


# FORM OF ORDER SHEET

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

Case No. - \_\_\_\_\_

680/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/03/2023	<p>The appeal of Mr. Sajid Iqbal resubmitted today by Mr. Daris Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ .Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Sajid Iqbal son of Said Khan Ex-Naib Qasid GGHS Jagaanath Razar received today i.e. on 13.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal be attested.
- 4- Memorandum of appeal be got signed by the appellatant.
- 5- Affidavit be got attested by the Oath Commissioner.
- 6- Annexures A & D of the appeal are illegible which may be replaced by legible/better one.
- 7- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.
- 8- Approved file cover is not used.
- 9- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

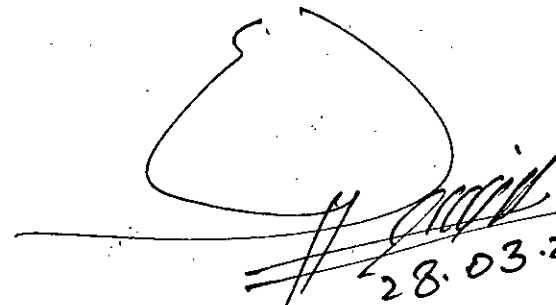
No. 987 /S.T.

Dt. 14-3- /2023.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Daris Khan Adv.  
High Court at Peshawar.

*Resubmitted after fulfilling all  
requirements.*

  
28.03.2023.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**

**PESHAWAR.**

S.A. No. 680 of 2023

Sajid Iqbal .....Appellant

VERSUS

Director Education, K.P Peshawar & others.....Respondents

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Appellant

Through:

**Daris Khan**  
Advocate, High Court

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR.**

S.A. No. 680 of 2023

Khyber Pakhtunkhwa  
Services Tribunal

Diary No. 4317

Dated 13-3-2023

Sajid Iqbal S/O Said Khan  
Ex-Naib Qasid Government Girls High School, Jagaanath, Razar,  
District Swabi.....Appellant

VERSUS

1. Director Education, Khyber Pakhtunkhwa, Peshawar.
2. Assistant Director (Admn) Directorate of elementary and Secondary Education, Peshawar.
3. District Education Officer (female), Swabi.....Respondents

SERVICE APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974  
AGAINST IMPUGNED ORDER ENDST NO.2815-G  
DATED 17.10.2022 WHEREBY MAJOR PENALTY  
OF REMOVAL FROM SERVICE WAS IMPOSED  
UPON APPELLANT.

PRAYER :

ON ACCEPTANCE OF APPEAL IMPUGNED  
ORDER DATED 17.10.2022 OF RESPONDENT  
NO.3 MAY KINDLY BE SET ASIDE AND THE  
SERVICE OF THE APPELLANT MAY BE  
RESTORED WITH ALL SERVICE BENEFITS.

Respectfully Sheweth;

1. That the appellant was appointed as Naib Qasid on 18.07.2016. (Copy of appointment letter / order dated 18.07.2016 is annexed)

2. That the appellant was performing his duty regularly, punctually and with full devotion.
3. That on 06.09.2022 respondent have issued a show cause notice to the appellant which was duly replied on 10.09.2022 vide dairy no.2094. (Copies of show cause notice and reply are annexed|).
4. That thereafter a questioner was given to appellant, which was answered. (Copies of questioner and reply are annexed)
5. That on 17.10.2022 respondent No.3 imposed major penalty of removal from service upon appellant. (Copy of order dated 17.10.2022 is annexed)
6. That on 25.10.2022 appellant filed representation against impugned order. (Copy of representation is annexed)
7. That thereafter appellant time and again approached respondents but till date no order was passed on representation.
8. That being aggrieved from aforementioned order appellant prefers instant appeal inter alia on following grounds;

GROUND:

- A. That the impugned order is against law rule and policy.
- B. That major penalty of removal from service was imposed upon appellant on registration of fake FIR in which appellant is on bail and the trial is still pending.
- C. That departmental proceeding against the appellant is the result of favoritism nepotism and political victimization.
- D. That inquiry has not been conducted as per law and rules therefore, the impugned order is not sustainable in the eyes of law.
- E. That the appellant craves permission to agitate any point / ground at the time of arguments.

(3)

It is therefore humbly prayed that on acceptance of this appeal, the impugned order dated 17.10.2022 may kindly be set aside and the service of the appellant may be restored with all service benefits

Any other relief which this Hon'ble tribunal deems appropriate in the circumstances of the case may also be granted in favor of appellant.

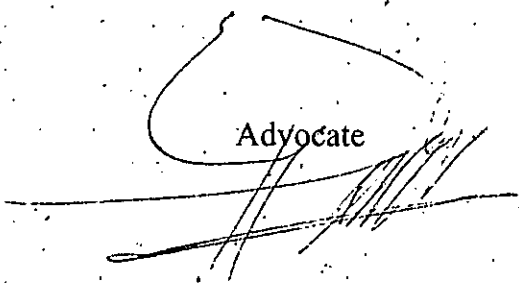
Appellant

Through:

  
Daris Khan  
Advocate Supreme Court

CERTIFICATE:

It is certified as per instruction of appellant no such like appeal has earlier been filed before this honorable tribunal.

  
Advocate

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

Service Appeal No. \_\_\_\_\_/2023

Sajid Iqbal. . . . . **APPELLANT**

**VERSUS**

Director Education & others. . . . . **RESPONDENTS**

**AFFIDAVIT**

I, Sajid Iqbal S/o Said Khan, Ex-Naib Qasid, Govt. Girls High School, Jaganath, Tehsil Razar, District Swabi, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ساجد اقبال

D E P O N E N T  
CNIC: 16201-07468347  
Cell: 0342-7424009

(5)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**

**PESHAWAR.**

S.A. No. \_\_\_\_\_ of 2023

Sajid Iqbal .....Appellant

**VERSUS**

Director Education, K.P Peshawar & others.....Respondents

**ADDRESSES OF PARTIES.**

**PETITIONER:**

Sajid Iqbal S/O Said Khan  
Ex-Naib Qasid Government Girls High School, Jagaanath, Razar,  
District Swabi

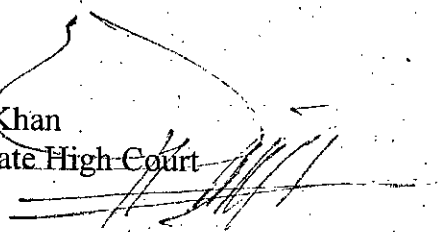
**RESPONDENTS**

1. Director Education, Khyber Pakhtunkhwa, Peshawar.
2. Assistant Director (Admn) Directorate of elementary and Secondary Education, Peshawar.
3. District Education Officer (female), Swabi

Appellant

Through:

Daris Khan  
Advocate High Court





B E F O R E   T H E   K H Y B E R   P A K H T U N K H W A   S E R V I C E S   T R I B U N A L  
P E S H A W A R

S.A. No. \_\_\_\_\_ of 2023.

Sajid Iqbal ..... Appellant/ petitioner  
VERSUS

Director Education and others and others ..... Respondents

**APPLICATION FOR CONDONATION OF  
DELAY IF IN FILING THE APPEAL.**

*Respectfully Sheweth;*

- 1) That the above noted appeal is being filed before this Hon'ble Tribunal in which no date has yet been fixed.
- 2) That grounds of appeal may be read as part and parcel of this application.
- 3) That appellant time and again approached respondents to pass an order on representation but respondents have delay it on one pretext or another and till date no such order is passed.
- 4) That appellant was ill and physician prescribed bed rest. (copy of medical reports are annexed)
- 5) That valuable rights of the appellant / applicant are involved, therefore, it is just fair as well as in the larger interest of justice that the delay in filing the titled appeal be condoned.
- 6) That if the holidays are excluded since filing of representation then instant appeal is within time.

7

7). That law favor adjudication on basis of merit rather than on technicalities.

It is, therefore, humbly prayed that on acceptance of this application, the delay if any, in filing the titled appeal may please be condoned in the best interest of justice.

Appellant:

Through:

**Daris Khan**

~~Advocate Supreme Court~~

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(8)

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

In Re:

Service Appeal No. \_\_\_\_\_/2023

Sajid Iqbal. . . . . **APPLICANT/APPELLANT**

**VERSUS**

Director Education & others. . . . . **RESPONDENTS**

**AFFIDAVIT**

I, Sajid Iqbal S/o Said Khan, Ex-Naib Qasid, Govt. Girls High School, Jaganath, Tehsil Razar, District Swabi, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

ساجد اقبال

D E P O N E N T  
CNIC: 16201-07468347  
Cell: 0342-7424009

Anex A (9)



**DISTRICT EDUCATION OFFICE (FEMALE) SWABI**  
(Office phone & Fax No 0938280339, [emisfswabi@yahoo.com](mailto:emisfswabi@yahoo.com))

**APPOINTMENT OF CLASS-IV SERVANTS.**

Consequent upon the recommendations of the Departmental Selection Committee as contained in its minutes of the meeting held on 07/05/2016, the competent authority is pleased to order the appointment of the following candidates in BPS-03 @ (Rs.6535-260-14335/-) plus usual allowances as admissible under the rules and posted against the post of Class IV mentioned against their names. They will be governed under the Civil Servant act, 1973 amended Khyber Pakhtunkhwa ACT-2005, further amended vide Govt. of Khyber Pakhtunkhwa act, 2013 with pension and gratuity in the best interest of public service on the terms and conditions given below.

**General Quota**

Sr	Name/Father's Name	D/O Birth	Home Address	Haltqa	Name of Post	Name of Station/School where appointed
1	Najid Iqbal s/o Said Khan	07/09/1977	VPO Jagan Nath The: Lahor Dist: Swabi	PK 33	Naib Qasid	IGMS Jagan Nath

**Terms and Conditions.**

1. This appointment is purely temporary and liable to termination without assigning any reason and without any prior notice.
2. He will have to produce "Fresh" Health and Age Certificate from the Medical Superintendent DHQ Hospital Swabi before taking over charge.
3. He should not be handed over charge if his age is below 18 or above 40 years.
4. He should take over charge within 15 days of the issuance of this order, in case of failure with in specific period his appointment will be expired automatically and no subsequent appeal etc; shall be entertained.
5. In case of resignation he will have to submit one month's prior notice otherwise his one month pay will be forfeited to the Government. After tendering resignation, he will not leave his job until the acceptance of his resignation by the competent authority nor shall he be granted any leave.
6. He will be governed by the service rules framed by the Government from time to time.
7. He must be permanent domiciled of District Swabi.
8. TA/DA etc; is not allowed to any one.
9. Charge reports should be submitted to all concerned.

(NAGHMANA SARDAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI

Endst: No. 2528-36 /C-IV Appointment/Dated Swabi the 18/7/2016.

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

1. PS to Honourable Minister for E&SE Govt. of Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department, Peshawar.
3. Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officer, Swabi.
5. Principal/Headmistress concerned schools.
6. ADEO (B&A) Local office.
7. ADEO (Estasb.) Local Office
8. Superintendents (Secondary) Local Office.
9. Candidates concerned.

*(Handwritten Signature)*

DISTRICT EDUCATION OFFICER  
(FEMALE) SWABI

Anex B

(14)

SHOW CAUSE NOTICE

Sofia Tabbasum District Education Officer(Female) Swabi, under the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules 2011, do hereby serve upon you, Mr: Sajid Iqbal Naib Qasid GGHS Jaga Nath Swabi, this show Cause notice as follows:-

- That Mst: Haseena D/O Noor Rehman has been appointed vide this office Endst No.2185-94 dated 31-08-2022 as Lab Att: under Gen Quota.
- That when she attended the school for taking over charge, you did not allow her for taking over charge and closed the school
- That you gave her threats not to come to school and also locked the school till the withdrawal of her appointment order.
- That you have also arose the local community for protest.
- That you have given the land on market price, but the Govtt: gave you job on humanitarian grounds.
- That you have also stopped the school staff not to attend for duty.
- That By reason of the above, you appear to be guilty of inefficiency and disobedience in your duty under Rules 3(a) (b) and (d) in Rule 1 (i), (ii), (iv) and (vi) of the Khyber Pakhtunkhwa Servants (Efficiency and Discipline) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-04 of the Rules ibid.

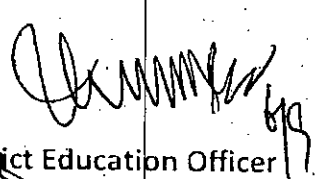
As a result therefore, I as the competent Authority have tentatively decided to proceed against you under the above mentioned rules. You are, therefore, required to show cause as to why none of the major or minor penalty under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, should not be imposed upon you and also intimate whether you desire to be heard in person. If no reply to this office is received within (07) days of its delivery, it shall be presumed that you have no defence to put in and in that case Ex-parte action will be taken against you which may culminate your removal from service.

(SOFIA TABBASUM)  
District Education Officer  
(Female) Swabi

Endst No 2284 / Dated 6/9 /2022

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

- Director Elementary & Secondary Education Khyber Pakhtukhwa Peshawar.
- Deputy Commissioner Swabi.
- Education Monitoring Authority Swabi.
- District Police Officer with the request for necessary action please.
- Mr. Sajid Iqbal Naib Qasid GGHS Jaga Nath Tehsil Razzar & District Swabi (Through registered Cover).

  
District Education Officer  
(Female) Swabi

The District Education officer (Female)

District Swabi.

(11)

2094

10/8/22

Subject: REPLY TO THE ALLEGED SHOW CAUSE NOTICE VIDE DATED 06-09-2022, ENDST NO. 2284.

Respected Sir/Madam.

1. That Mr. Sajid Iqbal Naib Qasid GGHS Jaganath Swabi, has nothing to do with Para No 1, hence no concern with the same.
2. That para No 2 of the Show Cause Notice is incorrect, therefore denied in Toto.
3. That Para No 3 is also incorrect, therefore denied in toto.
4. That Para No 4 is also incorrect, hence denied.
5. That Para No 5 is incorrect, as since his birth there is no landed property owned by him and had not sold / given any land to any department, hence this para is denied in toto.
6. That Para No 6 is also incorrect, hence denied, the alleged Show Cause Notice is based on surmises and conjectures and liable to withdrawn.
7. That the allegations against Mr. Sajid Iqbal are baseless with ulterior motives based on surmises and conjectures as Mr. Sajid Iqbal is not involved in the alleged incident.  
That Mr. Sajid Iqbal is ready to take Oath that the allegation against his are false and baseless.
8. That the matter alleged in the above cited notice is already pending in the court vide Case FIR No:682 dated 06-09-2022, hence the Show Cause notice in hands is infructuous. (Copies Attached)

It is, therefore, submitted that the Show Cause notice may kindly be withdrawn.

YOUR'S OBEDIENT

ساجد اقبال

Sajid Iqbal

Naib Qasid

GGHS Jaghnath.

سوالات

نام:- ساجد اقبال ولد سید خان

1. آپ نے 20/09/2012ء کو گورنمنٹ گراؤنڈ ہائی سکول جگتاہ سکول کو کیوں تالا لگا کر بند کیا۔ وجہ بت کریں۔
2. آپ نے گاؤں کے مسجد کے لاؤڈ سپیکر پر کیوں اعلان کر کے بچوں کو سکول آنے سے روکھا۔
3. کیا آپ کو معلوم نہیں کہ یہ سکول اپنی ذاتی ملکیت نہیں بلکہ حکومت وقت کی پراپرٹی ہے۔
4. کیا سرکاری ملازم ہوتے ہوئے اس طرح کا فعل سر انجام دینا کتنا خطرناک ہو سکتا ہے۔
5. کیا آپ نے سول سرونٹ کنڈکٹ رولز 1987ء کی خلاف ورزی نہیں کی ہے۔
6. کیا آپ کو معلوم ہے کہ کنڈکٹ رولز کی کسی بھی شق کی خلاف ورزی مس کنڈکٹ کے زمرے میں آتا ہے جسکی سزا اپنی ملازمت سے بر خاستگی پر منتج ہو سکتی ہے۔
7. ان جملہ سوالات کے جوابات قانون کے دائرے میں دیتے ہوئے مع ثبوت دیجیے۔

(13)

بیان سوالنامہ جواب

۱) ساجد اقبال ولد سید خاٹا

پوسٹ - نائب قاض

سوال نمبر جواب :- جناب عالی میں نے تالہ نہیں دکھایا تھا

اور اپنے عمامے کے وقت 7-00 ظہری دکھایا تھا

بھاری پیئرسٹرس میں نے P.P دکھایا تھا

جواب نمبر ۲) جناب عالی ہم ڈیوٹی پر تھے۔ مجھے نیتہ نہیں

آپ جناب سکول کے استانی سے معلوم کرتے ہیں بلکہ عدالت کے

جواب ۳) مجھے لیلے بھی لیتے ہیں اور اب میں سرکاری ڈیوٹی کر رہا ہوں۔

جواب ۴) مجھے لیتے ہیں۔ اور میں سرکاری ملازم ہوں۔ میں نے نہ تالہ

دکھایا ہے اور نہ سکول میں رکاوٹ کی ہے

جواب ۵) جناب عالی میں سرکاری ڈیوٹی جانتا ہوں اور نہ میں

ان تک ڈیوٹی ایسا کام کیا ہے کہ میں رخصت کی ہیں

جواب ۶) میں گلہ رولرز یا پینڈر نیونگا جناب عالی میں نے ایسا کوئی کام

نہیں کیا ہے جو قابل تکیہ ہو۔

۷) جناب عالیاں ہمارے نے گوانا کی کھلیے سکول بھڑا کے گلہ سٹاف

کوہ میں ہم نے نہ سکول بند کیا ہے اور نہ ہی کوڈ پینڈر پیر اعلان

کیا ہے۔ روز میرے ڈیوٹی کے محالہ ہوسکتا ہے مجھے 7.00 بجے

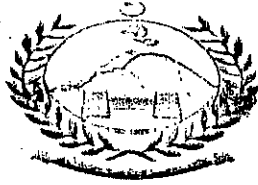
ڈیوٹی کے حاضر تھا اور سکول کھلا ہوا تھا

ساجد اقبال

۱) ساجد اقبال ولد سید خاٹا

نائب قاض سکول بھڑا





Anex<sup>3</sup> D (14)  
31

**DISTRICT EDUCATION OFFICE (FEMALE); SWABI**

(Office phone & Fax No 0938280339, [emist@swabi.gov.pk](mailto:emist@swabi.gov.pk))

**ORDER**

**WHEREAS**, disciplinary proceedings were initiated against Mr. Sajid Iqbal, N/Qasid Govt. Girls High School Jagan Naath, Swabi, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011. The accused was served with show cause due to not allowing the new appointee Class-IV, for taking over charge and kept close the school.

**AND WHEREAS**, he arose the local community for protest and also stopped the school staff from their official duty. Moreover he gave threats to the new Class-IV appointee.

**AND WHEREAS**, after receiving reply to the show cause the accused also opted for personal hearing, according he was personally heard on 26/09/2022.

**AND WHEREAS** after going through the material on record, reply to the show cause and subsequent personal hearing the accused is found guilty of misconduct.

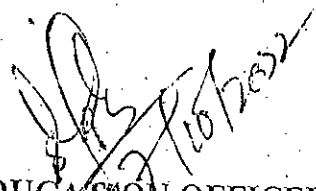
**NOW, THEREFORE**, in exercise of the powers, conferred upon the undersigned (Sofia Tabssum DEO Female Swabi) under Section 4(1) (b)(iii) of the Khyber Pakhtunkhwa (Efficiency & Discipline) rules, 2011, the Competent Authority is pleased to impose the major penalty of "**Removal from Service**" upon Mr. Sajid Iqbal, N/Qasid Govt. Girls High School Jagan Naath, Swabi with **immediate effect**.

(**SOFIA TABASSUM**)  
**DISTRICT EDUCATION OFFICER**  
(**FEMALE**)-**SWABI**

Endst:No. 2815-67 /Dated Swabi the:- 17/10/2022.

Copy of the above is forwarded for information and n/ction to the:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner, Swabi
3. District Accounts Officer Swabi.
4. District Monitoring Officer (DMO) Swabi.
5. Principal, GGHS Jagan Naath, Swabi.
6. Mr. Sajid Iqbal, N/Qasid Govt. Girls High School Jagan Naath, Swabi,  
Under Registered cover.
7. Master file.

  
17/10/2022

**DISTRICT EDUCATION OFFICER**

## بخدمت جناب ڈائریکٹر ایجوکیشن (فی میل) خیبر

### پختونخواہ، پشاور

ساجدا اقبال ولد سید خان

نائب قاصد گرلز ہائی سکول جگناتھ، تحصیل رزر ضلع صوابی (ایپلانٹ)

### بنام

ڈسٹرکٹ ایجوکیشن آفیسر (فیمیل) صوفیہ تسم، صوابی (رہائے انٹ)

### انڈیکس

صفحہ نمبر	دستاویز	نمبر شمار
3۲1	اپیل	-1
4	درخواست	-2
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8	نقل FIR لف ہے	-4
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12-15	نقل رجسٹر حاضری	-7

ایپلانٹ

ساجدا اقبال ولد سید خان

نائب قاصد گرلز ہائی سکول جگناتھ، تحصیل رزر ضلع صوابی



3- یہ کہ مورخہ 06/09/2022 کو ہی اپیلانٹ کے خلاف ایک جھوٹی اور بے بنیاد مقدمہ ایف آئی آر نمبر 682 زیر دفعات 34/186, 341, 506 پی پی سی تھانہ یار حسین میں درج رجسٹر ہوا تو من اپیلانٹ کو اسی دن سہ پہر کو مقامی پولیس نے گرفتار کیا اور من اپیلانٹ دو دن بعد ضمانت پر رہا ہوا۔ (نقل FIR لف ہے)۔

4- یہ کہ مورخہ 06/09/2022 کو من اپیلانٹ کے خلاف رسپانڈنٹ نے ایک Show Cause جاری کیا جس کا باقاعدہ Reply مورخہ 10/09/2022 کو ڈائری (انٹری) نمبر 2094 داخل دفتر کیا گیا۔ (کاپی شو کاز نوٹس اور Reply لف ہیں)۔

5- یہ کہ مابعد مورخہ 26/09/2022 کو اپیلانٹ بذات خود رسپانڈنٹ کے پاس پیش ہو کر سوالنامہ کے جوابات بھی تحریری جمع کئے۔ (حاضری، سوالنامہ اور جوابات کی کاپی لف ہے)۔

6- یہ کہ مورخہ 17/10/2022 کو من اپیلانٹ کے خلاف Major penalty لگا کر من اپیلانٹ کو نوکری سے برخاست کیا گیا۔ (نقل آرڈر مورخہ 17/10/2022 لف ہے)۔

7- یہ کہ آرڈر مورخہ 17/10/2022 بوجہات ذیل ناقابل بحالی اور حقوق اپیلانٹ پر کالعدم وغیر موثر ہے۔

### وجوہات:

الف- یہ کہ جملہ معاملہ میں تا حال کوئی پراپرائٹو انکوائری نہیں ہوئی۔

ب- یہ کہ تا حال رسپانڈنٹ نے سکول ہذا کا دورہ نہیں کیا تا کہ اصل حقائق ریکارڈ پر لائے جاسکیں۔

ج۔ یہ کہ من اپیلانٹ کو باقاعدہ چارج شیٹ نہیں دیا گیا اور نہ ہی اپیلانٹ کو کسی مجاز انکوائری افسر نے مرتکب جرم قرار دیا ہے جس کی بنیاد پر من اپیلانٹ نوکری سے محروم کیا جاسکے۔

د۔ یہ کہ من اپیلانٹ کے خلاف جملہ کارروائی مقامی سیاست دانوں کی ایما پر عمل میں لائی گئی ہے۔

ذ۔ یہ کہ من اپیلانٹ مورخہ 06/09/2022 کو اپنی ڈیوٹی مقرر وقت پر سکول حاضر ہو کر وقت مقررہ پر ڈیوٹی سرانجام دے کر کے گھر خود چلا گیا۔ (نقل رجسٹر حاضری لف ہے)۔

ر۔ یہ کہ من اپیلانٹ ناکردہ گناہ ہے اور کبھی بھی سکول کو بند کرنے کا تصور بھی نہیں کر سکتا ہے اس بابت من اپیلانٹ شہادت پیش کرنے اور باقاعدہ قرآن پاک پر حلف اٹھانے کو تیار ہے، اور اگر سکول بند تھا تو جملہ سٹاف اور اساتذہ کی حاضریاں کیسے لگ گئی۔

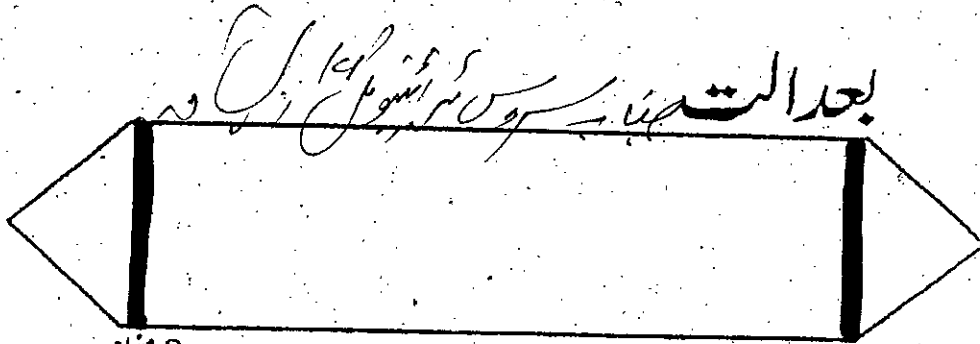
ز۔ یہ کہ من اپیلانٹ کو Hearsay اور Surmises and conjectures کی بنیاد پر بغیر کسی باقاعدہ انکوائری کے Major penalty لگائی گئی ہے جو کہ خلاف قانون، خلاف انصاف اور خلاف رولز بنیادی انسانی حقوق ہے۔

لہذا استدعا ہے کہ بمنظوری اپیل ہذا من اپیلانٹ کو بمعہ Back benefits اپنی نوکری پر بحال فرمایا جاوے۔

اپیلانٹ

ساجد اقبال ولد سید خان  
 سہیل احمد  
 نائب قاصد گزرائی سکول جگناتھ، تحصیل رزر ضلع صوابی





2 منجانب

بنام  
ڈاکٹر گلبرگ ونگر

سید احمد فضل و لکھنوی

موزخہ

مقدمہ

دعویٰ

جرم

Service Appeal

/ 23

باعث تحریر آئنگے

مقدمہ مندرجہ عنفلک بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
 آن مقام کے لیے ڈاکٹر گلبرگ ونگر کے لیے ڈاکٹر گلبرگ ونگر کے لیے  
 مقرر کر کے اتر آگیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک درو پیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی 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 باختیارات حاصل ہوں گے اور اس کا ساختہ  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

سید احمد فضل

03427424009

16201-0746834-7

الرقوم 14  
 ماہ مارچ 2023

بمقام  
 لکھنوی  
 کے لیے منظور ہے۔  
 Accept

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