

16th Feb, 2023

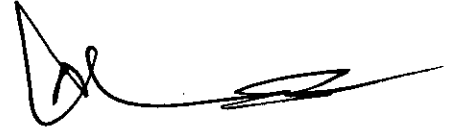
Learned counsel for the appellant present and submitted an application for withdrawal of the service appeal No. 480/2021 through office vide diary No. 3403 dated 06.02.2023. The case was fixed for arguments before the D.B on 05.04.2023 but on the request of learned counsel for the appellant, case file was requisitioned for today.

2. Learned counsel for the appellant submitted that the appellant does not want to further pursue the case and she wants to withdraw the instant appeal. Application is placed on file. Dismissed accordingly. Consign.

3: *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal on this 16th day of February, 2023.*



(Salah Ud Din)
Member(J)



(Kalim Arshad Khan)
Chairman

SCANNED
KCP3T
Peshawar

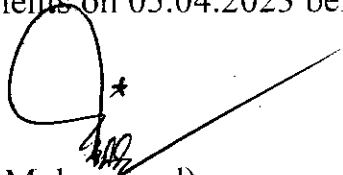
9.11.2022

Since 9th November has been declared as public holiday, case is adjourned to 05.01.2023 for the same as before.


Reader

05.01.2023 Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted to argue the case on the next date, failing which the case will be decided on available record without arguments. Adjourned. To come up for arguments on 05.04.2023 before D.B.


(Mian Muhammad)
Member (E)


(Kalim Arshad Khan)
Chairman

SCANNED
KPST
Peshawar

04.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for respondents present.

Reply/comments on behalf of official respondents are still awaited. Learned AAG sought time for submission of reply/comments. Last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 24.02.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

24-2-22

*Due to saturation of worthy children,
The case is adjourned to 1-6-22 for
the same.*




01.06.2022


Appellant present through counsel.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Nowroz Khan SDEO for respondents present.

Representative of respondents submitted reply. Copy of the same was handed over to the learned counsel for appellant who requested for adjournment. Adjourned. To come up for remaining arguments on 09.08.2022 before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

9-8-2022

*Due to the Public holiday the case is adjourned
to 9-11-2022*

Ready for

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman


Stipulated period passed reply not submitted.

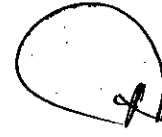
13.10.2021

Counsel for appellant counsel present.

: Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Learned A.A.G made a request for time to submit reply/comments, granted with direction to furnish the same within 10 days in office. If the reply/comments are not submitted within stipulated time, right of the respondents for submission of reply shall be deemed as struck off. To come up for arguments on 04.01.2022 before D.B.


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

04.06.2021

Counsel for the appellant present. Preliminary arguments heard.

1021

The appellant has challenged the order dated 21.03.2018 where-against he filed departmental appeal on 10.04.2018 within time but thereafter he instead of seeking remedy by way of service appeal before this Tribunal, filed Writ Petition No. 950-B/2020 before Hon'ble Peshawar High Court which was dismissed in limine vide judgment dated 13.10.2020 on the sole ground that the relief sought relates to terms and condition of service. The Hon'ble High Court held that the Writ jurisdiction is explicitly barred in service matters and the proper forum available for redressal of grievance of the appellant would be the Service Tribunal. The appellant contends that he has been removed from service without having resort to the procedural requirements of the disciplinary laws as well as service laws. Although the appeal is time barred in view of the particular position of the matter, period beyond prescribed limitation is condoned. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 13.10.2021 before the D.B.

Appellant Deposited
Security Process Fee

9/6/21

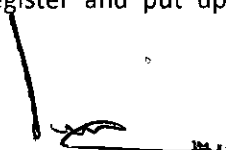
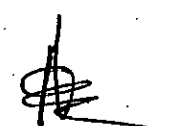

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- UG01 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/04/2021 SCANNED KPST Peshawar	The appeal of Mr. Waseemullah resubmitted today by Roeda Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.  REGISTRAR
2-	27/05/2021	This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>04/6/2021</u>  CHAIRMAN

The appeal of Mr. Waseemullah Qureshi son of Muhammad Israil r/o Ktka Molvi Muhammad Khalil Mandan Bannu received today i.e. on 02/04/2021 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 cancellation order of service (Appointment) mentioned in the heading of the appeal is not attached with the appeal which may be placed on it. Annexure-F is only letter for reconsideration of DPC recommendation with regard to the appointment of appellant but not a cancellation order.
- 2- Annexures-B/I and F of the appeal are illegible which may be replaced by legible/better one.

No. 628 /S.T,

Dt. 02/4/2021



REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Roeeda Khan Adv. Pesh.

objection No 2 has been removed
while in response of objection No 1 that
after receiving the order dated 21³/₂₀₁₈
by the appellant from the resp. department
the department has been cancelled
the service of the appellant and
not allow the appellant to
duty and stated to the appellant
that your service has been
cancelled through the impugned
order dated 21³/₂₀₁₈



BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Waseem Ullah Qurishi

VERSUS


Government of Khyber Pakhtunkhwa through Secretary
C&W Khyber Pakhtunkhwa Peshawar & others.

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-5
2.	Affidavit.		6
3.	Addresses of parties		7
4.	Condonation of delay		8-9
5.	Copies of academic record & domicile	"A & A1"	10 to 13
6.	Copy of office order No. 6289/7-E dated 07.03.2018 & retirement certificate	"B & B1"	14 To 15
7.	Copies of Medical certificate, Arrival Report & Service Book	"C, D & E"	16 To 20
8.	Copy of order	"F"	21
9.	Copy of departmental appeal	"G"	22
10.	Copy of writ petition	"H"	23 to 30
11.	Wakalatnama		


APPELLANT

Through


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 02/04/2021

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 4801 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 4533

Dated 02/4/2021

Waseem Ullah Qurishi S/o Muhammad Israil
Qureshi R/o Kotka Molvi Muhammad Khalil
Mandan Post Office Bada Mir Abbas Khan,
Tehsil & District Bannu.

Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary C&W Khyber Pakhtunkhwa Peshawar.
2. Chief Engineer (Centre) C&W Depatt. Khyber Pakhtunkhwa Peshawar.
3. Superintending Engineer C&W Division Bannu
4. Executive Engineer C&W Division Bannu

Filed to-day

Registrar
2/04/2021

Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE ORDER DATED 21/03/2018
WHEREBY THE SERVICE OF THE
APPELLANT HAS BEEN CANCELLED AGAINST
WHICH THE APPELLANT FILED
DEPARTMENTAL APPEAL ON 10/04/2018
WHICH HAS NOT BEEN DECIDED WITHIN
THE STATUTORY PERIOD OF 90 DAYS.

Re-submitted
to-day 2/4/2021 & filed.

Prayer:-

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDERS DATED 21/03/2018 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATED IN SERVICE ALONG WITH ALL BACK BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT THAT MAY ALSO BE ONWARD TRIBUNAL DEEMS FIT THAT MAY ALSO BE GRANTED IN FAVOUR APPELLANT.

Respectfully Sheweth,

1. That the appellant is bonafide resident of District Bannu and he has achieved a remarkable education record. (Copies of academic record & domicile are annexure "A & A1").
2. That the appellant was appointed as painter on Retired Sons Quota in C&W Department Bannu vide office order No. 6289/7-E dated 07.03.2018 on the recommendation of District Department Selection Committee. (Copy of office order No. 6289/7-E dated 07.03.2018 & retirement certificate is annexure "B & B1").
3. That after obtaining Medical Certificate, appellant submitted his Arrival Report and thereafter, his Service Book was prepared.

(Copies of Medical certificate, Arrival Report & Service Book are annexed as annexure "C", "D" & "E" respectively).

4. That after appointment the appellant performed his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
5. That on 21.03.2018 without fulfilling the codal formalities the service of the appellant has been cancelled. (Copy of order is annexure "F").
6. That the appellant filed the departmental appeal on 10.04.2018 which has not been decided within the statutory period of 90 days. (Copy of departmental appeal is attached as annexure "G").
7. That against the cancellation order dated 21.03.2018 the appellant filed writ petition No. 950-B/2020 which has been disposed on 13.10.2020 on the ground of lack of jurisdiction (Copy of writ petition is attached as annexure "H").
8. That feeling aggrieved the Appellant prefers the instant service appeal before

Filed to-day

Registrar

this Hon'ble Tribunal on the following grounds inter alia:-

GROUNDS:-

- A. That the impugned order 21/03/2018 is void and abinitio order because it has been passed without fulfilling codal formalities.
- B. That no charge sheet has been served or communicated to the appellant in this respect the appellant relied upon a judgment reported on 2009 SCMR page:615
- C. That no regular inquiry has been conducted by the Respondent department and no chance of personal hearing has been provided to the appellant in this respect the appellant relied upon the judgment dated 2008 SCMR Page:1369.
- D. It is a well settled maxim no one can be condemned unheard because it is against the natural justice of law in this respect the appellant relied upon a judgment reported on 2008 SCMR page:678.
- E. That no show cause notice has been issued to the appellant and no opportunity of personal hearing has been provided to the appellant.
- F. That the appellant was appointed by the Departmental Selection committee after fulfillment of requirements according to law on the Retired Sons Quota but unfortunately without any prior notice, and against the principle of natural justice, vide impugned order, the respondents wants to withdraw the appointment order of petitioner, which is obviously against the law.

Filed to-day

Registrar

5

G. That any other ground not raised here may graciously be allowed to be raised at the time full of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of this appeal the impugned orders dated 21/03/2018 may kindly be set aside and the appellants may kindly be reinstated in service along with all back benefits. any other remedy which this august tribunal deems fit that may also be onward tribunal deems fit that may also be granted in favour appellants

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

wasim
APPELLANT

Through

Roeda
Roeda Khan
Advocate, High Court
Peshawar.

Dated: 02/04/2021

NOTE:-

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

Roeda
Advocate.

Filed today

Peshawar

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Waseem Ullah Qurishi

VERSUS

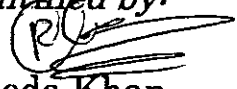
Government of Khyber Pakhtunkhwa through Secretary C&W
Khyber Pakhtunkhwa Peshawar & others

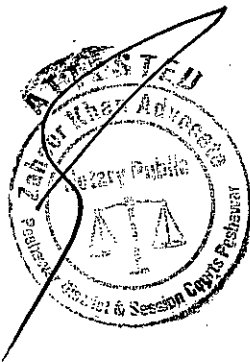
AFFIDAVIT

I, Waseem Ullah Qurishi S/o Muhammad Israil Qureshi R/o Kotka Molvi Muhammad Khalil Mandan Post Office Bada Mir Abbas Khan, Tehsil & District Bannu do hereby solemnly affirm and declare that all the contents of the **instant appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.


DEPONENT

Identified by:


Roeda Khan
Advocate High Court
Peshawar.



(7)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Waseem Ullah Qurishi

VERSUS

Government of Khyber Pakhtunkhwa through Secretary C&W
Khyber Pakhtunkhwa Peshawar & others

ADDRESSES OF PARTIES

PETITIONER.


Waseem Ullah Qurishi S/o Muhammad Israil
Qureshi R/o Kotka Molvi Muhammad Khalil
Mandan Post Office Bada Mir Abbas Khan,
Tehsil & District Bannu.

ADDRESSES OF RESPONDENTS

1. Government of Khyber Pakhtunkhwa through Secretary C&W Khyber Pakhtunkhwa Peshawar.
2. Chief Engineer (Centre) C&W Depatt. Khyber Pakhtunkhwa Peshawar.
3. Superintending Engineer C&W Division Bannu
4. Executive Engineer C&W Division Bannu


APPELLANT

Through


Roeda Khan
Advocate, High Court
Peshawar.

Dated: 02/04/2021

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BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2021

Waseem Ullah Qurishi

VERSUS

Government of Khyber Pakhtunkhwa through Secretary
C&W Khyber Pakhtunkhwa Peshawar & others

APPLICATION FOR CONDONATION OF DELAY (if any)

Respectfully Sheweth,

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That the impugned order has been passed on 21.03.2018 against with the appellant field departmental appeal on 10.04.2018 .
3. That against the cancelation order dated 21.03.2018 the appellant filed writ petition No. 950-B/2020 which has been disposed on

ew

13.10.2020 on the ground of lack of jurisdiction.

Grounds:

- a. That the impugned orders are void order and no limitation run against the void orders.
- b. That the impugned order has been passed without fulfilling the codal formalities which comes under the definition of void order.
- c. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.

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

ew
Appellant

Through

Date : 02.04.2021

PK
Roeeda Khan

Advocate, High Court
Peshawar.

**BOARD OF INTERMEDIATE AND SECONDARY EDUCATION****BANNU N-W.F.P PAKISTAN**

S.No.A- 50510

SECONDARY SCHOOL CERTIFICATE EXAMINATION PART-I&II

RESULT CARD

Roll No : 6587
Group : Science Season 2006 (Annual 10th)
Registration No : 021-B-BMNB-1-04
Certificate No : 20606587

This is to certify that Waseem Ullah Khan
Son / Daughter of Muhammad Israil Qureshi
and a student of Govt. High School Mandan, Bannu

has secured the marks shown against each subject, in the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu, held in March, 2006 as Regular Candidate

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Practical	Theory	Practical		
1. English	75	47	--	44	--	91	Ninety-One
2. Urdu	75	47	--	49	--	96	Ninety-Six
3. Islamiyat	75	38	--	--	--	38	Thirty-Eight
4. Pakistan Studies	75	--	--	47	--	47	Forty-Seven
5. Mathematics	75	28	--	49	--	77	Seventy-Seven
6. Physics	75	30	8	31	13	82	Eighty-Two
7. Chemistry	75	37	7	38	12	94	Ninety-Four
8. Biology	75	34	8	32	11	85	Eighty-Five

Total 1050

610-C

Six Hundred Ten Only

Remarks

8C

Date of Birth according to Registration Record: 21-06-1990 (21 June, Nineteen Ninety)Date of Declaration of Result: 26-06-2006

Prepared by:

Checked by:

Date of Issue: 26-06-2006

Controller of Examinations
Board of Intermediate and
Secondary Education, Bannu

Note: Errors / Omissions are excepted. Any mistake in Name, Date of Birth and correction needed must be intimated within 30 days of the declaration of Result.

(Compiled by HNR Computer CELL, BISE, Bannu)



(11A) (12)

UNIVERSITY OF SCIENCE & TECHNOLOGY BANNU

Khyber Pakhtunkhwa PAKISTAN

S.No:306957

DETAILED MARKS CERTIFICATE



Bachelor of Arts

Session: 2013-2015

Part-II Supplementary Examination Held in December, 2015

Name: Waseem Ullah Khan Roll No: 57067

Father's Name: Muhammad Israil Qureshi Reg No: 2013-UB-BP-62696

Institute Name: Private Candidate

The Candidate has secured the following Marks and is placed in **2nd** Division.

No.	Subjects	Max Marks	MARKS OBTAINED				Remarks
			Theory	Practical	Total	In Words	
1	Part-I	285		---	143	ONE HUNDRED FORTY-THREE	
2	English (Comp)	75	25	---	25	TWENTY-FIVE	
3	Islamic Studies (Elective)	75	25	---	25	TWENTY-FIVE	
4	Pakistan Studies.(Comp)	40	25	---	25	TWENTY-FIVE	
5	Arabic	75	30	---	30	THIRTY	
Total		550			248	TWO HUNDRED FORTY-EIGHT	

Note: Required Pass Percentage in each Subject (Written & Practical Separately) 33, Aggregate Pass Percentage 36

The Examination was taken **as a Whole**

Prepared by: *Dene*

Checked by: *Asim*

Asim
Controller of Examinations
University of Science & Technology, Bannu

Result Declaration Date	09-02-2016
Issue Date	09-02-2016



Roll No: 57067

Waseem Ullah Khan S/O Muhammad Israil Qureshi

Village Kotka molvi Muhammad khalil Mandan PO Bada Mir abass khan Tehsil Distt Bannu

Errors & omissions excepted, if any, are subject to subsequent rectification.

332/426

DOMICILE CERTIFICATE DISTRICT BANNU N.W.F.P. PAKISTAN

I declare that I was born of parents who are permanently domiciled in N.W.F.P.
having belonged to it by birth / settled in it.

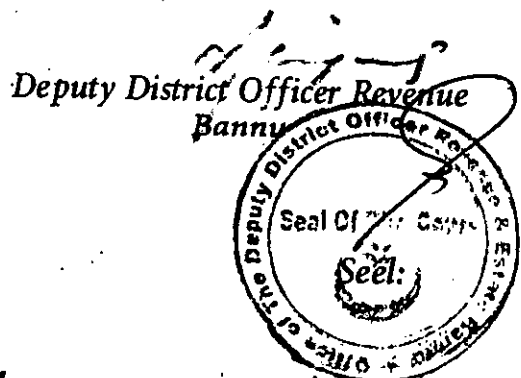
I belong by birth to village/Mohallah Kotka Mohi M. Khalil Mandan
Tehsil Bannu District Bannu

Waseem ullah
Signature of the applicant
Date 8.7.06

Pursuance to the declaration dated 8.7.2006 filed by Waseem ullah Qureshi
son / daughter / wife Muhammad Israil Qureshi domiciled in the N.W.F.P. It is
hereby certified that the said Waseem ullah Qureshi is born of parents who are
permanent residents of the N.W.F.P. having belonged to it by birth settled in it.

I have satisfied myself from personal / my knowledge verification that the above
declaration is true and certify.

This 10th day of July 2006

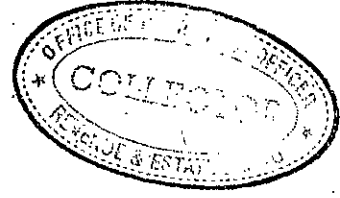


No. 2217 Dated 10/7/2006

COUNTERSIGNED

Seel:

DISTRICT OFFICER REVENUE & ESTATE / COLLECTOR
BANNU



جناب عالی

تصدیقاً جاتی ہے کہ!

وصیم اللہ قریشی ولد محمد اسراہیل قریشی کوئلہ مولوی

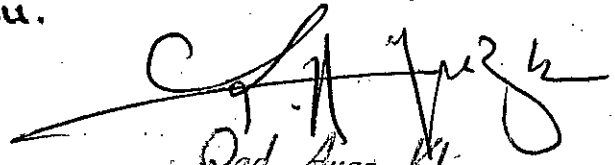
محمد خلیل منڈان (داخلہ صابو خیل) کے مستقل رہائشی و پیداؤشی ہے۔

وہ خود اوردان کے وانڈین کا ایف. اے سے کوئی تعلق نہیں۔ میں ذاتی طور پر
جانتا ہوں۔

رپورٹ عرض ہے


Abdullah Gureshi
General Councillor
U/C MANDAN

Attested and verified as attested and verified
by Mr. Abdullah Gureshi member Union Council
Mandan Bannu.


Qad Ayaz Khan
NAZIM
U/C. Mandan Bannu

CERTIFICATE

Certified that Mr. Muhammad Israil Qureshi was Provincial Government Servant and has been retired from service with effect from 31.12.84 A.N. as an Accounts Clerk.

*Attested
Juzaf Ali Bazar*

A
Superintending Engineer
C & W Circle Bannu
Superintending Engineer
C & W Circle Bannu

15/9/85
Sub Div. Edu. Bannu
BANNU

[Signature]
ATTESTED

(8) (15)

OFFICE OF THE EXECUTIVE ENGINEER C&W DIVISION BANNU

OFFICE ORDER

No. 623 / 17-E

Dated

Bannu the 07 / 03 / 2018

On the recommendation of District Departmental Selection Committee as per its Minutes of Meeting held on 05.03.2018 in pursuance of section 10 (04) A. & T. Rules 1989 under the Employee Son's Quota offer a position of transfer at the rate of Rs. 10260/- per month in the BPS-05 (10260-500-25260) Mr. Wasimullah Khan Kotka Molvi Muhammad Khalil Near Police Station Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu on the following Terms and Conditions:-

1. He shall be paid at the minimum rate of (BPS-05) 10260/- 500-25260 including usual allowance as admissible under the Rules. He will also be entitled to Annual Increment as per existing policy.
2. He shall be governed by the Khyber Pakhtunkhwa, Civil Servants Act-1973 and all the laws applicable to the Civil Servants and Rules made there under.
3. His employment in Communication & Works Department is on Regular Basis. His Services are liable to be terminated on fourteen (14) days prior notice or on the payment of 14-days Salary in lieu of the notice. In case he wishes to resign at any time, 14-days notice will be necessary or in lieu thereof 140-days pay will be offered.
4. He shall initially be on probation for a period of two years extendable up-to 3 years.
5. He shall produce a Medical Certificate of fitness from the Medical Superintendent District Head Quarter Hospital Bannu before reporting arrival himself for duty as required under the Rules.
6. He has to joint duty at his own expenses.
7. He shall have to serve any where in Khyber Pakhtunkhwa.
8. If he accepts the post on the above conditions, he should report to the office of Executive Engineer C&W Division Bannu with-in 14 days of the issue of this offer and produce Original Documents in connection with his Qualification, Domicile and Health/Age Certificate.

Executive Engineer,
C&W Division Bannu

Copy to the:-

1. Section Officer (Establishment) Govt. of KPK C&W Deptt. Peshawar for information please.
2. Superintending Engineer C&W Circle Bannu for information please
3. District Accounts Officer Bannu for information.
4. Mr. Wasimullah Khan S/O Muhammad Israil Qureshi Kotka Molvi Muhammad Khalil Near Police Station Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu for Information.

Executive Engineer,
C&W Division Bannu.

BETTER COPY

OFFICE OF THE EXECUTIVE ENGINEER C&W DIVISION BANNU OFFICE
ORDER

No 6289/7-E

Dated Bannu the 07/03/2018

On the recommendation of District Departmental Selection Committee as per its Minutes of Meeting on 05/03/2018 in the Section of 10 (4) ACT Rules 1989 under the employees Sons's Quota offer a post of painter at the rate of Rs. 10260/- per month in the BPS-05 (10260-500-25260) Mr. Wasim ullah Khan Kotka Molvi Muhammad Khalil Near Police Station Mandan P/O Bada Mir Khan Tehsil & District Bannu on the following Conditions:-

1. He will get pay at the minutes of (BPS-05) including usual allowance as admissible under the Rules. He will also entitle to Annual increment as pertaining existing policy.
2. He shall governed by the Khyber Pakhtunkhwa , Civil Servant Act, 1973 and all the laws applicable to the Civil Servants and Rules made their under.
3. His employment and work Department is un regular basis his service are liable to terminated un fourteen days prayed notice or under payment of fourteen days salary in life of the notice in case be wishes to resign anytime fourteen days notice will be necessary or is lieu thereof 140 days pay will be forfeited.
4. He there up initially be on probation for a period of two years extendable up-to 3 years.
5. He shall produce a Medical Certificate of fitness from the Medical Superintendent District Head Quarter Hospital Bannu before reporting Arrival himself for duty as required under the Rules.
6. He has to joint duty in his own expense.
7. He shall have to serve any wherein Khyber Pakhtunkhwa.
8. If he accepts the post on the above conditions, he should report to the office of Executive Engineer C&W Division Bannu within 14 days of the issue of this offer and produce Original Documents in connection with the Qualification. Domicile and Health/ Age Certificate.

Executive Engineer
C&W Division Bannu

Copy to the:-

1. Section Chief Establishment Govt of KPK C&W Deptt: Peshawar for Information please.
2. Superintendent Engineer C&W Circle Bannu for information please.
3. District Accounts Officer Bannu for information.
4. Mr. Wasimullah Khan S/o Muhammad Israil Qureshi Kotka Molvi Muhammad Khalil Near Police Station Mandan P/O Bada Mir Abbas Khan Tehsil & District Bannu for information

Executive Engineer
C&W Division Bannu

'C' (16)

MEDICAL CERTIFICATE

Name of Official Masimullah Khan

Father Name: Muhammad Ibrahim Qureshi

Cast of race: Muslim

Residence: Katka Malui Muhammad Khalil Bangash Khel
Tehsil 2 District Bannu.

Date of Birth: 21-06-1990 (1101-3146331-5)

Exact height by measurement _____

personal mark of Identification: Scars on R+ Index finger

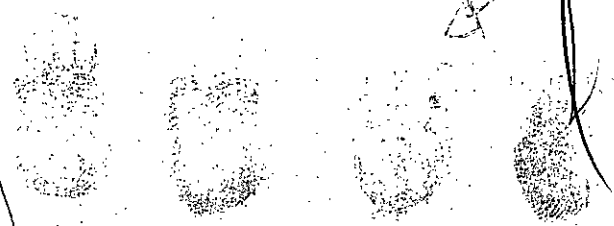
Signature of the Official: [Signature] *reported arrival for duty on 8-3-2018*

Signature of head of Office: _____
Seal Office: [Seal]

I do hereby certify that I have examined Mr Masimullah Khan A candidate for Employment in the office of the XEN C & W Division Bannu and can not discover that he had any disease communicable of other constitutional affection or bodily infirmity except _____

I do not consider this as disqualification for re employment in the office of the XEN C & W Division Bannu His age according to his own statement (28) year and appearance about Twenty Eight years.

Right Hand Thumb and Finger impression.....



[Signature]
ADDITIONAL HOSPITAL DIRECTOR
DHQ Teaching Hospital Bannu
Additional Hospital Director
DHQ Teaching Hospital
Bannu
08/3/2018

To,

The Executive Engineer,
C&W Division Banmu.

Subject:- **ARRIVAL REPORT**

Sir,

On my appointment as Painter vide your office Order No. 6289/7-E dated 07.03.2018, I beg to submit my arrival report on 08.03.2018 (F.N) please.

Thanks.

Dated 08.03.2018

Your Obediently,



(Mr. Wasimullah Khan)

Painter

ATTESTED

(20)

9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انقطاع ملازمت	11 Reason of termination (such as Promotion, transfer, Dismissal) وجوہات انقطاع ملازمت ترقی چارلہ یا برطرفی	12 Signature of the head of the officer or other Attesting Officer دستخط افسر مجاز	13 Nature and duration of leave taken رخصت کی نوعیت ومعیار	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین Period عرصہ Government to which debitable کون سے دوسرے حکومتی	14 Signature of the Head of the office or other attesting officer دستخط افسر مجاز	15 Reference to any recorded punishment or censure, reward, or praised of the Government servants سزا یا چڑایا غیر مناسب کارکردگی کا ریکارڈ
Appointed as Painter (BPS-05) under XEN ChW Division Bannu office order No: 6289/7-E, dated 7-3-2018 and reported arrival for duty on 8-3-2018 (F.N).							
Signature of the Head of the office or other attesting officer							

(F)

211

6472

To,

Dated Bannu

the 21/3/2018

The Superintending Engineer,
C&W Circle Bannu

Subject:-

REQUEST FOR CONSIDERATION OF DPC RECOMMENDATION
WITH REGARD TO THE APPOINTMENT OF MR. WASIMULLAH KHAN
S/O MUHAMMAD ISRAIL QUERSHI KOTKA MOLVI MUHAMMAD KHALIL
NEAR POLICE STATION MANDAN PO BADA MIR ABBAS KHAN TEHSIL
& DISTRICT BANNU AS PAINTER (BPS-05) AGAINST EMPLOYEE SONS
QUOTA.

It is submitted that a meeting of DPC was held on 05.03.2018 where as in the appointment of Mr. Wasimullah Khan S/O Muhammad Israil Qureshi as a Painter against retired Sons was considered by the committee.

Now it has been observed that the father of Mr. Wasimullah Khan was retired as an Accounts Officer (BPS-09) therefore the appointment of Mr. Wasimullah Khan S/O Muhammad Israil Qureshi in accordance with the appointments, transfers and promotion rules 1999, hence the matter needs to be reconsidered by your good self, being next higher authority in order to cancel the appointment order.

In view of the above it is requested that necessary approval may kindly be accorded to take appropriate action in the matter.

Executive Engineer,
C&W Division Bannu

Copy to the:-

1. Section Officer (Establishment) Govt. of KFK C&W Deptt. Peshawar for information please.
2. District Accounts Officer Bannu for information.
3. Mr. Wasimullah Khan S/O Muhammad Israil Qureshi Kotka Molvi Muhammad Khan Near Police Station Mandan PO Bada Mir Abbas Khan Tehsil & District Bannu for information


Executive Engineer,
C&W Division Bannu



To 6472/7-E

Dated Bannu the 21/3/2018

The Superintending Engineer

C&W Circle Bannu

Subject:

**REQUEST FOR CONSIDERATION OF DPC RECOMMENDATION
WITH REGARD TO THE APPOINTMENT OF MR. WASIMULLAH
KHAN S/O MUHAMMAD ISRAIL QURESHI KOTKA MOLVI
MUHAMMAD KHALIL NEAR POLICE STATION MANDAN PO
BADA MIR ABBAS KHAN TEHSIL & DISTRICT BANNU PAINTER
(BPS-05) AGAINST EMPLOYEE SONS QUOTA.**

It is submitted that a meeting of DPC meeting was held on 05/03/2018 where is in appointment of Mr. Wasim Ullah Khan S/o Muhammad Israil Qureshi is a painter against retire Son was consider by the Committee.

Now it has been observed that the father of Mr. Wasimullah Khan was retired is an accounts clerk (BPS-09) therefore, the appointment of Mr. Wasimullah Khan S/o Muhammad Israil Qureshi of appointment transfer and promotion rules 1989 hence the matter need to be reconsider of your good self being next higher authority and order to canceled the appointment order.

In view of the above it is requested that necessary approval may kindly be accorded to take appropriate action in then matter.

Executive Engineer

C&W Division Bannu

Copy to the:

1. Section Officer Establishment Govt of KPK C&W Department Peshawar for information please.
2. District Account Officer Bannu for information.
3. Mr. Mr. Wasimullah khan s/o muhammad israil qureshi kotka molvi muhammad khalil near police station mandan po bada mir abbas khan tehsil & district bannu

To,

The Secretary C&W Department Khyber Pakhtukhwa
Peshawar.

Subject:

DEPARTMENTAL APPEAL AGAINST THE ORDER
DATED 21.03.2018 WHEREBY THE SERVICE OF
THE APPELLANT HAS BEEN CANCELLED WITH
ANY REASON.

Respected Sir,

The appellant submits as under.

1. That the appellant was appointed as painter on Retired Sons Quota in C&W Department Bannu vide office order No. 6289/7-E dated 07.03.2018 on the recommendation of District Department Selection Committee.
2. That after obtaining Medical Certificate, appellant submitted his Arrival Report and thereafter, his Service Book was prepared.
3. That on 21.03.2018 without fulfilling the codal formalities the service of the appellant has been cancelled.

It is therefore, humbly prayed that on acceptance of this departmental appeal the impugned cancellation order dated 21.03.2018 may kindly be set aside and the appellant may kindly be reinstated into service along with all back benefits.

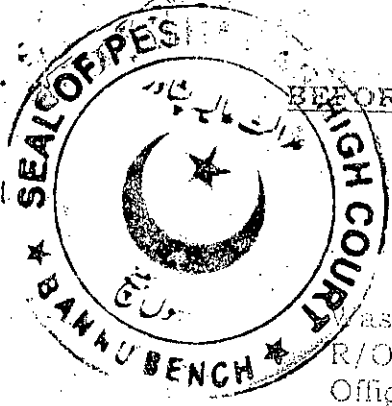

Appellant

Waseem Ullah Qureshi

Dated: 10/04/2018

C H 28

1



BEFORE THE PESHAWAR HIGH COURT BANNU BENCH

Writ Petition No. 950 B /2020

Masim Ullah Qureshi S/O Muhammad Israil Qureshi
R/O Kotka Molvi Muhammad Khalil Mandan Post
Office Bada Mir Abbas Khan, Tehsil & District Bannu
-----(Petitioner)

VERSUS

- 1- Government of Khyber Pakhtunkhwa through Secretary C&W Khyber Pakhtunkhwa, Peshawar
- 2- Chief Engineer (Centre) C&W Department Khyber Pakhtunkhwa, Peshawar
- 3- Executive Engineer C&W Division Bannu
- 4- Superintendent Engineer, C&W Circle Bannu
-----(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN,
1973 UPTO DATE AMENDMENT

PRAYER:-

162

ON ACCEPTANCE OF THIS PETITION, AN APPROPRIATE WRIT MAY VERY KINDLY BE ISSUED AGAINST THE RESPONDENTS TO THE EFFECT THAT THE OFFICE ORDER NO.6472/7-E DATED 21-03-2018, IS ILLEGAL, UNLAWFUL, AGAINST THE PRINCIPLES OF NATURAL JUSTICE, MALAFIDE, WITHOUT JURISDICTION, THEREFORE, VOID AB INITIO AND INEFFECTIVE UPON RIGHTS OF THE PETITIONER, HENCE OF NO LEGAL EFFECT AT ALL, BE SET ASIDE AND RESPONDENTS MAY KINDLY BE DIRECTED TO RELEASE THE SALARIES OF PETITIONER FROM THE DATE OF APPOINTMENT OR ANY OTHER RELIEF DEEMS FIT AND

Filed Today
08 OCT 2020
Additional Registrar

ATTESTED

Peshawar High Court
Bannu Bench

24

2

APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE, MAY GRACIOUSLY BE GRANTED IN FAVOUR OF THE PETITIONER AGAINST THE RESPONDENTS.

Respectfully Sheweth:-

BRIEF FACTS:-

1. That the petitioner is bonafide resident of District Bannu and he has achieved a remarkable education record. (Copies of testimonial are annexure "A")
2. That the petitioner was appointed as Painter on Employees Sons Quota in C&W Department Bannu vide office order No.6289/7-E dated 07-03-2018 on the recommendation of District Departmental Selection Committee. (Copy of Office Order No.6289/7-E dated 07-03-2018 is annexure "B")
3. That after obtaining Medical Certificate, petitioner submitted his Arrival Report and thereafter, his Service Book and Change Proforma was prepared. (Copies of Arrival Report, Service Book and Change Proforma are annexure "C", "D" & "E" respectively)
4. That thereafter, petitioner was performing his duty according to his ability.
5. That now without any prior notice, and against the principle of natural justice, vide impugned Office Order No.6472/7-E dated 21-03-2018, the

16/2

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08 OCT 2020
Additional Registrar

ATTESTED

ATTESTED
EXAMINER
Peshawar High Court
Bannu Bench

(25)

(3)

respondent No.3 on the recommendation of Departmental Selection Committee considered the service of petitioner for cancellation due to mistake, which is obviously against the law. (Copy of the Office Order No.6472/7-E dated 21-03-2018 is annexure "F").

- 6. That petitioner was time and again approach to respondents but they neither withdrawn the impugned order nor they gave the salaries to him.
- 7. That feeling aggrieved of the same and having no other efficacious remedy the petitioner invokes extra ordinary writ jurisdiction of this Honourable Court, inter alia on the following grounds:-

1/1/2

GROUND S:-

- 1. That the impugned order (Annexure F) is glaring example of injustice, illegality, favoritism and is thus liable to be set aside.
- 2. That while making the order of petitioner, he was not informed and nor any kind of opportunity was given about the hearing.
- 3. That by passing the impugned order, the respondents have shattered the already well-established principles of procedure of existing Civil Service Laws and have committed grave in convenience and discrimination towards the petitioner, which is not tenable in the eyes of law.

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 08 OCT 2020
[Signature]
 Additional Registrar

ATTACHED

ATTESTED
[Signature]
 EXAMINER
 Peshawar High Court
 Bannu Bench

26

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4. That the act of the respondents is against the law and only humiliate and torture the petitioner.
5. That the impugned order is against the principles of "audi alteram partem" and seems to be based with malafide as the services of the petitioner has been terminated for the appointment of others, whereas the petitioner being functioning without any complaint against him, could not be terminated under the law.
6. That the petitioner was appointed by the Departmental Selection Committee after fulfillment of requirements according to law on the Employees Sons Quota but unfortunately without any prior notice, and against the principle of natural justice, vide impugned order, the respondents wants to withdraw the appointment order of petitioner, which is obviously against the law.
7. That without hearing the petitioner the fundamental right in respect of service has been violated.
8. That additional grounds will be taken at the time of arguments with the permission of this Honourable Court.

162

It is, therefore, most humbly prayed that on acceptance of this petition, an appropriate writ may very kindly be issued against the respondents to the effect

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08 OCT 2020
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ATTORNEY

ATTESTED

EXAMINER
Peshawar High Court
Banna Bench

(27)

(5)

that the office order No.6472/7-E dated 21-03-2018, is illegal, unlawful, against the principles of natural justice, malafide, without jurisdiction, therefore, void ab initio and in-effective upon rights of the petitioner, hence of no legal effect at all, be set aside and respondents may kindly be directed to release the salaries of petitioner from the date of appointment or any other relief deems fit and appropriate in the circumstances of the case, may graciously be granted in favour of the petitioner against the respondents.

Dated: 8/10/2020

Petitioner
Through his counsel

Umar Zad Shah Bukhari

Umar Zad Shah Bukhari
Advocates High Court

Interim Relief:-

Interim relief in shape of suspension of impugned order No.6472/7-E dated 21-03-2018 as well as respondents may kindly be restrained from taking any action against the petitioner till final disposal of the Writ petition.

Umar Zad Shah Bukhari
Advocate

CERTIFICATE:-

This is to certify that no other such like petition is filed or pending disposal before any other forum or before this august court, except the instant petition, as per information conveyed by my Clients.

Umar Zad Shah Bukhari

LAW OF BOOKS:-

- I) Constitution of Islamic Republic of Pakistan, 1973.
- II) Other case law according to need

Filed Today
08 OCT 2020
Adil
Additional Registrar

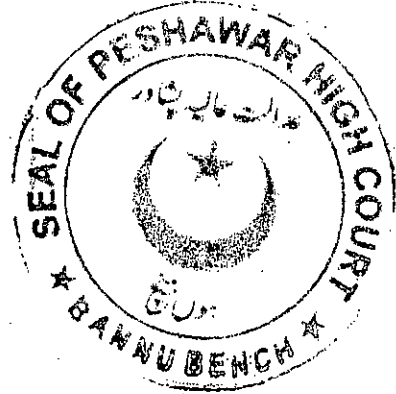
Umar Zad Shah Bukhari

~~ATTESTED~~ ATTESTED
EXAMINER
Peshawar High Court
Bachchan Bench

28

**JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, BANNU BENCH.
(Judicial Department)**

W.P No.950-B/2020.
Wasim Ullah
Vs
Govt: of KPK etc.



JUDGMENT

Date of hearing _____ 13.10.2020.

Petitioner(s)by: *Mr. Umerzad Shah Bukhari Advocate.*

Respondent(s) by: (In motion).

MUSARRAT HILALI, J--- Through this constitutional petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner seeks the following relief:-

"On acceptance of this petition, an appropriate writ may very kindly be issued against the respondents to the effect that the office order No.6472/7-E dated 21.3.2018, is illegal, unlawful, against the principles of natural justice, mala fide, without jurisdiction, therefore, void ab-initio and in-effective upon rights of the petitioner, hence of no legal effect at all, be set aside and respondents may kindly be directed to release the salaries of petitioner from the date of appointment or any other relief deems fit and appropriate in the circumstances of the case, may graciously

ATTENDED

ATTESTED

EXAMINER
Peshawar High Court
Bannu Bench

be granted in favour of the petitioner against the respondents."

2. Brief facts of the case are that petitioner was appointed on the recommendation of District Departmental Selection Committee vide office order dated 07.3.2018. After obtaining medical certificate, the petitioner submitted his arrival report and thereafter his service book and change proforma was prepared. Now the respondents without any prior notice and against the principle of natural justice respondent No.3 on the recommendation of Departmental Selection Committee issued office order dated 21.3.2018 for cancellation the service of the petitioner. Hence, the instant writ petition.

3. Arguments heard, record perused.

4. The petitioner being civil servant has filed the instant writ petition to set aside the office order No.6472/7-E dated 21.3.2018, issued by respondent No.3 on the recommendation of Departmental Selection Committee to

ATTESTED

CLERK
Bharwar High Court
Bansar Bench

ATTESTED

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consider the service of petitioner for cancellation and to release the salaries of the petitioner from the date of his appointment which relates to terms and condition of service.

The jurisdiction of this Court is explicitly barred under Article 212 of the Constitution in service matters and the proper forum available for redressal of grievance of the petitioner would be the service Tribunal. Thus this petition being not maintainable stands dismissed in LIMINE.

Announced
13.10.2020.

CERTIFIED TO BE TRUE COPY

[Handwritten Signature]
3/10/21

Examiner
Peshawar High Court Bannu Bench
Authorised Under Article 87 of
The Qanun-e-Shahadat Ordinance 1984

Ihsan (D.B) Hon'ble Justice Musarrat Hilali and Hon'ble Justice Sahibzada Asadullah

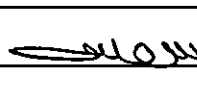
SCANNED


4 OCT 2020
[Handwritten Signature]
Khaid Khan

[Handwritten Signature]
14/10/2020

~~ATTACHED~~

قیمت 50 روپے	80304			
ایڈوکیٹ: 		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر:				
رابطہ نمبر: 0333 2665900				

بعد ازاں جناب:  لٹریچر سیکشن

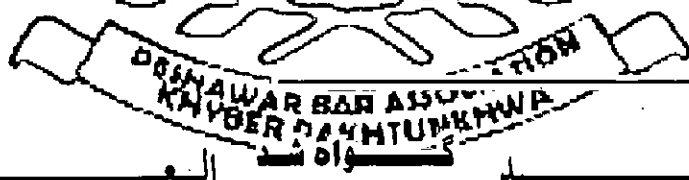
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	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام کے درمیان کیلئے روڈ ٹو ڈیٹا کے خلاف ایکٹ 1973 کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ سے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور ان کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تازیح پیشی مقام یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

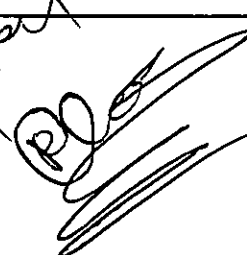
المرقوم:



المقام کے لیے منظور ہے۔

مقام

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

Accepted by 

BEFORE THE KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL PESHAWAR

Service Appeal No.4801/2021

Waseem Ullah Qureshi
S/O Muhammad Israil Qureshi.

...

Appellant

VERSUS

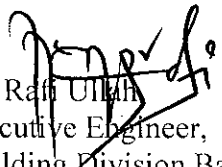
Secretary to Govt of Khyber Pakhtunkhwa
Communication & Works Department Peshawar & others

Respondents

I N D E X

S.NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Parawise Comments on behalf of Respondents No.1 to 4	-	1-2
2	Affidavit	-	3
3	Certificate	A	4-5
4	Executive Engineer C&W Division Bannu letter No.6738/7-E dated 05-04-2018	B	6

Deponent


Rafi Ullah
Executive Engineer,
C&W Building Division Bannu

①

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

Service appeal No. 4801 of 2021

Waseem Ullah Qureshi S/O Muhammad Israil Qureshi R/O Kotka Molvi Muhammad Khalil
Mandan Post Office Bada Mir Abbas Khan Tehsil & District Bannu (Appellant)

Versus

1. Govt of Khyber Pakhtunkhwa through Secretary C&W Department.
2. Chief Engineer (Centre) C&W Department, Khyber Pakhtunkhwa Peshawar
3. Supertending Engineer C&W Circle Bannu
4. Executive Engineer C&W Division Bannu

(Respondents)

PARA-WISE REPLY/ COMMENTS OF RESPONDENTS 01 TO 04 .

PRELIMINARY OBJECTIONS:-

1. The appellant has not come to this Honourable Court with clean hand.
2. The policy of retired sons quota Class-iv does not extend to appellant.
3. The instant Service appeal is not maintainable in the present form.
4. The appellant is estopped by his own conduct to prefer the appeal.
5. The appellant has deliberately concealed the important facts/rules of the case from this Honourable Tribunal.
6. The appellant has got no locus standi and cause of action.
7. That the appeal is barred by Law and Limitation.

RESPECTFULLY SHEWETH:

Reply on Facts:-

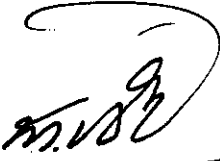
1. Para No. 1 pertains to record of the appellant.
2. In reply, it is stated that the appellant does not come within of ambit to retired (son quota / 25%), since the Father of the appellant has been retired on Senior Accounts Clerk. (Certificate and rules are enclosed as Annexure-A).
3. Para-3 is correct to the extent of obtaining Medical certificate issued by Addl: Hospital Director, DHQ Teaching Hospital Bannu, but neither he submitted his arrival report nor service Book was prepared by the respondents.
4. Para No. 4 incorrect, appellant did not perform any duty during the period his appointment till cancellation of his order by the competent authority.
5. Para No. 5 is incorrect. All the codal formalities has been fulfilled by respondents before issuing cancellation order being not issued according to law. (Cancellation order is Annexure-B).
6. Para No. 6 pertains to record.
7. Para No. 7 pertains to the record of writ petition filed by the appellant.
8. The appellant has no locus standi and cause of action to file the instant appeal.

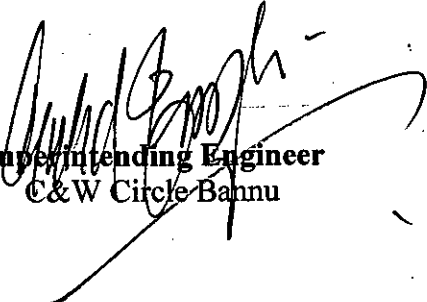
Ground


- A. Para A is incorrect.
- B. Para B is also incorrect. The respondents had fulfilled all codal formalities, the cancellation order has been issued under the law and by the competent authority.
- C. Para C is also incorrect. Detail reply is given in paras ibid.
- D. Para D is correct to the extent of the maxim, further stated that the respondents have fulfilled all the codal formalities before issuing the said order of cancellation.
- E. As explained in Para B ibid.
- F. Para F is incorrect, the said order of appointment has been issued wrongly and the same was cancelled in accordance with law /rules. Detail reply is given in para 2 ibid.
- G. The respondents be allowed to raise additional grounds during arguments.

It is, therefore humbly prayed that the appeal may kindly be dismissed in light of policy of Govt: of Khyber Pakhtunkhwa regarding appointment of a child against a quota of 25% reserved for Class IV retired Govt: servant, being devoid of merit and law.


Secretary
 C&W Department
 Govt of Khyber Pakhtunkhwa


Chief Engineer (Centre)
 C&W Department
 Khyber Pakhtunkhwa Peshawar


Superintending Engineer
 C&W Circle Bannu


Executive Engineer
 Building Division Bannu

3

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

Service Appeal No.4801/2021

Waseem Ullah Qureshi
S/O Muhammad Israil Qureshi.

...

Appellant

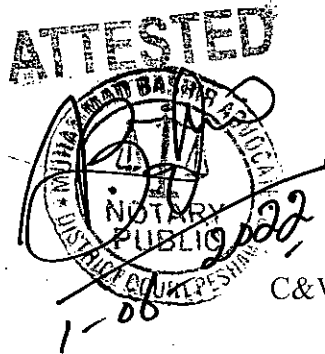
VERSUS

Secretary to Govt of Khyber Pakhtunkhwa
Communication & Works Department Peshawar & others

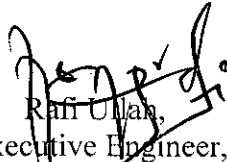
Respondents

AFFIDAVIT

I, Rafi Ullah, Executive Engineer C&W Building Division Bannu do hereby affirm and declare that all the contents of the Parawise Comments in Service Appeal No.4801 of 2021 are correct to the best of my knowledge and belief and nothing has been concealed.



Deponent


Rafi Ullah,
Executive Engineer,
C&W Building Division Bannu

(Annex-A)

9

6

CERTIFICATE

Certified that Mr. Muhammad Israil Qureshi was Provincial Government Servant and has been retired from service with effect from 31.12.84 A.N. as an Accounts Clerk.

Attested
Jusaf Ah. Qad

Superintendent Engineer
W Circle Danna
Circle Bannu

993
Sub Divi Eng. Circle
BANNU

Medical
P. H. H.

Sub Divisional Officer
Sub division No 1
BANNU

(13)

(S)

(Annex-4)

CERTIFICATE

Certified that Mr. Muhammad Israil Qureshi was Provincial Government Servant and has been retired from service with effect from 31.12.84 A.N. as an Accounts Clerk.

7

*Attested
Juzaf Ali Khan*

Asst. Secy Div. Gen. Secy
BANNU

9/9/85

Superintendent Engineer
C & W Circle Banna

M. H. Khan
P. H. Khan

Sub Divisional Officer
Sub division No 11
BANNU

OFFICE ORDER

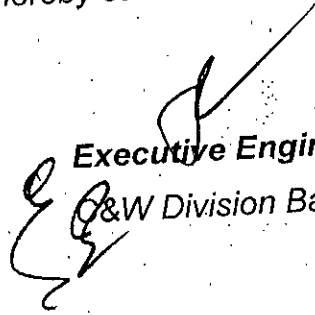
(Annex: B) (6)

No. 6738 IT-E

Dated Bannu


the 5/04/2018

In Terms of Appointment, Promotion and Transfers rules and with the approval from Superintending Engineer C&W Circle Bannu being next higher Authority, the appointment Order of Mr. Wasimullah Khan S/O Muhammad Israil Qureshi as Painter (BPS-05) being not eligible under the existing quota, bearing No. 6289/7-E dated 07.03.2018 is hereby cancelled / withdrawn.

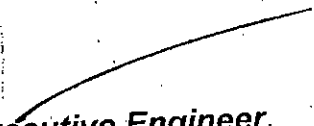

Executive Engineer,
C&W Division Bannu

Copy to:-

1. The Superintending Engineer C&W Circle Bannu w/r to above for information please.
2. The Section Officer (Estabtt.) Govt: of KPK C&W Department Peshawar w/r to above for information please.
3. The District Accounts Officer Bannu for information.
4. The Divisional Accounts Officer (Local) for information.
5. Mr. Wasimullah Khan S/O Muhammad Israil Qureshi Kotka Molvi Muhammad Khalil Near Police Station Mandan PO Bada Mir Abbas Khan Tehsil & District Bannu for information.

Attested


Sub Divisional Officer
of Sub division No 11
BANNU


Executive Engineer,
C&W Division Bannu