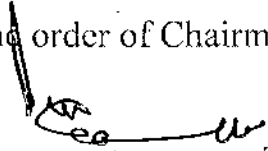


## FORM OF ORDER SHEET

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

Case No. - 324 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/02/2023	<p>The appeal of Mr. Abdul Saboor Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

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

APPEAL No. 324 /2023

**ABDUL SABOOR KHAN**

**VS**

**EDUCATION DEPTT:**

**INDEX**

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	.....	1-3
2.	Copy of the appointment order	A	4
3.	Copy of the order	B	5
4.	Educational Testimonials	C	6-9
5.	appointment order dated 28/09/2021 and Charge certificate	D & E	10-12
6.	departmental appeal	F	13-14
7.	appellate order	G	14-15
8.	Vakalatnama		16

  
**APPELLANT**

**THROUGH:**

  
**NOOR MUHAMMAD KHATTAK  
ADVOCATE SUPREME COURT**

1-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**APPEAL NO. 324 /2023**

Mr. Abdul Saboor Khan, Junior Clerk (BPS-11),  
GHS Domil, District Lower Chitral.

.....**APPELLANT**

**VERSUS**

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Lower Chitral.

.....**RESPONDENTS**

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT, 1974 FOR FIXATION OF PAY IN  
BPS-11 W.E.F. 20-04-1995 I.E. FROM THE DATE OF INITIAL  
APPOINTMENT TO THE POST OF JUNIOR CLERK AND  
AGAINST THE APPELLATE ORDER DATED 16-01-2023  
COMMUNICATED TO THE APPELLANT ON 07-02-2023  
WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT  
HAS BEEN REJECTED WITHOUT ANY GOOD REASON.**

**PRAYER:**

That on acceptance of this appeal the impugned appellate order dated 16.01.2023 may very kindly be set aside and the appellant may kindly be allowed/granted pay fixation w.e.f. 20-04-1995 with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

**Brief facts giving rise to the present appeal are as under:**

- 1- That the appellant was initially appointed in the respondent Department as Junior Clerk BPS-11 vide order dated 20-04-1995. Copy of the appointment order is attached as annexure..... **A.**

- 2- That it is worth mentioning here, that service of the appellant was dispensed with on the ground that his appointment was illegal through order dated 13-02-1997. Copy of the order is attached as annexure .....**B.**
- 3- That appellant is a qualified and an eligible in all respect and was appointed on the subject post accordingly. Copies of the educational testimonials are attached as annexure .....**C.**
- 4- That it is also worth mentioning, that on promulgation of KP Sacked Employee Act, 2012 appellant submitted an application for his reinstatement being covered under the said law but the same was not considered, hence the appellant filed writ petition no. 12 M/2018 before Peshawar high court Mingora Bench, which was allowed vide judgment dated 19/11/2019. That in compliance of the judgment ibid the appellant was appointed as Junior Clerk vide order dated 28/09/2021 pursuance in response the appellant submitted charge report and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order dated 28/09/2021 and Charge certificate are attached as annexure ..... **D & E.**
- 5- That the appellant filed Departmental appeal before respondents for fixation of pay w.e.f. the date of his first appointment i.e. 20/04/1997. Copy of departmental appeal is attached as annexure..... **F.**
- 6- That departmental appeal of the appellant was rejected vid appellate order dated 16.01.2023 and was communicated to the appellant on 07.02.2023. Copy of the appellate order dated 16.01.2023 is attached as annexure .....**G.**
- 7- That feeling aggrieved from the appellate order and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

**GROUND:**

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 20-04-1997 is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department 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 the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 20-04-1997 and as such

D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.

E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. the date of initial appointment.

F- 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:- 15.02.2023

  
**APPELLANT**  
ABDUL SABOOR KHAN

**THOROUGH:**

  
**NOOR MOHAMMAD KHATTAK**  
ADVOCATE SUPREME COURT

  
**KAMRAN KHAN**

  
**UMAR FAROOQ**

  
**WALED ADNAN**

&

  
**MUHAMMAD AYUB**  
ADVOCATES HIGH COURT

**AFFIDAVIT**

I Abdul Saboor Khan, Junior Clerk (BPS-11), GHS Domil, District Lower Chitral, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

  
**Deponent**

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SECT: CHITRAL.

APPOINTMENT.

Mr. Abdul Saeed Khan S/O Mohammad Wali Khan candidate is hereby appointed as J/Clerk on No. 1400/- P.M. in EPS No. 5 of No. 1400-56-2390 plus usual allowance as admissible under the rules with effect from the date of his taking over charge at GHS BREEZ against leave vacancy of Mohammad Ibrahim J/Clerk w.e.f. 1-03-1995 to 31-05-1995 under the following terms and conditions:-

TERMS AND CONDITIONS.

1. Charge report should be submitted to all concerned.
2. NO TA/DA is allowed being first appointment.
3. No joining time is allowed except that is absolutely necessary for transfer.
4. The appointment is purely on temporary basis and subject to termination at any time without assigning any reason or prior notice. In case he wishes to leave the post he shall have to submit one month's prior notice or in lieu thereof forfeit one month's pay and allowance to Govt. His educational qualification should be checked before the handing over the charge of the post.
5. He should produce his health and age certificate from the GHS Hospital Chitral within Seven days of reporting/arrival for duty as required under the Rules (F.R.10 & S.R.4).
6. In case, the candidate fails to take over the charge within 10 days from the date of issue of this letter, his appointment will stand cancelled automatically.
7. The verification roll of character and antecedent should be obtained from the candidate concerned as the prescribed form and submit to the office for further verification and record.
8. He should execute necessary bond in case he is required to spend Government money or property.
9. The pay scale and service Rules would be subject to reversal in accordance with order to be passed by the Govt. of NWFP from time to time.
10. On the expiry of leave of the original incumbent the service of Mr. Abdul Saeed Khan S/O Mohammad Wali Khan J/Clerk will be automatically cancelled.

(ALI ANWAR KHAN)  
District Education Officer,  
(Male) Secondary, Chitral.

B.No. 207-94 / Dated Chitral the 20th / 1995

Copy to:-

- 1:- The District Accounts Officer Chitral.
- 2:- The Headmaster G.H.S. BREEZ.
- 3:- The AERO (Accounts) Local Office.
- 4:- Candidate concerned.

District Education Officer,  
(Male) Secondary, Chitral.

**CLEAR COPY**

5

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SECY: CHITRAL**

**APPOINTMENT.**

Mr. Abdul Saboor Khan S/o Mohammad Wali Khan candidate is hereby appointed as J/ Clerk on Rs. 1400/- PM in BPS No. 5 of Rs. 1400-66-2390 Plus usual allowance as admissible under the rules with effect from the date of his taking over charge at GHS BREP against leave vacancy of Mohammad Ibrahim J/ Clerk w.e.f 01.03.1995 to 31.05.1995 under the following terms and conditions:-

**Terms and Conditions.**

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed being first appointment.
3. No joining time is allowed except that is absolutely necessary for transfer.
4. The appointed is purely on temporary basis and subject to termination at time without assigning any reason or prior notice. In case he wishes to leave the post he shall have to submit one month prior notice or in lieu thereof forfeit one month pay and allowance to Govt His educational qualification should be checked before the handing over the charge of the post.
5. He should produce his health and age certificate from the MS GHQ Hospital Chitral within seven days of reporting arrival for duty as required under the Rules (FR 10 and SE.4).
6. In case, the candidate fails to take over the charge within 10 days from the date of issue of this letter his appointment will stand cancelled automatically.
7. The verification roll of character and antecedent should be obtained from the candidate concerned on the prescribed form and submit to the office for further verification and record.
8. He should execute necessary bond in case he is required to handle government money or property.
9. The pay scale and service rules would be subject to revised in accordance with order to be passed by the Govt of NWFP from time to time.
10. On the expiry of leave of the original incumbent the service of Abdul Saboor Khan S/o Mohammad Wali Khan J/ Clerk will be automatically cancelled.

Ali Akbar Khan  
District Education Officer  
(Male) Secondary, Chitral

R No. 2391-94 dated Chitral the 20<sup>th</sup> 04.1995

**Copy to**

1. The District Accounts Officer Chitral.
2. The Headmaster GMS BREP.
3. The ADEC (Accounts) Local Office.
4. Candidate Concerned.

District Education Officer  
(Male) Secondary, Chitral



... ..

On the basis of the relevant records, the following names have been found illegal, and are being removed from the prescribed rolls. Their names are, therefore, hereby cancelled with immediate effect.

Sl. No. Name/Father's name and address.	Post.	School.
1- Abdul Wahid s/o Mohammad, ...	Junior Clerk.	GKS ...
2- Asadullah s/o Abaidullah, ...	Junior Clerk.	GKS ...

... ..

... .. /Date ... /Sub: ...

Copy forwarded for information to ...

- 1- Private Secretary to Chief Secretary, Govt. of ...
- 2- Private Secretary to ...
- 3- Director Secretary, ...
- 4- Divisional Director of Education, ...
- 5- Headmaster, ...
- 6- Concerned remote Clerks
- 7- District Accounts Officer, ...

... ..

...



**CLEAR COPY**

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SECT: CHITRAL**

**OFFICE ORDER/ DISPENSED OF SERVICE.**

On the perusal of relevant record, the appointments of the following Junior Clerks have been found illegal, despite valid and against the prescribed rules. Their service are, therefore, hereby dispensed with, with immediate effect.

S No	Name/ Parantage and address	Post	School
1	Abdul Saboor S/o Mohamamd Wali R/o Dros	Junioer Clerk	GHS Birgh Hisar
2	Asadullah S/o Obaidullah R/o Zait (Chitral)	Junioer Clerk	Junior GHS Reshun Clekr

Fazluddin District Education Officer  
Male Secondary Chitral

Endst No. 661-69/ Dated Chitral the 12. Feb 1997

Copy forwarded for information to the:-

1. Private Secretary to Chief Secretary of NWFP.
2. Private secretary to the (Sic)
3. Director Secondary Education Chitral
4. Divisional Director of Educational (S) MKD Div at Gulkada Swat.
5. Headmaster GHS Birga Hisar and
6. Concerned Remote Clerk.
7. District Accounts Officer, Chitral

District Education Officer  
Male Secondary Chitral

sNo 536103

Roll No. 2013



-6-

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan  
Secondary School Certificate Examination

SESSION 1986 SUPPLEMENTARY

THIS IS TO CERTIFY THAT Abdul Sabor Khan  
Son/Daughter of Muhammad Wali Khan  
and a resident of Chitral District

has passed the Secondary School Certificate Examination  
of the Board of Intermediate & Secondary Education, Peshawar, held in October 1986 as  
a Private Candidate. He/She obtained 358 Marks out of 850

and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- |            |                     |                |            |
|------------|---------------------|----------------|------------|
| 1. English | 3. Islamiyat        | 5. Mathematics | 7. Physics |
| 2. Urdu    | 4. Pakistan Studies | 6. Chemistry   | 8. Biology |

Date of birth according to admission form is Fourteenth April,  
one thousand nine hundred and Sixty Eight (14-4-1968)

*Sauf*  
Asstt. Secretary  
27th December 1986

*[Signature]*  
Secretary

*This certificate is issued without alteration or erasure*

*[Handwritten signature]*

-7-

**BOARD OF  
INTERMEDIATE & SECONDARY EDUCATION  
PESHAWAR**

No. 23202

**DETAILED MARKS CERTIFICATE**

Intermediate Examination (Humanities Group)

SESSION 1989 (Annual/Supplementary)



Name Abdul Sabir Khan

Father's Name Muhammad Wali Khan Roll No. 21425

SUBJECTS	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
English	200			63	
Urdu	200			87	
Islamic Education	50			45	
Pakistan Studies	50				
	200			98	
	200			81	
	200			110	
<b>Total</b>	<b>1100</b>			<b>484</b>	<i>Four hundred eighty four</i>

Errors/Omissions, excepted



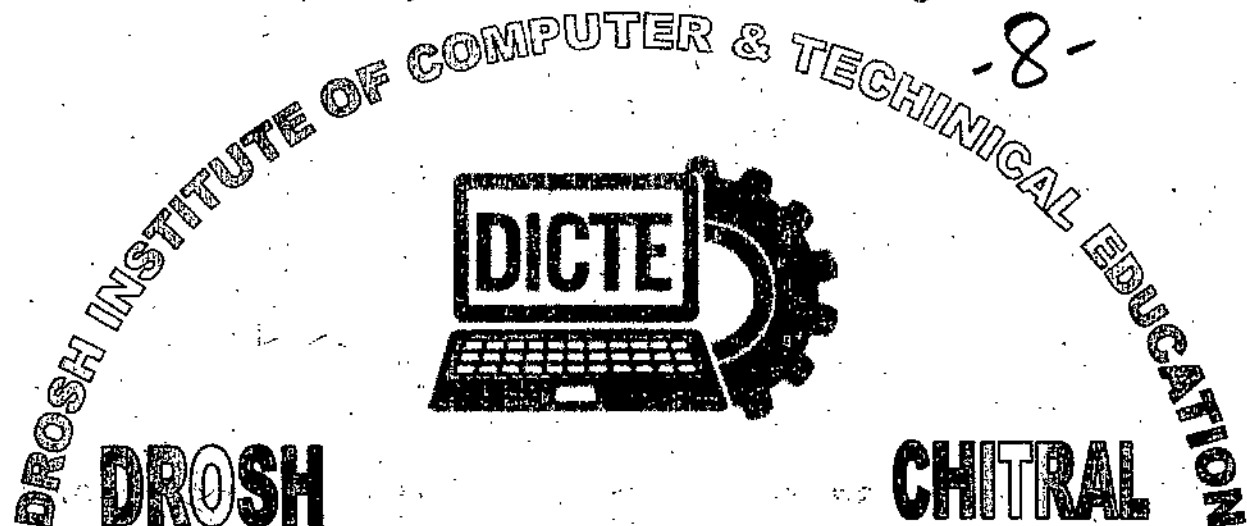
Prepared by 3

Checked by

Controller of Examinations  
Board of Intermediate & Secondary Education  
PESHAWAR

*[Handwritten signature]*

Affiliated with Govt Trade Testing Board (TTB) Peshawar Under Reg: No. DT/AM/TTB/DC&TECH/1/1001  
Affiliated with Skill Development Council Peshawar Under Reg: No. SDG/DICTE/7451



**TO WHOM IT MAY CONCERN:**

It is to certify that Mr.: Abdul Sabor Khan  
S/O: - Muhammad Wali Khan was a bonified student of  
Drosh Institute of Computer & Technical Education Drosh Chitral (KPK)  
Pakistan. He was enrolled in our Institute under R.No. DICTE/SMCC/137/2007. He  
has completed Three-month Ms office course in computer science.

FROM 1<sup>ST</sup> January 2007 TO 31<sup>th</sup> March 2007


The details of courses He has studied are as under.

**COURSES**

1. TYPING
2. MS WORD
3. INPAGE (Urdu)

His academic record and extra curriculum activities in this institute were excellent.

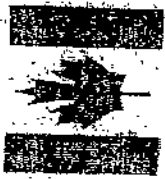
Issued On: June 11, 2007.

  
Principal  
Drosh Institute of Computer  
& Technical Education  
Drosh, Chitral

OPPOSITE HABIB BANK TARICHMIR MARKET NEW BAZAR DROSH TEH: AND P/O DROSHDISTT: CHITRAL KPK Pakistan.  
0092-0943-430614, 0092-0943-480772 dict@2001@gmail.com, www.dicte.edu.pk



AGHA KHAN RURAL SUPPORTS PROGRAMME  
(AKRSP) Chitral



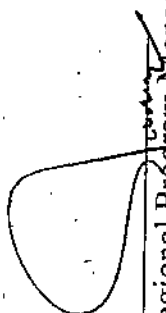
This is to certify that

**Mr. Abul Saboor**


has satisfactorily completed a training programme on

**Proposal Writing and Record Keeping**  
for Citizen Community Boards (CCBs) Facilitated by TCA.

from March 3rd to 5<sup>th</sup> 2008.

  
Regional Program Manager  
AKRSP Chitral

  
Course Facilitator  
Terich Meer Consulting Associates  
Chitral

  
Mr. Noor-u-Din  
Course facilitator  
Terich Meer Consulting Associates  
Chitral

-9-



**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**

**LOWER CHITRAL**

Phone: 0943-412627

Email address: [deomchitral@gmail.com](mailto:deomchitral@gmail.com)



10

**OFFICE ORDER**

In pursuance of Judgment of Honorable Khyber Pakhtunkhwa Peshawar High Court, Mingora Bench, Darul Qaza Swat in writ petition No.12-M/2018 dated 19-11-2019 and on the recommendation of Departmental Selection Committee in its meeting held on 24/08/2021 Mr. Abdul Saboor Khan S/O Molvi Muhammad Wali resident of village Azudam Drosh District Lower Chitral is hereby appointed against the vacant post of Junior Clerk, BPS-11 @ Rs(12570-880-38970/-) plus usual allowances as admissible under the rules at GHS Domil in 30% reserved quota for sacked employees under clause 3,4,5&7 of Khyber Pakhtunkhwa sacked employees(Appointment) ACT NO.XVIII OF 2012 with immediate effect in the interest of public with following terms and conditions.

**TERMS & CONDITIONS:**

1. He will be on probation period for one year as per section 6(1) of Khyber Pakhtunkhwa Civil Servant Act 1973 and clause 15(1) of APT rules, 1989.
2. His appointment is subject to the condition that the certificates/documents/Equivalency Certificates must be verified from the concerned authorities and if found producing bogus certificates or degrees, his appointment be treated cancelled w.e.f the date of issuance and will be reported to law enforcing agencies for further proceeding under the law and rules.
3. He will not be entitled to claim seniority and other back benefits under clause 5 of sacked employees Act 2012(KPK ACT NO.XVIII OF 2012) as well as Honorable Court Judgment.
4. Pay shall not be drawn until and unless a certificate is issued by this office to the effect that his documents have been verified.
5. He should join the post within 15 days after issuance of this order. In case of failure to join the post within 15 days, his appointment shall be treated automatically cancelled/withdrawn and no subsequent appeal etc shall be entertained.
6. Health & Medical fitness certificate should be produced from the Medical Superintendent DHQ Hospital Chitral before taking over charge under clause 3 of sacked employees Act 2012(KPK ACT NO.XVIII OF 2012).
7. He will be governed by such Rules and Regulations as may be issued for the category from time to time by the Government.
8. Concerned Headmaster is required to verify all the documents (DMCs and Degrees/Certificates/Equivalency certificates from the concerned Board/University) and provide his verified documents to this office for pay release.
9. Before handing over charge an affidavit be obtained and be placed in his Personal file by HM concerned that if any document is detected fake /bogus at any stage during his service, the appointment be treated as withdrawn w.e.f the date of issuance and all pays drawn will be recovered / deposited by him in Govt treasury. Non compliance will lead to legal proceeding.
10. Errors and omissions are excepted within the specified period of 15 days.
11. Charge report should be submitted to all concerned.
12. No TA/DA is allowed.

(Muzafar Ali Khan)  
District Education Officer  
(Male) Lower Chitral

ATTACHED

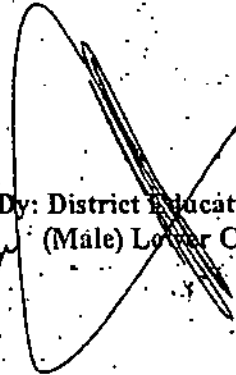


Endst: No. 15066-76 /EB (M)S-24/Appointment/Sacked Employees Dated 22/9/2021

Copy forwarded to the:-

1. Registrar, Peshawar High Court, Peshawar/ Dar-UI-Qaza Mingora Bench, Swat.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Lower Chitral.
4. District Accounts Officer Lower Chitral.
5. District Monitoring Officer (EMA) Lower Chitral.
6. Headmaster GHS Domil Lower Chitral.
7. Budget & Accounts Officer Local Office.
8. DEMIS of local office.
9. Candidate concerned.
10. PA to DEO(M) Lower Chitral.
11. Office file.

Dy: District Education Officer  
(Male) Lower Chitral



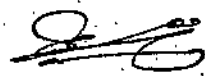
# ANNEXURE E (12)

## CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that I have on the fore/afternoon of this day respectively made over and received charge of the office of Headmaster, GHS Domil vide District Education Officer (M) Chitral Lower E:No.15066-76/EB(M)S-24/Appointment/Aacked Employees, Dated 28/09/2021.
2. Particulars of cash and important secret and confidential documents handed over are noted on the reversre.

Signature of relieved  
Govt: servant  
Designation Vacant i/c post

Station GHS Domil


Signature of relieving   
Govt: servant Abdul Saboor Khan  
Designation Junior Clerk  
Dated: 28/09/2021

Dated     /     / 2021

Endst: No. 695

Copy forwarded to the:-

1. Registrar, Peshawar High Court, Peshawar/ Dar-UI-Qaza Mingora, Swat.
2. Director of Elematory and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (M), Chitral Lower.
4. District Accounts Officer, Chitral Lower.



Headmaster,  
GHS Domil.

Head Master DDO  
G.H.S  
Domail Chitral (L)



"F" -13-

To,

The Director Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

Subject: **DEPARTMENTAL APPEAL FOR PAY FIXATION**


R/Sir,

With humble submission I would like to say that I have been appointed as Junior Clerk in the year 1995 in good self-department. That in the year 1997 my services dispensed with on the ground that my services were no more required to the department. That on promulgation of the KP Sacked Employees ACT 2012, I submitted an application for reinstatement being cover under the said law but the same was not considered. Feeling aggrieved I was filed Writ Petition before the Peshawar High Court Mingora Bench, which was allowed. Dear Sir, I was appointed as Junior Clerk w.e.f. taking over charge in light of Peshawar High Court Darul Qaza Bench Judgment. That in response I have submitted my charge report and started duty quite efficiently and up to the entire satisfaction of my superiors. That I am entitle for fixation of pay from the date of my initial appointment i.e. 20-05-1995 but the concerned authority has been appointed me with immediate effect i.e. from the date of taking over charge. Sir, I am feeling aggrieved preferred this Departmental appeal before your good self.

It is therefore, most humbly prayed that on acceptance of this Departmental appeal I may kindly be allowed/granted for pay fixation w.e.f. 20-04-1995 with all consequential benefits. Any other remedy which your good self deems fit hat may also be awarded in my favor.

Dated 16-12-2022

Yours faithfully,

  
**Abdul Saboor Khan**  
Junior Clerk, GHS, Domil,  
District Lower Chitral.

No.1073

RAD00286878

Rs. Ps.

For insurance notices see reverse.  
Stamps affixed except in case of  
uninsured letters of not more than  
the initial weight prescribed in the  
Post Office Guide or on which no  
acknowledgment is due.

30/10/52

Received & registered  
addressed to Mr. P. C. S. S. S.

Initials of Receiving Office 1073

Insured for Rs. (in words) Rs. 100/-

Insurance fee Rs. Rs. 10/- (in words)

Name and address of sender

Weight Kilo Grams

If insured



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. \_\_\_\_\_ /F.No./A-23/MS/Purpose of Pay

Dated Peshawar the 16/01 /2023

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

"9"

To

Mr. Abdul Saboor Khan Junior Clerk,  
GHS Domil District Lower Chitral.

-15-

Subject: **DEPARTMENTAL APPEAL FOR PAY FIXATION.**

Memo:

I am directed to refer to your appeal received vide this office diary No. 1742 dated 03/01/2023 on the subject cited above and to state that your appeal has been examined/analyzed by this office and **rejected** by the appellate authority.

*sd*

**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 7670

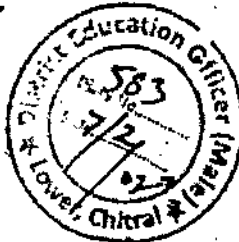
Copy forwarded to the: -

1. District Education Officer (Male) Lower Chitral.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

*EIB*  
*17/1/23*  
*07-12-2023*

*JP*  
*13/1/23*

**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar



16-

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

APPEAL NO: \_\_\_\_\_ OF 20\_\_

Abdul Saboor Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/We (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** 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. \_\_\_/\_\_\_/202

  
**CLIENT**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE SUPREME COURT**  
(BC-10-0853)  
(15401-0705985-5)

  
**KAMRAN KHAN**

  
**UMAR FAROOQ MOHMAND**

  
**WALEED ADNAN**

&  
  
**MUHAMMAD AYUB**  
**ADVOCATES**

**OFFICE:**

Flat No. (TF) 291-292 3<sup>rd</sup> Floor,  
Deans Trade Centre, Peshawar Cantt.  
(0311-0214222)