

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1518/2019

Date of Institution ... 13.11.2019
Date of Decision ... 22.11.2021

Majid Ali S/O Nawab Ali Ex-Naib Qasid Government Girls High
School Khadi Zai, Kohat.

... (Appellant)

VERSUS

Director Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar and two others.

... (Respondents)

Noor Badshah Bangash,
Advocate

... For appellant.

Kabir Ullah Khattak,
Additional Advocate General

... For respondents.

Rozina Rehman
Atiq ur Rehman Wazir

... Member (J)
... Member (E)

JUDGMENT

Rozina Rehman, Member(J): Brief facts of the case are that appellant joined service as Naib Qasid at Government Girls High School Khadi Zai District Kohat. He was proceeded against departmentally on the allegations of absentia and was removed from service. He preferred departmental appeal which was rejected, hence, the present service appeal.

2. We have heard Noor Badshah Bangash Advocate learned counsel for appellant and Kabir Ullah Khattak, learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Noor Badshah Bangash Advocate, learned counsel for appellant submitted that the impugned orders are illegal, against the prescribed service rules and norms of justice as no opportunity was provided to the appellant for personal hearing and he was condemned unheard. He submitted that service rules were frequently violated by the respondents as it was incumbent upon the respondents to proceed with relevant provision of service rules but they removed the appellant from service in a cursory manner. He further submitted that from the record it is evident that the appellant was suffering from chronic disease and was lying on bed but this aspect of the case was not mulled by the respondents' Department. Lastly, he submitted that no proper charge sheet alongwith statement of allegation was served upon appellant and no proper inquiry was conducted into the matter. He, therefore, requested that the appellant may be reinstated in service with all back benefits.

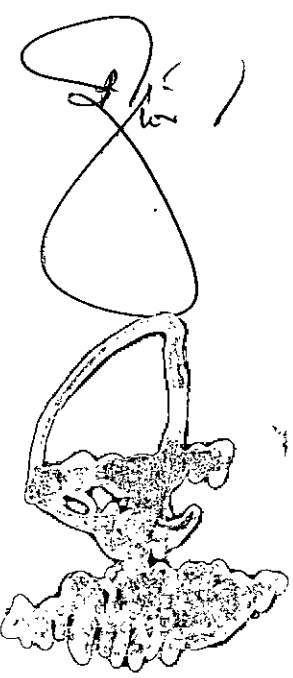
4. Conversely, learned A.A.G argued that appellant remained in Dubai (UAE) and that after fulfillment of all codal formalities, he was removed from service according to law. He argued that the appellant never submitted any application alongwith medical prescriptions before the competent authority nor any medico legal advice was ever produced, therefore, he was rightly removed from service on account of his willful absence from duty.

5. From the record it is evident that appellant was appointed as Class-IV (Naib Qasid) in BPS-01 vide order of Executive District Officer E&SE, Kohat dated 04.07.2012. He was departmentally proceeded against on the allegations of absentia under Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline)

Rules, 2011. As per record, he remained absent w.e.f 06.12.2018, therefore, was proceeded under rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. As per law, a notice was issued by the competent authority on his home address on 20.12.2017, 17.01.2019 and 04.01.2019 for resumption of duty in accordance with law/rules but no response was received from the absentee. A notice was also published in Daily AAJ and Daily Mashriq but even then the appellant failed to resume his duty in the stipulated period of time and he was removed from service on 25.03.2019 w.e.f 06.12.2018. He filed departmental appeal on 10.07.2019 which was rejected on merits. His departmental appeal was also time barred.


6. It is well-entrenched legal proposition that when an appeal before departmental authority is time barred, the appeal before Service Tribunal would be incompetent. In this regard reference can be made to cases titled Anwarul Haq v. Federation of Pakistan reported in 1995 SCMR 1505, Chairman, PIAC v. Nasim Malik reported in PLD 1990 SC 951 and State Bank of Pakistan v. Khyber Zaman & others reported in 2004 SCMR 1426. He has just placed on file two different applications but admittedly, there is no official record which could show that these applications were properly submitted before the competent authority and it is also not disputed that he remained absent without taking prior permission from the authority. Today, his travelling record was also produced which justify the stance of the respondents' Department that appellant was abroad during absence.

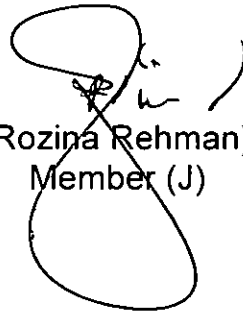
7. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant

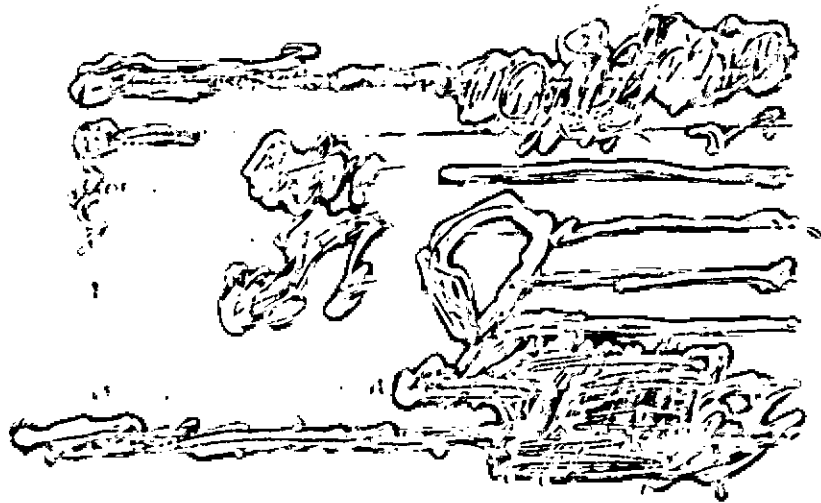
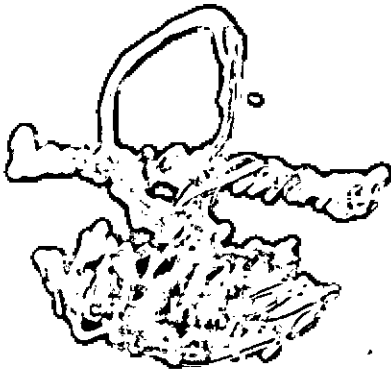


service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.
22.11.2021


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)





KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. _____ /ST

Dated: _____ /2021

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

To

The Director Education Officer Male,
Government of Khyber Pakhtunkhwa,
Haripur.

Subject: JUDGMENT IN APPEAL NO. 2226/2019, MR. SHAHZADA.

I am directed to forward herewith a certified copy of Judgement dated 01.12.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR



**KHYBER PAKHTUNKHWA
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REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR


Order
22.11.2021

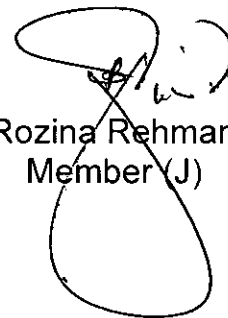
Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Vide our judgment of today of this Tribunal placed on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

Announced.
22.11.2021


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

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

APPEAL NO. _____ /2021

USMAN KHAN

VS

GOVT. OF KP & OTHERS

**REJOINDER ON BEHALF OF THE APPELLANT IN RESPONSE
TO THE COMMENTS SUBMITTED BY THE RESPONDENTS 1-3**

R/SHEWETH:

PRELIMINARY OBJECTIONS:

1 TO 6:

All preliminary objections raised by the respondent are incorrect, baseless, erroneous and frivolous, as having no legal and factual backing. That the respondents have failed to explain as why the petitioners have got no locus standi and cause of action. No plausible explanation had been provided /submitted by the answering respondents in support of their contentions. Whatever the respondents have said in their preliminary objections are incorrect and the appellant has all the rights to press his contention before this Honorable tribunal. That the respondents are estopped due to their own conduct to raise any objection at this stage of the case.

ON FACTS:

- 1- That Para 1 to 5 has been admitted correct by the respondents hence needs no comments.

- 2- Para 6 of the comments is incorrect and the respondents have no replied accordingly. That the appellant DDO Code is 8089 but the respondents have mention a wrong DDO code in their comments. The name of the project was "OFFICE AUTOMATION SYSTEM" (E-OFFICE). That it is important to mention here that vide letter dated 26-02-2008 the respondents have already admitted that appellant are the employee of the Civil Secretariat. That it is also pertinent to mention here that the vide notification dated 29-05-2021 the staff of the Energy Monitoring Unit (EMU) was merged in the DDO code of the Finance Department. That letter dated 22-04-2020 is not a speaking one as it has not been justified that why the appellant is not cover under the rules and what are the hindrance in their way of getting this benefits. That it is further worth to mention here that if once a benefit has been extended

to the appellant then under what law the same can be stopped/
recovered and this act of the respondents is violation of the
principle of Locus Ponitientiae. Copies of the letter dated 26-04-
2008 and notification dated 29-05-2021 are attached as
annexure**A & B.**

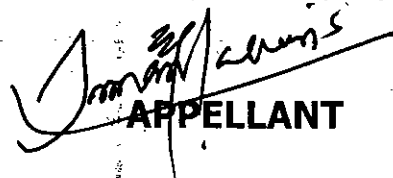
3- Para 7 to 9 needs no comments:

ON GROUNDS:

(A TO H):

All paras of grounds of appeal are correct while the comments
of the respondents are incorrect and baseless. That appellant is
entitled for the mention allowance as he is the employee of the civil
secretariat by every definition of service law.

It is therefore, humbly prayed that on acceptance of this
rejoinder the appeal of the appellant may be accepted as prayed for.


APPELLANT

USMAN KHAN

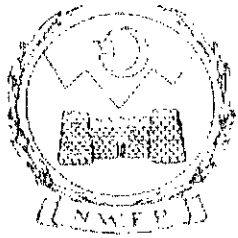
THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

ANNEXURE "A"

3

318



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(REGULATION WING)

No. SO(O&M)E&AD/1-4/2002
Dated Peshawar, the 26th February, 2008

To

The Accountant General, NWFP.

Subject: CLEARANCE OF THE STATUS OF STAFF TRAINING INSTITUTE (STI) ESTABLISHMENT DEPARTMENT, GOVT. OF NWFP.

Dear Sir,

I am directed to refer to the subject noted above and to state that Special Allowance and Utility Allowance are admissible to the officers/staff of STI as they are the employees of Civil Secretariat, NWFP and posted there by transfer.

Yours Faithfully,

SECTION OFFICER (O&M)

Copy to:-

The Section Officer (Admn), STI for information wither reference to his letter No. DD(S.T.I)E&AD/1(3)/2007-08, dated 23-02-2008.

SECTION OFFICER (O&M)

(2) *Recd*
26/2/08

"H. Saeed Khan"

ATTACHED



GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKPFD](https://www.facebook.com/GoKPFD)

twitter.com/GoKPFD

Dated Peshawar the 29th May, 2021

NOTIFICATION

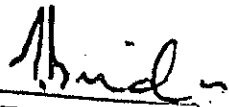
No. SO (A)/FD/EMU/1-31/2020. The competent authority has been pleased to merge the staff of Energy Monitoring Unit (EMU) from DDO Cost Centre PR-5749-EMU to the DDO Cost Centre PR-4041-Finance Department with immediate effect, in the best public interest.

SECRETARY FINANCE

Endst: No. & Date Even.

Copy is forwarded to the:

1. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
2. Accountant General, Khyber Pakhtunkhwa.
3. Chief Manger, State Bank of Pakistan, Peshawar.
4. Additional Secretary (EMU), Finance Department.
5. Consultant EMU, Finance Department.
6. The Manager, Khyber Bank, Civil Secretariat Branch, Peshawar.
7. PS to Secretary, Finance Department.
8. PS to Special Secretary, Finance Department.
9. PA to Additional Secretary (EMU), Finance Department.
10. PA to Additional Secretary (Admn), Finance Department.
11. Master file.


(ABDUR RASHID KHAN)
SECTION OFFICER (ADMN)

ATTACHED

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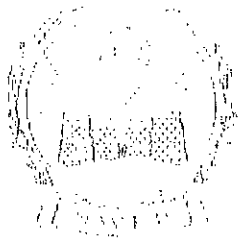

APPELLANT

M. USMAN KHAN

THROUGH:

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

ANNEXURE 2: A (3)



GOVERNMENT OF NEPAL
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(REGULATION WING)

No. 5005/MI-5/AD/1/2007
Dated Pokhara, the 30th February, 2008

To

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Dear Sir,

I am directed to refer to the subject noted above and to state that Special Allowance and Utility Allowance are admissible to the officers/staff of STI as they are the employees of Civil Secretariat, NWFP and posted there by transfer.

Yours Faithfully

SECTION OFFICER (REG-III)

Copy to:

The Section Officer (Admin) STI for information with reference to his letter No. 103(5.T.I)E&AD/1(3/2007)03, dated 13-02-2008.

SECTION OFFICER (REG-III)

(2) *Asad*
[Signature]
26/2/08

The Accountant General

[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT

Finance Department Civil Secretariat Peshawar

<http://www.finance.gkp.pk>

[facebook.com/GoKPED](https://www.facebook.com/GoKPED)

twitter.com/GoKPED

Dated Peshawar the 29th May, 2021

NOTIFICATION

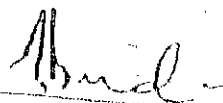
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10. PA to Additional Secretary (Admn), Finance Department.
11. Master file.


(ABDUR RASHID KHAN)
SECTION OFFICER (ADMN)

6005
21/2/19

ADEO ESTD
put up as
proper file
M. S. D. 21/2/19 90

ENQUIRY REPORT IN RESPECT OF MR. MAJID ALI
N/QASID GGHS KHADIZAI; DISTT; KOHAT.

As per directions of worthy Distt; Education Officer (F) local office No.18742-43/File No-63/Enquiry/ Vol; IDEO (F) dated; 26/12/2018.

I alongwith Mr; Abdul Rauf ADEO (P&D) of this office conducted an enquiry on 28/01/2019 against Mr: Majid Ali N/Qasid GGHS Khadizai Kohat who was absent in the last 03 years & now continuously absent w.e.f 06/12/2018.

questionnaire was served upon the Headmistress Dilnashcen of the concerned school where she replied as under: (Annex-'A')

- a) She is working in this school since: 20/10/2016 till date.
- b) She stated that D/o/Apptt of Mr. Majid Ali in this school is 09/07/2012.
- c) The pay of Mr. Majid Ali; N/Qasid has been stopped w.e.f 06/2018 as per IMU report and due to his continuously absence from his duty.
- d) Two absence notice have been already issued by the H/M vide; Regd; No.805, 806 dated 20/12/2018; (Annexure B) & 2nd absence notice on 17/01/2019 vide; R.No 850 where as the 3rd Notice is awaited;
- e) The H/M has also issued absence notices from time to time in the year, 2017.
- f) The pay stoppage S-II of the official could not provided by the authority.
- g) The H/M has also stated in her statement that there are some people in the school as well as in the office who guided Mr. Majid Ali N/Q of her school. (As per Sr.No 08).

h) He absent from his school duty as detail below;

- i. In the year 2016 = 31-days
- ii. In the year 2017 = 19-days
- iii. In the year 2018 = 95-days

copies of attendance register etc as per (A-C-P-01-32)

Correspondence regarding absence of Mr. Majid Ali N/Qasid between the H/M & office of DEO (F) Local offices have been made since from the year, 2016 but there was a gap between office & H/M of the concerned school. (Annex;D) P-1-19

The H/M has also stated that as per face book & Whatsapp share by the chowkidar he has gone to abroad.

PERSON IDENTIFICATION



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Handwritten text at the bottom right corner, including the words "No" and "to" and a signature.



157

PENDING RECOMMENDATION:

- i. The payment of absence period already paid to him may be recovered from his G.P.F if the amount is available in GPF balance or the DDO & Clerk are responsible for this recovery.
- ii. He must be proceeded under E&D rules 2011, as soon as possible.

AR
MR; ABDUL RAUF
ADEO (P & D)

Umer Khan
UMER KHAN
SUPTT; DEO (F) KOHAT.

05.01.2021

Appellant in person and Addl. AG alongwith Gohar Ali Junior Clerk for the respondents present.

Parawise comments on behalf of the respondents have been submitted. Placed on record. The appeal is assigned to D.B for hearing on 05.04.2021. The appellant may furnish rejoinder, within one month, if so advised.

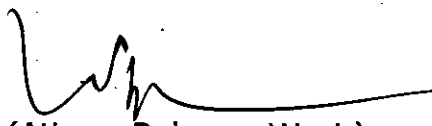

Chairman


05.04.2021

Appellant in person present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former submitted rejoinder which is placed on file. Lawyers are on general strike, therefore, case is adjourned. To come up for arguments on 7/7/2021 before D.B.


(Atiq ur Rehman Wazir)
Member (E)

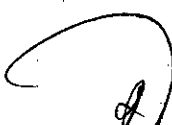

(Rozina Rehman)
Member (J)

07.07.2021

Appellant present in person.

Javid Ullah learned Assistant Advocate General alongwith Ghulam Qadir Superintendent for respondents present.

Former made a request for adjournment as his counsel is busy before Hon'ble Peshawar High Court; granted. To come up on 22.11.2021 for arguments before D.B.


(Rozina Rehman)
Member(J)


Chairman

22.07.2020

Junior counsel for appellant is present. Notices to respondents could not be issued due to public holidays on account of COVID-19, therefore, fresh notices be issued to the respondents for submission of written reply/comments. To come up for written reply/comments on 14.09.2020 before S.B.


(MUHAMMAD JAMAL KHAN)
MEMBER

14.09.2020

Appellant in person and Addl. AG alongwith Khan Muhammad, Assistant for the respondents present.

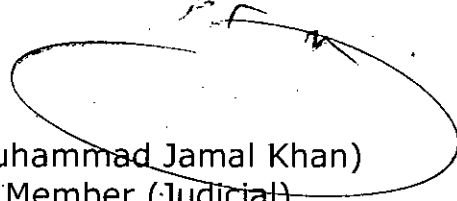
Representative of the respondents seeks further time to furnish the requisite reply/comments. Adjourned to 03.11.2020 on which date reply/comments shall positively be furnished by the respondents.


Chairman

03.11.2020

Nemo for appellant. Mr. Kabirullah Khattak, Additional Advocate General is present.

Neither written reply on behalf of respondents submitted nor any representative on their behalf is present, therefore, notices be issued to them for submission of written reply/comments. File to come up for written reply/comments on 05.01.2021 before S.B.


(Muhammad Jamal Khan)
Member (Judicial)

12.03.2020

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-Naib Qasid) has filed the present service appeal against the order dated 25.03.2019 whereby major penalty of removal from service was imposed upon him on the ground of willful absence from official duty and against the order dated 28.10.2019 through which his departmental appeal was rejected.

Submissions made by the learned counsel for the appellant, need consideration. The present service appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 08.05.2020 before S.B.

Appellant Deposited
Security & Process Fee

12/3/20


Member

07.05.2020

Due to COVID19, the case is adjourned to 22.07.2020 for the same as before.


Reader

1518/2019

16.12.2019

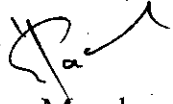
Nemo for appellant.

Notice be issued to appellant/counsel for preliminary hearing before S.B on 27.01.2020.


Chairman

27.01.2020

Appellant absent. Learned counsel for the appellant absent. Due to general strike of the bar, on call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for preliminary hearing on 12.03.2020 before S.B.




Member

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1518/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/11/2019	<p>The appeal of Mr. Majid Ali presented today by Mr. Noor Badshah Bangash 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 13/11/19</p>
2-	14/11/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/12/19.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

P-34

16.12.2019

Counsel for the appellant present.

It is the case of appellant that after extension of officiation as ASI on 07.06.2016 in line with the provisions of Standing Order No. 11 and validation of Standing order Act 2005, the appellant has been denied regular promotion to the said rank and further promotion to the rank of Sub Inspector by the respondents. Learned counsel referred to notification dated 10.01.2019 whereby, inter-alia, the incentives for promotion provided through Standing Order No. 11/1987 were considered to be out of turn promotion and stated that the said notification was held in abeyance through order dated 17.01.2019. Despite, the latter and grant of promotion to other officials placed similar to the appellant the denial of respondents was discriminatory towards the appellant.

In view of available record and arguments of learned counsel, instant 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 on 07.02.2020 before S.B.

Chairman

*Inverdent by due to clerical
mistake misprinted.*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Appeal No. 1518/2019

Majid Ali S/o Nawab Ali Appellant

VERSUS

Director Elementary & Secondary Education KPK Peshawar and
others

..... Respondents

INDEX

S. No	Description of Documents	Annex	No. of copies
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4	Medical documents / prescription of doctor	C	21-30
5	Application for medical leave		31-32
6	Departmental appeal of appellate authority	D	33
7	Removal order dated 25-03-2019	E	34
8	Rejection order of departmental appeal	F	35
9	Wakalatnama		36

Through: Appellant

Noor Badshah Bangash
Noor Badshah Bangash
Advocate Kohat

Dated: 07-11-2019

Cell: 0333-9621235

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Appeal No. 1518/2019

Majid Ali S/o Nawab Ali Ex. Naib Qasid Govt. Girls High School Khadi Zai District Kohat

..... Appellant

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1613

Dated 13-11-2019

VERSUS

1. Director Elementary & Secondary Education Kyber Pakhtunkhwa Peshawar
2. District Education Officer Female Kohat
3. Headmistress Govt. Girls High School Khadizai Kohat

..... Respondents

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL, WHEREBY RESPONDENT NO.1 HAS REJECTED THE DEPARTMENTAL APPEAL LODGED BY APPELLANT MAJID ALI NAIB QASID VIDE ORDER ENDST. NO. 3437-41/F-NO. 271/A/KOHAT-6 DATED 28-10-2019.

PRAYER:

On acceptance of this appeal, the impugned order of respondent No.1 and No.2 may please be set aside being illegal, contrary to the prescribed Service Rule and against the facts and circumstances of the case. Therefore, the appellant may please be re-instated in service with all back benefits. Any remedy deems appropriate to the facts and circumstances of the case may also be extended in favour of appellant to secure ends of justice.

Sheweth:

FACTS:

Filed to-day

Registrar
13/11/19.

1. That the appellant joined service as Naib Qasid at Govt. Girls High School Khadizai District Kohat vide appointment Endst. No. 8626-31 dated 04-07-2012. (copy enclosed as annexure "A")
2. That after taking over charge the appellant performed his duties honestly and to the entire satisfaction of his superiors, which is evident from the record. (copies of service book as annexure "B")
3. That unfortunately, in ~~November~~ November, 2018, the appellant suffered from serious illness and was under treatment of Dr. Syed Muhammad Sultan Psychiatric and continued his treatment and was unable to perform duties etc. (All the relevant prescription/ medical documents are annexed as annexure "C")
4. That the appellant submitted an application for grant of leave to respondent No.3, who gave no response with regard to its acceptance or rejection.
5. That the respondent No.3 despite submission of ~~application~~ application for grant of leave, started proceeding and absented the appellant, despite of his illness etc. It is added that the respondent No.3 did not bother to inquire the factual position with regard to leave application / illness of the appellant and proceeded wrongly. The appellant was in the anticipation that leave applied for would be sanctioned but with no positive result. (copy enclosed as annexure "D")
6. That later on the appellant received removal order from respondent No.2. (copy of the same is enclosed as annexure "E")
7. That the appellant preferred a departmental appeal before respondent No.1, who contrary to the prescribed service rules upheld the order of removal from service of appellant, which was made by respondent No.2 (copy enclosed as annexure "F")

8. That feeling aggrieved, the appellant submit the instant appeal on the following grounds:

GROUND:

- a) That the impugned orders referred to above are illegal, against the prescribed service rules, norms of justice and also against the facts and circumstances of the case, therefore, the impugned orders of both the respondents No. 1 & 2 are liable to be set aside.
- b) That no opportunity has been provided to the appellant, and he condemned unheard. The respondents No. 1 & 2 have flagrantly violated the service rules and others important aspect of the case. Therefore, the appellant may please be reinstated in service and impugned orders be set aside.
- c) That it was incumbent upon the respondents 1 & 2 to proceed with the relevant provisions of service rules but in cursory manner removed the appellant from service by respondent No.2 while respondent No.1 also overlooked and did not concentrate upon the illegalities / irregularities by respondents No. 2 & 3, therefore, calling for interference of this hon'ble court.
- d) That it is prima-facie established from the relevant prescription / medical documents of psychotrics Doctor, that the appellant was suffering from chronic disease and he was lying on bed and not in normal position. This aspects of the case has absolutely been ignored by the respondents mentioned above, hence the impugned orders are not sustainable in the eyes of law.
- e) That no proper charge sheet and statement of allegation has been served upon the appellant and no proper inquiry conducted in this regard. It is worth

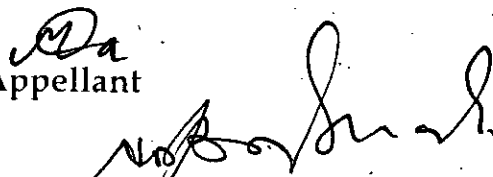
mentioning here that no opportunity of personal ~~person~~ hearing was given to appellant which is against the service rules and order of removal has been passed on his back. Therefore, the impugned orders of both respondents mentioned above are not tenable.

- f) That the appellant is class-IV Government servant supporting family members i.e. 2 minors children and also hails from poor family, therefore, deserve to be reinstated in service as the respondents have not been proceeded according to law.
- g) That the appeal is within time.

Keeping in view of the above, it is humbly prayed the appellant may graciously be reinstated in service with all back benefits, so that the requirements of justice are fulfilled.

Dated: 07-11-2019

Through:


Appellant

Noor Badshah Bangash
Advocate, Kohat

(5)

Annex (A)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEM & SECY EDU KOHAT

APPOINTMENT

Consequent upon the approval of District Selection Committee, the following Candidates are hereby appointed as Class IV Post on regular basis BPS-01(4800-150-9300) plus usual allowance against the vacant post at the School noted against each in the interest of public service with effect from the date of their taking over charge on the following terms and conditions.

S#	Name & Father's Name	Name of UC	Post	Name of School where to be appointed	Remarks
1	Asal Din S/O Safi-ud-Din	Khushal Garh	N/Qasid	GHS Pershai	A.V.P
2	Mammanda Bibi W/O Muhammad Ismail	Khushal Garh	Sweepers	GGMS Gul Hassan Banda	A.V.P
3	Majid Ali S/O Nawab Ali	Ali Zai	N/Qasid	GGHS Khadizai	A.V.P
4	Abdul Hameed Afridi S/O Khial Bad Shah	Billitang	Chowkidar	GPS Dhoke Akbar Jan	A.V.P
5	Sabiha Bibi D/O Maula Bakhsh	Khushal Garh	Sweepers	GGMS Khushal Garh	A.V.P

TERMS AND CONDITION

1. They will be governed by such rules and regulations as may be issued from the time to time the Govt:
2. Their Service will be terminated any time in case their performance is found unsatisfactory/found and error/fraud, they will be processed against under the E&D rules 1973
3. They are to produced health and age Certificate from Medical authority concerned before taking overcharge.
4. No TA/DA etc is allowed.
5. They will not be handed overcharge if they are under 18 years and above 45 years of age.
6. Their services will be considered as regular without pension and gratuity, in terms of section 19 of KPK civil servant act 1973 as amended by KPK civil Service Amendment Act 2005. They will be contributing CP fund @10% at the minimum of payment 10 % contribution will be made by Govt.
They will have to take overcharge within 15 days after the issuance of office order otherwise the order will be stand null and void.

Attended to be done copy 7/10/12

(IMTIAZ UL HAQ)
EXECUTIVE DISTRICT OFFICER
ELEM: & SECY: EDUCATION KOHAT

Endst No. 8656-31

Dated 4/7/2012

Copy to the:-

1. PA to DCO Kohat.
2. PA to EDO (E&SE) Kohat.
3. District Account officer Kohat
4. District Officer (M/F) Local office.
5. Head Master/ Head Mistress concerned
6. All official Concerned.

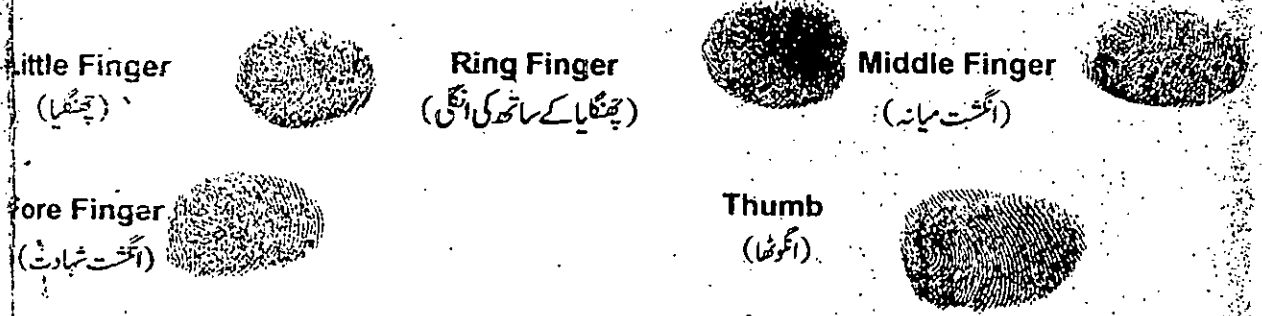
Attested

[Signature]
HEAD MISTRESS
Govt Girls High School
Khadizai Kohat

[Signature]
DISTRICT OFFICER (M)
ELEM: & SECY: EDUCATION KOHAT

- ⑥
- 1- Name (میت) MAJID ALI Annex-③
- 2- Nationality and Religion Pakistani, Islam
(قومیت اور مذہب)
- 3- Residence Vill: & P.O Khadizai, Distt. Kohat
(سختل رہائش)
- 4- Father's name and residence Nawab Ali
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as 25-03-1985
nearly as can be ascertained
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 5' 5"
(قد و قامت)
- 7- Personal mark of identification Mole on Face
(نشان شناخت)
- CNIC No = 14301-3889512-5

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)
(مزدکی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)



9. Signature of Govt. Servent
(سرکاری ملازم کے دستخط)

[Handwritten Signature]

10. Signature and designation of the Head of the Office or other Attesting officer
(تصدیق کنندہ افسر کے دستخط اور مہر)

[Handwritten Signature]

HEAD MISTRESS
Govt Girls High School
Khadizai Kohat

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہئے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

Da

1	2	3	4		5		6	7	8	9	10
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	1
			Rs.	Ps.	Rs.	Ps.	اسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر مجاز	ter app
		BPS-01 (4800-150-9300)									
Naib Qasid Guljis Khadizai	Temp.		Rs=	4800/-	P.M			09/07 2012	<i>[Signature]</i>	HEAD MISTRESS Govt Girls High School Khadizai Kohat	
										3-1 8/12	
			Rs=	4800/-	P.M			01/12 2012	<i>[Signature]</i>	HEAD MISTRE Govt Girls High S Khadizai Koh.	
			Rs=	4950/-	P.M			01/12 2013	<i>[Signature]</i>	HEAD MISTRE Govt Girls High S Khadizai Koh	
			Rs=	5100/-	P.M			01/07 2014	<i>[Signature]</i>	HEA Govt G Khw	
			Rs=	5250/-	P.M			01/12 2014	<i>[Signature]</i>	HEAD MISTRE Govt Girls High Khadizai Koh	

[Handwritten signature]

7.	8.	9.	10.	11.	12.	13.	14.	15.	
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رضعت کی نوعیت و معیار	پارہہ تک کی رضعت کے لئے اوسط خواہ کا لینے	دستخط افسر مجاز	سزا یا تادیب یا غیر مناسب کارکردگی کا ریکارڈ
						Period عرصہ	Government to which debitabe حکومت جسے رقم ادا ہوگی		
07/2012	[Signature]	HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2012	No Inc. Service less than six months	[Signature]				Appointed as Naib Qasid in BPS-01 (4800-150-9300) plus usual allowances vide EDO EO SE, Kohat
12/2012	[Signature]	HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2013	A/Inc	[Signature]				Passed SSC (A) Exam, 2002 from BISE Peshawar under Roll No. 25149 in Grade 'B' securing 487/850 marks. Result declared on 29-06-2002.
12/2013	[Signature]	HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2014	one pre-mature Incr.	[Signature]				
07/2014	[Signature]	HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2014	A/Incr.	[Signature]				Service Verified w.e.f 09-07-2012 to 30-11-2012 From the office record.
12/2014	[Signature]	HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2015	Reversion 2015 of scales.	[Signature]				

Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8

1	2	3	4	5	6	7	8	9
Name of Post	Whether Substantive, or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8
			Rs. Ps.	Rs. Ps.	مسابقات تعمیراتی دیگر الاداری	تاریخ تقریری	دستخط سرکاری ملازم	دستخط افسر مجاز
		Revised BPS-01 (6210-195-12060)						
N/Based	Temps		Rs= 679.5/- P.M			01/07 2015		HEAD MISTRESS Govt Girls High School Khadizai Kot
		BPS-03 (6535-260-14335)						
4	4		Rs= 705.5/- P.M					
			(+2) 260/- (one premature)					
			Total Rs= 7315/- P.M			01/07 2015		HEAD MISTRESS Govt Girls High School Khadizai Kot
4	4		Rs= 7315/- P.M			01/12 2015		HEAD MISTRESS Govt Girls High School Khadizai Kot
		Revised BPS-03 (8040-325-17790)						
N/Based			Rs= 9015/- P.M			01/07 2016		HEAD MISTRESS Govt Girls High School Khadizai Kot
4	4		Rs= 9340/- P.M			01/12 2015		HEAD MISTRESS Govt Girls High School Khadizai Kot

(Handwritten signature and notes)

2	8	9	10	11	12	13	14	15	
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitabla to another Government چار ماہ کی رخصت کے لئے اوسط تنخواہ کا تین گواہ	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants سزا یا جزیاء بیر مناسب کا کردگی کا ریکارڈ
						Period عرصہ	Government to which debitabla گورنمنٹ ہے تم اداروں کی		
1/07 2015	[Signature]	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	13/06	upgradation BPS-03	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	1/12		[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	Service Verified w.e.f 01-12-2012 to 30-11-2013 from the office record.
07 2015	[Signature]	[Signature] HEAD MISTRESS II Govt Girls High School Khadizai Kohat	29/07 2015	No. Quer Six months not completed	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	Sanction of one Pre-mature Increment to the regular employees of Provincial Govt. from BPS-01 to BPS-04 w.e.f 01-07-2014 vide Finance Dept. No. FD (SO SR) 2-123/ 2014 Dated Islamabad the 14-07-2014.
12 2015	[Signature]	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	
1/07 16	[Signature]	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat	Drawn Rs=436/- on at a amount of Pay of below w.e.f 01-7-2014 to 31-6-2014 on account of one Pre- mature Increment.
12 16	[Signature]	[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] HEAD MISTRESS Govt Girls High School Khadizai Kohat			[Signature] District Accounts Officer Kohat	

1	2	3	4		5		6	7	8
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature of Government servant
	عارضی مستقل یا یا قائم مقام	اگر عارضی ہے تو رول کے مطابق پیش کش کیا گیا ہے؟	Rs.	Ps.	Rs.	Ps.	مانسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
N/Asid.		Revised Bps-						01/07/17	
		Rs - 11560/- P.M						01/12/17	

Signature and Designation of the Head of the office or other testing officer attestation of column 1 to 8

دستخط آفیسر مجاز

HEAD OF THE OFFICE
 District Officer
 Khadija Khat

HEAD OF THE OFFICE
 District Officer
 Khadija Khat

Attest
 [Signature]

7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or other attesting officer column 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other Attesting officer	13 Nature and duration of leave taken	13 Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government servant چار ماہ کی رخصت کے لئے اوسط تنخواہ کا تین گونہ	14 Signature of the Head of the office or other attesting Officer	15 Reference to any recorded punishment or censure, reward or praised of the Government servants سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
01/07/17		HEAD MISTRESS Revised of Govt Girls High School Khadizai Kohat		D-477 11-4-2017	HEAD MISTRESS Govt Girls High School Khadizai Kohat		Service verified w.e.f 01-12-2013 to 30-11-2014 from the office record.		
01/12/17		HEAD MISTRESS A/2/c Govt Girls High School Khadizai Kohat		D.A.O A/c			Allowed Two pay scale upgradation w.e.f 01-07-2015 vide Finance Deptt. No. FD/50 (FR) 7-20/2015 Dated Peshawar the 30-6-2015		
							Under taking A do hereby undertake to the effect that if overpayment is made to me w/c for upgradation to Bpe-03 w.e.f 01-07-2015, the amount will be recovered from my Pay / Pension / Gratuity.		
							HEAD MISTRESS Govt Girls High School Khadizai Kohat		(Majid AS) N/Qand

11

01/07/17

01/12/17

Attest
Notary

HEAD MISTRESS
Govt Girls High School
Khadizai Kohat

(Majid AS)
N/Qand

7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکاری ملازم	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 تبادلہ یا برطرفی	12 Signature of the head of the office or other Attesting officer دستخط افسر مجاز	13 Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government پارہ ماہ کی رخصت کے لئے اوسط تنخواہ کا تسلیے Period عرصہ Government to which debit to حکومت جسے رقم ادا ہوگی		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 جزایا غیر مناسب کارکردگی کا ریکارڈ
						Service verified w.e.f 01-12-2014 to 30-11-2015 from the Acquittance Roll and other office record			
						Service verified w.e.f 01-11-2015 to 30-11-2016 from the Acquittance Roll and other office record			
						G.O.L. w.e.f 01/06/2016 to 31/08/2016 (92 days) without pay under D.O. (R) K.Dict. Exdt No. 2004-5/CR-IV. Kawalt 01/04/2017.			
						Service verified w.e.f 01-12-16 to 30-11-17 from the Acquittance Roll and other office record			

F.F.
HEAD MISTRESS
Govt Girls High School
Khudizai Kohat

HEAD MISTRESS
Govt Girls High School
Khudizai Kohat

HEAD MISTRESS
Govt Girls High School
Khudizai Kohat

HEAD MISTRESS
Govt Girls High School
Khudizai Kohat

7	8	9	10	11	12	13		14	15
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitble to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر مجاز	تاریخ انقطاع ملازمت	دجوابات انقطاع ملازمت ترقی تدارک یا برطرفی	دستخط افسر مجاز	رضعت کی نوعیت و معیار	پارامہ تک کی رضعت کے لئے اوسط خواہ کا تعین Period عرصہ Government to which debitble ہے گورنمنٹ سے رقم ادا ہوگی	دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ

01/07/17
 HEAD MISTRESS *Revised*
 Govt Girls High School Scale.
 Khadizai Kohat
 HEAD MISTRESS
 Govt Girls High School
 Khadizai Kohat
 Service verified w.r.f. 01-12-2013 to 30-11-2014 from the office record.
 Recovery of overpayment
 Total recovery Rs = 48184/-
 per Month instalment = 7000/- pm w.e.f. 1/17
 Through system

01/12/17
 HEAD MISTRESS A/2/c
 Govt Girls High School
 Khadizai Kohat
 HEAD MISTRESS
 Govt Girls High School
 Khadizai Kohat
 Allowed Two pay scale upgradation w.r.f. 01-07-2015 vide Finance Deptt. No. FD/SO (FR) 7-25/2015 Dated Peshawar the 30-6-2015

Undertaking
 A do hereby undertake to the effect that if overpayment is made to me w.r.f. upgradation to BpL-03 w.r.f. 01-07-2015, the amount will be recovered from my Pay / Pension / Gratuity.

Majid AS
 (Majid AS)
 N/Qarid

1	2	3	4		5		6	7	8	9
Name of Post درجہ ملازمت	Whether Substantive or officiating and whether permanent or temporary عارضی مستقل یا یا قائم مقام	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پینشن کا مستحق ہے؟	Pay in substantive position تنخواہ بطور عارضی ملازمت		Additional pay for officiating زائد تنخواہ بطور قائم مقام		Other emoluments falling under the term pay ماسوائے تنخواہ دیگر الاؤنس	Date of appointment تاریخ تقرری	Signature of Government servant دستخط سرکاری ملازم	Signature and designation of the Head of the Office or other officer attestation of column 1 to 8 دستخط افسر نجاز
			Rs.	Ps.	Rs.	Ps.				
N/Gasid	Revised Bps-03 (9610-390-21310)								01/07/17	HEAD MISTRESS Govt Girls High Sch Khadizai Kohat

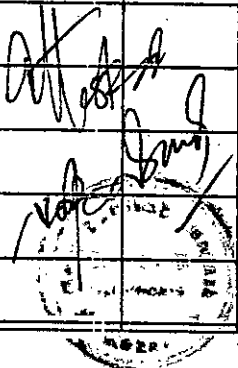
RS - 11560/- P.M

Handwritten signature and stamp.

HEAD MISTRESS Govt Girls High Sch Khadizai Kohat

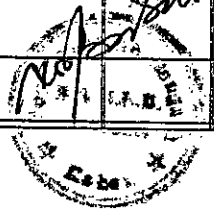
HEAD MISTRESS Govt Girls High Sch Khadizai Kohat

7	8	9	10	11	12	13		14	15	
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government		Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
							Period	Government to which debit		
تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رضت کی نوعیت و معیار	چار ماہ کی رخصت کے لئے اوسط تواریخ کا تعین	Government کو جس سے رقم ادا ہوگی	دستخط افسر مجاز	سزایا جزا یا غیر مناسب کارکردگی کا ریکارڈ
							Service verified w.e.f 01-12-2014 to 30-11-2015 from the Acquittance Roll and other office record.			
									HEAD MISTRESS Govt Girls High School Khadizai Kohat	
									HEAD MISTRESS Govt Girls High School Khadizai Kohat	
							G.O.L w.e.f 01/06/2016 to 31/08/2016 (92 days) with cost pay under DDO (P) Khat. Govt. Order 2004-5/100-IV. Leave dt 01/04/2017.			
									HEAD MISTRESS Govt Girls High School Khadizai Kohat	
							Service verified w.e.f 01-12-16 to 30-11-17 from the Acquittance Roll and other office record.			
									HEAD MISTRESS Govt Girls High School Khadizai Kohat	



7	8	9	10	11	12	13		14	15
Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitabla to another Government پارہدہ کی رخصت کے لئے اوسط خواہہ باقیین	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ
							Period عرصہ	Government to which debitabla گورنمنٹ سے رقم ادا ہوگی	
21/07/2015	دستخط سرکاری ملازم	دستخط افرجیاز	تاریخ انتظام ملازمت	وجہات انتظام ملازمت یا برطرفی	دستخط افرجیاز	رخصت کی نوعیت و معیار	Service Verified w.e.f 01-12-2012 to 30-11-2013 from the office record.		دستخط افرجیاز
		HEAD MISTRESS Govt Girls High School Khadizai Kohat	13/06/2015	upgradation ib BPS-03	HEAD MISTRESS Govt Girls High School Khadizai Kohat				HEAD MISTRESS Govt Girls High School Khadizai Kohat
21/07/2015		HEAD MISTRESS II Govt Girls High School Khadizai Kohat		No. Ancey Six month not completed	HEAD MISTRESS Govt Girls High School Khadizai Kohat		Sanction of one Pre-mature Anceyement to the regular employees of Provincial Govt. from BPS-01 to BPS-04 w.e.f 01-07-2014 vide Finance Deptt. No. FD(SO SR)2-123/2014 Dated Peshawar the 14-07-2014.		
21/12/2015		HEAD MISTRESS Govt Girls High School Khadizai Kohat			HEAD MISTRESS Govt Girls High School Khadizai Kohat				
			4/1/16	1-35237					HEAD MISTRESS Govt Girls High School Khadizai Kohat
						0-742 10-9-2014	Dr. Akbar R=4361 - on acc of area of Pay & Allow. w.e.f. 01-7-2014 to 31-6-2015		
21/07/16		HEAD MISTRESS Govt Girls High School Khadizai Kohat			HEAD MISTRESS Govt Girls High School Khadizai Kohat		are advised of one Pre-mature Anceyement.		
21/12/16		HEAD MISTRESS Govt Girls High School Khadizai Kohat					District Accounts Officer Kohat		

1	2	3	4		5		6	7	8	9
Name of Post	Whether Substantive, or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature of Government servant	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8
			Rs.	Ps.	Rs.	Ps.				
درجہ ملازمت	عارضی مستقل یا یا قائم مقام	اگر عارضی ہے تو رول کے مطابق پیش کش کا مستحق ہے؟					ما سوائے عتقواہ دیگر الاؤنس	تاریخ تقریری	دستخط سرکاری ملازم	دستخط افسر مجاز
N/Basic	Revised Temp's	BPS-01 (6210-195-12060)	Rs=		679.5/-	P.M		01/07/2015		HEAD MISTRESS Govt Girls High School Khadiza Kohat
4	4	BPS-03 (6535-260-14335)	Rs=		705.5/-	P.M				
		(+) 260/- (one promotion)								
		Total			731.5/-	P.M		01/07/2015		HEAD MISTRESS Govt Girls High School Khadiza Kohat
4	4		Rs=		731.5/-	P.M		01/12/2015		HEAD MISTRESS Govt Girls High School Khadiza Kohat
N/Basic	Revised BPS-03	(8040-325-17790)	Rs=		901.5/-	P.M		01/07/16		HEAD MISTRESS Govt Girls High School Khadiza Kohat
"	"		Rs=		934.0/-	P.M		01/12/16		HEAD MISTRESS Govt Girls High School Khadiza Kohat



7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal)	12 Signature of the head of the office or other Attesting officer	13 Nature and duration of leave taken	14 Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitiable to another Government		15 Signature of the Head of the office or other attesting Officer	16 Reference to any recorded punishment or censure, reward or praised of the Government servants
							Period	Government to which debitiable		
							عرصہ	گورنمنٹ سے رقم ادا ہوگی		
						رضعت کی	چار ماہ تک کی رضعت کے لئے اوسط تنخواہ کا تین		دستخط افسر مجاز	سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ
09/07/2012	<i>[Signature]</i>	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2012	No Inc. Service Less Than Six Months	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat		Appointed as Naib Basid In BPS-01 (4800-150-9300) Plus usual allowances vide FDO EO SE, Kohat Endst. No: 8626-31 Dated: 04-07-2012.		<i>[Signature]</i>	
							S-I on RS 8444/- a/c 6 on 6 pay & Mas of 97% 31/7/12 till to 31/7/12 till to			
							DCO NOC received		<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	
01/12/2012	<i>[Signature]</i>	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2013	A/Inc	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat		Passed SSC (A) Exam: 2002 from BISE Peshawar under Roll No. 25149 in grade 66 c " securing 487/850 marks. Result declared on 29-06-2002.		<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	
21/12/2013	<i>[Signature]</i>	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2014	one promotion Incr.	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat				<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	
01/07/2014	<i>[Signature]</i>	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/11/2014	A/Incr.	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat		Service Verified w.e.f 09-07-2012 to 30-11-2012 From the office record.		<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	
01/12/2014	<i>[Signature]</i>	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	30/6/2015	Revision of scales.	<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat				<i>[Signature]</i> HEAD MISTRESS Govt Girls High School Khadizai Kohat	

(29)

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

PROFESSOR
Dr. Sayed Mohammad Sultan

M.R.C. (Psych) England F.R.C. (Psyche)
Psychiatry & Family Therapist
Chairman Deptt. Of Psychiatry K.T.H.
DEAN (Faculty of Psychiatry)
College of Physicians & Surgeons Pakistan.

Ex President SAARC Psychiatric Federation
Ex President Elect Pakistan Psychiatric Society.

Visiting Psychiatrist
Khyber Teaching Hospital Peshawar. &
Govt. Mental Hospital Peshawar.

عروا کثانی



(Consultation by prior appointment)



Dr. Muhammad Ali Sultan
M.B.B.S., M.C.P.S

Miss. Kulsoom Bangash
M.Sc. PMDCP
M. Phil (Psychology) Psychologist

Miss. Hafsa Shah Psychologist
M. Sc. (Psychology) Psychotherapist

20/11/18

تاریخ

کوہاٹ

پتہ

نام مریض ماجد علی

Rx

① Tab Otopria 15mg

1/2 گلیٹ لٹ کو جاوی

② Tab. Citenan 40mg
1/2 x 4 بار دن میں صبح سے شام تک

③ Tab Logim 50mg

1+1 جاوی

④ ~~Tab Alp 50mg~~

① ایک گلیٹ

② ایک گلیٹ - پھر بند

④ Tab Domic

ایک جاوی

Depo Sholop

1 x 1

Dep Othemanit

1 x 1

ATU in 2mg
1 x 1
1 x 1

Signature

دوبارہ معائنہ کیلئے آنے سے پہلے ان نمبرز پر رابطہ کریں۔
0305-5199763
091-5851551

معائنہ کیلئے بعد تشریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان

سید سائیکیاٹرک کلینک غفار آباد بالمقابل گل حاجی پلازہ تہکال یونیورسٹی روڈ پشاور

2007 JUNE 12/01/18
at 10:00 AM

see 3270
Manned only
ED matrix
problems

stopped 2 06/12

was admitted here
had secured etc

u

- Burden on head (heart)
- own mood
- flexibility
- tension
- coping spell
- sleeplessness
- restlessness

Parasitic thoughts

open

2007 JUNE 12/01/18

5.66

B/P
Pulse
Temp

130/90
80

air
on
in
to

the above - only
2-3 days

23

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

PROFESSOR

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M.B.B.S., M.C.P.S., D.P.M.
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Miss. Kulsoom Bangash

Clinical Psychologist
M.Sc. PMDCP

Miss. Afshan Psychologist

MBC

Visiting Psychiatrist

Khyber Teaching Hospital Peshawar. &
Govt. Mental Hospital Peshawar.

15-1-18 تاریخ بعد از

Majeed Ali

1st session

2nd session

R.B + P

R.B + P

Psychiatrically ill
regarding illness

Psychiatrically
regarding illness

ECG response - P

H-died

H-died

ECG response - P

[Signature]

15-1-18.

[Signature]

رابطہ فون نمبر
091-5851551
091-5512785

بعد تشریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان

سید سائیکیاٹرک کلینک، شفا آباد نزد شیراز ریسٹورنٹ، تم کمال یونیورسٹی، پشاور

3rd session

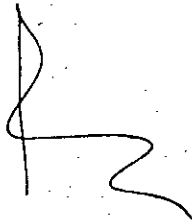
16-1-88

R. B. +

Proced. filly
regarding illu

H. diel

ECT responses

A handwritten signature or set of initials, possibly 'R' or 'B', written in dark ink.

25

74 - 9pc 696

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

PROFESSOR

Dr. Sayed Mohammad Sultan

M.B.B.S., M.C.P.S., D.P.M.
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Miss. Kulsoom Bangash

Clinical Psychologist
M.Sc. PMDCP

Miss. Afshan Psychologist

MSC

تاریخ: 26/01/17
پتہ: گورنمنٹ ہسپتال
فاجیلہ

1- Citanein drops

روسی

2- Tab Papzot

روسی = 100

3- Tab Punny Zen

100

4- Tab Mussygor

100

5- Tab Lexdind sy

100

6- Tab Lagem

100

7- Tab Pynmol

روسی = 100

Sup Duphralen / Sandak
Tab Ampoxe Synt / Sandak
Tab Lidem 10mg
100

2

رابطہ فون نمبر:
091-5851551
091-5512785

معائنہ کیلئے فارم جو ماہی بعد تشریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان

سید سائیکیاٹرک کلینک، نفاذ آباد، ڈسٹرکٹ ہسپتال یونیورسٹی روڈ پشاور

1st visit here

age 31y

ca

PD 05/12
PD 03000

loss of interest in life
death wishes
suicidal ideas
weight loss
low mood
sleeplessness
↓ appetite
avoid ppl
cortisol ↑
anhedonia

PALE ✓

seen by Comherno Cognil
✓ used
↓ improved ✓

dep +1

Family ✓

266 266 266

1300
1301
parent of
father died
refused ✓
Personnel ✓

B/P
PULS
TEMP
20 C
M

CUR
OR
CAR
R

DIAGN
CD MARI
DOB CHALLENGER
JHS status @
NO DRUG

PERMISSION
CASE

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

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M.Sc, PMDCP

Miss. Afshan Psychologist
MSC

Visiting Psychiatrist
Khyber Teaching Hospital Peshawar. &
Govt. Mental Hospital Peshawar.

تاریخ: 16/08/17 کوہاڑے عسکر ماہر علی

im' Doxosec water 1000ml
1/2 tin

1/4 Canella past.

3- Decadron 1cc 1/2

Adapt
Feb alprazolam 1mg

Handwritten notes and scribbles, including a circled '1' and '0'.

ECTS Camp Turyer

رابطہ نمبر
091-5851551
091-5512785

ماہنامہ کیلئے
بعد شریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان
سید سانیلیا ٹرک کینڈک شمارہ 14 ہندو شہر از ریسٹورنٹ تہ کمال پورہ پشاور

Handwritten signature and notes at the bottom right.

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

PROFESSOR

Dr. Sayed Mohammad Sultan

M.R.C. (Psych) England F.R.C. (Psyche)
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M.Sc. PMDCP
M. Phil (Psychology) Psychologist

Miss. Hafsa Shah Psychologist
M. Sc. (Psychology) Psychotherapist

تاریخ 30/08/019 کوئیٹہ نام مہتمم فاجر علی

1 Cap Olanco 12/25mg

ایک بار سے جاری

2 Tab Login 5mg

ایک بار سے جاری

3 Tab Inymin 10mg / Cap Civesca

ایک بار سے جاری

4 Tab Exomil

ایک بار سے جاری 1/2 سے 1 بار سے

5 Tab Daily Gaf

ایک بار سے جاری

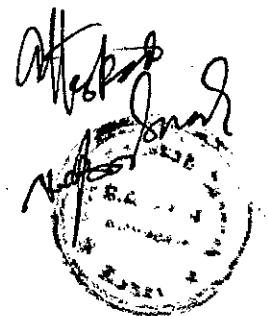
مہتمم

0305-5199763
091-5851551

معاہدہ کیلئے [] بعد تشریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان

سید سائیکیاٹرک کلینک غفار آباد بالمقابل گل حاجی پلازہ تہکال یونیورسٹی روڈ پشاور



Last visit 20/11/018

- Stop medication
- Well improved.

Age 31 two

C/O

- Burden on head/Heart.
- Aggressive - Irritability
- Fearfulness - Sadness
- Tension
- Epigastrium "Discomfort."
- OCD
- (5/1/02) 3/1/09

S ✓ W ✓ A ✓

BPI $\frac{110}{80}$ ✓

Pw4 = 76 (mmt)

T.M. 98 Fo

28

Laboratory

Phiatric
Near Sheraz Restaurant
University Road, Peshawar.
5512785



دی لیبارٹری
پشاور سید سائیکس ٹرک غفار آباد
نزد شیراز ریسٹورانٹ
جنرل یونیورسٹی روڈ پشاور
فون: 091-5512785

Pat's Name Majid Ali

Investigation Required

Admission
card

by Serwan Sy 20p/1m

by - Mujib Khan 1 April

EC 7 x 3-4

B.P. Data reported 2

نوٹ: کسی بھی وجہ سے رپورٹ میں تاخیر ہو سکتی ہے۔

Handwritten signature and scribbles.

29
28

دی لیبارٹری
کلینک سید سید محمد سلطان
نزد شیراز میڈیٹرنٹ
تہہ کمال یونیورسٹی روڈ پشاور
فون: 42785

B.4

(Not Valid For Court)

SPL-478

SAYED PSYCHIATRIC CLINIC

PROFESSOR

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Clinical Psychologist
M.Sc, PMDCP

Miss. Afshan Psychologist

MSc

Visiting Psychiatrist

Khyber Teaching Hospital Peshawar. &
Govt. Mental Hospital Peshawar.

12/1/2018 تاریخ کو بجای Majeed Ali

9

① Tab Lognisomg

1 + 1 بجای

② Tab Olimag 10mg

1 بجای

③ Tab Moodic 3mg

1 بجای

④ Tab Okamid

1 + 1 بجای

⑤ Tab Dimic

1 بجای

ڈیپریسین

رابطہ فون نمبر
091-5851551
091-5512785

بدر تشریف لائیں

پروفیسر ڈاکٹر سید محمد سلطان

سید سائیکیاٹرک کلینک، سید سید محمد سلطان، نزد شیراز میڈیٹرنٹ، تہہ کمال یونیورسٹی روڈ پشاور

Last visit had

Patient's Name

16 18 17

Age 31 1/2

rect

on med.
well vis

all

P

Previous s/s upi

irritability

Overtalkative

Burden in hands

Restlessness

↓ S

↓ A

3

all
w/

Bp

Pulse

Temp

78 in

98.6

(Not Valid For Court)

SAYED PSYCHIATRIC CLINIC

PROFESSOR

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M. Phil (Psychology) Psychologist

Miss. Hafsa Shah Psychologist
M. Sc. (Psychology) Psychotherapist

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نسر ڈاکٹر سید محمد سلطان

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20-11-018 سے 18

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2019

(ذریعہ 1/2 1/2 کے لئے ایک قادیان)

20-11-018

ذریعہ 1/2 1/2 کے لئے ایک قادیان
Ma

(39) محرمیت پرنسپل صاحبہ گزرتز پائی سکول خادیرئی

جناب عالیہ -

گزارش ہے کہ سائل بیمار ہے - اس درخواست سے پہلے بھی
سائل نے علاج معالجی کیلئے درخواست دوہینے کی ہے -
جو میری صحت مثبت نہیں ہے اور ہسپتال سے علاج جاری
ہے - لہذا استدعا ہے کہ سائل کو مزید دوہینے چھٹی
نورم 19-1-2019 سے 18-3-2019 تک رخصت دی جائے

سائل آپ کا دعا گوہ رہے گا

18-1-2019

العارضی

ماجد علی نائب قاصد
گورنمنٹ گزرتز پائی سکول خادیرئی

Ma

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32

Annex - (B)

Before the Learned Director E&SE Khyber Pakhtunkhah Peshawar

Majid Ali N/Qasid GGHS Khadi Zai Kohat

Versus

1. District Education Officer Female Kohat.
2. Head Mistress GGHS Khadi Zai Kohat

Departmental Appeal / Representation against the order dated 25-3-2019 of respondent No.1 whereby major penalty of "Removal from service" was imposed on petitioner without giving opportunity of hearing to appellant.

Respected Sir,

The petitioner / appellant humbly prayed as below.

FACTS.

1. That the petitioner was appointed as Naib Qasid GGHS Khadizai Kohat and served his duties with honesty and dedication.
2. That recently in early December 2018 the petitioner suffered serious illness and was unable to perform his duties and in this respect the petitioner moved leave applications to respondent No.2.(copies attached)
3. That in the meanwhile the department started absence / departmental proceedings against the petitioner for not attending the school and lastly the petitioner came to know that he was removed from service vide letter No. 4793-98 file No. 63 enquiry vol-/ D.E.O/F Kohat (copy attached) , hence the petitioner being aggrieved from the said order file the instant departmental appeal on following **Grounds,**
 1. That the order dated 25-3-2019 is against the facts and circumstances of the case and also against the norms of justice therefore liable to be set aside.
 2. That the petitioner being poor and only person to earn for his poor family members.
 3. That the petitioner soon after illness wrote leave application to school Head Mistress but the petitioner was surprised on his dismissal from service as no show cause notice was served on him nor any charge sheet was given and even no statement of allegation nor was given and opportunity of personal hearing was given which is against the service rules and thus great unjust has been done the petitioner.
 4. That the petitioner is honest and dedicated one and leave no stone unturned to discharge his duties therefore the petitioner deserved to be re-instated with all back benefits of service.
 5. That interestingly the whole proceedings were conducted in the absence of the petitioner as he was lying on death bed but the department even proceeded against him though he wrote leave applications in the said period to the concerned authority which is also against humanity.

It is therefore humbly prayed that the petitioner being alone the earning member of his family and the order of the authority / respondent No.1 being illegal, against the facts and circumstances of the case and also against the service rules and norms of justice may kindly be set aside and the petitioner may kindly be re-instated with all back benefits of service.

Dated 05-06-2019

Petitioner

Majid Ali N/Qasid GGHS Khadi Zai Kohat
CNIC # 14301-3889512-5

(34)

Annex-(E)



DISTRICT EDUCATION OFFICER (FEMALE) KOHAT

demisfemalekohat@gmail.com (KDA Gate No # 02, Complex 3rd block) 0922-9260290

ORDER.

No.F.No.63/ Enquiry Vol-/ D.E.O (F) Kohat WHEREAS

- (1) Mr. Majid Ali N/Qasid GGHS Khadi Zai Kohat was proceeded against under Khyber Pakhtunkhwa Government Servants(Efficiency & Discipline) Rules,2011 for the charges as willful absence from official duty since 06/12/2018.
- (2) AND WHEREAS. He was served absence notice on his home address on dated 20/12/2018,17-01-2019 and 04-02-2019 for resumption of his duty in accordance with Rules 09 on the Rules ibid.
- (3) AND WHEREAS final show cause notice was published in "Daily" Aaj dated 01-03-2019 and "Daily Mashriq" dated 05-03-2019, but even then he failed to resume his duty in the stipulated period of time.
- (4) AND WHEREAS, the competent authority District Education Officer (F) Kohat after having considered the charges and evidence on record, is of the view that the charge of willful absence from official duty have been proved.
- (5) NOW THEREFORE, In exercise of power conferred under rules-9 Government of Khyber Pakhtunkhwa (Efficiency and Disciplinary) Rules 2011, the competent authority District Education Officer (F) Kohat is pleased to impose major penalty of "REMOVAL FROM SERVICE" upon Mr. Majid Ali Naib Qasid GGHS Khadizai w.e.f 06/12/2018.

Sd
DISTRICT EDUCATION OFFICER
FEMALE KOHAT.

Ednst: No. 4793-98/File No.63-Enquiry Vol-/ D.E.O (F) Kohat

Dated Kohat the 25/3/2019.

Copy of above is forwarded for information & necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohat
3. District Accounts Officer Kohat.
4. Headmistress GGHS Khadizai Kohat.
5. Official Concerned.
6. P.A to DEO (F) Kohat.
7. Master file copy.

Sd
10/6/19
Pa

Attest
[Signature]
[Circular Stamp]

DISTRICT EDUCATION OFFICER (F)



35

Annex 4F

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

Phone: 091-9225344

Email: ddadmn.es@gmail.com

NOTIFICATION

1. **WHEREAS**, Mr. Majid Ali Naib Qasid GGHS Khadzai Kohat was removed from Government Service under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 by the DEO (Female) Kohat vide her Notification No Endst No 4793-98 dated 25/03/2019
2. **AND WHEREAS**, the said aggrieved Naib Qasid filed a departmental appeal dated 10/07/2019 to the Director E&SE Khyber Pakhtunkhwa Peshawar (appellate Authority) for redressal of his grievances/reinstatement in service.
3. **AND WHEREAS**, the appellate authority in pursuance of Section 17 read with sub rule (1) & (2) of the E&D Rules 2011 called for the record of the case and comments from the DEO (F) Kohat vide letter No 4307 dated 18/07/2019 for consideration of the appeal.
4. **AND WHEREAS**, the DEO Concerned provided the requisite record/comments, accordingly vide his letter No 9663 dated 03/08/2019 merely describing the reason/circumstances under which the appellant had removed from service.
5. **And WHEREAS**, in the light of record Absentee notices and publication of Absentee Notice in the Daily Newspaper the competent authority issued removal from service, the appeal submitted by Majid Ali is not tenable.
6. **NOW, THEREFORE**, in exercise of the powers conferred under Section-17 rule (2) (a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, the Director E&SE/appellate authority has **decided to reject the appeal** lodged by Mr. Majid Ali Naib Qasid GGHS Khadzai Kohat (appellant) for re-instatement in service and uphold the order of the DEO (F) Kohat issued vide Endst No 4793-98 dated 25/03/2019

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

3437-41

Endst: No. _____ /F.No. 271/A-20/C-IV/Kohat-6 Dated Peshawar the 28/10/2019.

Copy of the above is forwarded for information and n/action to the -

- 1- District Education Officer (Female) Kohat w/r to her letter No. cited above.
- 2- District Account Officer Kohat.
- 3- Principal/HM Concerned.
- 4- Appellant concerned.
- 5- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.

attest
representing

28/10/19
Assistant Director (Admn)
E&SE, Khyber Pakhtunkhwa, Peshawar



645

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

Handwritten signature and numbers: 0333-9621235, 0333-9621235

KPK سروس سٹریٹجی

بعدالت جناب:

دعویٰ:	
علت نمبر:	
مورخہ:	
تھانہ:	Svc appeal

ماہر عدلی
Ex-NA
Education Dept
Khat
بنام ڈرامہ
Ea SE KPK
Pshawr

بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کیلئے فوراً برساہ نگلٹس لٹریچر کوہاٹ 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 تقر ثالث و فیصلہ بر حلف 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 کے 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 بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے۔

المرقوم 07/11/2019

Handwritten signatures and stamps: "I accept", "Kohat", "Hajid Ali (appmt)"

BEFORE THE KHYBER PAKHTUN KHA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1518/19

Majid Ali s/o Nawab Ali, Naib Qasid Govt. Girls High School Khadi Zai,

District Kohat _____ Appellant

V/S

District Education Officer (Female) Kohat and Other _____ Respondents



INDEX

S#	Description of Document	Annex	Pages
1	Para Wise Comments		1-3
2	Enquiry	A	1
3	Absentee Report		1
4	Notice in Daily Mashriq		1
5	Sanction		1
6	Notification		1
7	Appeal		1
8	Affidavit		1

Dated: _____

Respondent No: _____

[Signature]
District Education Officer
(Female) Kohat

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 1068/2019

Majid Ali S/O Nawab Ali Ex N.Qasid GGHS Khadizai Kohat..... APPELLANT

V/S

DISTT EDUCATION OFFICER (FEMALE) KOHAT & OTHERS.... RESPONDENTS
Parawise comments on behalf of Respondent No: 1 to 3

Respectfully Sheweth

Preliminary objections:

1. That the appellant has got no cause of action locus standi.
2. That the instant Service appeal is badly time barred.
3. That the appellant has concealed material facts from the Hon'able Tribunal in the instant service appeal.
4. That the instant service appeal is against the relevant provisions of law.
5. That the appellant has not come to this Hon'able Tribunal with clean hands.
6. That the appellant is estopped by his own conduct to file the instant appeal.
7. That the instant service appeal is not maintainable in the present form & circumstances of the case.

FACTS

1. Para No: 1 of the fact of appeal has no concerned with the present respondents and pertains to record.
2. Para No: 2 is incorrect, the appellant concealed the material facts as the appellant without any prior permission from the competent authority proceeded abroad.
3. Para No: 3 of the facts is incorrect, the appellant is habitual one, the appellant remained in Dubbi (UAE) and all the codal/ legal formalities in accordance with the law has been done, which could be verified from concerned agencies for verifying the travelling history as well as the appellant annexed Medical documents which were not tendered to the respondent department by any course and in this regard apex court judgment are very much clear that each and every day should be explained and no Medical documents speaks about his medical rest.

4. Para No: 4 is incorrect as the appellant neither submitted any application before the competent authority alongwith Medical prescription nor any Medico legal advice produced before the competent authority in this regard. One thing does not appeal to prudent mind that the appellant annexed application for leave on Medical ground and himself specified the time of recovery, from illness which is seems not natural.
5. Para No: 5 of the appeal is incorrect already discussed in leading paras above that the appellant neither initiated nor any application for leave submitted before the competent authority alongwith necessary Medical prescriptions which speaks about the illness of the appellant not have any advice report produced about his medical rest. So far as sanction of the application for leave is concern objection or rejection is sole prerogative of the competent authorities and the appellant has not concern.
6. Para No 6 of the appeal has no concern with the present respondents.
7. Para No: 7 of the appeal is incorrect as the order of Removal from service was passed by the competent authority in accordance with the law by initiating in proper enquiry against the appellant.
8. Para No: 8 of the appeal has no concern with the respondents.

GROUND.

- A. Para No A of the ground is incorrect removal from service order passed in accordance with the law by the competent authority after fulfilling all the codal formalities regarding enquiry, resultantly into removal from service. (Enquiry report is annexed as **Annexure A**)
- B. Para No B of the ground is incorrect, as all the opportunities were provided to the appellant but the appellant deliberately escaped to join the enquiry proceedings.
- C. Para No C of the ground is incorrect to the extent that the appellant absent himself for noticeable time from his official assign duty without obtaining any due permission from the competent authority which also amount to lack of

interest and also guilty of misconduct, rest of the para is legal regarding interference of Hon'able Tribunal.

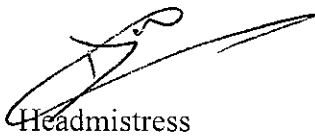
D. Para No D of the ground is totally incorrect already discussed above in leading paras vide para 3 of the fact of the appellant.

E. Para No E of the ground is incorrect proper enquiry has been conducted against the appellant and all the enquiry proceedings were conducted in accordance with the law & rules prescribed in enquiry rules, as well as the appellant conceals the material fact before the Hon'able Service Tribunal Khyber Pakhtunkhwa & intends to mislead the Hon'able Service Tribunal Khyber Pakhtunkhwa by the explaining about his traveling towards UAE (Dubbi).

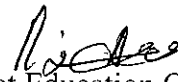
It is worth mentioning here that a person traveling to Dubbi for a long time without any permission and then after them become a Psycho patient, so the competent authorities rightly pass the removal from service order.

F. Para No F of the ground has no concern with the respondents but the perusal of the Annexure annexed by the appellant regarding his illness there is no proof annexed by the appellant with proof that after treatment he is mentally & physically fit person & the respondent Department has got no objection upon the any decision announced by the Hon'able Service Tribunal Khyber Pakhtunkhwa.

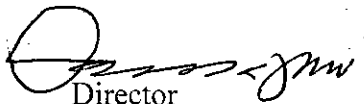
G. Para No G of the ground is incorrect no such grounds agitated by the appellant nor explain that the appeal is in hand well in time. Hence the appeal is badly barred by time may graciously be dismissed.



Headmistress
Govt Girls High School Khadizai Kt
Respondent No: 3



District Education Officer
(Female) Kohat
Respondent No: 2



Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
Respondent No: 1

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR
SERVICE APPEAL NO. 1068/2019

Majid Ali S/O Nawab Ali Ex N.Qasid GGHS Khadizai Kohat..... APPELLANT

V/S

DISTT EDUCATION OFFICER (FEMALE) KOHAT & OTHERS.... RESPONDENTS
Parawise comments on behalf of Respondent No: 1 to 3

Respectfully Sheweth

Preliminary objections:

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[Handwritten signature]
24/12/2020

4. Para No: 4 is incorrect as the appellant neither submitted any application before the competent authority alongwith Medical prescription nor any Medico legal advice produced before the competent authority in this regard. One thing does not appeal to prudent mind that the appellant annexed application for leave on Medical ground and himself specified the time of recovery, from illness which is seems not natural.
5. Para No: 5 of the appeal is incorrect already discussed in leading paras above that the appellant neither initiated nor any application for leave submitted before the competent authority alongwith necessary Medical prescriptions which speaks about the illness of the appellant not have any advice report produced about his medical rest. So far as sanction of the application for leave is concern objection or rejection is sole prerogative of the competent authorities and the appellant has not concern.
6. Para No 6 of the appeal has no concern with the present respondents.
7. Para No: 7 of the appeal is incorrect as the order of Removal from service was passed by the competent authority in accordance with the law by initiating in proper enquiry against the appellant.
8. Para No: 8 of the appeal has no concern with the respondents.

GROUND.

- A. Para No A of the ground is incorrect removal from service order passed in accordance with the law by the competent authority after fulfilling all the codal formalities regarding enquiry, resultantly into removal from service. (Enquiry report is annexed as **Annexure A**) ✓
- B. Para No B of the ground is incorrect, as all the opportunities were provided to the appellant but the appellant deliberately escaped to join the enquiry proceedings.
- C. Para No C of the ground is incorrect to the extent that the appellant absent himself for noticeable time from his official assign duty without obtaining any due permission from the competent authority which also amount to lack of

 24/12/2020

interest and also guilty of misconduct, rest of the para is legal regarding interference of Hon'able Tribunal.

D. Para No D of the ground is totally incorrect already discussed above in leading paras vide para 3 of the fact of the appellant.

E. Para No E of the ground is incorrect proper enquiry has been conducted against the appellant and all the enquiry proceedings were conducted in accordance with the law & rules prescribed in enquiry rules, as well as the appellant conceals the material fact before the Hon'able Service Tribunal Khyber Pakhtunkhwa & intends to mislead the Hon'able Service Tribunal Khyber Pakhtunkhwa by the explaining about his traveling towards UAE (Dubbi).

It is worth mentioning here that a person traveling to Dubbi for a long time without any permission and then after them become a Psycho patient, so the competent authorities rightly pass the removal from service order.

F. Para No F of the ground has no concern with the respondents but the perusal of the Annexure annexed by the appellant regarding his illness there is no proof annexed by the appellant with proof that after treatment he is mentally & physically fit person & the respondent Department has got no objection upon the any decision announced by the Hon'able Service Tribunal Khyber Pakhtunkhwa.

G. Para No G of the ground is incorrect no such grounds agitated by the appellant nor explain that the appeal is in hand well in time. Hence the appeal is badly barred by time may graciously be dismissed.

Resubmitted along with the following required documents:
1) - Service Record
2) Complete Record.




Headmistress
Govt Girls High School Khadizai Kt
Respondent No: 3

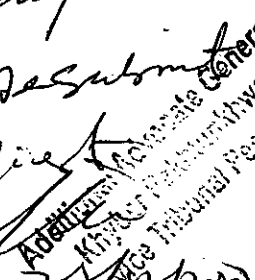


District Education Officer
(Female) Kohat
Respondent No: 2

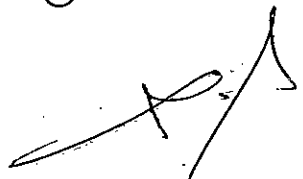
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
Respondent No: 1

Return with the direction to provide service record as well as complete record and resubmit for vetting at earliest

Please vet
DAU

22/12/2020



Vetted subject to necessary
connection, attachment of
annexures and affidavit.



24/12/2020

Additional Advocate General
Khyber Pakhtunkhwa
Service Tribunal Peshawar

(33)

Annex-(A) A



DISTRICT EDUCATION OFFICER (FEMALE) KOHAT

demisfemalekohat@gmail.com (KDA Gate No # 92, Complex 3rd block) 0922-9260290

ORDER.

No.F.No.63/ Enquiry Vol-/ D.E.O (F) Kohat WHEREAS

- (1) Mr. Majid Ali N/Qasid GGHS Khadi Zai Kohat was proceeded against under Khyber Pakhtunkhwa Government Servants(Efficiency & Discipline) Rules,2011 for the charges as willful absence from official duty since 06/12/2018.
- (2) AND WHEREAS. He was served absence notice on his home address on dated 20/12/2018,17-01-2019 and 04-02-2019 for resumption of his duty in accordance with Rules 09 on the Rules ibid.
- (3) AND WHEREAS final show cause notice was published in "Daily" Aaj dated 01-03-2019 and "Daily Mashriq" dated 05-03-2019, but even then he failed to resume his duty in the stipulated period of time.
- (4) AND WHEREAS, the competent authority District Education Officer (F) Kohat after having considered the charges and evidence on record, is of the view that the charge of willful absence from official duty have been proved.
- (5) NOW THEREFORE, in exercise of power conferred under rules-9 Government of Khyber Pakhtunkhwa (Efficiency and Disciplinary) Rules 2011, the competent authority District Education Officer (F) Kohat is pleased to impose major penalty of "REMOVAL FROM SERVICE" upon Mr. Majid Ali Naib Qasid GGHS. Khadizai w.e.f 06/12/2018.

Sd/
DISTRICT EDUCATION OFFICER
FEMALE KOHAT.

Ednst: No. 4793-98/ File No.63-Enquiry Vol-/D.E.O (F) Kohat

Dated Kohat the 25/3/2019.

Copy of above is forwarded for information & necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohat
3. District Accounts Officer Kohat.
4. Headmistress GGHS Khadizai Kohat.
5. Official Concerned.
6. P.A to DEO (F) Kohat.
7. Master file copy.

Handwritten notes: 10/6/19, 21, etc.

Handwritten signature and stamp: Attest, [Signature], [Circular Stamp]

DISTRICT EDUCATION OFFICER (F)

REMINDER:-

Keyed (2)

12



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHAT**



No. 1102 / F.No.07/ Vol-I/ Complaint/Class IV/2017-18/Estab: Secondary DEO(F) Kohat
Dated: 17/7/2018

To

The Headmistress,
GGHS Khadizai Kohat.

Subject: NAIB QASID ABSENTEE REPORT

Memo:

Refer this office No.2527 Dated 16/02/2018. (Copy attached for ready reference).

You are once again directed to recover the pay from Mr. Majid Ali N/Q of your school of absent period and deposit it into Govt treasury through challan and also stop his pay under intimation to this office.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) KOHAT
Act

Endst No ____ / F.No.07/ Vol-I/ Complaint/Class IV/2017-18/Estab: Secondary DEO(F) Kohat
Dated ____/____/2018

Copy to the:-

1. District Account Officer Kohat.
2. DMO Kohat.
3. PA to DEO(F) Kohat.

-sd-
DISTRICT EDUCATION OFFICER
(FEMALE) KOHAT



OFFICE OF THE
DISTRICT EDUCATION OFFICER

(3)



demisfemalekohat@gmail.com (FEMALE) KOHAT 0922-9260290

No. 2577 / F.No. 07/Vol-1//Complaint/Class IV /2017-18/Estab: /DEO (F) Kohat

Date 16/2/2018

To

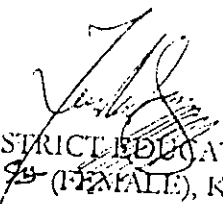
The Head Mistress
GGHS Khadizai Kohat

Subject: NAIB QASID ABSENTEE REPORT

Memo:

Refer to the letter No 19 dated 27-01-2018 on the subject cited above.

You are directed to recover the pay of Mr. Majid Ali N/Q of his absent period and his case may be referred to Medical Board under intimation of the undersigned office.


DISTRICT EDUCATION OFFICER
(FEMALE), KOHAT

No. _____ / F.No. 07/Vol-1//Complaint/Class IV /2017-18/Estab: /DEO (F) Kohat

Date: _____ / _____ /2018

Copy to the:

1. Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar
2. DMO Kohat
3. District Account Office, Kohat
4. ADEO (Estab) Secondary local office
5. PA to DEO (F) Kohat
6. Master File

DISTRICT EDUCATION OFFICER
(FEMALE), KOHAT

(۶)

ڈسٹرکٹ ایجوکیشن آفیسر زنانہ کوہاٹ



”نوٹس غیر حاضری“

مسٹر مہدی علی نائب کا صد گورنمنٹ گریڈ ہائی سکول خاریز کوہاٹ آپ مورثہ 6/12/2018 سے مسلسل غیر حاضری

ہیں آپ کو غیر حاضری کے نوٹس مندرجہ ذیل تاریخوں پر بذریعہ رجسٹری گھر کے دونوں بچوں پر ارسال کئے گئے ہیں (1) مورثہ 20/12/2018 رجسٹری نمبر 805,806 (2) مورثہ 17/11/2019 رجسٹری نمبر 1850، (3) مورثہ 4/2/2019 رجسٹری نمبر 881 لیکن نہ آپ حاضر ہوئے اور نہ ہی آپ کی طرف سے کوئی اطلاع موصول ہوئی ہے۔

لہذا آپ کو آخری بار بذریعہ نوٹس ہدایت کی جاتی ہے کہ اس نوٹس کی اشاعت کے 15 دن کے اندر اندر اپنی ڈیوٹی پر حاضر ہو جائیں اور اپنی غیر حاضری کی وجہ بتائیں ورنہ آپ کے خلاف یکطرفہ کارروائی عمل میں لائی جائیگی۔

المستہر۔ ڈسٹرکٹ ایجوکیشن آفیسر زنانہ کوہاٹ

INF(P)912/19 www.khyberpakhtunkhwa.gov.pk

(5)

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①

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHAT

ACTION.

Consequent upon the inquiry report and provision of leave rules 1981, absent
of Mr. Majid Ali N/Q GGHS, Khadizai Kohat due to his abroad journey is
reby converted into leave without pay w.e.f. 1.6.2016 to 31.8.2016.

Note:- Necessary entry to this effect should be made in his service book accordingly.
His pay for the period w.e.f. 1.6.2016 to 31.8.2016 may be recovered through
computer source under intimation to the undersigned with documentary proof i.e.
computer source and monthly pay roll.

(RIZWANA LIAQAT)
DISTT:EDU:OFFICER,
(FEMALE)KOHAT.

Endat: No. 2244/S /Class IV/Leave, Dated Kohat the 21/04/2017.

Copy of the above is forwarded to the:-

1. ✓ Headmistress GGHS Khadizai Kohat.
2. District Accounts Officer Kohat.
3. Official concerned.

Rizwana Liaquat
DISTT:EDU:OFFICER,
(FEMALE)KOHAT



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Annex 4

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

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

NOTIFICATION

1. **WHEREAS**, Mr. Majid Ali Naib Qasid GGHS Khadzai Kohat was removed from Government Service under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 by the DEO (Female) Kohat vide her Notification No Endst No 4793-98 dated 25/03/2019
2. **AND WHEREAS**, the said aggrieved Naib Qasid filed a departmental appeal dated 10/07/2019 to the Director E&SE Khyber Pakhtunkhwa Peshawar (appellate Authority) for redressal of his grievances/reinstatement in service.
3. **AND WHEREAS**, the appellate authority in pursuance of Section 17 read with sub rule (1) & (2) of the E&D Rules 2011 called for the record of the case and comments from the DEO (F) Kohat vide letter No 4307 dated 18/07/2019 for consideration of the appeal.
4. **AND WHEREAS**, the DEO Concerned provided the requisite record/comments, accordingly vide his letter No 9663 dated 03/08/2019 merely describing the reason/circumstances under which the appellant had removed from service.
5. **And WHEREAS**, in the light of record Absentee notices and publication of Absentee Notice in the Daily Newspaper the competent authority issued removal from service, the appeal submitted by Majid Ali is not tenable.
6. **NOW, THEREFORE**, in exercise of the powers conferred under Section-17 rule (2) (a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, the Director E&SE/appellate authority has **decided to reject the appeal** lodged by Mr. Majid Ali Naib Qasid GGHS Khadzai Kohat (appellant) for re-instatement in service and uphold the order of the DEO (F) Kohat issued vide Endst No 4793-98 dated 25/03/2019

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

3437-41

Endst: No. _____ /F.No. 271/A-20/C-IV/Kohat-6 Dated Peshawar the 28/10/2019.

Copy of the above is forwarded for information and n/action to the -

- 1- District Education Officer (Female) Kohat w/r to her letter No. cited above.
- 2- District Account Officer Kohat.
- 3- Principal/HM Concerned.
- 4- Appellant concerned.
- 5- PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.

att. sp. sb
Majid Ali

28/10/19
Assistant Director (Admn)
E&SE, Khyber Pakhtunkhwa, Peshawar

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Annex - 18

Before the Learned Director E&SE Khyber Pakhtunkhah Peshawar

Majid Ali N/Qasid GGHS Khadi Zai Kohat

Versus

- 1. District Education Officer Female Kohat.
- 2. Head Mistress GGHS Khadi Zai Kohat

Departmental Appeal / Representation against the order dated 25-3-2019 of respondent No.1 whereby major penalty of "Removal from service" was imposed on petitioner without giving opportunity of hearing to appellant.

Respected Sir,

The petitioner / appellant humbly prayed as below.

FACTS.

- 1. That the petitioner was appointed as Naib Qasid GGHS Khadizai Kohat and served his duties with honestly and dedication.
- 2. That recently in early December 2018 the petitioner suffered serious illness and was unable to perform his duties and in this respect the petitioner moved leave applications to respondent No.2.(copies attached)
- 3. That in the meanwhile the department started absence / departmental proceedings against the petitioner for not attending the school and lastly the petitioner came to know that he was removed from service vide letter No. 4793-98 file No. 63 enquiry vol-/ D.E.O/F Kohat (copy attached) , hence the petitioner being aggrieved from the said order file the instant departmental appeal on following **Grounds,**

- 1. That the order dated 25-3-2019 is against the facts and circumstances of the case and also against the norms of justice therefore liable to be set aside.
- 2. That the petitioner being poor and only person to earn for his poor family members.
- 3. That the petitioner soon after illness wrote leave application to school Head.Mistress but the petitioner was surprised on his dismissal from service as no show cause notice was served on him nor any charge sheet was given and even no statement of allegation nor was given and opportunity of personal hearing was given which is against the service rules and thus great unjust has been done the petitioner.
- 4. That the petitioner is honest and dedicated one and leave no stone unturned to discharge his duties therefore the petitioner deserved to be re-instated with all back benefits of service.
- 5. That interestingly the whole proceedings were conducted in the absence of the petitioner as he was lying on death bed but the department even proceeded against him though he wrote leave applications in the said period to the concerned authority which is also against humanity.

It is therefore humbly prayed that the petitioner being alone the earning member of his family and the order of the authority / respondent No.1 being illegal, against the facts and circumstances of the case and also against the service rules and norms of justice may kindly be set aside and the petitioner may kindly be re-instated with all back benefits of service.

Dated 05-06-2019

Petitioner

Majid Ali

*Attested
Majid Ali*

Majid Ali N/Qasid GGHS Khadi Zai Kohat
CNIC # 14301-3889512-5

BEFORE THE HONOURABLE SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL No. 1518/19

Majid Ali s/o Nawab Ali, Naib Qasid Govt. Girls High School Khadi Zai,
District Kohat _____ Appellant

V/S

District Education Officer (Female) Kohat and Other _____ Respondents

Parawise comments on behalf of respondents No. 1 to 3 _____

AFFIDAVIT

I, **GOHAR ALI** Junior Clerk (BPS-11) office of the District Education Officer (Female) Kohat do hereby solemnly affirm and declare on oath that the contents of the accompanying Para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed withheld from this Honourable court.

Deponent

N. A. Ali
District Education Officer
(Female) Kohat

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1518/19

Majid Ali S/o Nawab Ali, Naib Qasid Govt. Girls High School
Khadi Zai District Kohat

..... Appellant

VERSUS

District Education Officer (Female) Kohat and others

..... Respondents

Subject: REJOINDER FOR / REPLICATIONS ON BEHALF OF
APPELLANT

Sheweth:

PRELIMINARY OBJECTION:

1. That the appellant has got cause of action and locus standi.
2. That in view of the facts and circumstances of the case, the instant appeal is not time barred.
3. That the respondents departments have concealed the real and material facts from this hon'ble court.
4. That the instant appeal is within parameter of services law, while the respondents departments have mis-conceived the same.
5. That the appellant has come to this hon'ble tribunal with clean hands. This objection is absolutely wrong.

6. That the appellant is not estopped by his own conduct to file the instant appeal.
7. That the instant appeal is maintainable in the present form and circumstances of the case. The plea taken is based on presumption.

FACTS:

1. Para No.1 is absolutely wrong. Respondent No.2 and No.3 is denying concerning facts without justification because the appointment of appellant was issued by Education Department. This reflects malafide on the part of respondents No.2 and No.3. Record is clear.
2. Incorrect and irrelevant reply / comments incorporated, whatever the appellant has stated in para No.2 not given relevant comments in response.
3. Incorrect. First portion of para No.3 is based on presumption and no logic in it, while last portion of Para No.3, the appellant was admitted which speaks his medical history. The respondents department has not gone through the medical documents and refused from medical prescription which was prescribed and treated the appellant by a responsible psychiatric doctor (Syed Muhammad Sultan), the record is clear. Denying and making observations on such a definite / lucid medical documents / admission of patient / appellant is beyond wisdom which is unwarranted in law, hence this comments having no validity at all.
4. Incorrect, vide pages 31 and 32 of appeal file, an application regarding illness for purpose of medical leave alongwith prescription etc. were handed over to Principal Govt. Girls High School Khadizai Kohat. She was supposed to sent it to quarter concerned, but she did not do so malafidely.

5. Incorrect. Para No.5 of appeal is well founded.
6. Incorrect. It relates to respondents departments, because order of removal was passed by them.
7. Absolutely incorrect. Order of removal was not passed in accordance with law and appellant proceeded ex parte illegally.
8. Incorrect. Needs no reply.

GROUNDS:

- a) Incorrect. Removal of order from service of appellant is not in accordance with law and the appellant has been treated in discriminate manner and proceeded as ex parte.
- b) Incorrect. Para B of appeal is well grounded.
- c) Incorrect, well explained ground taken in appeal which is crystal clear in all aspect.
- d) Ground taken in appeal is correct. Respondents department, reply / comments based on distortion, hence no validity at all.
- e) Incorrect. The comments are based on presumption and drawn wrong conclusion. If the respondents departments are so interested, they should have been proved this allegation, therefore comments having no logic.
- f) Incorrect. Full proof is available by supporting documents by appellant.
- g) Whatever mentioned in appeal submitted by appellant is correct i.e. appeal is within time. Deliberately not sending removal order^e late to appellant is malafide

intention on part of respondent department, which is evident from record.

In view of above, it is prayed that the appeal may please be accepted as prayed for to secure ends of justice.

Dated 26-03-2021



Majid Ali
Ex. Naib Qasid

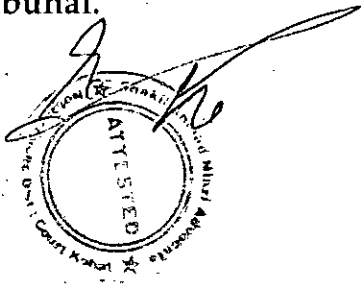
Through:



Noor Badshah Bangash
Advocate Kohat

AFFIDAVIT

I do hereby solemnly affirm and declare that the contents of above mentioned replications are correct to the best of my knowledge and belief and nothing concealed from this Hon'ble Tribunal.



Deponent

Lab Laboratory

Clinic: Sayed Psychiatric
Ghaffar Road Near Sheraz Restaurant
Tehkal University Road, Peshawar.
Ph: 091-5512785



دی لیبارٹری
کلینک غفار آباد نزد شیراز ریسٹورانٹ
تھکال یونیورسٹی روڈ پشاور

(24)

Ph: 091-5851551

Par's Name

Majeed Abo

Investigation Required:

Admit x 7 day

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ad, Peshawar.



دی لیبارٹری

کلیک: سید ماٹکیا ٹرک غفار آباد
نزد شیراز ریسٹورانٹ
جہکال پوینٹورشی روڈ پشاور
فون: 091-5512785

(20)

Ph: 091-5512785

Pat's Name

صابر علی

Investigation Required

Admit X Body

Imp Screen smy Rap // smy
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کسی بھی چیز سے رپورٹ میں ناچر ہوگئی ہے۔

Signature
[Circular Stamp]