

Appeal No. 03/2019
Shor Zada vs Govt

13.01.2021

Appellant present in person.

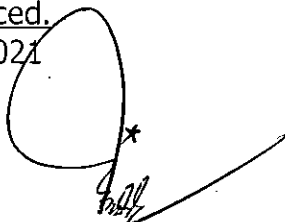
Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Appellant made a request for withdrawal of the instant service appeal. In this regard, his statement was also recorded.

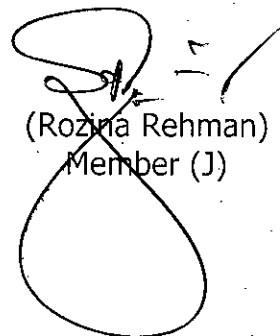
In view of above, instant appeal is hereby dismissed as withdrawn. No order as to costs. File be consigned to the record room.

Announced.

13.01.2021



(Mian Muhammad)
Member (E)



(Rozina Rehman)
Member (J)

Statement of Sher Zada S/O Pacha R/O Dir Upper Tehsil Sheringal
Village & P.O Narkoon appellant, on oath:

I am appellant and have filed the instant service appeal but
now i seek withdrawl of my appeal. It is, therefore, requested that
my appeal may kindly be dismissed as withdrawn. .

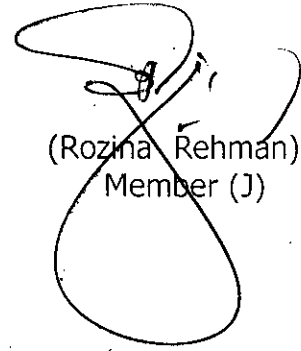
R.O & A.C

Dated: 13.01.2021



Sher Zada, Appellant.

(Mian Muhammad)
Member (E)



(Rozina Rehman)
Member (J)

01.07.2020

Due to COVID-19, the case is adjourned to 26.08.2020 for the same.


Reader

26.08.2020

Due to summer vacation case to come up for the same on 02.11.2020 before D.B.


Reader

02.11.2020

Appellant in person and Usman Ghani, District Attorney for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 13.01.2021 for hearing before the D.B.


(Mian Muhammad)
Member


Chairman

30.10.2019

Appellant in person present. Mr. Zia Ullah learned Deputy District Attorney present. Appellant seeks adjournment as his counsel is not in attendance. Adjourn. To come up for arguments on 17.12.2019 before D.B.


Member


Member

17.12.2019

Lawyers are on strike on the call of Peshawar Bar Association. Adjourn. To come up for further proceedings/arguments on 19.02.2020 before D.B.


Member


Member

19.02.2020

Appellant in person present. Mr. Kabirullah Khattak learned Additional AG for the respondent present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 06.04.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member


6.4.2020

Due to COVID, 19, The case is adjourned to 1.7.2020 for same as before.




25.04.2019

Counsel for the appellant present. Add: AG alongwith Mr. Hayat Khan, AD for respondents present. Learned counsel for the appellant submitted application for grant of permission to amend the service appeal alongwith copies of amended memo of appeal which is placed on file. Notice of the said be issued to the respondents for submission of written reply/comments on 19.06.2019 before S.B.


(Ahmad Hassan)
Member

19.06.2019

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Sher Daraz Khan, ADO (Litigation) for the respondents present. Representative of the department submitted joint written reply on behalf of respondents No. 1 to 3. Case to come up for rejoinder and arguments on 06.08.2019 before D.B.

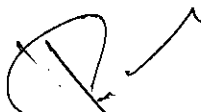

(Muhammad Amin Khan Kundi)
Member

06.08.2019

Appellant in person and Mr. Muhammad Jan, DDA alongwith Mr. Nadar Khan, Supdt for respondents present.

Appellant requests for adjournment due to non-availability of his learned counsel.

Adjourned to 30.10.2019 before D.B.


Member


Chairman

04.02.2019

Counsel for the appellant present.

Contends, inter-alia, that the appellant was not provided any opportunity of personal hearing or bringing forth his defence before the passing of impugned order dated 01.08.2018. Further stated that this was a case of imposition of major penalty of removal from service and in view of the judgments of the Apex Court proper enquiry was all the more necessitated in the matter.

In view of the above, instant 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. To come up for written reply/comments on 27.03.2019 before S.B.

The appellant may bring on record additional documents relevant to case, if so advised.

Appellant Deposited
Security & Process Fee


Chairman

27.03.2019

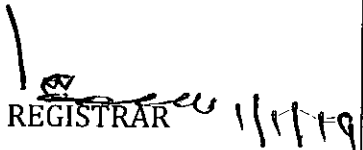
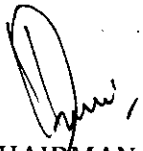
Appellant in person present. Written reply not submitted. Hayat AD representative of the respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 25.04.2019 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 3/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/1/2019	<p>The appeal of Mr. Sherzada resubmitted today by Syed Usman Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 1/1/19</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>4-2-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Service Appeal No. 3 /2018

SherzadaAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa, through
Secretary E&SE and othersRespondents

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Appellant

Sherzada

Through

Syed Usman
Advocate High Court

Syed Usman

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

Amended Service Appeal No. 03 /2019

Sherzada S/o Pacha
C.T, GMS Sundrai, Dir UpperAppellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director General E&SE, Khyber Pakhtunkhwa, Near Govt. Higher Secondary School, G.T Road, Peshawar.
3. District Education Officer (M), Dir Upper

....Respondents

**AMENDED SERVICE APPEAL U/S 4 OF
SERVICE TRIBUNAL ACT, 1974 AGAINST
ORDER DATED 01.08.2018 VIDE WHICH
PETITIONER WAS REMOVED FROM HIS
SERVICE, AND THE SAME WAS
COMMUNICATED TO THE PETITIONER
ON 05.09.2018, AGAINST WHICH
DEPARTMENTAL APPEAL FILED BY
PETITIONER TO RESPONDENT NO.2
WAS REJECTED ON 06.12.2018**

Respectfully Sheweth:-

- 1) That appellant was appointed as Certified Teacher (CT) Male on 12.03.2015 at GMS Sundrai. (Copy of appointment order is Annex "A")

2) That petitioner has performed his duty with full devotion and to the entire satisfaction of his superiors and there is no complaint whatsoever against the appellant.

~~3)~~ That due to some unavoidable/ blood feud circumstances, appellant couldn't attend his office and was exiled from the locality by the elders of the locality to avoid the breach of peace, however, appellant informed his immediate officer verbally about his domestic problem/ obligation and requested to grant leave, so appellant assumed that the competent authority accepted his request.

4) That now due to efforts of elders of locality the matter was patched-up between the parties peacefully. (Copy of compromise deed is Annex "A1")

5) That appellant remained unaware/ not intimated of his removal from service, till 01.09.2018, when he attended his office he was astonished when he was informed that he is removed from service.

6) That on his personal efforts, appellant obtained his removal order from concern department on 05.09.2018. (Copy of removal order is Annex "B")

7) That to the utmost surprise of the appellant, the District Education Officer E&S Education (M), Dir Upper imposed the major penalty of removal from service, which is against the law, facts, natural justice and was liable to be set-aside, hence being aggrieved, the appellant filed departmental appeal/ representation respondent No.2, which was rejected on 06.12.2018. (Copy of departmental appeal & rejection order dated 06.12.2018 is Annex "C")

- 8) That being aggrieved and having no other adequate remedy, the appellant now approaches this hon'ble Tribunal on the following grounds amongst others:-

GROUND

- 1) Because the impugned removal order is harsh and against the law.
- 2) Because no inquiry whatsoever has been conducted against the appellant nor he has been associated with the same, hence the impugned order is illegal and against the law.
- 3) Because appellant has been condemned unheard, as no proper opportunity of hearing has been provided to appellant before passing the impugned order.
- 4) Because appellant has been treated discriminately
- 5) Because absence of the appellant was not willful nor deliberate, and the appellant informed his high-ups in this respect in time.
- 6) Because neither any charge sheet, nor statement of allegation given to appellant, which is mandatory as per rules.

It is, therefore, humbly prayed that, on acceptance of this appeal, orders dated 01.08.2018 and 16.12.2018 may graciously be set-aside, and appellant may be reinstated into his service with all back benefits.

Appellant

Through



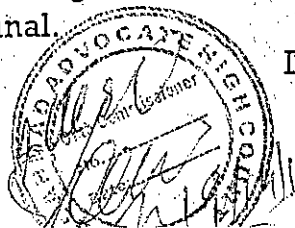
Saad Usman

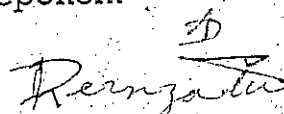
Advocate High Court

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Deponent





(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Khyber Pakhtukhwa
Service Tribunal

Service Appeal No. 3 /2019

Diary No. 01

Dated 01-1-2019

Sherzada S/o Pacha
C.T, GMS Sundrai, Dir UpperAppellant

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director General E&SE, Khyber Pakhtunkhwa, Near Govt. Higher Secondary School, G.T Road, Peshawar.
3. District Education Officer (M), Dir Upper

....Respondents

**SERVICE APPEAL U/S 4 OF SERVICE
TRIBUNAL ACT, 1974 AGAINST ORDER
DATED 01.08.2018 VIDE WHICH
PETITIONER WAS REMOVED FROM HIS
SERVICE, AND THE SAME WAS
COMMUNICATED TO THE PETITIONER
ON 05.09.2018, AGAINST WHICH
DEPARTMENTAL APPEAL FILED BY
PETITIONER TO RESPONDENT NO.2
WAS NOT RESPONDED TILL ATE**

Filed to-day
Registrar
17/1/19.

Respectfully Sheweth:-

- 1) That appellant was appointed as Certified Teacher (CT) Male on 12.03.2015 at GMS Sundrai. (Copy of appointment order is Annex "A")

- 2) That petitioner has performed his duty with full devotion and to the entire satisfaction of his superiors and there is no complaint whatsoever against the appellant.
- 3) That due to some unavoidable circumstances, appellant couldn't attend his office however, appellant informed his immediate officer verbally about his domestic problem/ obligation and requested to grant leave, so appellant assumed that the competent authority accepted his request.
- 4) That appellant remained unaware/ not intimated of his removal from service, till 01.09.2018, when he attended his office he was astonished when he was informed that he is removed from service.
- 5) That on his personal efforts, appellant obtained his removal order from concern department on 05.09.2018. (Copy of removal order is Annex "B")
- 6) That to the utmost surprise of the appellant, the District Education Officer E&S Education (M), Dir Upper imposed the major penalty of removal from service, which is against the law, facts, natural justice and was liable to be set-aside, hence being aggrieved, the appellant filed departmental appeal/ representation respondent No.2, which was rejected on 06.12.2018. (Copy of departmental appeal & rejection order dated 06.12.2018 is Annex "C")
- 7) That being aggrieved and having no other adequate remedy, the appellant now approaches this hon'ble Tribunal on the following grounds amongst others:-

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- 3) Because appellant has been condemned unheard, as no proper opportunity of hearing has been provided to appellant before passing the impugned order.
- 4) Because appellant has been treated discriminately
- 5) Because absence of the appellant was not willful nor deliberate, and the appellant informed his high-ups in this respect in time.
- 6) Because neither any charge sheet, nor statement of allegation given to appellant, which is mandatory as per rules.

It is, therefore, humbly prayed that, on acceptance of this appeal, removal order dated 01.08.2018 may graciously be set-aside, and he may be reinstated into his service with all back benefits.

Dated: 28/12/2018

Ketpoo
Appellant

Through *Syed Usman*
Syed Usman *Masdar*
Advocate High Court

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Ketpoo
Deponent



(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018

SherzadaAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa, through
Secretary E&SE and othersRespondents

ADDRESSES OF PARTIES

APPELLANT

Sherzada S/o Pacha
C.T, GMS Sundrai, Dir Upper

RESPONDENTS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. Director General E&SE, Khyber Pakhtunkhwa, Near Govt. Higher Secondary School, G.T Road, Peshawar.
3. District Education Officer (M), Dir Upper



Appellant

Through


Syed Usman

Advocate High Court

(5)

Appointment Order CT (M) Contract
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DIR UPPER.



APPOINTMENT.

*Attest to
 Signed
 For*

Ann-A

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Certified Teachers Male (CT) School based in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge :-

S.#	Name	Father's Name	Merit	Place of Posting	Remarks
01	Shaukat Ali	Faizullah	142.68	GMS Galkore	AVP
02	Mukhtiar ud Din	Gul Zaman Khan	135.53	GHS Beyar	AVP
03	Zafar Khan	Asil Khan	127.82	GMS Matar	AVP
04	Liaqat Zeb	Shakirullah	126.53	GMS Malanga	AVP
05	Mainoosh Khan	Shamsud Din	126.14	GHS Beyar	AVP
06	Laiq Zada	Sher Zada	124.44	GMS Sheratkal	AVP
07	Amir Badshah	Khan Saray	123.16	GMS Shaltalo	AVP
08	Zia ur Rahman	Aqal Zarin	123.03	GMS Shahoor	AVP
09	Gawhar ud Din	Muhammad Din	122.42	GMS Doon Bala	AVP
10	Ijazullah	Hamza Khan	122.41	GMS Achar Bala	AVP
11	Hazrat Younas	Shah Afzal Khan	121.68	GMS Gurrai	AVP
12	Sher Zada	Pacha	120.85	GMS Sundrai	AVP
13	Fazal Wadood	Sadullah Khan	120.53	GHS Badar Kani	AVP
14	Umar Munir Khan	Akhon Zada	120.48	GHS Beyar	AVP
15	Naik Wali	Bakhtia Gul	119.37	GHS Kair Darra	AVP
16	Arbab Khan	Amir Laiq	118.45	GHS Miana Doag	AVP
17	Mahay ud Din	Wazir Khan	117.53	GMS Jandrai	AVP
18	Zahir Rahman	Musharaf Khan	117.5	GMS Sunnai	AVP
19	Ghulam Muhammad	Ashbar Khan	117.18	GMS Sunnai	AVP
20	Ziaullah	Shafiullah	116.99	GHSS Kalkot	AVP
21	Shah Zada	Ahmad Zada	116.95	GMS Lamoout	AVP
22	Sharifullah	Gauhar Rahman	116.85	GHS Miana Doag	AVP
23	Anwar Sadat	Fazal Malik	116.43	GMS Nasrat	AVP
24	Yar Hussain	Muhammad Zarin Khan	115.93	GHS Thall	AVP

Appointment Order CT (M) Contract
TERMS & CONDATION


6

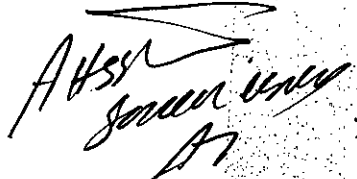
1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis initially for one year.
4. They should not be handed over charge if they exceed 35 years or below 20 years of age.
5. Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authorities if any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be paid until and unless a certificate from the concerned authority is issued that their certificates are verified.
8. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, his appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. Their services shall be terminated at any time, in case of their performance is found unsatisfactory during their contract period. In case of misconduct, They will be proceeded under the rules framed from time to time.
12. Their appointments are made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
13. Before handing over charge once again their document may be checked if they have no required qualifications, they may not be handed over charge.
14. No payment will be made so then before making verification from concerned institutions.

(Jehan Muhammad)
District Education Officer,
(Male) Dir Upper.

Endst: No. ~~981-88~~ / File No.12(A)/CT/Appnt:/DEO(M) Dir(U) /SEB Dated Dir (U) the 12/3/2015
Copy forwarded for information and necessary action to the:-

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Dir Upper
3. Dy: District Education Officer Male Dir Upper.
4. Principals/Head Masters concerned.
5. A.P EMIS Local Office.
6. Accountant Middle Schools(Male) local office.
7. Official Concerned.
8. M/File


District Education Officer,
(Male) Dir Upper.


Ahsan
Jawan
A7



(7) Annex B

OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE DIR UPPER,
PH NO.0944-881400 FAX -0944-880411 Email deomdirupper@gmail.com

OFFICE ORDER

Whereas, I Mr. Abdul Haq, District Education Officer Male Dir Upper, as competent authority, am of the opinion that Mr. Sher Zada CT GMS Sundari has rendered himself liable to be proceeded against as he committed the following acts/ omissions with the meaning of rule 3(d) of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011.

Statement of allegations.

That he remained absent since 01-03-2018 without prior sanction of leave as reported by the IMU/Head Master. His act is against the office discipline and guilty of habitually absenting himself from duty without prior approval of leave or under rules 3 (d) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

Whereas, 1st show cause notice was issued to the accused vide this office Endst: No.2860-61 dated 26-05-2018, but he has not resumed duties within stipulated period.

Whereas, 2nd show cause notice was issued to the accused vide this office Endst: No.3439-41 dated 12-06-2018, but he has not resumed his duties within stipulated period.

Whereas, the last show cause notice was issued to him through Press which has been published in Daily Express dated 06-07-2018, but he has not resumed his duties within stipulated period.

Now therefore, I Mr. Abdul Haq, District Education Officer Male Dir Upper in the capacity of competent authority am satisfied that the charges against the accused has been proved beyond no doubt. I, as a competent authority under the power conferred upon me under Rule 4 b (iii) of the Khyber Pakhtunkhwa Government servants (Efficiency and Discipline) Rules, 2011 is hereby impose Major Penalty of Removal from service upon Mr. Sher Zada CT GMS Sundari w.e.f 01-03-2018. ✓

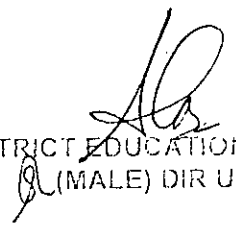
(ABDUL HAQ)
DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.

No. 4688-95 /P.F.No.02 /DEC (M)/SEB/ADO(S) Dated Dir (U) the, 07/18 /2018. ✓

Copy forwarded for information to:-

- 01- Deputy Commissioner Upper Dir.
- 02- The District Accounts Officer Dir Upper.
- 03- Dy: District Education Officer Local Office.
- 04- District Monitoring Officer for information.
- 05- Accountant Concerned for process.
- 06- Head Master Concerned.
- 07- Officials Concerned
- 08- Office Record

Attesh
Gallewani
ml


DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.

To

The Director
Elementary And Secondary Education Peshawar
Khyber Pakhtunkhwa

(8)

Ans - C

Subject:-

DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 01-08-2018 VIDE WHICH THE PETITIONER REMOVED FROM SERVICE AND WHICH WAS COMMUNICATED TO THE PETITIONER ON DATED 05-09-2018 WHICH IS AGAINST THE LAW, FACTS AND LIABLE TO BE SET ASIDE AND PETITIONER MAY KINDLY BE REINSTATED IN SERVICES WITH ALL BACK BENEFITS.

Respected Sir,

- 1) That the petitioner was appointed as certified Teacher (C.T) Male on 12-03-2015 at GMS Sundrai. (Copy is attached).
- 2) That the petitioner has performed his duty with full devotion and entire satisfaction of his Superior and there is no complaint against petitioner.
- 3) That the petitioner has unblemished and spotless service record of about 3 years.
- 4) That due to some unavoidable circumstances petitioner could not attend his office however, petitioner informed his immediate officer verbally about his domestic problem/obligation and requested to Grant leave. So Petitioner assumed that the competent authority accepted his request.
- 5) That the Petitioner was remained unaware/not intimated of his removal from service while on dated 01-09-2018 when attended his duty was astonished when he was informed that he is removed from service.
- 6) That on his personal efforts petitioner obtain his removal order from concern department on dated 05/09/2018.
- 7) That utmost surprise of the petitioner that the District Education Officer E&S Education male Dir upper imposed the major penalty of removal from service which is against law, facts, natural justices and liable to be set-aside on the following grounds.

Attest
Sundrai
F/S

(9)

GROUNDS

- A. That under the rules before removal from services regular inquiry is must however, No such inquiry was conducted in petitioner case which is violation of due process of law.
- B. That petitioner was deprived of his right of defense.
- C. That the petitioner was not granted the opportunity of personal hearing.
- D. That the petitioner was not informed about the initiation of disciplinary action.
- E. That petitioner was not provided documentary evidence to prove his innocence. While petitioner was orally informed about his removal on dated 01/09/2018 and petitioner obtained his removal order on 05/09/2018 on his personal efforts and petitioner appeal is in with in time.
- F. That the petitioner was proceeded Ex-party which is against law and natural justice.
- G. That the petitioner is a poor person and sole bread earner of his large family.
- H. That the petitioner has no source of income.
- I. That If the petitioner departmental appeal is not accepted. He and his family will suffer irreparable loss.

It is therefore humbly requested that the impugned order dated 01/08/2018 may kindly be set-aside in the best interest of justice, equity and petitioner may kindly be reinstated in services with all back benefits:

Date: 10/09/2018

AB/
Renzano
Your Obediently,

Sherzada S/o Pacha
C.T GMS Sundrai Dir Upper
Cell No 03449242112

Slary No 337

10-09-2018

Avesh
Sachedumar
AS



DIRECTORATE OF ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHWA.

No. 2250 /F.No.162/Vol:18/Appeal of
PST(M)General.
Dated Peshawar the 12 /12 /2018.

To,

✓
The District Education Officer (M)
Dir Upper.

Subject:- **DEPARTMENTAL APPEAL.**

Memo:-

I am directed to refer to your letter No.6830/F.No.109/DEO (M) SEB Dir Upper dated 09.10.2018 on the subject cited above and to state that the appeal of Mr. Sher Zada CT GMS Dir Upper of DEO (M) Dir Upper report is hereby rejected.

I am further directed to ask you to inform the teacher concerned accordingly.

[Signature]
Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

Endst: No. _____

1. Mr. Sher Zada CT GMS Dir Upper.
2. P.A to Director Elementary & Secondary Education local office.

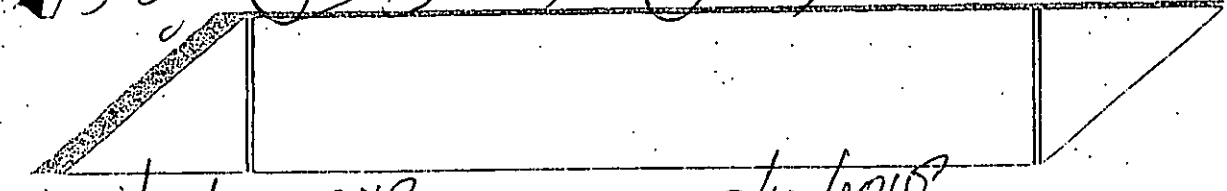
Deputy Director (Estab :)
Elementary & Secondary Edu:
Khyber Pakhtunkhwa Peshawar.

AD: S
Do the needful

21/12/18

1726
22/12/18

بعد الت صاحب برادرسٹریٹ سروس ٹریڈنگ کمپنی لیسٹڈ



2016ء پنجاب ایڈووکیٹس

28/12/2016

مورخہ:

مقدمہ:

دعویٰ:

حکم:

بنام: حکومت
سیریز اڈن

سوی ایڈووکیٹس
بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا اپنی طرف سے واسطے بیروی و جواب دہی و کل کارروائی متعلقہ
ان مقام کیلئے صندھ بیک خان - ایڈووکیٹ سید عزیز علی - ایڈووکیٹ سید ساجد کی طرف سے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا مکمل اختیار ہوگا، نیز وکیل صاحب کو رضی نامہ کرنے و تقرر ثالث فیصلہ

پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء و وصولی چیک رو پیسہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر
دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری کی طرف یا ایڈیشن کی برآمدگی اور منسوخی نیز دائر کرنے سے ایجنل نگرانی و نظر ثانی و بیروی کرنے کا
اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ وہ جانہ
التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ پر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیروی مذکور کریں۔
لہذا وکالت نامہ لکھ دیا کہ سنڈ رہے۔

2016ء

28 ماہ 28

المرقوم:

العبد

گواہ

العبد

بمقام لہاف کے لیے منظور ہے۔

Attested & Accepted
Saeed usman
Advocate Mardan

Handwritten signature and stamp of the advocate, including the name 'Saeed Usman' and 'Advocate Mardan'.

0314 9719-006

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No 03/2019.

Sher Zada S/O Pacha C.T GMS Sundrai, Dir Upper.-----Appellant.

VERSUS

1. Govt of KPK through Secretary Education, Peshawar.
2. Director of Education, E&SE, KP Peshawar.
3. District Education Officer (M) Dir Upper.-----Respondents

Reply on the behalf of the Respondents.

Respectfully sheweth.

PERLIMINARY OBJECTIONS.

01. That the appellant has no cause of action.
02. That the appellant has not come to the service tribunal with clean hands.
03. That the appellant has been , estopped by his own conduct to file the instant appeal.
04. That the appellant has no locus standi.
05. That the appeal is not main table in its present form.
06. That the appeal is time barred.
07. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.

OBJECTION ON FACTS.

01. Pertain to record, hence need no comments.
02. Incorrect, and hence denied.
03. Incorrect, The appellant remained absent from duty w.e.f 01-03-2018 without prior sanction of leave from competent authority.
04. Incorrect, the appellant was intimated through show cause notice bearing endst: No2860-61 dated 26/05/2018. 2nd show cause notice bearing No 3439-41 dated 12/06/2018, and last show cause through press daily Express dated 06/07/2018, to resume duty but all in vain.
05. Incorrect, and hence denied. As replied above.
06. Incorrect replied in Para No 4 objection on facts.
07. Pertain to law hence need no comments.

OBJECTIONS ON GROUNDS.

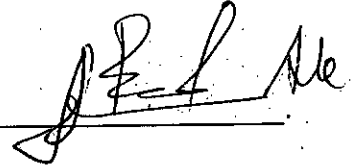
01. Incorrect, the impugned order is according to law.
02. Incorrect, the absence was reported by Head Master concerned and IMU, and hence the respondent was duty bound to take action on the report submitted by Head Master of IMU officials.
03. Incorrect, the appellant was called to appear for personal hearing and justify his stance but appellant avoided to appear and hence it was assumed that he nothing to say in his defence.
04. Incorrect, and hence denied. As replied above.
05. Incorrect, and hence denied. As replied in ground 3 above.
06. Incorrect, and replied already in Para No 04 objection on facts.

PRAYER

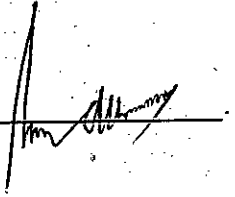
It is therefore, humbly prayed that on acceptance of this comments, the appeal may kindly be dismissed with cost in the favor of respondents please.

RESPONDENTS

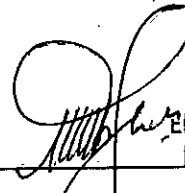
01. The Govt: of Khyber Pakhtunkhwa through Secretary E&SE Peshawar



02. The Director Elementary & Secondary Education Peshawar



03. District Education Officer Male Dir Upper



P/A to Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

District Education Officer
(Male) Dir Upper

Report

Special Cases-Male

GPS BARKALI GWALDI:

The school was visited on 20-03-2018. Mr, Muhammad Anwar (PST) found absent from March to 19 March, 2018.

SACHAR PAYAN:

The school was visited on 20-03-2018. Mr Yasir Ali(PST) found absent since May 2017 till (20-03-2018).

SHSS SHERINGAL:

The school was visited on 28/03/2018. Mr, Ahmad shah Lab assistant found absent since 24 March to 28 March without any lawful permission of the competent authority.

SMS SUNDRAI:

The school was visited on 19-03-2018. Mr, Sherzada (CT) found absent from 1st March to 03-2018.

IMU Report

Special Cases-Male

GPS DOBANDO

The school was visited on 03/05/2018. Mr Shafiqur Rahman(PSHT) and Naseeb Khan (Ch) were found absent from 1st March, 2018 to 5th March, 2018.

GPS JUGHABANI

The school was visited on 26-05-2018. Mr, Mehmood Idress was found absent for seven days.

GHSS SERI SULTAN KHEIL

The school was visited on 29-05-2018. Mr, Nasir Ahmad was found un-authorized absent. As per statement of the head master he did not inform him about his absence. While in this month he had availed 3 Casual leaves but application for only one day was found in the record. He was also marked on duty for one day but no record found. Upon conformation from the students he is habitual absentee strict action may be taken against him under the law.

Impersonations

School Name	Gender	Monitoring Date	Proxy	Original	Designation
GATKOTO	Boys	08-05-18	Taza Amin	Shah Wali	
KANDOWGAI	Boys	23-05-18	Zoor Talab khan	Rahat Ullah	Chowkidar
LOONTOR	Boys	29-05-18	Muhammad Ikram	Muhammad Nawaz	Chowkidar
DARAK	Boys	30-05-18	Lal Badshah	Gul Pacha	Chowkidar
Bara Dada Doon	Boys	22-03-2018	By some one from two years.	Mr, Tariq Khan	Chowkidar

Impersonations

GGMS TARPATAR

The school was visited on 10-03-2018. Riaz Uddin(Sweeper) found absent and impersonated since long. And four teachers were found on exam duty while two were on casual leave, only one teacher was there on duty.

GGMS DRAMDALA

The school was visited on 7-03-2018. Rabia BIBI(sweeper) was found absent and her mother is working instead of her and she keeps CNIC of her daughter. upon asking from her she told that its mine but the date of birth was written as 1991.

GGMS DOOG PAYEEN

The school was visited on 14/03/2018. Miss Zahida sweeper was found absent and has been impersonated by her daughter.

GGPS ALLOWRAI:

The school was visited on 30-03-2018. Rahim Shah (chowkidar) Found absent, and someone else is performing his duty.

DEO(M)

Dir Upper

subject: Absenteesm Report

R/Sir! It is stated that Mr. Sher Zada

S/o pacha CT at GMS Sundrai
Dir Upper is absent from his
duties since 01-03-2018.


His personal No is 00744193
and his CNIC No is 16102-1283589-3

This Report is forwarded to
your office for Necessary
actions please.

NO-68, GMS Sundrai dated the
12-03-2018

ADOL(s)
process under
EAD rules, issued
crime notice.

yours obedient


Head Master
S. Sundrai

(6)

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

Dir Upper (Phone # 0944-881400) E-mail:

To

Mr. Sher Zada CT,
GMS Sundrai Upper Dir.

Subject: 1st SHOW CAUSE NOTICE

Memo:-

It has come into the notice of the undersigned that you remained absent from your school duty without legal permission since 01-03-2018. Your this practice and reported by IMU is against office discipline and amounts to be guilty of habitually absenting yourself from duty without approval of leave under section 3 (c) and Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 2011 and liable to be removed from service.

You are, therefore, directed to submit your written defense within fifteen days of the receipt of this letter. Your written defense, if any should reach to this office within the specified period, failing which it shall be presumed that you have nothing to present in you defense and in that case ex-part/action shall be followed against you.

/

(ABDUL HAQ)


DISTRICT EDUCATION OFFICER (M)
DIR UPPER

Endst No. 2860-61/F.No.36/DEO (M)/Estb (S)

Dated: 26/05/2018

Copy forwarder for information to the:-

1. Principal/Head Master concerned.


DISTRICT EDUCATION OFFICER (M)
DIR UPPER

(7)

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

Dir Upper (Phone # 0944-881400) E-mail:

To

Mr. Sher Zada CT,
GMS Sundrai Upper Dir.

Subject: -- 2nd SHOW CAUSE NOTICE

Memo:-

It has come into the notice of the undersigned that you remained absent from your school duty without legal permission since 01-03-2018. Your this practice and reported by IMU is against office discipline and amounts to be guilty of habitually absenting yourself from duty without approval of leave under section 3 (c) and Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 2011 and liable to be removed from service.

You are, therefore, directed to submit your written defense within fifteen days of the receipt of this letter. Your written defense, if any should reach to this office within the specified period, failing which it shall be presumed that you have nothing to present in you defense and in that case ex-part/action shall be followed against you.


(ABDUL HAQ)
DISTRICT EDUCATION OFFICER (M)
DIR UPPER

Endst No. 3439-41 /F.No.36/DEO (M)/Estb (S)

Dated: 12/06 / 2018

Copy forwarder for information to the:-

1. Principal/Head Master concerned.
2. District Monitoring Officer Upper Dir.


DISTRICT EDUCATION OFFICER (M)
DIR UPPER

DAILY EXPRESS



پاکستان کے 11 شہروں سے ایک وقت شائع ہونے والا واحد اخبار
 16 ماہ 276 | قیمت اسہارک 21 | شمال الگزم 1439 | 06 جولائی 2018 | صفحات 18 | قیمت 15 روپے

ایگزیکٹو جلی ڈگری کی کس شہریت



جیزمین ایگزیکٹو شیب احمد شیخ کی نائل تصویر

اسلام آباد (تقدیر پورز) ایگزیکٹو جلی ڈگری کی کس شہریت

پاکستان کے 11 شہروں سے ایک وقت شائع ہونے والا واحد اخبار
 16 ماہ 276 | قیمت اسہارک 21 | شمال الگزم 1439 | 06 جولائی 2018 | صفحات 18 | قیمت 15 روپے

ایگزیکٹو جلی ڈگری کی کس شہریت

پاکستان کے 11 شہروں سے ایک وقت شائع ہونے والا واحد اخبار

محکمہ ایجوکیشن دیوبند بالآخری نوٹس اظہار وجوہ / غیر حاضر

نمبر	نام	تاریخ امتحان	تاریخ نوٹس	تاریخ حاضری	تاریخ حاضری
1	فرہان علی	27-03-2018	27-03-2018	01-03-2018	01-03-2018
2	مہتاب علی	05-05-2018	05-05-2018	29-06-2016	29-06-2016
3	ایوب علی	07-05-2018	07-05-2018	01-11-2016	01-11-2016
4	نیر علی	26-05-2018	26-05-2018	01-03-2018	01-03-2018
5	ایوب علی	11-08-2017	11-08-2017	31-12-2016	31-12-2016

آپ درج بالا نامزد ہونے والے تلامذہ کے لئے اس وقت تک امتحان کی اجازت کے بغیر مسلسل غیر حاضر ہیں آپ کو بار بار اطلاع دی گئی کہ زبانی پر حاضر ہوجائیں۔ لیکن آپ ایسا کرنے میں تاخیر سے لہذا آپ کو آخری بار بذریعہ اخباری اشتہار مطلع کیا جاتا ہے کہ اس اشتہار کی اشاعت کے چند روزوں کے اندر اندر اپنے زبانی پر حاضر ہوجائیں۔ اور زبانی پر غائب ہونے کے بعد نوٹس کی اجازت کی درخواست کی جائے گی جس میں آپ کی ملازمت سے برطرفی بھی شامل ہے جس کے بعد کوئی مدد قبول نہیں کیا جائیگا۔

عبدالحق ڈسٹرکٹ ایجوکیشن آفیسر مردانہ دیوبند

E-AUCTION نوٹس برائے شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار)

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

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بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔

بھارتی حکومت کے زیر نگرانی اور نگرانی میں شلای تحصیل میونسپل ایڈمنسٹریشن خدوخیل (دوسری بار) کی عطاء کی جا رہی ہے۔



OFFICE OF THE
DISTRICT EDUCATION OFFICER MALE DIR UPPER,
PH NO.0944-891400 FAX -0944-880411 Email deomdirupper@gmail.com

OFFICE ORDER

Whereas, I Mr. Abdul Haq, district Education Officer Male Dir Upper, as competent authority, am of the opinion that Mr. Sher Zada CT GMS Sundari has rendered himself liable to be proceeded against as he committed the following acts/ omissions with the meaning of rule 3(d) of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011

Statement of allegations.

That he remained absent since 01-03-2018 without prior sanction of leave as reported by the IMU/Head Master. His act is against the office discipline and guilty of habitually absenting himself from duty without prior approval of leave; or under rules 3 (d) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

Whereas, 1st show cause notice was issued to the accused vide this office Endst: No.2860-61 dated 26-05-2018, but he has not resumed duties within stipulated period.

Whereas, 2nd show cause notice was issued to the accused vide this office Endst: No.3439-41 dated 12-06-2018, but he has not resumed his duties within stipulated period.

Whereas, the last show cause notice was issued to him through Press which has been published in Daily Express dated 06-07-2018, but he has not resumed his duties within stipulated period.

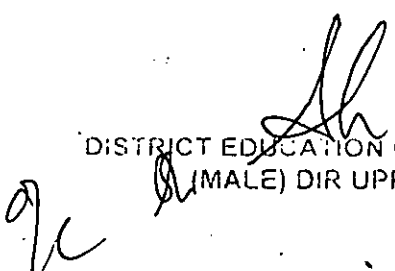
Now therefore, I Mr. Abdul Haq, District Education Officer Male Dir Upper in the capacity of competent authority am satisfied that the charges against the accused has been proved beyond no doubt. I, as a competent authority under the power conferred upon me under Rule 4 b (iii) of the Khyber Pakhtunkhwa Government servants (Efficiency and Discipline) Rules, 2011 is hereby impose Major Penalty of Removal from service upon Mr. Sher Zada CT GMS Sundari w.e.f 01-03-2018.

(ABDUL HAQ)
DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.

No. 4688-95 /P.F.No.02 /DEO (M)/SEB/ADO(S) Dated Dir (U) the: 01/18 /2018.

Copy forwarded for information to:-

- 01- Deputy Commissioner Upper Dir
- 02- The District Accounts Officer Dir Upper
- 03- Dy: District Education Officer Local Office.
- 04- District Monitoring Officer for information.
- 05- Accountant Concerned for process.
- 06- Head Master Concerned.
- 07- Officials Concerned.
- 08- Office Record


DISTRICT EDUCATION OFFICER,
(MALE) DIR UPPER.

رجسٹر حاضرین مدرسہ

گورنمنٹ ڈسٹرک سکول سندھ دیو والا ڈسٹرک 2018ء
 مارج بابت ماہ

حضرت سید			شیب ذادہ			عباد اللہ			محمد اللہ		
S.S.T			C.T			C.T			D.M		
آئینہ	دستخط	روائی	آئینہ	دستخط	روائی	آئینہ	دستخط	روائی	آئینہ	دستخط	روائی
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2	8:15	دستخط	12:40	دستخط	8:15	12:40	دستخط	2:20	8:15	دستخط	2:20
3	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
4	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
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25	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
26	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
27	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
28	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
29	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
30	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15
31	8:15	دستخط	2:20	دستخط	8:15	2:20	دستخط	8:15	دستخط	2:20	8:15

Absent

23 March Pakistan Day

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	توجہ
11	8+2	01	13	10+1	02	12	10+2	00	03	2	01	...
11	10	01	13	11	02	12	00	03	2	01

Head Master
 G.M.S Sundral
 Distt:-Dir Upper

رجسٹر حاضرہ مدرسین

گورنمنٹ ہائی اسکول، نزدیکی ڈالہ، ضلع دیر بالا

۲۰۱۳

بابت ماہ

شمارتہ			عبادتہ			شہر زادہ			حضرت سسر			نمبر
D.M			S.T			S.T			S.S.T			
دستخط	روانی	آمد	دستخط	روانی	آمد	دستخط	روانی	آمد	دستخط	روانی	آمد	آؤتنگ
												۱
												۲
												۳
												۴
												۵
												۶
												۷
												۸ (S)
												۹
												۱۰
												۱۱
												۱۲
												۱۳ F
												۱۴
												۱۵ S
												۱۶
												۱۷
												۱۸
												۱۹
												۲۰ F
												۲۱
												۲۲ S
												۲۳
												۲۴
												۲۵
												۲۶
												۲۷ F
												۲۸
												۲۹ S
												۳۰
												۳۱

Absent
 ON DUTY
 ON DUTY

Attested
 GMS Suiyod
 Dist. Dupper

جسٹریٹری ملٹرین

2015

بابت نامہ

نام		حضرت سید		تیسر ڈارہ				سید				عہدہ	
D-M		C-T		C-T				S-S-T					
آؤتھ	آمد	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	آؤتھ
													1
	7:30			7:30								7:30	2
	7:30			7:30								7:30	3
	7:30			7:30								7:30	4
	7:30			7:30								7:30	5
	7:30			7:30								7:30	6
	7:30			7:30								7:30	7
	7:30			7:30								7:30	8
	7:30			7:30								7:30	9
	7:30			7:30								7:30	10
	7:30			7:30								7:30	11
	7:30			7:30								7:30	12
	7:30			7:30								7:30	13
	7:30			7:30								7:30	14
	7:30			7:30								7:30	15
	7:30			7:30								7:30	16
	7:30			7:30								7:30	17
	7:30			7:30								7:30	18
	7:30			7:30								7:30	19
	7:30			7:30								7:30	20
	7:30			7:30								7:30	21
	7:30			7:30								7:30	22
	7:30			7:30								7:30	23
	7:30			7:30								7:30	24
	7:30			7:30								7:30	25
	7:30			7:30								7:30	26
	7:30			7:30								7:30	27
	7:30			7:30								7:30	28
	7:30			7:30								7:30	29
	7:30			7:30								7:30	30
	7:30			7:30								7:30	31
میزان	حال	میزان	سابقہ	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	قسمت
0	01	0	0	01	0	0	01	0	01	0	0	01	انسانی
0	01	01	0	01	0	01	01	01	01	01	01	01	بیاری
													میزان کل

Attested
Head Master
S.M.S. Sandral

نام حضورتہ ملازم		عہدہ		ST		C.T		D.M		D.O		روزانہ		روزانہ	
آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ	آؤٹ
1 F	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30
2	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
3 S															
4	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
5	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
6	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
7 F	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30
8															
9															
10 S															
11	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
12	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
13	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
14	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30	12:35	7:30
15 F															
16															
17 S															
18															
19	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
20	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
21	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
22 F															
23	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
24 S															
25	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
26	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30	1:35	7:30
27															
28															
29 F	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30
30	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30	11:15	7:30
31															

Head Master

قسمت
آفتاب
استخوان
بیماری
بیماران کل

PAYROLL SYSTEM
AMENDMENT FORM
SINGLE EMPLOYEE ENTRY

Date

Page No.



OFFICE OF THE Dy: DEO. (male) Dir (U)

FOR THE MONTH OF 03 - 2018

DDO Code (Cost Center) DP6012 Description DDEO (m)

Personnel Number 00744193 Employee Name Sher Zada

National ID Card Number

Grade (Pay Scale Group) 15 CT

Salary Status Start Stop

GENERAL DATA CHANGE ¹³			CHANGE IN PAYMENTS / DEDUCTIONS ¹⁷					Effective Date ²¹	Remarks ²²
Info ¹⁴ Type	Field ID ¹⁵	New Contents ¹⁶	Wage Type ¹⁸	Amount			Adj ²⁰		
				Rupees ¹⁹	Paisa				
			118- Inactive					01/03/2018	Reported by the Headmaster that Mr. Sher Zada CT has been absent from duty since 01/03/2018 with no information, till now 16/03/2018. Pay stopped till further order.

Deputy District Education Officer (Male) Dir Upper

Prepared By

Audited/Checked By

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No 03/2019.

Sher Zada S/O Pacha C.T GMS Sundrai, Dir Upper-----Appellant.

Versus

Govt: of KPK and others -----Respondents.

AFFIDAVIT.

I, Mr; Sardaraz Khan ADEO (Lit) Male Dir Upper, do hereby solemnly affirm and declare on oath that the contents of the joint written reply submitted by respondents are true and correct to the best of my knowledge and belief as per office record and that nothing has been concealed from this Hon: Court.

Deponent



SARDARAZ KHAN

ADEO (Lit) OFFICE OF THE DEO (MALE)

DIR UPPER.

CNIC.NO.15702-2476972-1

خدمتِ خانہ سرسبز ٹریبونل FRC لاہور

سٹریٹ آف شاہ سکر ٹریبونل حکیم نسیم و فریہ

تاریخ 13 مئی 2021

حضرت درخشاں مراد قرانی راجہ

برائے withdrawal کرنے

میں سابقہ ماسک سے معذرتیں

خانہ

سابقہ عدلیہ عرضی راجہ

۱۔ یہ کہ عدلیہ میں سابقہ حکیم نسیم سے teach کے

میں خدمات سرانجام دے رہے تھے

۲۔ یہ کہ عدلیہ حکیم نے عدلیہ میں سابقہ عدلیہ راجہ

کے *deposition* کرنا تھا

۳۔ یہ کہ راجہ نے حکیم کے خلاف عدلیہ میں

6/1

سر دفتر سپرنٹنڈنٹ کے پاس ۱۷۴۱۷ لکھنؤ میں ریل و ڈاکٹر

جس میں آدھ ٹاؤن کی پٹی مقرر ہے

۱۔ یہ کہ اگر کادرد ال ٹو لکھنؤ میں سے منسوخ ہو

بغیر آدھ ٹاؤن کی پٹی کے کھلا رہے

ریل و ڈاکٹر کی پٹی کی طرف سے باقی پٹی

استعمال کے لئے منسوخ ہو جائے اور ریل و ڈاکٹر

کی طرف سے استعمال ہو اور اس سے مزید کادرد ال ٹو

بغیر داخل دفتر نہ ہو اور - تمام پٹی

کوڈنگ کے لئے کادرد ال ٹو کے لئے منسوخ ہو

سے ریل و ڈاکٹر کے سر دفتر سپرنٹنڈنٹ کے پاس لکھنؤ میں ریل و ڈاکٹر

۱۷۴۱۷ لکھنؤ میں ریل و ڈاکٹر کے سر دفتر سپرنٹنڈنٹ کے پاس

۱۷۴۱۷

۱۷۴۱۷ لکھنؤ میں ریل و ڈاکٹر کے سر دفتر سپرنٹنڈنٹ کے پاس

سر دفتر سپرنٹنڈنٹ کے پاس لکھنؤ میں ریل و ڈاکٹر

سر دفتر سپرنٹنڈنٹ کے پاس لکھنؤ میں ریل و ڈاکٹر

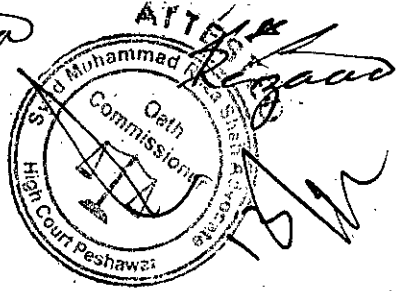
۱۷۴۱۷ لکھنؤ میں ریل و ڈاکٹر کے سر دفتر سپرنٹنڈنٹ کے پاس

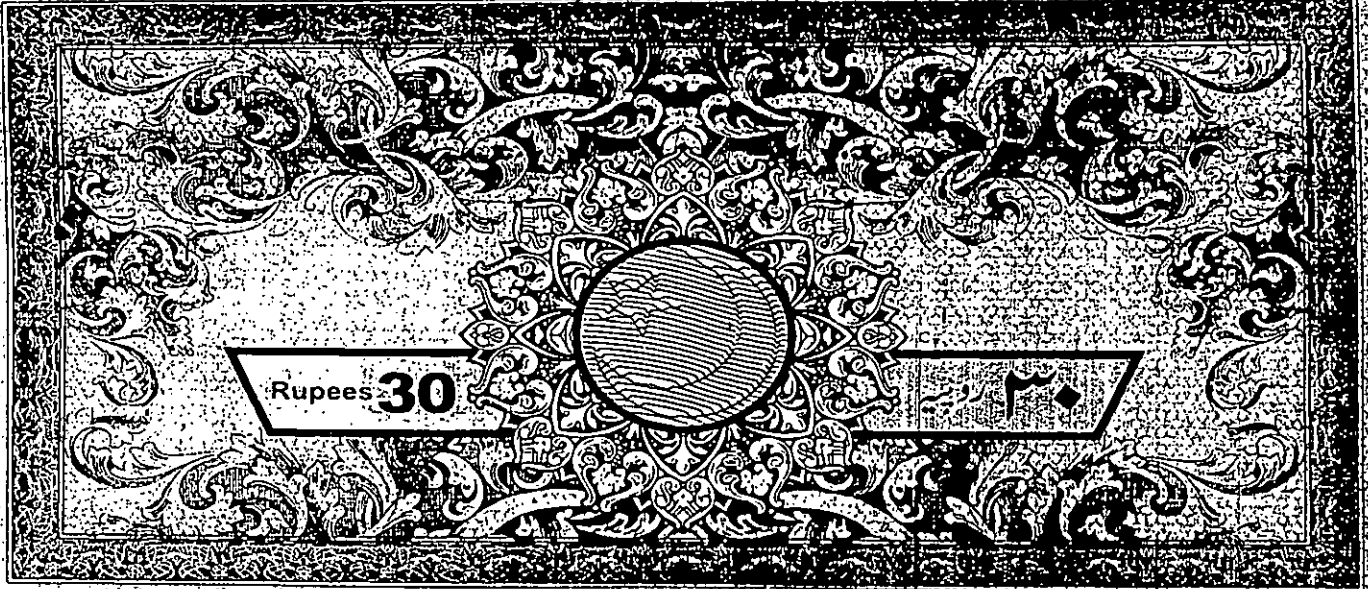
سر دفتر سپرنٹنڈنٹ کے پاس

سر دفتر سپرنٹنڈنٹ کے پاس

سر دفتر سپرنٹنڈنٹ کے پاس

سر دفتر سپرنٹنڈنٹ کے پاس





راضی نامہ / بیان حلفی

حمید خان ولد خان زرین سکندری پاتراک تحصیل شرینگل ضلع دیر بالا - (فریق اول)
 1- شیرزادہ، 2- تورخان پسران پاچا سکندری ناک تحصیل شرینگل ضلع دیر بالا - (فریق دویم)

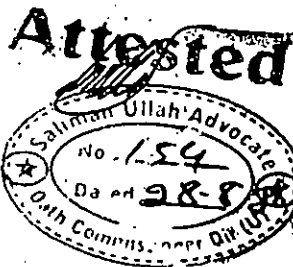
بہم فریقین یہ حوش و حواس حمسہ بہ رضاء و رغبت بروئے تحریر ہذا موجودگی گواہان ذیل اقرار کر کے لکھ دیتے ہیں کہ ما فریقین مذکورہ بالا کے مابین تنازعہ اراضیات پیدا ہو کر علاقہ مشران مسمیان، 1- مولانا اشفاق احمد، 2- اسحاق قاری نے فریقین کو علاقہ بدر کرنے کا فیصلہ کیا۔ فریق اول ولی آباد پشاور اور فریق دویم کراچی ٹرک آڈھ ماڑی پور نقل مکانی کیا۔ اب فریقین نے علاقہ مشران کے وساطت سے خانگی راضی نامہ کیا ہے۔ فریقین کے نہ ابھی اور نہ ایندہ کیلئے کوئی دعویٰ جاری نہیں کریں گے۔ اور نہ کرنے کے مجاز ہو گئے راضی نامہ فریقین کے بہترین مفاد میں ہے۔ لہذا راضی نامہ لکھ دیا گیا تاکہ سنداً تحریر ہے۔

موزعہ 28/08/2018

فریق دویم العبد
 شیرزادہ 3-1883589-16102

فریق دویم العبد
 تورخان 7-15000-6734515

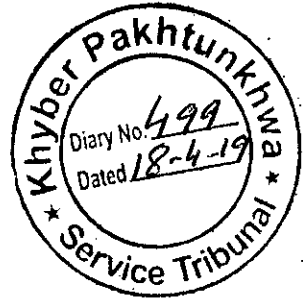
فریق اول العبد
 حمید خان 5-15701-8287302



گواہ شدہ العبد
 شہیر خان ولد سلام
 ناکن تحصیل شرینگل ضلع دیر بالا
 15701-4911145-7

گواہ شدہ العبد
 عمر یا جا ولد فیروز
 جہڑی ناکن تحصیل شرینگل ضلع دیر بالا
 16102-4393812-5

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



In Re:
Service Appeal No. 3 /2019

SherzadaAppellant

put up to the court with relevant appeal.

VERSUS

Govt. of Khyber Pakhtunkhwa, through
Secretary E&SE and othersRespondents

18/4/19
Reader

**APPLICATION FOR GRANT OF
PERMISSION TO AMEND TILTED
SERVICE APPEAL**

Respectfully Sheweth:-

- 1) That the above titled appeal is pending adjudication before this hon'ble Tribunal.
- 2) That through instant application, the appellant seeks permission of this hon'ble Tribunal to amend the titled appeal, as the situation has been changed, which needs amendment, hence this application.
- 3) That there is no legal bar in allowing the instant application.

It is, therefore, prayed that on acceptance of this application, the appellant may graciously be permitted to amend the titled appeal.

Appellant *Sherzada*

Through *Saeed*
Syed Usman
Advocate High Court

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.

Sherzada
Deponent

