


29.10.2015

Petitioner in person and Daud Jan, Supdt. alongwith Addl: A.G for respondents present. Representative submitted copy of order dated 26.10.2015 according to which the order of the Tribunal has been implemented.

In view of the afore-stated development petitioner requested for withdrawal of contempt proceedings. The application is, therefore, dismissed as withdrawn. File be consigned to the record room.




ANNOUNCED  
29.10.2015

  
Chairman  
29.10.15

FORM-A  
FORM OF ORDER SHEET

Court \_\_\_\_\_

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

	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	14.09.2015	<p>The COC application submitted by Majeed Gul through Khushdil Khan, Advocate, may be entered in the relevant register and put up to the Worthy Chairman for further order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case be put up before the court of S.B for further proceedings on <u>21-9-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	21.09.2015	<p>Counsel for the petitioner, M/S Hameedullah Jan, Director Education Fata and Abdul Malik, Assistant Director alongwith Assistant AG for respondents present. To come up for reply and arguments on application on 29.10.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

C.O.C No. 101 / of 2015  
IN RE:

Service Appeal No. 388 / of 2015

Majid Gul,  
A.A. E.O

VERSUS

The Addl: Chief Secretary  
FATA and others.

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1.	Contempt of Court Petition			1 - 2
2.	Affidavit			0 - 3
3.	Copies of order sheet alongwith application and letters	01.07.2015 02.07.2015 09.07.2015 20.08.2015	A	4 - 7

  
Appellant

Through:

  
(Khush Dil Khan)  
Advocate

Supreme Court of Pakistan  
9-B, Haroon Mansion  
Khyber Bazar Peshawar  
Cell # 0300-5887691

Dated: 10.09.2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

A.W.F PROVINCE  
Service Tribunal  
Diary No. 1020  
Dated 14/9/15

C.O.C No. 101 / of 2015  
IN RE:

Service Appeal No. 388 / of 2015

Majid Gul,  
A.A. E.O

VERSUS

The Addl: Chief Secretary  
FATA and others.

---

APPLICATION FOR INITIATING CONTEMPT OF COURT  
PROCEEDINGS AGAINST THE RESPONDENT No.3 FOR  
NON COMPLIANCE WITH THE ORDER DATED  
01.07.2015 THEREBY IMPUGNED ORDER OF TRANSFER  
DATED 18.03.2015 WAS SUSPENDED BY THIS  
HONOURABLE SERVICE TRIBUNAL.

---

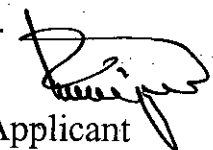
Respectfully Sheweth:

1. That the above captioned Service Appeal is pending in this Honourable Tribunal and fixed for 21.09.2015 for further proceedings.
2. That since the impugned order of transfer was premature and illegal, therefore, applicant also filed an application for its suspension which was suspended vided order dated 01.07.2015.
3. That after obtaining attested copy of order dated 01.07.2015 the same was submitted with an application dated 02.07.2015 before the respondent No.3 (Director Education FATA) for its compliance the copy of which was also sent to respondent No.2 (Secretary Social Sectors Department FATA) but respondent No.3 has not yet implemented the aforesaid order though the respondent No.2 also marked copy of the same application for necessary action. In addition,

Deputy Secretary Litigation also written letters for the requisite compliance vide dated 09.07.2015 and 20.08.2015 but of no avail. (Copy of the order dated 01.07.2015, application and letters are **Annexed:-A)**

4. That the respondent No.3 is making delayed tactics and deliberately not implemented the order of this Honourable Tribunal amounting to Contempt of Court which has committed by him.

It is, therefore, humbly prayed that on acceptance of this application, the contempt of Court proceedings may please be initiated against the respondent No.3 he be summoned, proceeded against and be punished in accordance with law. Moreover he also be directed to act fairly and implement the order of this Honourable Tribunal in letter and spirit.

  
Appellant/Applicant

Through:

  
**(Khush Dil Khan)**

Advocate

Supreme Court of Pakistan

9-B, Haroon Mansion

Khyber Bazar Peshawar

Cell # 0300-5887691

Dated: 10.09.2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

C.O.C No. \_\_\_\_\_ / of 2015  
IN RE:

Service Appeal No. 388 / of 2015

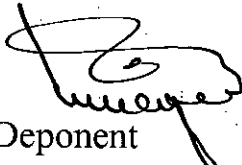
Majid Gul,  
A.A. E.O

VERSUS


The Addl: Chief Secretary  
FATA and others.

AFFIDAVIT

I, Majid Gul, Additional Agency Education Officer/Assistant Agency Education Officer, Lower/Central Kurram, do hereby solemnly affirm and declare on oath that the contents of this Contempt of Court Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

  
Deponent

IDENTIFIED BY:

  
**(Khush Dil Khan)**  
Advocate, Peshawar.

**DIRECTORATE OF EDUCATION, FATA SECRETARIAT, PESHAWAR**

**TRANSFER/RE-ADJUSTMENT**

In pursuance of Khyber Pakhtunkhwa Service Tribunal Peshawar decision dated 04/05/2015, Mr. Majid Gul SST (B-16) Ex-Addl: AEO Lower/Central Kurram is hereby re-adjusted/transferred as Addl: AEO Lower/Central Kurram against a vacant post with immediate effect till further order.

**DIRECTOR EDUCATION (FATA)**

Endst: No. 10889-62 /A-12/Majid Gul

Dated Pesh: the 26/10 /2015

Copy forwarded to the:-

- 1 Deputy Secretary Litigation AI&C Deptt: FATA Secretariat
- 2 Section Officer (Estab), AI&C Department FATA Secretariat
- 3 Addl: Agency Education Officer, Central/Lower Kurram
- 4 Agency Accounts Officer, Kurram Agency at Parachinar
- 5 Principal GMHS Sadda Kurram Agency
- ✓ 6 Headmaster GHS Bagan Kurram Agency
- 7 PS to Secretary Social Sector Deptt: FATA Secretariat
- 8 P.A to Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar
- 9 PA to D.E FATA
10. EMIS Local Directorate
- 11 Mr. Daud Jan Dealing Asstt: Service Tribunal cases in Local Directorate

  
DY: DIRECTRESS (ESTAB :)

(Anwar)

Annex A 124

05

01.07.2015

Appellant with counsel and Mr. Daud Jan, Supdt. along with Addl: A.G for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comments on 29.7.2015 before S.B. The impugned order shall remain suspended to the extent of appellant. *///*

*SKY*  
Chairman

Certified to be true copy  
E. M. A. KHAN  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 2-7-2015  
No. of Pages 800  
Cost of Copy 6--  
Urgent 2--  
T.M. 8--  
Date of Copy 2-7-2015  
Date of Completion of Copy 2-7-2015  
Date of Delivery of Copy 2-7-2015



P-5

Please take  
n.a. as per  
law.

11/7/15

Dir Edu (FATA)

To,  
The Director of Education,  
FATA Secretariat, Peshawar.

Subject: APPLICATION FOR IMPLEMENTATION OF ORDER  
THE HON'BLE SERVICE TRIBUNAL VIDE D.  
01.07.2015.

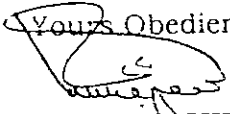
Respected Sir,

It is submitted that an order dated 18.03.2015 was issued by this directorate, whereby I was transferred from the Post of Add: AEO/AAEO Lower/Central Kurram Sadda and posted as SST at GHS Bagan Lower Kurram. The applicant was approached the Hon'ble Service Tribunal Peshawar through Appeal No.388/2015.

In the case, preliminary hearing was held on 01.07.2015, resultantly the transfer order was suspended (Copy of the order attached for compliance).

It is requested to may kindly be implemented the order and allow me to continue my duty as Add: AEO/AAEO Lower and Central Kurram in view of the Hon'ble Service tribunal order dated: 01.07.2015..

Yours Obediently,

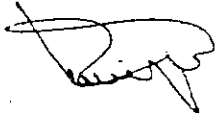
  
**MAJEED GUL**  
Additional AEO/AAEO  
Lower/Central Kurram Sadda

Dated: 02.07.2015

Copy forwarded to the:

1. Additional Chief Secretary (FATA), Warsak Road, Peshawar.
2. Secretary Education (FATA), Warsak Road, Peshawar.
3. Sardar Muhammad, SET, GHS, Sadda, Kurram Agency.

SSD No 2150  
dated 15.7.15

  
**MAJEED GUL**  
Additional AEO/AAEO

P. 6

**MOST URGENT**  
**COURT CASE**

**FATA SECRETARIAT,**  
**(Admn & Coord Department)**  
**WARSAK ROAD PESHAWAR**

No. S.O.(Lit)/CSF/FC/ 2675

Dated Peshawar the 09-07-2015

To,

The Director Education, FATA  
FATA Secretariat,  
Peshawar.

Subject: **SERVICE APPEAL NO. 388/2015 MAJEED GUL AAEO KURRAM VS**  
**ACS FATA & OTHERS.**

Dear Sir,

I am directed to enclose herewith a copy of Judgment dated 01-07-2015  
of KP Service Tribunal Peshawar for compliance under intimation to this office, please.

This may be treated as **"MOST URGENT"**.

Yours faithfully,

  
Deputy Secretary(Lit.)

Encls: **As above.**

REMINDER 1<sup>st</sup>

MOST URGENT  
COURT CASE

P-7

**FATA SECRETARIAT,**  
(Admn & Coord Department)  
**WARSAK ROAD PESHAWAR**

No. S.O.(Lit)/CSF/ ~~11273~~-74

Dated Peshawar the 20-08-2015.

To,

The Director Education (FATA),  
FATA Secretariat,  
Peshawar.

Subject: **SERVICE APPEAL NO. 388/2015 MAJEED GUL AAEO KURRAM VS**  
**ACS FATA & OTHERS**

Dear Sir,

I am directed to to refer to this Office letter No. S.O(Lit)/CSF/FC/2675 dated 09-07-2015, on the subject noted above (copy attached for ready reference) and to state that the Compliance report asked for vide our letter is still awaited under reference may please be expedited.

This may be treated as "MOST URGENT".

Yours faithfully,

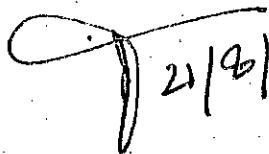
  
Deputy Secretary (Lit:)

Encls: As above.

Copy to:-

✓ Secretary Social Sector Department FATA Secretariat Peshawar.

For n.s.p.

  
21/8/15

Dir E

  
Deputy Secretary (Lit:)

SSD No - 223  
21/8/15

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

C.O.C No. 101 / of 2015  
IN RE:

Service Appeal No. 388 / of 2015

Majid Gul,  
A.A. E.O

VERSUS

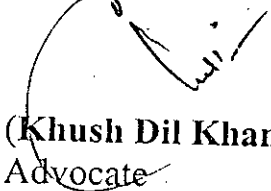
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Through:

  
(Khush Dil Khan)  
Advocate

Supreme Court of Pakistan  
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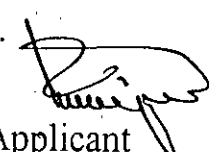
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Dated: 10.09.2015

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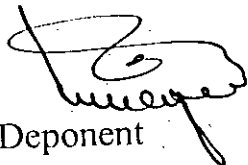
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IDENTIFIED BY:

  
(Khush Dil Khan)  
Advocate, Peshawar.

Annex 'A' 124

09 01.07.2015

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Sly  
Chairman

Certified to be true copy  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

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Time 8-00  
Date of completion of work 2-7-2015  
Date of delivery of copy 2-7-2015



P. 5

Please take  
n.a as per  
law.

14/7/15

To,  
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01.07.2015.

Dir Edu (FATA)

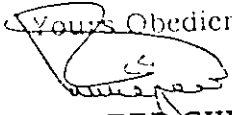
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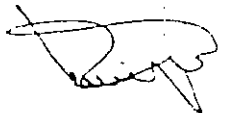
  
MAJEED GUL  
Additional AEO/AAEO  
Lower/Central Kurram Sadda

Dated: 02.07.2015

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SSD No 2150  
Date 15.7.15

  
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Additional AEO/AAEO

12/5

P. 6

**MOST URGENT**  
**COURT CASE**

**FATA SECRETARIAT,**  
**(Admn & Coord Department)**  
**WARSAK ROAD PESHAWAR**

No. S.O.(Lit)/CSF/FC/ 2675

Dated Peshawar the 09-07-2015

To,

The Director Education ,FATA  
FATA Secretariat,  
Peshawar.

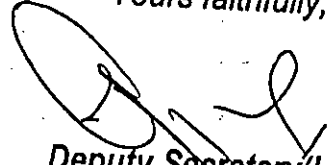
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Deputy Secretary(Lit.)

Encls: As above.

12  
12  
12

REMINDER 1<sup>st</sup>

MOST URGENT  
COURT CASE

P 7

**FATA SECRETARIAT,**  
(Admn & Coord Department)  
**WARSAK ROAD PESHAWAR**

No. S.O.(Lit)/CSF/ 11273-74

Dated Peshawar the 20-08-2015.

To,

The Director Education (FATA),  
FATA Secretariat,  
Peshawar.

Subject: **SERVICE APPEAL NO. 388/2015 MAJEED GUL AAEO KURRAM VS**  
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Deputy Secretary (Lit:)

Encls: As above.

Copy to:-

✓ Secretary Social Sector Department FATA Secretariat Peshawar.

For n. a. pl. /  
21/8/15

Deputy Secretary (Lit:)

Dir E

SSD No - 2223  
21/8/15