# FORM OF ORDER SHEET

Court of	••	•	•	<del>-</del>	
Case No				38	4/ <b>2023</b>

S.No	Date of order	Order or other proceedings with signature of judge				
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		today by registered post through Mr. Sadam Hussain Zakori				
	·	Advocate. It is fixed for preliminary hearing before touring				
		Single Bench at D.I.Khan on Notices be issued to				
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INDEX

# BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KHYBERPAKHTUNKHWA

Appeal No. 384 of 2023

Muhammad Arshad

VERSUS Government of KP and

others Selvice Tribunal

APPEAL U/S 4 OF KP

TACT, 1974

INDEX

EATT.

S#	Description of Documents	Annexure	Page Numbers
1.	Grounds of Appeal With Affidavit	g- us as	1 +04
-2.	Memo of Addresses of Parties		5
3.	Copy of Removal from Service order of Respondent No.3 Dated 10.10.2022	A	6
	Copy Departmental appeal Dated 25.10.2022 along with office letter to respondent No.3	В	7-8
5.	Copies of Attendance Register		9 to 20
6.	Court Fee		21 to 24.
	Wakalatnama in favour of Sadam Hussain Zakori Advocate High Court		25

Yours Humble Appellant

Arshad

Through Counsel

Sadam HussainZakori

Advocate-High-Court



# BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KHYBERPAKHTUNKHWA

Service Tribunal Appeal No: 564 of 2023

Muhammad Arshad, Ex-Naib Qasid, GMS Jhoke Mohana Kulachi, District Dera Ismail Khan

(Appellant)

Khyber Pakkinskines Service Tellment

**VERSUS** 

17/2/2023

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar
- 2. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar
- 3. District Education Officer (Male), District Education Office,
  Dera Ismail Khan
- 4. District Comptroller, District Account Office, Dera Ismail Khan
- 5. District Account Officer, District Account Office, Dera Ismail Khan

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(Respondents)

Alshal

17/2/2017)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 KP AGAINST THE ORDER DATED 10.10.2022 OF REMOVAL OF THE APPELLANT BY THE RESPONDENT NO.3

Respectfully Sheweth,

#### BRIEF FACTS:

- 1. That the addresses of the parties written above for the purpose of services may be deemed sufficient.
- 2. That the appellant was initially appointed as Ex-Naib Qasid and was lastly posted at GMS Jhoke Mohana DIKhan.

- 3. That the appellant is imposed upon by the Respondent No.3 major penalty of Removal from Service vide its order Dated 10.10.2022 which is impugned before this Honourable Tribunal. Copy of the impugned order Dated 10.10.2022 is attached as *Annexure-A*.
- 4. That the appellant preferred departmental appeal against the said order of removal before the respondent No.2 on 25.10.2022, however, the same is not decided by the said competent authority within statutory time period. Copy of the departmental appeal along with letter to respondent No.3 is attached as **Annexure-B**.
- **5.** That the attested copies of the attendance register of the relevant periods are attached as *Annexure-C*.
- 6. That now feeling aggrieved from the order Dated 10.10.2022 and not deciding the appeal of the appellant the appellant is left with no other option but to invoke the appellant jurisdiction of this Honourable Court, inter alia, on following grounds;

#### GROUNDS:

Abshad

- 1. That the impugned order Dated 10.10.2022 and not deciding the department representation of the appellant in favour of appellant, within statutory time period, are against the law and facts hence, not tenable in the eyes of law.
- **2.** That appellant was to be treated fairly and justly under the articles 2, 2A, 9, 10, 24, 25, 10A of the Constitution of Pakistan, 1973 and other statutory and case laws.
- **3.** That the allegations levelled against the appellant regarding the absenteeism are totally baseless as the attendance register speaks volume about the same. Appellant has never remained absent from duty and has performed his duties to utmost zeal and dedication.
- 4. That appellant served in the said GMS as Ex-Naib Qasid and the incharge / Headmaster of the said school never made any complaint against the appellant. The EMA demanded kickbacks from appellant which he didn't give, hence, the appellant was marked absent from duty. It is very unfortunate that the basic aim and objective of the establishment of EMA has been defeated by the various employees of EMA and have rather become a breeding ground for corruption. Hence, the allegations levelled by them are totally baseless and against the real facts.

- 5. That the respondent No.3 in the impugned order has allegedly referred to various show cause notices which are never received by the appellant. It would have been very easy for the respondent No.3 to serve the said notices on appellant had these notices been served on appellant through the headmaster of the said school. However, no show cause notice is ever served upon appellant.
  - 6. That it was incumbent upon the competent authority to comply with Rule 9 of KP Civil Servants (Efficiency & Discipline) Rules, 2011. However, the same are also not complied with.
  - 7. That it is now settled principle of law that major punishment can't be imposed upon wilful absentecism. This is also time and again reiterated by the August Supreme Court of Pakistan in its various judgments. However, the appellant has never remained absent from his duties, rather has delivered extra duties in wake of any function etc.
  - 8. That no inquiry is made into the allegations which are off course factual in nature and wherein inquiry can't be dispensed with.
  - 9. That no incriminating material is collected against the appellant.
  - 10. That the facts mentioned above may please be considered sufficient grounds for the acceptance of the instant appeal, however, the counsel of the appellant may please be allowed to raise additional grounds for the success of the instant appeal.

HENCE, IT IS, THEREFORE, REQUESTED TO SET ASIDE THE IMPUGNED ORDER DATED 10.10.2022 OF THE RESPONDENT NO.3 AND REINSTATE THE APPELLANT IN SERVICE WITH ALL BACK BENEFITS.

Your humble Appellant

Alstod

Muhammad Arshad

Ex-Naib Qasid.

GMS Jhoke Mohana Kulachi

Dera Ismail Khan

Phrough Counsel

Sadam Hussain Zakori

Advocate High Court

Dated 31/91/2023

# AFFIDAVIT

I Muhammad Arshad do hereby solemnly affirm and declare that the contents of this Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Tribunal and this is the lone Appeal on the subject.

CERTIFIED AT D.I.KHAN

Deponent

03326270584

12/0503609.191

That the parawise content of the instant appeal are true and correct and it is the lone petition on the subject matter

Asslud

Muhammad Arshad....

(Appellant)

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# BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KHYBERPAKHTUNKHWA

Appeal No.\_\_\_\_\_of 2023

Muhammad Arshad

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VERSUS Government of KP and

Service Inbumal

APPEAL U/S 4 OF KP

ACT, 1978

MEMO OF ADDRESS

Muhammad Arshad, Ex-Naib Qasid, GMS Jhoke Mohana Kulachi, District Dera Ismail Khan

(Appellant)

#### **VERSUS**

- 1. Government of Khyber Pakhtunkhwa through Secretary
  Elementary & Secondary Education Department, Khyber
  Pakhtunkhwa, Peshawar
- 2. Director, Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar
- 3. District Education Officer (Male), District Education Office,
  Dera Ismail Khan
- 4. District Comptroller, District Account Office, Dera Ismail Khan
- 5. District Account Officer, District Account Office, Dera Ismail Khan

(Respondents)

Your humble Appellant

(Muhammad Arshad)

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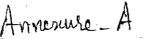
Through dounsel

Sadam Hussain Zakori<sup>)</sup>

Advocate High Court

Dera Ismail Khan

Dated 71/-1-/ 2023





## OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

Tell: 09669280131 Email: deom.di@kpese.gov.pk

WHERE AS you Mr. MUHAMMAD ARSHAD while serving as NAIB QASID at GN JIJOKE MOHANA KULACHI DIKhan were proceeded for having committed the following acts which constitutes inefficiency and misconduct under rules 3 sub rules (a),(b) & (d) of t Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) rules 2011.

a. That you were appointed against the post of Naib Qasid.

c. That you remained absent from duties as reported by EMA (Educati Monitoring Authority) as mentioned in various show cause notices served up you.

AND WHERE AS show cause notices were served upon you vide this office No. 14904 dat 14/07/2021, No. 18453 dated 10/09/2021, No. 23016 dated 22/10/2021, No. 549-52 dat 11/01/2022, No.1865-66 dated 31/01/2022, No. 8738 dated:11/05/2022 by the compete authority i.e. District Education Officer (Male) DIKhan.

AND WHERE AS your reply to any of show cause notices was not received.

AND WHERE AS you were intimated to join the duties through public notice sent to Direct Information vide this office endst no: 20062-65 dated: 19-08-2022 but you failed to do so.

NOW THEREFORE the Competent Authority in exercise of the power conferred under S Rules 4-b (iii) and 9 of Govt: of Khyber Pakhtunkhwa, Establishment & Administrat Department Rules 2011, I Mr. Musarrat Hussain Khan District Education Officer (Male) DIK as competent authority is pleased to impose the Major Penalty of "REMOVAL FRO SERVICE" upon Mr. MUHAMMAD ARSHAD NAIB QASID GMS JHOKE MOHA KULACHI from the date of his first show cause notice i.e. 14/07/2021.

Asshedd

DISTRICT EDUCATION OFFIC (MALE) DIKHAN

Dated

Endst: No. 24219-23 /PF
Copy for information & necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.

2. Deputy Commissioner Dera Ismail Khan.

3. District Comptroller of Accounts DlKhan.

4. Principal/ Head Master/SDEO concerned.

5. Master file.

(MALE) DIKHAN

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server through office order No:24219-23/PF Dated 10-10-2022 titled "Removal from

On the heris of multiple absentee reports of EMA staff and absence from personal hearing regarding show cause notices issued by the office.

Here I plead my case to your worthy self for reconsidering the decision taken by the DEO as the applicant is a dutiful personal of the education department and that the applicant did not receive any insumation regarding the personal hearings, show cause notices and public notice mentioned in the termination letter issued by the DEO office

Thank you

Your Sincerely
Muhammad Arshad (NQ BPS-3)
GMS Jhok Mohana Kulachi
D I Khan

Dated:17-Oct-2022

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DIRECTORATE OF BLESSENTARY & SECONDARY EDUCATION MICHER PARITION IN A PERILAMAN With A 2012 IVALI Klim Arthur NO

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The District Education Office (Male) D.I Khan,

Subject; Memo:

Application for Re-Instatement.

I am directed to soler to the subject noted above and to enciose homeith a coba or self-employable abblication aloud with other injectual, docrinants entities by Mr. Muhammad Archad Maib Qasid GMS India Muhana Kuluchi Diatrict D.I Khan.

You are therefore during to submit detail report terminents at an early date.

(nmbA) voluer (dimeter (Admin) Directorate EA Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst; No.

Copy formarded to the: -

- 1. Mr. Munammad Arshad Naib Qasid GMS thoug Muhana Kulachi Districs D.I Khan. 2
- PA to Director Elementary & Secondary Education Knyber Pakhtunkhara Peshawar.

₹, Master Elle.

> Assistant Director (Admin) Directorate ES Secondary Education Khybor Pakhtunkhwa, Poshamar

Alshou

2 (Administrated Att) Class (V) Copyet Commons (Muhammad Arahod Di Shn.dec



#### BETTER COPY

It is respectfully stated that the DEO (M) D I Khan has removed the applicant from service through office order No.24219-21/PF Dated 10-10-2022 titled "Removal from service"

On the basis of multiple absence reports of EMA staff and absence from personal hearing regarding show cause notice issued by the office.

Here I placed my case to your worthy self for reconsidering the decision taken by the DEO as the applicant is a dutiful personal of the education department and that the applicant did not receive any intimation regarding the personal hearing, show cause notices and public notice mentioned in the termination letter issued by the DEO office

Thank you

- sd -

Your sincerely
Muhammad Arshad (NQ BPS-3)
GMS Jhok Mohana Kulachi
D I Khan

Dated: 17-OCT-2022



# DIRECTORATE OF THE ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.

No. 4901

Dated Peshawar the 30-10-2022

То

The District Education Officer

(Male) D.I.Khan

Subject:

APPLICATION FOR RE-INSTATEMENT

Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application along with other relevant documents submitted by Mr. Muhammad Arshad Naib Qasid GMS Jhoke Muhana Kulachi District D.I.Khan.

You are therefore and to submit detail report comments at an early date.

#### 28/10/2022 Assistant director (Admn)

Directorate E& Secondary Education Khyber Pakhtunkhwa, Peshawar

Endst:	No.	1	•		
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Copy forwarded to the:-

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- 2. PA to directorate Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3. Master File

- Sol-

28/10/2022 Assistant director (Admn)

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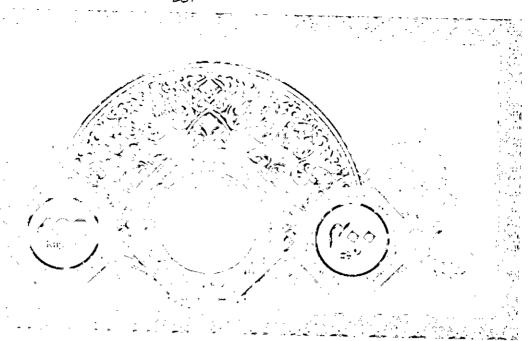
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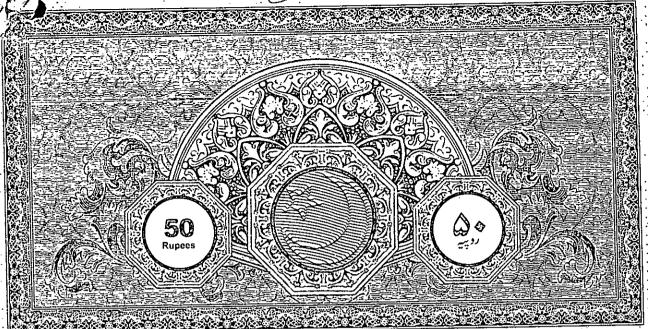
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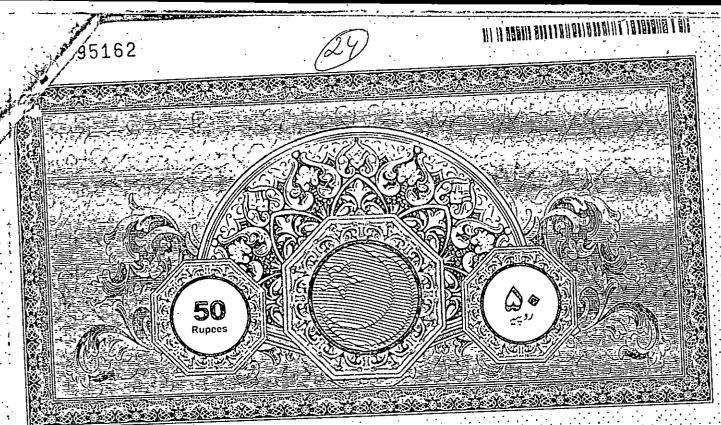
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PAKISTAN COURT FEE

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PAKISTAN COURT FEE



#### KHYBER PAKHTUNKHWA BAR COUNCIL

#### SADAM HUSSAIN ZAKORI

Advocate bc-14-4591

Date of Issue: December 2020 Valid Upto: December 2023







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Offence/Suit/Appeal/Application/Writ

VERSUS

Muhammaal Ashad

## I/We hereby appoint **SADAM HUSSAIN ZAKORI ADVOCATE HIGH** COURT, DIKHAN according to the following terms & conditions:-

- As my / our counsel in the above mentioned case with power to appear, plead and act marking and presenting applications to the Court by signing and verifying pleadings, by depositng withdrawing and receiving document and money from Court or from the opposite party in the above said case. By doing all other legal act, and legal proceedings as I / we were present personally.
- No part of fee is refundable in any case whatsoever and my / our counsel shall be entitled to retain costs payable by other side.
- I / we make our own arrangements for attending the Court on every hearing and to inform' him. My / our counsel shall not be responsible for any loss caused to me through my / our failure to so inform him.
- I / we shall make special arrangements for travel in case my / our hearing is held in any outstation. All expenses shall be borne by me / as and my / our counsel is not liable to incur any of the said expenses.
- I / we undertake to appear in the above matter before the Court, my / our counsel shall not be held responsible in case the matter is dismissed / disposed off ex-party due to my / our failure to appear / attend the case.
- I / we also undertake to pay his full professional fees before the conclusion of the case. In case his full fee is not paid the counsel can withdraw his wakalatnama from the above
- My / our counsel is also authorized to engage and appoint any other pleader or counsel whenever my / our counsel thinks to do so.

DATED: 31

Accepted By

SADAM HUSSAIN ZAKORI ADVOCATE HIGH COURT, D.I.KHAN Mob# 0341-9283883

Signature / thumb impression of Client

CNIC# 12-10503604191 Mob #073) 177584