH ALL BACK BENEFITS.

Respectfully Sheweth,

- 1. That the Appellant was appointed by the competent authority as Ex Theology Teacher on 13/12/1994 with the Respondent department.
- 2. That the appellant performed hex duty regularly as Theology teacher at Government Girls Primary School Barai Sadda District Kurram and with full devotion and no complaint what so ever has been made against the Appellant. (Copy of attendance register is annexed as annexure "A")
- 3. That the Appellant performed hes duties regularly till 21/12/2015 as thereafter winter vacation has been start w.e.f. 25/12/2015 to 29/02/2016. (Copy of

(1)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

		Service Tribunal
In Re S.A No.	/2019	Diary No.
		Dated 01-1-2019

Mst. Shehnaz Ex Theology teacher Government Girls Primary School Barai Sadda District Kurram.

....Appellant

VERSUS

- 1. Additional Agency Education Officer, Lower, and Central Kurram, Sadda, District Kurram
- 2. Director Of Education FATA, FATA Secretariat Peshawar.
- 3. Agency Account Officer District Kurram.
- 4. Government of Khyber Pakhtunkhwa, through Secretary Education, Civil Secretariat Peshawar.

Filedto-day

....Respondents

Registrar

APPEAL U/S-4 OF THE PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE OFFICE ORDER NO. 3374-18/02/2016 PASSED BY 78 DATED THE WHEREBY RESPONDENT NO.1 BEEN REMOVED APPELLANT HAS SERVICE.

Prayer:-

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED OFFICE ORDER NO. 3374-78 DATED 18/02/2016 OF

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

	•	متصير	
In Re S.A No.		<u> </u>	/2019

Mst. Shehnaz

V_{ersus}

Additional Agency Education Officer and Others

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4.	Condonation of Delay		9-10
5.	Copies of attendance register	"A"	Q1 0T11
6.	Copy of attendance register	"B"	13
7.	Copy of attendance Register and pay slip	"C & D"	14318
8.	Copy of the show cause notice and impugned order	"E & F"	16217
9.	Copy of Departmental appeal	"G"	187020
10.	Copy of Decision	"H"	217025
11.	Wakalat Nama		·

APPELLANT

Through

Dated: 01/01/2019

Roeeda Khan

Advocate, High Court

Peshawar.