10.12.2021

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Respondent-department submitted reply/comments in the instant service appeal. Placed on file. Learned counsel for the appellant also submitted an application stating therein that during pendency of the service appeal, the impugned order dated 16.04.2015 awarding the appellant major penalty of "removal from service" w.e.f 01.09.2014 was issued which is received to him in the court today. His application for withdrawal of the instant service appeal is accepted. File be consigned to record room.

ANNOUNCED 10.12.2021

> (Mian Muhammad) Member (E)

16.08.2021

Mr. Mir Zaman Safi, Advocate for appellant present. He submitted Wakalatnama, which is placed on file. Mr. Asif Masood Ali Shah, DDA for the respondents present. No representative for the respondents present.

This appeal was admitted for regular hearing on 22.11.2019. The respondents despite directions given from time to time have so far not been able to furnish their written reply/comments. The delay on part of the respondents for the said needful is quite inordinate and leave no room for them to give further time but again as a matter of last opportunity they are directed to submit their written reply/comments within 15 days of receipt of notice. Fresh notices be issued to the respondents. In case of their failure their right for submission of written reply/comments shall stand struck off. File to come up for arguments before D.B on 10.12.2021.

Chairman_

Appellant in person present.

Usman Ghani learned District Attorney present.

Written reply on behalf of respondents is still awaited. Notice be issued to respondents for 16.12.2020 for reply/comments before S.B at Camp Court, Abbottabad.

(Rozina Rehman) Member (J) Camp Court, A/Abad

Due to coupe case;

17.03.2021

Appellant alongwith counsel present. Mr. Riaz Khan Paindakheil learned Assistant Advocate General respondents present.

Preceding date was adjourned on a Reader's note, therefore notice be issued to respondents for submission of reply/comments. To come up for reply/comments on 13 /07 /2021 before **\$**.B at Camp Court Abbottabad

(Atiq ur Rehman Wazir) Member (E)

Camp Court, A/Abad

Due to covid ,19 case to come up for the same on 5/4/20 at camp court abbottabad.

Reader

Due to summer vacation case to come up for the same on / 21 / 20 at camp court abbottabad.

Reader

18.12.2019

Junior counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Saeed, ADO for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further time to file written reply. Adjourned to 23.01.2020 for written reply/comments before S.B at Camp Court Abbottabad.

(Muhammad Amin Khan Kundi) Member Camp Court Abbottabad

23.01.2020

No one present on behalf of appellant. Fakhat Saced ADO representative of the respondent department present and seeks time to furnish reply. Granted. To come up for reply/comments on 19.02.2020 before S.B at Camp Court Abbottabad.

Member Camp Court, A/Abad 25.10.2019

Appellant present in person. Counsel for the appellate is not present. Appellant requested for adjournment. Adjourn. To come up for preliminary hearing on 22.11.2019 before S.B at camp court, Abbottabad.

Member Camp court, A/Abad

22.11.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant has filed the present service appeal for his reinstatement in service. Allegedly the appellant Naeem (Ex-PST) was sanctioned ex-Pakistan leave without pay w.e.f 10.08.2012 to 31.08.2014 (752 days). Allegedly the appellant joined back his duties on 09.09.2014 however he was not paid salary and when he approached the relevant office, he came to know that his services have been terminated. File of the present service appeal is deficient of necessary documents/termination order, however in the interest of justice, the instant service appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for reply/comments. To come up for written reply/comments on 18.12.2019 before S.B at Camp Court, A/Abad.

Appellant Deposited
Securit & Process Fee

The respondent department is directed to furnish IBMS Travel History/Passport Travel History of the appellant along with their written comments.

Member Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of	
Case No	873/ 2019

Shahd Muhammad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 23 -08 -2019 CHAIRMAN CHAIRMAN Appellant absent. Learned counsel for the appellant absert Notice be issued to the appellant and his counsel for the appellant and his cou		Case No	0/3/2019
The appeal of Mr. Naeem Syed received today by post through Mr. Shahd Muhammad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. This case is entrusted to touring S. Bench at AAbad for preliminary hearing to be put up there on 23.08.2019 CHAIRMAN Appellant absent. Learned counsel for the appellant absert Notice be issued to the appellant and his counsel for the date fixed before S.B at Camp Court, Abbottabad.	S.No.		Order or other proceedings with signature of judge
2- 18-9-19 Shahd Muhammad Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 23 08 2019 CHAIRMAN Appellant absent. Learned counsel for the appellant absert Notice be issued to the appellant and his counsel for the date fixed before S.B at Camp Court, Abbottabad. Member	1	· 2	. 3
This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on 23.08.2019 CHAIRMAN Appellant absent. Learned counsel for the appellant absert Notice be issued to the appellant and his counsel for the date fixed before S.B at Camp Court, Abbottabad. Member	1-	02/07/2019	The appeal of Mr. Naeem Syed received today by post through Mr. Shahd Muhammad Khan Advocate may be entered in the Institution
Appellant absent. Learned counsel for the appellant abser Notice be issued to the appellant and his counsel for 25.10.2019. Adjourn. To come up for preliminary hearing of the date fixed before S.B at Camp Court, Abbottabad.	2-	18-7-19	REGISTRAR This case is entrusted to touring S. Bench at A.Abad for
Notice be issued to the appellant and his counsel for 25.10.2019. Adjourn. To come up for preliminary hearing of the date fixed before S.B at Camp Court, Abbottabad. Member			CHAIRMAN .
Notice be issued to the appellant and his counsel for 25.10.2019. Adjourn. To come up for preliminary hearing of the date fixed before S.B at Camp Court, Abbottabad. Member	,		
Notice be issued to the appellant and his counsel for 25.10.2019. Adjourn. To come up for preliminary hearing of the date fixed before S.B at Camp Court, Abbottabad.			
25.10.2019. Adjourn. To come up for preliminary hearing of the date fixed before S.B at Camp Court, Abbottabad. Member		23.08.2019	Appellant absent. Learned counsel for the appellant absent
Member			Notice be issued to the appellant and his counsel fo 25.10.2019. Adjourn. To come up for preliminary hearing or
			the date fixed before S.B at Camp Court, Abbottabad.
	. •		Member
			T I
	·		

The appeal of Mr. Naeem Syed son of Tawiz Syed resident of Sooral Tehsil Judbah District Torghar received today i.e. on 19.06.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of impugned termination order mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 2- Departmental appeal having no date be dated.
- 3- Annexures of the appeal may be flagged.

No. 1107 /S.T,
Dt. 20. -6-/2019.

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shad Muhammad Khan Adv. Supreme Court at Mansehra.

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SHAD MUHAMMAD KIAN ADVOCATE SUPREME DESIT OF PAKISTAN 29 - 6 > 2019.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Naeem Syed......Appellant

Versus

SERVICE APPEAL

INDEX

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5.	Copy of sanction of leave	"B"	9
6.	Copy of order.	"C"	10
7.	Copy of appeal.	"D"	//
8.	Copy of legal notice and acknowledgement	"E" & "F"	12,13
9.	Wakalat Nama	-	14

Dated 14.06.2019

Naeem Syed (Appellant)

Through: -

SHAD MUHAMMAD KHAN

Advocate Supreme Court of Pakistan (Mansehra)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal 100. 873/2019

Khyber Pakhtukhwa Service Tribunal

Diary No. 268

Versus

1) District Education Officer Torghar

2) Director Education KPK Peshawar.....Respondents

APPEAL AGAINST THE ORDER OF RESPONDENT NO. 1 VIDE WHICH THE APPELLANT WAS TERMINATED FROM SERVICE.

Respected Sir,

Filedto-day Registrar

The brief facts leading to the instant appeal are arrayed as follows: -

Re-submitted to -day and filed.

Registrar 19

as PTC Teacher on 04.03.2006 vide order No. 3685-95 dated 04.03.2006 by the District Officer Schools & Literacy Mansehra. The appellant joined the service and performed his duties to the best

(2)

satisfaction of his immediate officers.

(The copy of appointment order is attached as Annexure "A")

to District Education Officer
Torghar and his application was
accepted and leave for two (2) years
from 10.08.2012 to 31.08.2014 was
sanctioned.

(The copy of the sanction of leave is attached as Annexure "B").

That, the appellant after availing the above mentioned leave came back and reported his arrival and was posted as PTC teacher at GPS Shaloon Bassi Khail vide Endst. No. 128-31, dated 09.09.2014.

(The copy is attached as Annexure "C").

4) That, the appellant was discharging his duties but, for reason best known his salary was not paid for which he ran from pillar to post his grievances were redressed rather he was terminated from service and even the termination order was not communicated to the appellant. all the efforts made by the appellant did not bring any fruit.

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5) That, finding no any other alternative, the appellant submitted an appeal to respondent No. 2, but even then no any intimation with respect to the fate of his appeal was conveyed to the appellant.

(The copy of appeal is attached as Annexure "D").

6) That, as no reply was given by respondent No. 2 nor intimation with respect to the fate of appeal was conveyed so, the appellant sent a legal notice to respondent No. 1 to get the order through which he was either removed, dismissed or terminated from service. The legal notice was received and the acknowledgement was returned.

(The copy of legal notice and acknowledgement are attached as Annexure "E" & "F").

7) That, the appellant seeks his reinstatement on the following amongst other grounds: -

GROUNDS: -

A) That, the appellant is the eligible and regular employee of

(g)

department who had served the department for sufficient long time, but was dismissed without adopting the procedure laid down by the law.

- B) That, the appellant was never served any show cause notice nor any inquiry was conducted against the appellant nor the appellant was intimated in this respect.
- C) That, it is one of the mandatory provision of law that before depriving him, it is incumbent to issue a charge sheet alongwith a statement of allegation, so that the could person know proceedings have been initiated and he is giving all the options to defend himself.
- D) That, no any regular inquiry has been conducted by the department and as such, the order, if any does not hold legal backing.
- E) That, the constitution as well as the service laws have laid down a mandatory provisions which shall have to be adopted and in case if there is any deviation the entire superstructure is bound to fall.

P-S

It is, therefore, most humbly prayed and requested that on acceptance of appeal, the appellant may kindly be re-instated in service.

Dated 14.06.2019

Naeem Syed

(Appellant)

Through: -

SHAD MUHAMMAD KHAN

Advocate Supreme Court of Pakistan (Mansehra)

VERIFICATION

I, NAEEM SYED SON OF TAWIZ SYED, RESIDENT OF SOORAL, TEHSIL JUDBAH DISTRICT TORGHAR DO HEREBY VERIFY THAT THE CONTENTS OF FOREGOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

NAEEM SYED (DEPONENT)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Naeem Syed......Appellant

Versus

SERVICE APPEAL

AFFIDAVIT

I, NAEEM SYED SON OF TAWIZ SYED, RESIDENT OF SOORAL, TEHSIL JUDBAH DISTRICT TORGHAR DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONOUABLE TRIBUNAL NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE COURT.

NAEEM SYED (DEPONENT)

IDENTIFIED BY: -

SHAD MUHAMMAD KHAN ADVOCATE SUPREME COURT OF PAKISTAN (MANSEHRA)

P-D

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Naeem Syed......Appellant

Versus

District Education Officer Torghar etc......**Respondents**

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

Respectfully Sheweth!

Correct addresses of the parties are as under: -

APPELLANT

Naeem Syed son of Tawiz Syed, resident of Sooral, Tehsil Judbah District Torghar

RESPONDENTS

1) District Education Officer Torghar

2) Director Education KPK Peshawar

Dated 14.06.2019

Naeem Syed

(Appellant)

Through: -

SHAD MUHAMMAD KHAN

Advocate Supreme Court of Pakistan (Mansehra)

Fricer schools & Literacy Manserra

OFFICE OF THE EXECUTIVE DISTT:OFFICER SCHOOLS & LITERACY MANSHRA.

CORRIGENDUM.

In partial modification of this office E/No.3072-3227, 3043-71 & 3000-21 dated 22/2/2006. The following corrigendum are hereby accorded in the interest of public service with effect from the date mentioned above.

S.No. S.I	vo.in Name of I ler	PST.	Place of precruitmen order.		posting to read as.	KGWG ,153°
1. 2	Nizamul Haq.	GPS	Prinjal.	GPS	Keran Sydan	V/No.2
2. 18	Abdur Rehman.	GPS	Karan Sydan	GPS	Prinjal.	V/No.1
3. 9	Ghulam Muhd.	GPS	Tegram.		Garhi Bala.	Vamout. post.
4. 8	Ihsanullah.	GPS	Legra.	GPS	P/Bartoni.	V/No.5
5. 2	M. Wahab,	GPS	P/Bartooni.	GPS	Tegram.	V/No.3
6.	Insanullah.	GPS	Surmal.	GPS	Leegra.	V/No. 5 4
7. 12	M.Saeed.	GPS	S/Kohani.	GPS	Koonray.	V/No. 8
8. 7	Aleemud Din.	GPS	Koonray.	GPS	S/Wohani.	V/110.7
2. 16	Naeem Syed.	GPS	Kotkay.	GPS	Sural.	V/Post.

NOTE: - 1. Charge report should be submitted to all concerned.

2. No TA/DA is allowed.

EXECUTIE DISTRICT OFFICER (M) SCHOOLS & LITERACY MANSEHRA.

Endst: No. 365-95/dated, 04/03/06

Copy to the :-

Distt:Accounts Officer Mansehra.

2. HT Concerned.

3. Budget & Accounts Officer local office.

4. Teachers concerned.

E-ESUTIVE DISTRICT OFFICER SCHOOLS & LIETRACY MANSEHRA

Man man

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Supperior

SENCTION OF LEAVE:

Consequent upon the approval of the competent authority and under the provision of

Leave rules 1981 Sanction is hereby accorded to the grant of leave in favor of the following Employees

For the period/kind mentioned against each their names as due and admissible under the rules.

S.No	Employee's Name along with Designation and school	Period Leave	Remark
1	Habib ur Razzaq AT GMS Kotlay H.Z	05-10-2012 to20-11-2012 (47 days)	
2	Ameer Zaib AT GMD Judba		Hajj Leave (Earned Leave)
3	Khalid Islam PST GPS Jangri	17-09-2012 to 05-11-2012 (50 days)	Earned Leave on Medical Ground
4		01-09-2012 to 31-08-2014 (730 days)	Ex-pakistan Leave
4	Naeem said PST GPS DADA BANDA	10-08-2012 to 31-08-2014 (752 days)	(Without pay) Ex-pakistan Leave
5	Said Ummat khan Chowkidar GPS kunhar sharif H.Z		(Without pay)
		15-10-2012 to 20-10-2012 (06 days)	Casual Leave

Note:

- Necessary entries to this effect should be made in his service book and leave account Proforma.
- After expiry of leave he will be adjusted in the school where the vacant post is available in the district. If the employee did not submit his arrival report on the expiry of leave, he will be proceeded under
- 4- In Case of Leave on Medical ground the employee would have to submit the fitness certificate From the Doctor concerned before re-joining the duty.
- 5- No single school teacher/employee is allowed to proceed on leave till the arrangement of his/her

-hz-**Executive District Officer** (E&S) Tor Ghar

Endst:No2313/Leave Sanction / EDO/ TG Copy to the:

- 1- District Accounts Officer Tor Ghar.
- 2- District Officer (M) Local Office.
- 3- Head Master/Head Teacher Concerned School.
- Employee C concerned.

Leave sanction File

office of SDEO (m) TorGhar Mr. Nacem Said PST return from ex-Pakistan leave Sanctioned Viele No. 2313/L. 1EDO 1TG dt. 26/12/2012 is hereby posted at GPS Shalown Basikhail with immidiat effe. till his peopes posting orders. endd. No. 128-31 dl. 9/9/2014 Tor Ghar

1. DEO (M) Tor Ghav for Information. 2. H/T GPS Shaloon BIK Teachyl Concern.

Order

ن فیزیدندواه فیزیدندواه

جنابعالي

گزارش ہیکہ سائل مورخہ 10/08/2012 تا 31/08/2014 تک سکول ہذاہیں ہے۔ اور بعد 09/09/2014 تک سکول ہذاہیں اپنی پوسٹ کا جارج سنھال لیا بعد از مورخہ 09/09/2014 کوچھٹی سے واپس آ کرسکول ہذاہیں اپنی پوسٹ کا جارج سنھال لیا ۔ اور جارج رپورٹ دفتر کے گئی چکرلگائے گر سائل کوکوئی تسلیٰ بحش جواب نہیں ملا بلکہ پچھڑ صہ بعد پنہ جا کہ سائل کو غیر حاضری کی بنیاد پر نوکری سے سائل کوکوئی تسلیٰ بحش جواب نہیں ملا بلکہ پچھڑ صہ بعد پنہ جا کہ سائل کو غیر حاضری کی بنیاد پر نوکری سے نکال دیا گیا ہے۔ جو کہ سراسر ناانصافی ہے کیونکہ سائل کو نہ Explanation کیٹر نہ شوکا زاور نہ ہی ٹرمینیشن آرڈ رملا ہے برائے کرام سائل کواپنی پوسٹ پر تعیناتی کا تھم صادر فر ما کرمشکور فر ما کیس سائل تا حیات دُ عا گور ہے گا

العارض آپ کامخلص: نعیم سید PST جی پی ایس شالون ضلع تو رغر سکنه سورال بسی خیل ضلع تو رغر

Man mount

SHAP COUNTY BY SEAR

SUPPLIE COLLEGE PRESSAN

SHAD MUHAMMAD KHAN

Advocate Supreme Court of Pakistan, District Courts, Mansehra

Ref No.

Datcd /

To,

The Executive District Officer (E&SE) Torghar,

LEGAL NOTICE

My client Nacem Syed son of Taviz Syed, resident of Sooral PO Thakot, Tehsil Judbah District Torghar has appointed me as counsel and directed to serve you the following legal notice: -

That, my client was appointed as PTC 1) Teacher in year 2006. My client served till 2012.

That, my client submitted an application for 2) Ex-Pakistan Leave and he was granted leave for two (2) years.

That, my client return and reported his 3) arrival in the School on 09.09.2014 and started working as such.

That, thereafter my client was terminated 41 from service, but he was never issued any show cause notice, charge sheet nor any inquiry was conducted against him. likewise my client was never provided the order of his termination from his service.

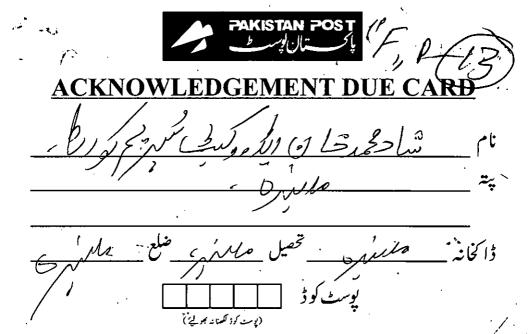
That, my client ran from pillar to post to get 5) the order through which he was terminated from service.

You are therefore, asked to provide him the termination order if any or any other of der which had been passed against hit

Paki A DY (Mabischra)

SUPREME COURT OF PAKISTAN

This legal notice is sent through registered AD and photo opy has been kept in my office for further necessary action.



RP-54 🖈 يبان "جهني" " نوست كار دُ" " ييك" يا " إرسل" جو چيز مو تحرير كري بيد كي صورت مي الفظار أبيه " بيلي تورير آ 🔵 صرف بیمه کی صورت میں یہاں اندراج کیاجائے۔ بصورت دیگر کاٹ قت قیمت: د س رویے -/Rs.10

شادمجمه خان ايرووكيث سيريم كورث آف ما كستان بدین شرط و کیل مقرر کیا ہے کہ میں ہر پیٹی برخود یا بذر بعد مختیار خاص روی وعد الت حاضر ہوتا ریول گا۔ اور بونت یکارے جانے وكيل صاحب موصوف كواطلاع در كرماضر كرون كارا كركسى بيشى يرمظهر حاضرت واادر غير حاضرى كى وجدس كورير مقدمه مير عظاف بوكيا توصاحب موصوف اس كي طرح ذمددادنه بول محد نيز وكيل معاحب موصوف صدرمتام كجهرى ك علاده كى اورجك يا كجهرى ك مقرره اوقات سے يملے يا بروز تعطيل بيروى كرنے كوباز ندموں ك_ أكر مقدم مقام كجرى كركس اورجكه اعت مونى يا يروز كجرى كادقات كآم يا يحصه مونى يمظر كوكوكى نقصال بنيجاتو ذمداريا اس کے واسطے کی معاوضہ اوا کرنے ، مختیار نامدوالی کرنے ہے بھی صاحب موصوف ذمدوار ند ہول کے .. مجھے کل ساخت يرداخته صاحب مثل كرده ذات خودمنظور وقبول موكا _اورصاحب مصوف كوعرض دعوى اوردرخواست اجرائ ومحرى ونظر ثاني ائیل تکرانی دائر کرنے ، نیز برقتم کی درخواست برد سخط تقدیق کرنے کا بھی اختیارہ وگا اور کسی تھم یا ڈگری کے اجراء کرانے اور ہر قتم کارد پیدوسول کرنے اور دسید دینے اور داخل کرانے کا ہرتتم ہیان دینے اور سپر د ثالثی وراضی نامد و فیصلہ ، خلاف کرنے و اقبال دُوي كااختيار موكاادر بصورت ايل وبرآ مدكى مقدمه يامنسوني وُكرى يكطرفه درخواست حكم امّنا ى يا وُكر بي تبل از فيصله اجرائ ڈگری بھی صاحب موصوف کوبشرطادا میگی علیحدہ پیروی مختیار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپل ادرا بیل كرواسط كى دومر دركيل يابير شركو بحائد اسينه مراه مقرركرين اوراييم شيرقانونى كوجى اس امريس وى التيارات حاصل ہوں کے جیے صاحب موصوف کو، یوری فیس تاریخ بیش سے سلے اداند کروں گا توصاحب موصوف کو بوراا فقیار ہوگا کہ تقدمد ک پیروی ندگریں ادرایس حالت میں میرامطالبہ صاحب موصوف کے برخلا نے بیں ہوگا۔لہذا بختیار نامہ لکھ دیا ہے کہ مندر ہے۔ مضمون مختيار نامدين لياب ادماح في طرح مجمليا بهادر منظور ب Advocate Supreme Court.

SL

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

	,
	OF 2021
Nacem Said	(APPELLANT) (PLAINTIFF)
	(PETITIONER)
<u>VERSUS</u>	
Education Deptt.	(RESPONDENT) (DEFENDANT)
I/We <u>Saces</u> Do hereby appoint and constitute Advocate, Peshawar to appear, withdraw or refer to arbitration Counsel/Advocate in the above no liability for his default and wengage/appoint any other Advocate I/we authorize the said Advocate to receive on my/our behalf all sums	plead, act, compromise, for me/us as my/our ted matter, without any with the authority to Counsel on my/our cost. To deposit, withdraw and
deposited on my/our account in the Dated//2021	

MIR ZAMAN SAFI

ADVOCATE

OFFICE:

Room No.6-E, 5th Floor, Rahim Medical Centre, G.T Road, Hashtnagri, Peshawar. Mobile No.0323-9295295

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem SyedAppe	llant
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VERSUS

District Education Officer Tor Ghar & Other..... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

INDEX

S.No	Particular of Documents	Annexure	Pages
	Parawise comments along		
1	with affidavit		1-5
	Copy of teacher		
2	attendance register	"A"	6-14
	Copy of Notification vide		
	No.5570-74 dated		15
3.	16.04.2015	"B"	, ,
	Copy of Show Cause notice		
4	dated 22.01.2015	"C"	16
	Copies of notices of		
	reputed newspapers dated		17.10
5	13-03-2015 & 05-03-2015	" D&E"	17-18

Respondent No.

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.873 /2019

Naeem SyedAppellant

VERSUS

Districts Education Officer Tor Ghar KPK Peshawar & Others...... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:

- 1. That the Appellant has got no cause of actions/locus standi.
- 2. That the instant appeal is filed by suppressing the material facts from this honorable Tribunal, hence not maintainable.
- 3. That the major penalty of removal from service has been imposed upon the appellant, as he has been willfully ebsent of from his duty for a long time without any application / prior permission or leave sanctioned after expiry of two weeks expended and prior permission or leave sanctioned after expiry of two weeks expended and prior permission or leave sanctioned after expiry of two weeks expended and prior permission or leave sanctioned after expiry of two weeks expended and permission or leave sanctioned after expiry of two weeks expended and permission or leave sanctioned after expiry of two weeks expended and permission or leave sanctioned after expiry of two weeks expended and permission or leave sanctioned after expiry of two weeks expended and the sanction of the

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- 4. That the instant appeal is against the prevailing law & rules.
- 5. That the instant appeal has been filed just to pressurize the respondents.
- 6. That the appellant has not come to this honorable tribunal with clean hands.
- 7. That this honorable tribunal lacks jurisdiction in the instant matter in issue.
- 8. That the instant appeal is hopelessly time barred.
- 9. That the appellant is estopped to sue through his own conduct.

FACTS

- 1. That Para No-1 needs no comments, being pertains to the service career of the appellant.
- 2. That para No 2 is correct, hence no comments.
- 3. That Para No. 3 is incorrect, After expiring the said leave, He was posted as PTC at GPS Shaloon Basi khail but as per report of sub Divisional Education officer, He did not submit his arrival while remained absent from duty after posting at said school. Copy of teacher attendance register is appended as Anx-A.
 - 4. That the major penalty of removal from service has been imposed upon the appellant, as he has been willfully absent from his duty since 01.09.2014 without any application / prior permission or leave sanctioned after expiry of two years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days) as per report of the Sub Divisional Education Officer Male Tor Ghar. Copy of Notification dated 16.04.2015 is annexed as Anx-B
 - 5. In reply to para No 5 it is stated that removal order was

- 03.08.2018 after a period of 3 years that was badly time barred hence the same is liable to be dismissed.
- 6. That the appellant remained in deep slumber and served notice on 14.05.2019.
- 7. That the instant service appeal of the appellant is bereft any intent hence liable to be dismissed inter alia following Grounds.

GROUNDS

- A) That Para A of the grounds is incorrect, the order was passed after having considered the charges, evidence on record under rules and regulation of the department as the appellant has been wilfully absent since 01.09.2014 without any application/prior permission or leave sanctioned after expiry of 02 years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days).
 - B) Incorrect, the show cause notice was issued vide No. 4722-27 dated 22.01.2015 and final order was passed after due process of law. Copy whereof is appended as Anx-C.
 - C) In reply to Para No. C it is stated that after issuing the final show cause notice he was also issued notices regarding his absenteeism through print media daily "Mashriq" Peshawar dated 05.03.2015 and 13.03.2015 respectively for the purpose to resume his duty but he turned to deaf ear hence all the proceedings against him were conducted with in legal sphere. Copies where of appended as Anx D&E.
 - D) That complete & comprehensive reply has already been given in preceding paras.
 - E) That complete & comprehensive reply has already been given in preceding paras.

It is therefore; in the light of above stated facts & circumstances most humbly prayed that the instant appeal may kindly be rejected/dismissed with cost.

Respondent. No.1

Wy/

District Education Office (M)

(E&SE) For Black Office (M)

District Char

Respondent No. 2

Director Education

(E&SE) Peshawar Additional Director (Estat) Director te of E & SE) Khyber Pakhtunkhwa Peshawar.

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem SyedAppellant

VERSUS

District Education Officer Tor Ghar & other.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

AFFIDAVIT

I, My Haziy-Un-Rehman DEO(M) District Torghar, do hereby solemnly affirm on oath, that the contents of Parawise comments are True & Correct in the best of my knowledge & belief and nothing has been concealed or suppressed from this honorable tribunal.

DEPONENT

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OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (MALE) JUDBA TOR GHAR

CERTIFICATE

Certified that Mr. Naeem Said PST has not been performed his duties at GPS Shaloon Basi Khail, Tor Ghar, for the period w.e.f September,2014 to April,2015, as per record of the said school.

Sub-Divisional Education Officer (Male)
Judba District Tor Ghar

REGISTERED



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TOR GHAR

NOTIFICATION

ADO (S/E) NAEEM SAID PST: WHEREAS Mr. Naeem Said PST GPS Shaloon District Tor Ghar proceeded against under Knyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of his willful and unauthorized absence from duty.

- 2. AND WHEREAS the accused Teacher was issued show cause through print media Daily Express dated 02/03/2015 and Daily Mashriq Peshawar Dated 05/03/2015 and 3-03-2015, but he failed to submit his reply within stipulated time.
- 3. AND WHEREAS the Competent Authority (District Education Officer 'M') after having considered the charges and evidence on record, response to the Show Cause Notice, is of the view that the charges against the accused official have been proved.
- 4. NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer 'M') is pleased to impose major penalty of "REMOVAL FROM SERVICE" w.e.f 01/09/2014 upon Mr. Naeem Said PST GPS Shaloon District Tor Ghar.

-SD-

District Education Officer (M)
E&SE Tor Ghar

Endst: No 55 70 -74 Idated 161 04 12015:

Copy forwarded for information and necessary action to the -

- 1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2. P.S to Minister Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 3. District Accounts Officer, Tor Ghar at Mansehra.
- 4. SDEO (M) Judba Tor Ghar
- 5. Mr. Naeem Said GPS Shaloon Khall District Tor Ghar.

Dy; District Education Officer (M)

E&SE Tor Gbar





(FINAL SHOW CAUSE) OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TOR GHAR



No. 4722 Dated. 22101 1495

Mr. Naeem Sald PST GPS Shaloon

Subject:

FINAL SHOW CAUSE NOTICE

If The District Education Officer (M) Elementary and Secondary Education District Tor Ghar competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplina) Ru 2011, do hereby serve you, Mr. Naeem Sald PST GPS Shaloon.

- As reported by the Subr Divisional Education Officer (M) Tor Ghar vide his letter No. 199/SDEO (i) dated 24/10/2014, you are absent from your duty since 01/09/2014 to till date, after expiry of two y Ex-Pakistan Leave without pay (01/08/2012 to 31/08/2014 (752 days)), and the community endorsed that you are giways remain absent and not performing your duty an also involved yours dubious, undesired and unwanted activities.
- Ongoing through the material on record and other connected papers. I am satisfied as per provisi Rule 7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2014, the have committed the following acts/omissions specified in rule-3 of the said rules:
 - (a) Inefficient
- (b) Misconduct (c) Corruption
- As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of REMOVAL FROM SERVICE under rule 4 of the said rules.
- You are, thereof, required to show cause as to why the aforesaid penalty should not be in 3. upon you and also intimate whother you desire to be heard in person.
- If no reply to this final notice is received within seven days or not more than fifteen day 4. delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action taken against you.

District Education Cifficer (E&SE Tor Ghar

Endst: No. 4723-27 /Dated. 22 10/ 120/

Copy for information to the:-

- 1. Secretary E&SE Department Govt of Khyber Pakhtunkhwa Peshawar.
- 2. The Director E&SE Khyber Pakhtunkhwa Peshawar.
- 3. Deputy Commissioner Tor Ghar
- 4 District Accounts Office Tor Ghar.
- Sub Divisional Education Officer Tor Ghar.
- Office File.



District Education Office **E&SE Tor Ghar**



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عصران خان کون

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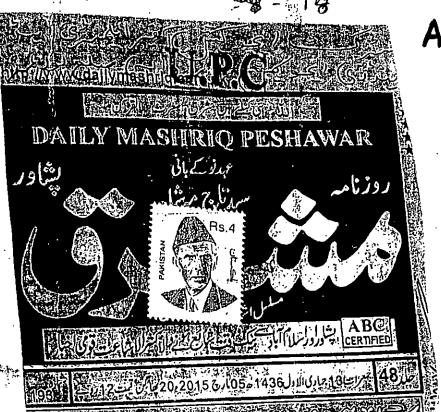
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کر کتا کی موت هوگئی

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نوس غير حاضري

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BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem Sve	d	Appellar	٦t
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VERSUS

District Education Officer Tor Ghar & Other...... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

INDEX

S.No_	Particular of Documents	Annexure	Pages
	Parawise comments along		,
1	with affidavit	-	1-5
	Copy of teacher		
2	attendance register	"A"	6-14
	Copy of Notification vide	·	,
	No.5570-74 dated		15
3	16.04.2015	"B"	15
	Copy of Show Cause notice	\	
4	dated 22.01.2015	"C"	16
	Copies of notices of		
	reputed newspapers dated		,
5	13-03-2015 & 05-03-2015 ⁻	" D&E"	17-18



BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Appeal No.873 /2019



Naeem Sy	/ed	Appellant

VERSUS

Districts Education Officer Tor Ghar KPK Peshawar & Others...... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:

- 1. That the Appellant has got no cause of actions/locus standi.
- 2. That the instant appeal is filed by suppressing the material facts from this honorable Tribunal, hence not maintainable.
- imposed upon the appellant, as he has been will be from his duty for a long time without any application permission or leave sanctioned after expiry of two Pakistan leave without pay w.e. f 01.08.2012 to 31.08.2014 days) as per report of the Sub Divisional Education Control (No. 2013).

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-rate has been

- 4. That the instant appeal is against the prevailing law & rules.
- 5. That the instant appeal has been filed just to pressurize the respondents.
- 6. That the appellant has not come to this honorable tribunal with clean hands.
- 7. That this honorable tribunal lacks jurisdiction in the instant matter in issue.
- 8. That the instant appeal is hopelessly time barred.
- 9. That the appellant is estopped to sue through his own conduct.

FACTS

- 1. That Para No-1 needs no comments, being pertains to the service career of the appellant.
- 2. That para No 2 is correct, hence no comments.
- 3. That Para No. 3 is incorrect, After expiring the said leave, He was posted as PTC at GPS Shaloon Basi khail but as per report of sub Divisional Education officer, He did not submit his arrival while remained absent from duty after posting at said school. Copy of teacher attendance register is appended as Anx-A.
- 4. That the major penalty of removal from service has been imposed upon the appellant, as he has been willfully absent from his duty since 01.09.2014 without any application / prior permission or leave sanctioned after expiry of two years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days) as per report of the Sub Divisional Education Officer Male Tor Ghar. Copy of Notification dated 16.04.2015 is annexed as Anx-B
- 5. In reply to para No 5 it is stated that removal order was passed on 16-04-2015 and departmental appeal was filed on

- 03.08.2018 after a period of 3 years that was badly time barred hence the same is liable to be dismissed.
- 6. That the appellant remained in deep slumber and served notice on 14.05.2019.
- 7. That the instant service appeal of the appellant is bereft any intent hence liable to be dismissed inter alia following Grounds.

GROUNDS

- A) That Para A of the grounds is incorrect, the order was passed after having considered the charges, evidence on record under rules and regulation of the department as the appellant has been wilfully absent since 01.09.2014 without any application/prior permission or leave sanctioned after expiry of 02 years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days).
- B) Incorrect, the show cause notice was issued vide No. 4722-27 dated 22.01.2015 and final order was passed after due process of law. Copy whereof is appended as Anx-C.
- C) In reply to Para No. C it is stated that after issuing the final show cause notice he was also issued notices regarding his absenteeism through print media daily "Mashriq" Peshawar dated 05.03.2015 and 13.03.2015 respectively for the purpose to resume his duty but he turned to deaf ear hence all the proceedings against him were conducted with in legal sphere. Copies where of appended as Anx D&E.
- D) That complete & comprehensive reply has already been given in preceding paras.
- E) That complete & comprehensive reply has already been given in preceding paras.

- 4-

It is therefore; in the light of above stated facts & circumstances most humbly prayed that the instant appeal may kindly be rejected/dismissed with cost.

Respondent. No.1

X/

District Education Officer (IM)
(E&SE) For Ghain Gha

Respondent No. 2

Director Education

(E&SE) Peshawar Additional Director (Ester) Director to of E & SE)

Khyber Pakhtunkhwa Peshawas.

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem SyedAppellant

VERSUS

District Education Officer Tor Ghar & other.....Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

AFFIDAVIT

I, M1, Haziq-UN-Rehman DEOCM) District Torghar, do hereby solemnly affirm on oath, that the contents of Parawise comments are True & Correct in the best of my knowledge & belief and nothing has been concealed or suppressed from this honorable tribunal.



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OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (MALE) JUDBA TOR GHAR

CERTIFICATE

Certified that Mr. Naeem Said PST has not been performed his duties at GPS Shaloon Basi Khail, Tor Ghar, for the period w.e.f September,2014 to April,2015, as per record of the said school.

Sub-Divisional Education Officer (Male)
Judba District Tor Ghar



REGISTERED



OFFICE OF THE DISTRICT EDUCATION OFFICER (M) TOR GHARS

NOTIFICATION

ADO (S/E) NAEEM SAID PST: WHEREAS Mr. Naeem Said PST GPS Shaloon District Tor Ghar proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of his willful and unauthorized absence from duty

- 2. AND WHEREAS the accused Teacher was issued show cause through print media Daily Express dated 02/03/2015 and Dally Mashriq Peshawar Dated 05/03/2015 and 3-03-2015, but he failed to submit his reply within stipulated time.
- 3. AND WHEREAS the Competent Authority (District Education Officer 'M') considered the charges and evidence on record, response to the Show Cause Notice, is of the view that the charges against the accused official have been proved.
- NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer 'M') is pleased to impose major penalty of (REMOVAL FROM SERVICE) w.e.f 01/09/2014 upon Mr. Naeem Said PST GPS Shaloon District Tor Ghar.

-SD-

District Education Officer (M) **E&SE Tor Ghar**

5575-74 Idated 161 04 12015: Endst: No

Copy forwarded for information and necessary action to the -

- 1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2. P.S to Minister, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 3. District Accounts Officer, Tor Ghar at Mansehra.
- 4. SDEO (M) Judba Tor Ghar
- Mr. Naeem Said GPS Shaloon Khall District Tor Ghar.

: District Education Officer (M)

E&SE Tdr





(FINAL, SHOW CAUSE) OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) TOR GHAR



No. 4722 Dated 22101 1205

Mr. Naeem Sald PST GPS Shaloon

Subject: FINAL SHOW CAUSE NOTICE

- I. The District Education Officer (M) Elementary and Secondary Education District Tor Ghar competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Ru 2011, do hereby serve you, Mr. Naeem Said PST GPS Shaloon.
- (i) As reported by the Subr Divisional Education Officer (M) Tor Ghar vide his letter No. 199/SDEO dated 24/10/2014, you are absent from your duty since 01/09/2014 to till date, after expiry of two y Ex-Pakistan Leave without pay (01/08/2012 to 31/08/2014 (752 days)), and the community endorsed that you are atways remain absent and not performing your duty an also involved /ours dubious, undesired and unwanted activities.
- Ongoing through the material on record and other connected papers. I am satisfied as per provis Rule 7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 201,1, tha have committed the following acts/omissions specified in rule-3 of the said rules:
 - (a) Inefficient
- (b) Misconduct (c) Corruption
- As a result thereof, I, as competent authority, have tentatively decided to impose upon you the 2. penalty of REMOVAL FROM SERVICE under rule 4 of the said rules.
- You are, thereof, required to show cause as to why the aforesaid penalty should not be in 3. upon you and also intimate whother you desire to be heard in person.
- If no reply to this final notice is received within seven days or not more than fifteen day 4. delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action taken against you.

District Education Cifficer (E&SE Tor Ghar

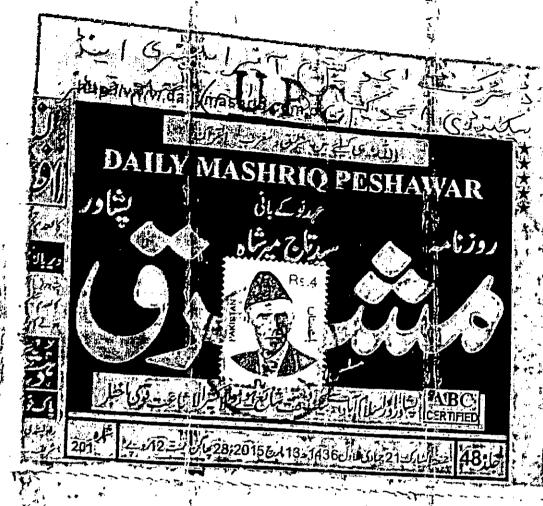
Endst: No. 4723 - 27 /Dated. 22 101 120/

Copy for information to the:-

- 1. Secretary E&SE Department Govt of Khyber Pakhtunkhwa Peshawar.
- 2. The Director E&SE Khyber Pakhtunkhwa Peshawar.
- 3. Deputy Commissioner Tor Ghar
- 4 District Accounts Office For Ghar,
- 5. Sub Divisional Education Officer Tor Ghar.
- Office File.



District Education Office **E&SE Tor Gnar**



روز در رن جادر السام أر سه (7) 13 د 2015 و

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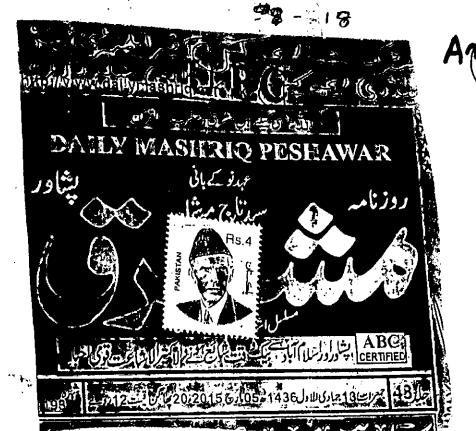
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BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem SyedAppellant

VERSUS

District Education Officer Tor Ghar & Other...... Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE A UNDER:

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Respondent

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.873 /2019

Naeem Sved	 Appellant
Macelli Sycu	 the second

VERSUS

Districts Education Officer Tor Ghar KPK Peshawar &	•
Others Res	pondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:

- 1. That the Appellant has got no cause of actions/locus standi.
- 2. That the instant appeal is filed by suppressing the material facts from this honorable Tribunal, hence not maintainable.
- 3. That the major penalty of removal from service has been imposed upon the appellant, as he has been willfully absent of from his duty for a long time without any application / prior permission or leave sanctioned after expiry of two years Experimental Pakistan leave without pay w.e. f 01.08.2012 to 31.08.2014 (753) days) as per report of the Sub Divisional Education Officer Male Tor Ghar.

- 4. That the instant appeal is against the prevailing law & rules.
- 5. That the instant appeal has been filed just to pressurize the respondents.
- 6. That the appellant has not come to this honorable tribunal with clean hands.
- 7. That this honorable tribunal lacks jurisdiction in the instant matter in issue.
- 8. That the instant appeal is hopelessly time barred.
- 9. That the appellant is estopped to sue through his own conduct.

FACTS

- 1. That Para No-1 needs no comments, being pertains to the service career of the appellant.
- 2. That para No 2 is correct, hence no comments.
- 3. That Para No. 3 is incorrect, After expiring the said leave, He was posted as PTC at GPS Shaloon Basi khail but as per report of sub Divisional Education officer, He did not submit his arrival while remained absent from duty after posting at said school. Copy of teacher attendance register is appended as Anx-A.
 - 4. That the major penalty of removal from service has been imposed upon the appellant, as he has been willfully absent from his duty since 01.09.2014 without any application / prior permission or leave sanctioned after expiry of two years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days) as per report of the Sub Divisional Education Officer Male Tor Ghar. Copy of Notification dated 16.04.2015 is annexed as Anx-B
 - 5. In reply to para No 5 it is stated that removal order was

- 03.08.2018 after a period of 3 years that was badly time barred hence the same is liable to be dismissed.
- 6. That the appellant remained in deep slumber and served notice on 14.05.2019.
- 7. That the instant service appeal of the appellant is bereft any intent hence liable to be dismissed inter alia following Grounds.

GROUNDS

- A) That Para A of the grounds is incorrect, the order was passed after having considered the charges, evidence on record under rules and regulation of the department as the appellant has been wilfully absent since 01.09.2014 without any application/prior permission or leave sanctioned after expiry of 02 years Ex-Pakistan leave without pay w.e.f 01.08.2012 to 31.08.2014 (752 days).
 - B) Incorrect, the show cause notice was issued vide No. 4722-27 dated 22.01.2015 and final order was passed after due process of law. Copy whereof is appended as Anx-C.
 - C) In reply to Para No. C it is stated that after issuing the final show cause notice he was also issued notices regarding his absenteeism through print media daily "Mashriq" Peshawar dated 05.03.2015 and 13.03.2015 respectively for the purpose to resume his duty but he turned to deaf ear hence all the proceedings against him were conducted with in legal sphere. Copies where of appended as Anx D&E.
 - D) That complete & comprehensive reply has already been given in preceding paras.
 - E) That complete & comprehensive reply has already been given in preceding paras.

4-

It is therefore; in the light of above stated facts & circumstances most humbly prayed that the instant appeal may kindly be rejected/dismissed with cost.

Respondent. No.1

X/

District Education Carrier (NA)

(E&SE) To Ghain Char

(EXE) To Ghain Char

(E

Respondent No. 2

Director Education

(E&SE) Peshawar Additional Director (Estt.) Direct write of E & SE) Khyber Pakhtunkhwa Peshawar.

BEFORE THE HOUNARABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 873/2019

Naeem SyedAppellant

VERSUS

District Education Officer Tor Ghar & other......Respondents

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS ARE AS UNDER:

AFFIDAVIT

I, Mr, Haziq-ur-Rehman DEOCM) District Torghar, do hereby solemnly affirm on oath, that the contents of Parawise comments are True & Correct in the best of my knowledge & belief and nothing has been concealed or suppressed from this honorable tribunal.

DEPONENT