

6

27.05.2015

Appellant with counsel present. Learned counsel for the appellant seeks adjournment. Last opportunity granted. Adjourned for preliminary hearing to 22.6.2015 before S.B.


Chairman

7

22.06.2015


Appellant in person present. Counsel for the appellant is not in attendance due to strike of the Bar. To come up for preliminary hearing on 13.7.2015 before S.B.


Chairman

8

13.07.2015

Appellant with counsel present. Learned counsel for the appellant seeks adjournment. Directed to furnish necessary documents including copy of writ petition and order made thereon. Adjourned to 31.7.2015 for preliminary hearing before S.B.


Chairman

9

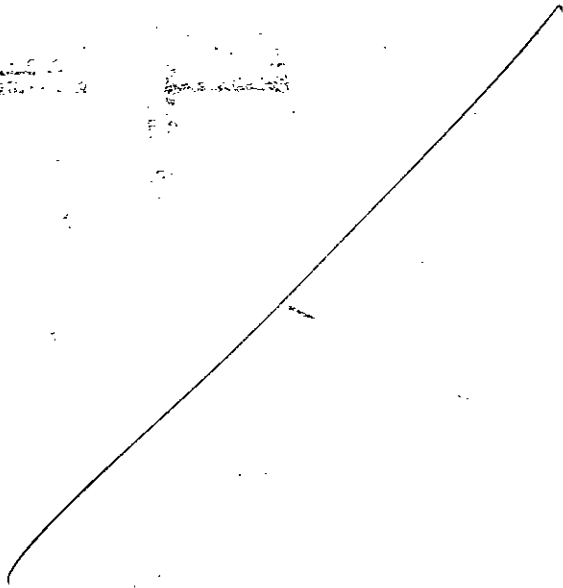
31.07.2015

Appellant with counsel present. Submitted application for withdrawal of appeal. The same is dismissed as withdrawn. File be consigned to the record.

ANNOUNCED
31.7.2015


Chairman

31.07.15




3. 16.04.2015 Counsel for the appellant present. Seeks adjournment.

Adjourned to 30.04.2015 for preliminary hearing before S.B.


Chairman

4. 30.04.2015 Counsel for the appellant present. Seeks adjournment.

Adjourned for preliminary hearing to 13.05.2015 before S.B


Chairman

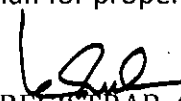

5. 13.05.2015 Appellant in person present and seeks adjournment as his
counsel is busy at Islamabad. Adjourned to 27.5.2015 for
preliminary hearing before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 313/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.04.2015	<p>The appeal of Mr. Mushtaq Ali resubmitted today by Mr. Shahab Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>16-4-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2	13-4-15	

The appeal of Mr. Mushtaq Ali son of Abdul Ghani Senior Distt. Education Officer (M) Battagram received to-day i.e. on 10.04.2015 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- List of Addresses of the parties is unsigned which may be got signed.
- 2- Annexures of the appeal may be attested.

No. 426 /S.T,

Dt. 13-4 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shahb Khattak Adv. Pesh.

Repeatedly

*list of address of parties and Annexures
of appeal has been duly signed and
attested as per directions of honorable
office. Resubmitted please.*

Dated: -13 ⁴/₂₀₁₅

Shahb

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 313 /2015

Mustaq Ali.....(Appellant)

V E R S U S

The Secretary Elementary & Secondary Education, Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.

And others.....(Respondents)

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal		1-6
2.	Affidavit		7
3.	Addresses of the Parties		8
4.	Application for condonation of delay		9-11
5.	Affidavit		12
6.	Copy of promotion order and posting order	A	13-16
7.	Copy of the order of compulsory retirement	B	17
8.	Copies of application and Medical Certificate	C/1 & C/2	18-33
9.	Copies of F.I.R, Application and Certificate	D/1 to D/3	34-36
10.	Copy of the representation/ appeal	E	37
11.	Copy of the appeal	F	38
12.	Wakalat Nama		

Through

Dated: 09/04/2015


Appellant
MUSTAQ ALI


Shahab Khattak

&

Qasim Khan

Advocates High Court,
Peshawar.

Cell No. 0306-8329443

①

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 313 /2015

A.W.P Province
Service Tribunal
Diary No 322
Dated 10-4-2015

Mustaq Ali S/o Abdul Ghani R/o Musazai Gul Abad, Inqilab Road, Peshawar, Senior Clerk District Education Office (M), Battagram.....(Appellant)

VERSUS

1. The Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. District Education Officer (M) Peshawar, Hashtnagri, Peshawar.
3. District Education Officer (M) Battagram Bazar, Battagram.
4. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Dabgari Garden, Peshawar.....(Respondents)

APPEAL UNDER SECTION 4 OF KHYBER PUKHTUNKHWA SERVICE TRIBUNAL ACT 1974, FOR SETTING AS ASIDE OFFICE ORDER NO. 729-32 DATED 05/09/2014 OF RESPONDENTS NO. 2, WHEREBY THE APPELLANT HAS BEEN RETIRED COMPULSORILY FROM THE SERVICE AS THE ORDER IS AGAINST THE LAW, VOID AB-INITIO AND WITHOUT JURUSCTION.

[Handwritten signature]
10/4/15

[Handwritten signature]
13/4/15

PRAYER IN APPEAL:

On acceptance of this appeal, this Hon'ble Tribunal may be please to set aside the Compulsory Retirement order bearing No. 729-32 dated 05/09/2014 and to reinstate the appellant in his service with all the back benefits.

Respectfully Sheweth:

1. That the appellant has been serving Education Department for 29 yeas, presently posted as Senior Clerk in the Office of respondent No. 3 since 20/05/2014. (Copy of promotion order and posting order is annexure "A").
2. That respondent No. 2 issued on 05/09/2014 mercilessly compulsory retirement order of appellant on ground of absence from 18/05/2013 but the period of absence has not been specifically shown. (Copy of the order of compulsory retirement annexure "B").
3. That appellant has been suffering from HCV seriously and had submitted an application for leave on Medical Grounds from 18/05/2013 to

18/01/2014, which was duly forward by the principal to the EDO (E&S) Peshawar. the appellant remained admitted in Hospital for treatment from 18/05/2013 to 31/05/2013. (Copies of application and Medical Certificate annexure "C/1" and "C/2" respectively).

4. That the appellant during his medical leave period also remained in jail for 4 moths from 27th July 2013 to 20th November, 2013, u/s 489-F PPC. (Copies of F.I.R, Application, Certificate annexure "D/1" to "D/3" respectively).
5. That the respondent No. 2 has traversed his jurisdiction to issue the compulsory retirement order dated 05/09/2014 the appellant who has been transferred to the office of respondent No. 3 on 28/05/2014. The appellant was no more under the service of respondent No. 2.
6. That the impugned order is void ab-initio and without jurisdiction and in violation of fundamental rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.

7. That there were no disciplinary proceedings against the petitioner since on 20/05/2014, the Departmental Promotion Committee promoted the appellant from the post of Junior Clerk to the post of Senior Clerk with due consideration of the unblemished and clear service record of the appellant and he was transferred from Peshawar to Battagram against the vacant post.

8. That the appellant has not been served upon any charge sheet/ statement of allegations, show cause notice, no inquiry officer has ever been notified, and no opportunity of personal hearing and reply have been given the appellant.

9. That the service record of the appellant is complete and in continuity and this fact is confirmed from the service book of the appellant. It also show that the respondent No. 2 did everything in vacuum and at the back to the appellant. Even the superior officers of appellant at Battagram were not informed.

5

10. That the illegal and arbitrary order of the respondent No. 2 clearly proves his malafide and personal grudge against the appellant.
11. That the appellant has filed representation before the Director Elementary & Secondary Education, Khyber Pakhtunkhwa. (Copy of the representation/ appeal is annexure "E").
12. That the appellant submitted yet another representation/appeal on 08/12/2014, which was duly entertained by the respondent No. 4, but still no reply has been given. (Copy of the appeal is annexure "F").
13. That the appellant is filling the instant Service Appeal subject to withdrawal/ disposal of the Writ Petition No. 3846/2014 on question of jurisdiction, filed earlier by the appellant before the Hon'ble Peshawar High Court, Peshawar.
14. That the appellant approaches this Hon'ble Tribunal in view of the above facts and grounds.

6

It is, therefore, most humbly prayed that on acceptance of this Service Appeal, this Hon'ble Tribunal would be pleased to set aside the impugned compulsory retirement order of the appellant dated 05/09/2014 and restoring him to his post and duties with all the back benefits, please.

Any other relief may also be granted in favour of the appellant which deems fit please.

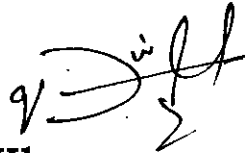
Through

Dated: 09/04/2015


Appellant
MUSHTAQ-ALI


Shahab Khattak

&


Qasim Khan
Advocates High Court,
Peshawar.

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2015

Mushtaq Ali.....(Appellant)

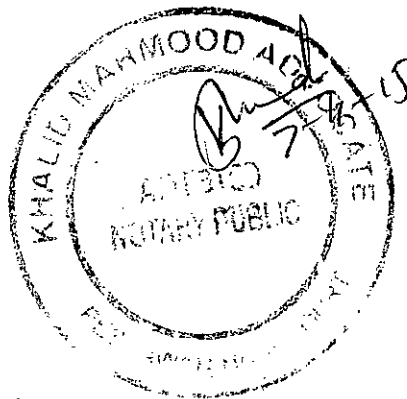
VERSUS

Secretary Elementary & Secondary Education, Khyber
Pakhtunkhwa Civil Secretariat, Peshawar.

and others.....(Respondents)

AFFIDAVIT

I, **Mustaq Ali** S/o Abdul Ghani R/o Musazai, Gul Abad,
Inqilab Road, Peshawar, Ex-Senior Clerk, District Education
Office, (Male) Battagram, do hereby solemnly affirm and
declare, that the contents of the **Service Appeal** are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.



Mushtaq Ali
DEPONENT

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2015

Mustaq Ali.....(Appellant)

V E R S U S

The Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

And others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Mustaq Ali S/o Abdul Ghani R/o Musazai Gul Abad, Inqilab Road, Peshawar, Senior Clerk District Education Office (M), Battagram.

RESPONDENTS:

- 1. The Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2. District Education Officer (M) Peshawar, Hashtnagri, Peshawar.
- 3. District Education Officer (M) Battagaram Bazar, Battagaram.
- 4. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Dabgari Garden, Peshawar.

Mustaq Ali
Appellant
MUSTAQ-ALI

Through

Dated: 09/04/2015

Shahab Khattak

&

Qasim Khan
Qasim Khan
Advocates High Court,
Peshawar.

9

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. ____/2015

In

Service Appeal No. ____/2015

Mustaq Ali.....(Appellant)

V E R S U S

The Secretary Elementary & Secondary Education, Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.

And others.....(Respondents)

**APPLICATION FOR CONDONATION OF
DELAY, IF ANY.**

Respectfully Sheweth:

1. That the appellant has filed the accompanying Service appeal before this Hon'ble Tribunal.
2. That the grounds of main Appeal may kindly be considered as part and parcel of the instant application.

3. That appellant prayed for condonation of delay if any on the following grounds:


GROUND:

- A. That the impugned order is against the law, void and without jurisdiction.
- B. That the petitioner approached the Hon'ble Peshawar High Court, Peshawar and hence this case comes under the exceptions provided by the Limitation Act.
- C. That the appellant had filed a second representation/ appeal which has also not been disposed of so far.
- D. That on merits, the appellant has got a genuine case, moreover, valuable rights of petitioner are involved in the matter.
- E. That a compromise has been effected in the main dispute between the complainant and appellant.
- F. That the appellant has a long service in Education Department and the Service is the only means of livelihood for the appellant and his family.

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G. That any other ground/ documents may kindly be allowed to be presented at the time of hearing of the appeal.

It is, therefore, most humbly prayed that on acceptance of this application, this Hon'ble Tribunal may be pleased to allow the condonation of appeal if any.

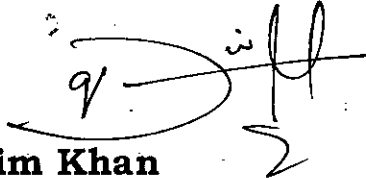

Appellant
MUSTAFAZ ALI

Through

Dated: 09/04/2015


Shahab Khattak

&


Qasim Khan
Advocates High Court,
Peshawar.

12

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2015

In

Service Appeal No. _____/2015

Mustaq Ali.....(Appellant)

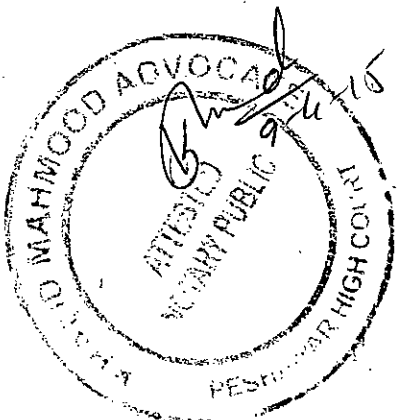
V E R S U S

The Secretary Elementary & Secondary Education, Khyber
Pakhtunkhwa, Civil Secretariat, Peshawar.

And others.....(Respondents)

AFFIDAVIT

I, Mustaq Ali S/o Abdul Ghani R/o Musazai Gul Abad,
Inqilab Road, Peshawar, Senior Clerk District Education Office
(M), Battagram, do hereby solemnly affirm and declare on
oath, that the contents of the **Application for Condonation of
delay** are true and correct to the best of my knowledge and
belief and nothing has been concealed from this Hon'ble
Tribunal



Mustaq Ali
DEPONENT
MUSTAQ ALI

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR.


NOTIFICATION

Consequent upon the recommendations of the Departmental Promotion Committee (DPC) in its meeting held on 20-05-2014, the following Junior Clerks (B-07) working in and under the E&SE Deptt: Khyber Pakhtunkhwa /FATA/DCT&E/PITE are hereby promoted/adjusted as Senior Clerk BPS-09 on regular basis in the interest of public service with immediate effect:-

S.No	Name	Address	Adjusted at	Remarks
1	Rahman Ullah J/Clerk	GHS Bagh Dush Khel Dir Lower	S/Clerk GHS Serai Bala (Talash)	Against vacant post
2	Sultan Perviz J/Clerk	GHS Lolownai Shangla	S/Clerk GHSS Khwaza khela Swat	Against vacant post
3	Muhammad Faheem J/Clerk	GHS Teri Karak	S/Clerk DEO (M) Karak	Against vacant post
4	Sultani Room J/Clerk	GGHS Mian Baringola Dir Lower	S/Clerk DEO (M) Dir Lower	Against vacant post
5	Muhammad Saeed J/Clerk	GHSS Shah Salim Karak	S/Clerk GHSS Shah Salim Karak	Against vacant post
6	Rahmat Hussain ASK J/Clerk	GHS Kirman Kuram Agency	S/Clerk Services placed at the disposal of DE FATA	For further Adjustment
7	Muhammad Umer Khan J/Clerk	GHSS Jehagiri Karak	S/Clerk GHSS Bogara Karak	Against vacant post
8	Sibtul Hassan Shah	GGHS No.8 Sherazi D.I.Khan	GHSS Kachi Pind Khan D.I.Khan	Against vacant post
9	MUHAMMAD AYAZ KHAN J/Clerk	GHS Ghazni Khel Lakki	S/Clerk GHSS Landiwah Lakki	Against vacant post
10	Manzoor Hussain J/Clerk	GHS Gurguri Karak	S/Clerk GHSS Nari Panoos Karak	Against vacant post
11	Muhammad Rashid J/Clerk	GHSS Spin Khak NSR	S/Clerk GGHS Dak Ismail Khel Nowshera	Against vacant post
12	Sardar Zulfiqar J/Clerk	GGHS Bandi Mera AAbad	S/Clerk DEO (M) Abbottabad	Against vacant post
13	Muhammad Khurshid J/Clerk	GHSS Pirpai NSR	S/Clerk GHSS Manki Sharif NSR	Against vacant post
14	Muhammad Javed J/Clerk	GGHS Sajkot (Chehr) AAbad	S/Clerk GHS Mori Bedbhen A/Abad	Against vacant post
15	Badshah Gul J/Clerk	GHS Khader Khel Kohat	S/Clerk DEO (F) Kohat	Against vacant post
16	Dakhil Badshah J/Clerk	GGHS Bazid khel Karak	S/Clerk GHSS Karak	Against vacant post
17	Sanat Khan J/Clerk	GHSS Jandari Karak	S/Clerk GHSS Jandri Karak	Against vacant post
18	Ayaz Hussain J/Clerk	GGHS Palosa Kimari Karak	S/Clerk GHSS Chanda Khurram Karak	Against vacant post
19	Haroon Khan J/Clerk	GGHS Dhodial AAbad	S/Clerk DCTE Abbottabad	Against vacant post

Attended
9/5/14

1	ABDUL MANAN J/Clerk	GHS Inzargai Mkd	S/Clerk SDEO (M) Swat Ranizai Mkd	Against vacant post
2	Abdul Qayyum J/Clerk	GHS Tarnawai AAbad	S/Clerk DCTE Abbottabad	Against vacant post
3	Shamrez Muhammad J/Clerk	GGHS Aziz Bang AAbad	S/Clerk RITE (M) Haripur	Against vacant post
4	Munirullah J/Clerk	GHS Paimal Sharif Battagram	S/Clerk DEO (F) Battagram	Against vacant post
5	S.Abrar Hussain Shah J/Clerk	GGHSS Kakul A/Abad	S/Clerk GGHSS Kakul A/Abad	Against vacant post
6	Muhammad Zaman	SDEO (M) Abhottabad	S/Clerk DEO (M) Abbottabad	Against vacant post
7	Safdar Zaman J/Clerk	GGHS Samandar Katha AAbad	S/Clerk GHSS Bagnotar A/Abad	Against vacant post
8	Umar Rashad J/Clerk	GHS Chuprial Swat	S/Clerk GHS Matta Swat.	Against vacant post
9	Sardar Muhammad Saleem J/Clerk	GGHS Mullach AAbad	S/Clerk GHSS Khanspur Ayubia A/Abad	Against vacant post
10	Mahnat ullah J/Clerk	GGHS Nari Panoos Karak	S/Clerk GCPE Karak	Against vacant post
11	Awal Sardar J/Clerk	GHS Tettar khel Karak	S/Clerk GHSS Warana Karak.	Against vacant post
12	Ali Akbar J/Clerk	GHS Chantalai Swat	S/Clerk DEO (M) Swat	Against vacant post
13	Fazal Wahab J/Clerk	GHS No. 3 Mingora Swat	S/Clerk DEO (M) Swat	Against vacant post
14	Nisar Melmood J/Clerk	GHS Shamoza Swat	S/Clerk GHSS Shamoza Swat	Against vacant post
15	Zahoor ullah J/Clerk	GGHS Ismaila Swabi	S/Clerk SDEO (F) Topi Swabi	Against vacant post
16	Muhammad Jameel J/Clerk	GGHS Upper Kehal AAbad	S/Clerk GHSS Lora Abbottabad	Against vacant post
17	Yar Khan J/Clerk	DE&SE K.P Peshawar	S/Clerk DE&SE K.P. Peshawar	Against vacant post
18	Syed Muhammad J/Clerk Jan	GHS Shakar Dhand charsadda.	S/Clerk GGHSS Shabqadar Fort Charsadda	Against vacant post
19	Amir Awais Khan J/Clerk	GHS Khungi Dir Lower	S/Clerk SDEO (M) Dir Lower	Against vacant post
20	MUSHTAQ ALI J/Clerk	GHSS No. 4 Pesh city	S/Clerk DEO (M) Battagram.	Against vacant post
21	BAKHTIAR KHAN J/Clerk	GHS Hassan Garhi Peshawar	S/Clerk GHSS No.3 Peshawar City	Against vacant post
22	Muhammad Ishaq J/Clerk	DEO (I) Abbottabad	S/Clerk SDEO (M) A/Abad	Against vacant post
23	NAVEED ANWAR J/Clerk	GHS Pakha Ghulam Peshawar	S/Clerk GHS Daag Peshawar	Against vacant post
24	Monia Khan J/Clerk	GGHS Khurram Karak	S/Clerk DEO (M) Karak	Against vacant post
25	ABDUR REHMAN J/Clerk	DE&SE K.P	S/Clerk GHSS No.3 Peshawar city	Against vacant post
26	Sher Ahmad J/Clerk	GHS Kanju Swat	S/Clerk GHSS Mingora Swat	Against vacant post

Attended


46	Muhammad Naseer	Nagri Tutial Aabad	S/Clerk GISS Lora A/Abad	Against vacant post
47	Ghulam Noorani J/Clerk	GGHS Bandi Dhundan Aabad	S/Clerk RITE (F) Abbottabad	Against vacant post
48	S.AKBAR SHAH J/Clerk	GHS Wadpaga Peshawar.	S/Clerk GGHS Akbarpura	Against vacant post
49	Khanwaiz J/Clerk	GHS No.2 Haveelian Aabad	S/Clerk DEO (M) Abbottabad	Against vacant post
50	UMAR GUL J/Clerk	GGHS Pakha Ghulam Pesh	S/Clerk GHSS Sufaid Sang Peshawar	Against vacant post
51	Zahir Shah J/Clerk	GGHS Panr Mingora Swat	S/Clerk DEO (M) Swat	Against vacant post
52	Mujahidullah J/Clerk	GGHS Islamia collegiate Pesh	S/Clerk GGHS Hayat Abad Peshawar	Against vacant post
53	Liaq Khan J/Clerk	GGHS Thand Koi Swabi	S/Clerk GHSS Ayub Khan Kalay Swabi	Against vacant post
54	MUHAMMAD HAMAYUN J/Clerk	DEO (M) Peshawar	S/Clerk GHSS Musazai Peshawar	Against vacant post
55	Amir Hussain J/Clerk	GGHS Turlandi Swabi	S/Clerk GGHS Kalu Khan Swabi	Against vacant post
56	S.USMAN SHAH J/Clerk	GHS Wadpaga Peshawar	S/Clerk GISS Akbarpura Nowshera.	Against vacant post

CONSEQUENTIAL TRANSFER.

In Consequent to above, the posting/transfer in respect of following officials are hereby ordered on their own pay & BPS in the interest of public service with immediate effect:-

S.No	Name/Designation	From	To	Remarks
1	Muhammad Hanif S/Clerk	DE&SE K.P Peshawar	GTHSS Gulbahar Peshawar	Against vacant post
2	Mr. Kifayat Shah Junior Clerk	GGHS Shankar Mahal District Mardan (under transfer at the disposal of DEO (M) Abbottabad	GGHS Aziz Bhang Abbottabad	Against vacant post
3	Musarat Hussain J/Clerk	GHS Sufaid Dheri Academy Town Peshawar	GGHS Islamia collegiate Peshawar	Against vacant post
4	Muhammad Ayaz S/Clerk	GGHS Dak Jamail Khel Nowshera	GGISS Rashakai	Against vacant post
5	Mahboob J/Clerk	DFO (F) Peshawar	GHS Pakha Ghulam Peshawar	Against vacant post

Note: 1. Charge reports should be submitted to all concerned.


DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

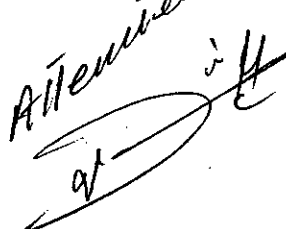
Endst No: 4015-4040/F.No.A-23/MS/Promotion/S/Clerk/2014/DD (F&A) Dated 28/05/2014

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

Attended
[Signature]

- (16)
1. Accountant General Khyber Pakhtunkhwa Peshawar.
 2. Director of Education (ETA) Peshawar.
 3. Director Curriculum & Teachers Education Khyber Pakhtunkhwa Abbottabad.
 4. Director PITE Peshawar.
 5. Section Officer-I, CM Secretariat Khyber Pakhtunkhwa Peshawar.
 6. Section Officer Primary E&SE Department Govt Khyber Pakhtunkhwa.
 7. DEOs (M&F) concerned.
 8. SDEO (M&F) concerned.
 9. Agency Education Officer concerned.
 10. District Accounts Officer concerned.
 11. Principals concerned.
 12. Officials concerned.
 13. Cashier (Local Office)
 14. M/File.
 15. PA to Director (E&SE) Khyber Pakhtunkhwa Peshawar.
 16. PA to Additional Director (Estab) Local Directorate


Assistant Director (Admin)
(E&SE) Khyber Pakhtunkhwa Peshawar
28/5/2014

Attended


17

(Ann-B)

1118

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

COMPULSORY RETIREMENT:-

Whereas absence report was received from the principal GHSS No.4 Kakshal Peshawar city against Mr.Mushtaq Ali J/Clerk vide his Memo No.47 dated:22/05/2013, No.53 dated:29/05/2013, No.63 dated:13/06/2013 and No.71 dated:24/06/2013.

Whereas the principal was directed vide this office memo No.430 dated:06/07/2013 to furnish latest information regarding absence of the official concerned.

Whereas the principal GHSS No.4 Kakshal Peshawar city has confirmed the absence of the official from 13/05/2013 vide his memo No.99 dated:22/11/2013.

Whereas Show Cause Notice was served on the official concerned through principal GHSS No.4 Kakshal Peshawar city vide this office Memo No:3187 dated:12/02/2014 duly acknowledged by him on 18/02/2014.

Whereas the reply to show cause notice dated 19/02/2014 was received in this office.

Whereas an inquiry was conducted through the principal GHSS Hazar Khwani Peshawar in compliance with notification issued in this regard vide Endst No:6049-51 dated:27/03/2014.

Whereas the inquiry officer recommended for imposing of major penalty (Compulsory Retirement) vide his report No.160 dated:15/05/2014.

And whereas I, Mr.Sharif Gul DEO(M) Peshawar being competent authority am pleased to impose major penalty (Compulsory Retirement) under Rules 4(b) (ii) of Govt of KPK Govt Servants (E&D) Rules 2011 w.e.f 18/05/2013.

The pay of the official concerned of the absence period should be recovered and copy of challan be furnished to this office for reference and record.

(Sharif Gul)
District Education Officer,
(Male) Peshawar.

Endst: No. 729-32 Dated Peshawar the 5/9 /2014

Copy for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director E&SE KPK Peshawar.
3. Principal GHSS No.4 Kakshal Peshawar city for strict compliance regarding recovery from the official concerned.
4. Official Concerned.

Deputy District Education Officer,
(Male) Peshawar.

Attended

DR Hanif Akbari (M.D.-C) 19

Surgeon Name: _____ Anesthetist Name: _____



KHURSHID MEDICAL CENTRE

KMC TREATMENT SHEET

Pt. Name: Abdul Qadir Age: 45 Sex: Male Weight: _____

Ward: 3 Bed No/ Room No: X Ad. date: 18/05/13 Ref. No: _____

Diagnosis: HCV (HDS) - Positive

Address: _____

Date	Treatment	Diet	Investigation
			HB% <u>8.2 -</u>
			HBS <u>Positive</u>
			HCV <u>Positive</u>
			RBS _____
			Urea _____
			Creatinin _____
	<u>1mg Panamin 6 loading</u> <u>OD</u> <u>Decadron 1cc</u> <u>Zante 200 1/0</u> <u>Cly raw 1gm BD</u> <u>Transfusion (3)</u> <u>point 18/5/13</u>		
	<u>Attended</u> <u>Dr. Hanif Akbari</u>		
	<u>Hameed</u> <u>Decadron</u> <u>600mg</u> <u>25/5/13</u>		

OT Notes.
Adm
ESR
FB-S
UW / Lab
TLS



KHURSHID MEDICAL CENTRE

PATIENT CASE SHEET AND AFFIDAVIT

21

Patient Name: _____ Room No: _____ Date: _____

Name: Q. S. Age: 45 Sex: male

Date Admission: _____ Cell No: _____

Identity Card No: _____ Relation With Patient _____

Address: _____

NOTE: Khurshid Medical Centre is a Welfare Hospital With skilled Doctors and Technicians

I want to get Treatment from Khurshid Medical Centre and the facilities here forced me to Come here rather than by any Reference.

Signature: [Signature]

Chief Complaints

Enamie

History of Present Illness

H2U
HTBS (Positive)

Past History

Family History

Socioeconomic Condition

NON [Signature]

Attended
[Signature]

TREATMENT OF HOME:

گھر کے لئے علاج

Tas, Ibrat

intensity

(30)

Tas, Panadol

1-1-1-1

Tas folic Acid

Eastern powder

4 1/2 3 Carpet Bed

6 months

mokey checkup way

31/08/13

FOLLOW UP:

24 گھنٹے (OPD) کی خدمات

ضروری حدایت

- 1) دوائیں اسرف اپنے ڈاکٹر کے مشورے سے بند کریں۔
- 2) اپنے تمام کاغذات، ٹیسٹ رپورٹ، ایکسرے وغیرہ سنبھال کر رکھیں۔
- 3) صحت آرام کریں۔
- 4) دن کے بعد سناٹے کیلئے تشریف لائیں۔
- 5) تکلیف، شکایات، طبی صورت میں بددیہیہ نمبرات سے فوری رابطہ کریں۔ 0345-2228800 - 0321-8131313

KHURSHID

MEDICAL CENTER & SURGICAL HOSPITAL



دردی جی۔ ایچ۔ ایف۔ ہسپتال اینڈ میڈیسنی سروسز

Discharge Sheet

Near Casualty Gate Lady Reading
Hospital Peshawar City.
Tel: +92 321 8131313

Patient Name: Musheeq Ali

S/O D/O W/O: Abdul Ghani

Age: 45 yrs Sex: male W/ight: on

Address: Masuzai Peshawar

Room No: Mah Ward W/Bad No: (3)

Consultant / Surgeon Dr. Name: DR Hameed Chaudhry

Date of Operation: 18/07/13 Date of Discharge: 31/08/13

Diagnosis: HW + HPS postne

Operation: _____

Signature of Doctor

Help line: 0321-8131313 / 0345-2228800

TREATMENT OF HOSPITAL:

Pladex 100mg qd
Zantac 1/2 BD
Clayton 1/2 qm BD
N/Star 100mg qd
Panamin 6 Weekly
one. Dose

[Signature]

INVESTIGATION

*HB	HRW	Positiv
*TLC	HRW	
*DLC	HRW	
*HBS		
*BLOOD SUGER	SGPT	1126
*URINE R/E	Ucr	
*UREA CREATININE	Ucr	18500
*S. CREATININE		
*BLOOD GROUP		
*E.C.G	OK	
*X-RAY		
*ULTRA SOUND		
*BIOPSY		

OPERATION AND FINDINGS:

HRW HRW
Positiv

[Signature]

Pladex 100mg qd
Zantac 1/2
Clayton 1/2
N/Star 100mg qd
D days

Partly TPR
BP. Plus
Nursing Case

[Signature]

PCR
Positiv

[Signature]

23

(19) (24)

KHURSHID MEDICAL CENTRE LABORATORY SECTION

SANGEEN KHAN
Dip. MLT, PGPI, LRH:
BSC (Hon's) Medical Laboratory
Gandhara Medical Universty.,

DR, ASIF KHAN.
MBBS,RMP

Zahid : 03128914891

NAME :-MUSHTAQ

DATE :-13-07-2013

SEX :- MALE

REP NO=002

AGE :-YRS

REF BY :-KMC

SPECIMEN:- BLOOD

TEST REQUIRED: HBS.HCV

RESULT

HBS Ag ----- REACTIVE

ANTI HCV Abs----- REACTIVE

Lab Incharge

Attested
[Signature]

Near LRH Emergency Gate Asamai Road Peshawar,

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 courts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for Officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
Mushtaq Ali J/c DEO (Male) Battagram.							
<p>UPGRADATION: - Notification No. PD/SC/FR/10-22/2014. 9th BPS No-7 to BPS No-11 (6600-460-20400) vide Secretary to Government of Khyber Pakhtunkhwa Finance Department/Regulation wing/dated Peshawar the 29-5-2014.</p>							
<p><i>[Signature]</i> DEO (Male) 11/6 Battagram.</p>							
<p><u>BPS = No-11 (6600-460-20400)</u></p>							
<p>- DO - Upgradation Bps-7 to Bps 11 Rs:- 15800/- pre-mechuse increment Rs:- 460/- Net Basic Pay Rs = 16260/-</p>							
<p><i>[Signature]</i> DEO (Male) Battagram. 11/6</p>							
<p>UNDERTAKING</p> <p>I Mr. Mushtaq Ali J/c Abdul Ghani here by order taking up gradation on Bps 7 to Bps 11 request that in case of any over payment the required up gradation should be deducted from my pension and gratuity.</p>							
<p><i>[Signature]</i> 11/6</p>							

DISTRICT EDUCATION OFFICER
MALAK BATTAGRAM

15/5400/- 12/2012

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Name of post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service courts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for Officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
S/clerk DEO (male) Bathagram			Rs. 17150/-pm			29/5/2004	Mushtaq Ali
		Revised entry due to one spl. Inc. 0.0.7 1-9-2007 vide notification issued by the Finance Deptt. under notification issued vide No. 50 (SR-1) 2-4/2008 dt. 4-4-2008 in BPS-7 @ Rs. 2940-16-7740					
			Rs. 6780/- pm on			1-9-2007	Mushtaq Ali
			Rs. 6940/-			1 ¹² / ₂₀₀₇	Mushtaq Ali
		Scale Revised BPS No. 7 @ Rs. 3530-150-9230					
			Rs. 8280/2			1 ⁷ / ₂₀₀₈	Mushtaq Ali
			Rs. 8470/=			1 ¹² / ₂₀₀₈	Mushtaq Ali
			Rs. 8660/=			1 ¹² / ₂₀₀₉	Mushtaq Ali
			Rs. 8850/2			1 ¹² / ₂₀₁₀	Mushtaq Ali
		scale	Rs. revised @ Rs. 5800-330-15400				
			Rs. 14760/=			1 ⁷ / ₂₀₁₁	Mushtaq Ali
			Rs. 15080/=			1 ¹² / ₂₀₁₁	Mushtaq Ali
			Rs. 15100/=			1 ¹² / ₂₀₁₁	Mushtaq Ali
						1 ¹² / ₂₀₁₂	

DISTRICT EDUCATION OFFICER
MALE BATHGRAM

Attempted
9/

DISTRICT EDUCATION OFFICER

DISTRICT EDUCATION OFFICER

DISTRICT EDUCATION OFFICER

DISTRICT EDUCATION OFFICER

01

Sl. No.	Name and designation of the head or other officer in charge of the office	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			Government to which debitable
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Pay active for the month 7/6/2014

District Accounts Officer
Battagram

Allowed all dues of Pay & allowances w.e.f. 1-4-2011 to 31-3-2012 (12 months) & 1-10-2012 to 31-3-2013 (4 months) allowed vide Honorable High Court Peshawar under his judgement order announced on 29-5-2012 vide Registrar Peshawar High Court No. 8386 dated 4-6-2012 as well as Director PSE pay adjustment order No 933-37/FNO A-23/MS/S/dsk dated 13-07-2014

Amount Rs: 476129/- pay and allowance w.e.f. 1-4-2011 to 30-11-2011, 1-12-11 to 31-3-2012, 1-4-2012 to 30-11-2012, & 1-12-2012 to 31-1-2013 S.No 90 dt 18-8-2011 pay released pay by vide Assn (Admin) (Admn) E+SE) K.P.H. No 933-37 dt 3-7-2014

District Accounts Officer
Battagram

Attended
at

BY DISTRICT EDUCATION OFFICER (MALE) BATTAGRAM
30/11/2007
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30/6/2027 PR
30/6/2028 PR
30/6/2029 PR
30/6/2030 PR

No. of the head of the office or other officer in charge of the office	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
524	2014	upgraded to scale	[Signature]				
525	2014		[Signature]				
526	2014		[Signature]				
527	2014		[Signature]				
528	2014		[Signature]				
529	2014	Promoted to BPS-14	[Signature]				
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اطلاعات (105) فارم نمبر

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پوس رپورٹ شدہ زبردفعہ 152 مجموعہ ضابطہ فوجداری

ضلع مردان

تخت بھائی

تاریخ وقوعہ - 23/3/1100

جرم 304

تاریخ و وقت رپورٹ 4/11/1300 1300 4/11/1300 27/3/1100 0900

ام و سکونت اطلاع دہندہ ستیث حالہ حالہ در صورت حال سید مسدود رپورٹ شدہ کلاسی تحت بھائی

فقیر کیفیت جرم (معدومہ) حالہ بڑھ چوکیا گیا ہو۔

بائے وقت و فاصلہ قحمانت اور مستحضر مردی واقعہ کسٹنر جملہ حد کنڈ روڈ تحت بھائی۔

ام و سکونت ملزم مستحضر سسلی و مدعو عبدالغنی کسان صوبی لڑائی محل آباد القلاب روڈ اور

باروانی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو

حیدرآبہ جناب DPP صاحب جو صوبہ لڑائی کے تفریح و تفریح کے بارے میں

مانندہ روایت کی تاریخ و وقت

بسمیل ڈاکر

سوسلر 35000 روپے کے ابتدائی اطلاع نچے درج کرو۔ حسیت حذر جواز نہ لانے مسلم مند صاحبان

و دیگر ایک چیک برآمدی رقم 25183001 - CHEQUE 11010023500

یار پولیٹیکل لبریریل آباد نے نام لکھنے میں مذکورہ کارڈ رقم تھا۔ بینک بکھریے پورٹ حاصل کیا جس پر

سرکار نے صوبہ حیدرآبہ سے رائے حاصل کرتے ہوئے DPP صاحب سے مستحضر آرا سسلی و مدعو عبدالغنی کسان صوبی لڑائی

محل آباد القلاب روڈ اور بھٹی قوت مسلم لاڈلہ ذبح ہو کر تھوڑے عرصے میں لڑائی کے متعلق کلاسی تحت بھائی

تحت بھائی بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

ہے۔ درخواست مندرجہ ذیل ہے۔

Dakhmani 714113 51-PS-13

حیدرآبہ اسسٹنٹ کمشنر اور سسٹنٹ ڈپٹی کمشنر کے پاس درخواست ملانے کے لئے سسلی و مدعو عبدالغنی کسان صوبی لڑائی

کے ذیل آ رہے ہیں کہ سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

تحت بھائی بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

بینک پورٹ بکھریے نقل اسناد سسلی و مدعو عبدالغنی کسان صوبی لڑائی کے متعلق کلاسی تحت بھائی

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فہمہ جناب سیر سٹریٹ میں ڈسٹرکٹ سیکرٹری

درخواست گزار علی محمد
بابت ایک جوہر

از جوہر 2013ء تا نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سائڈ ٹول پور - منٹا شمار

Attested
3/12/14

فہمہ علی

جوہر مشتاق علی محمد عبدالغنی نے
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء

جوہر مشتاق علی محمد عبدالغنی نے
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء

جوہر مشتاق علی محمد عبدالغنی نے
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء
جوہر مشتاق علی محمد عبدالغنی سے نومبر 2013ء

Attested
3/12/14

از اسناد پانزدهم (36) مجلس شورای اسلامی (Ann-D)

مباحثی

3/12/013 فی تاریخ 3/12/013

متردد 304 (489F) 27-4-2013

27/2/013

مجلس شورای اسلامی

Superintendent
District Jail Mardam

Handwritten signature and stamp

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(Ann-E)

بخدمت جناب ڈائریکٹر ایلمنٹری اینڈ سکندری ایجوکیشن خیبر بختونخوا پشاور

عنوان: اپیل

جناب عالی!

مودبانہ گزارش ہے کہ بندہ بحسب سینئر کلرک ڈسٹرکٹ ایجوکیشن آفس مردانہ بنگرام میں ڈیوٹی سرانجام دے رہا ہوں مگر DEO مردانہ پشاور نے بندہ کا بلا جواز جبراً رٹارمنٹ کا آرڈر مورخہ 05-09-2014 بحوالہ نمبر 32-329 کیا ہے جو کہ سراسر نا انصافی ہے۔ کیونکہ بندہ کو پتہ بھی نہ تھا اور نہ مجھے معطل کیا اور نہ ہی چارج شیٹ نہ شوکا ز نوٹس اور نہ انکواری آفیسر آیا ہے۔ حالانکہ میں اس دوران HCV کا شدید بیمار ہوں اور میں نے میڈیکل لیو کے لئے پرنسپل صاحب کو درخواست 18-05-2013 تا 18-01-2014 تک میں لیو پر تھا اور یہ ریٹ ڈاکٹر صاحب نے لکھا ہے تمام کا عذات منسلک درخواست ہے۔ جناب اپ بخوبی جانتے ہیں کہ میں میڈیکل لیو پر تھا اور میں ہر ماں تنخواہ لیتا تھا اور اب بھی تنخواہ لے رہا ہوں اور میرے سروس بک میں اس دوران کا سروس ویریفیکیشن موجودہ اور پرنسپل صاحب نے کیا ہے۔ اگر میں میڈیکل لیو پر نہ تھا تو کبھی میری سروس ویریفائیڈ نہ ہوگا جو پریڈ غیر حاضری کا ہے۔ وہ سراسر غلط ہے۔ کیونکہ میں نے قانون کے مطابق چھٹی کی ہے۔ برائے مہربانی بندہ نے محکمہ تعلیم میں 29 سال سروس کر چکا ہے اور یہ میری توہین ہے اور بے عزتی ہے۔ برائے مہربانی مجھے بحال کر کے مشکور فرمائیں۔ میں گھر کا واحد کفیل ہوں اور میرے گھر میں اور کوئی کمانے والا نہیں ہے اس عمر میں بیمار کے باجوہ میں نے اپنے ڈیوٹی کے بغیر اور کچھ نہیں کر سکتا۔

شکریہ

نام: مشتاق علی ولد عبدالغنی سینئر کلرک ڈسٹرکٹ ایجوکیشن آفس مردانہ بنگرام
العاض

موبائل نمبر 0310-9700744

شناختی کارڈ نمبر 7-17301-7488978

مورخہ 10-09-2014

Record

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(38) (Ann-F)

خدمت جناب ڈائریکٹر صاحب ایلمنٹری اینڈ سکندری ایجوکیشن خیبر بختونخوا پشاور

عنوان: اپیل / اری انکواری جن مشتاق علی ولد عبدالغنی سینئر کلرک ڈسٹرکٹ ایجوکیشن آفس مردانہ بگرام

جناب عالی!

مودبانہ گزارش ہے کہ بندہ بحسبیت سینئر کلرک ڈسٹرکٹ ایجوکیشن آفس مردانہ بگرام میں ڈیوٹی سرانجام دے رہا ہوں مگر DEO مردانہ پشاور نے بندہ کا بااجاز جبرار یار منٹ کا اراڈر مورخہ 05-09-2014 بحوالہ نمبر 32-329 کیا ہے جو کہ سراسر نا انصافی ہے۔ کیونکہ بندہ کو پتہ بھی نہ تھا اور نہ ہیے متل کیا اور نہ ہی چارج شیٹ نہ شوکا ز نوٹس اور نہ انکواری آفیسر آیا ہے۔ حالانکہ میں اس دوران HCV کا شدید بیمار ہوں اور میں نے میڈیکل لیو کے لئے پرنسپل صاحب کو درخواست 18-05-2013 تا 18-01-2014 تک میں لیو پر تھا اور یہ ریسٹ ڈاکٹر صاحب نے لکھا ہے تمام کاغذات منسلک درخواست ہے۔ جناب اپ بخوبی جانتے ہیں کہ میں میڈیکل لیو پر تھا اور میں ہر ماں تنخواہ لیتا تھا اور اب بھی تنخواہ لے رہا ہوں اور میرے سروس بک میں اس دوران کا سروس ویریفیکیشن موجودہ اور پرنسپل صاحب نے کیا ہے اگر میں میڈیکل لیو پر نہ تھا تو کبھی میری سروس ویریفائیڈ نہ ہوگا جو پریڈ غیر حاضری کا ہے وہ سراسر غلط ہے کیونکہ میں نے قانون کے مطابق چھٹی کی ہے برائے مہربانی بندہ نے محکمہ تعلیم میں 29 سال سروس کر چکا ہے اور یہ میری توہین ہے اور بے عزتی ہے برائے مہربانی مجھے بحال کر کے مشکور فرمائیں میں گھر کا واحد کفیل ہوں اور میرے گھر میں اور کوئی کمانے والا نہیں ہے اس عمر میں بیمار کے باجود میں نے اپنے ڈیوٹی کے بغیر اور کچھ نہیں کر سکتا۔

نوٹ: بندہ ذاتی دشمنی کی وجہ سے بندہ کے خلاف FIR ضلع مردان تھا نہ تخت بھائی مورخہ 27/04/2013 منگولت درج کیا گیا جو کہ بعد میں علط ثابت ہوا اور بعد با مزت لاور پر FIR تے بری: دا۔ نا۔ ا۔ ک۔ بندہ نے مورخہ 27-07-2013 تا 20-11-2013 جیل میں بے گناہ جیل کاٹا یعنی درجہ بالا اطوار میں بندہ یا تو بیمار تھا یا جیل کاٹ رہا تھا جو کہ دونوں کام بندہ کے مرضی کے مطابق نہیں تھا لیکن DEO پشاور نے غلط انفا مشین کے تحت بندہ سروس جبرار یار منٹ کر لیا یہ جینٹل کا قانون ہو سکتا ہے نہ کہ ادارے کا قانون اس میں کوئی صداقت نہیں استدعا ہے کہ ری انکواری کا حکم صادر فرمائیں بندہ تاجیات دعا گوہر ہیں گا۔

شکریہ

العارض

20/11/14

نام: مشتاق علی ولد عبدالغنی سینئر کلرک ڈسٹرکٹ ایجوکیشن آفس مردانہ بگرام

موبائیل نمبر 0310-9700744

شناختی کارڈ نمبر 17301-7488978-7

Attended

2

D.No. 1372

8/12/14

بعد الت خیر بخشو خواہ سہولتیں، سپاہ

Appellant Service Appeal

سید مخدوم
بنام

سائق علی

موزخہ
مقدمہ
دعویٰ
جرم

The Secretary Elementary & Education
K.P.K and others

باعث تحریر آنکے

آن مقام سپاہ کیلئے شعیب خٹک، ماسٹر خان انڈسٹریز سپاہ
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
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 کبھی 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 دہوگا۔
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 لکھد یا کہ سندر ہے۔

Attested And
Accepted

المرقوم 9 4 20

واہ العب
Peshawar
بمقام
کے لئے منظور ہے۔
9

Before The M.P.K Services Tribunal, Peshawar.

Mushtaq Ali versus Secretary FBO


Application for Adjournment
Respectfully Submitted: ^{& others}

1. That the above titled case is fixed
hearing for tomorrow i.e 13 ⁵/₂₀₁₅
before this Honorable Tribunal.

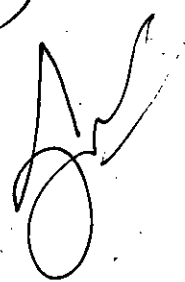
2. That the learned counsel for Appellant
~~will~~ proceed to Islamabad, therefore
would be unable to
appear before the court.

0-5
13.05.15

It is therefore, most humbly prayed
→ that in light of above submission
the above titled case may kindly
be adjourned to any other date
convenient before the Honorable
court.

Appellant 
(Mushtaq Ali)

Dated: - 11 ⁵/₂₀₁₅

Through
counsel 

BEFORE THE K.P.K SERVICES TRIBUNAL, PESHAWAR.

C.M Appli.No. _____/2015

In

Service Appeal No. **313**/2015

Mushtaq Ali S/O Abdul Ghani R/O Musazai Gul Abad, Inqilab road,
Peshawar, Senior Clerk District Education Office (M), Battagram.

.....Applicant/Appellant

VERSUS

The Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar and others.

.....Respondents

***Application for withdrawal of the Service
Appeal No. 313/2015.***

.....
Respectfully Sheweth.

1. That the petitioner / applicant has submitted the above titled Appeal which is fixed for today i.e 31 /07/2015 before this Hon'ble Tribunal.
2. That the Applicant / appellant has also filed Writ Petition No. 3846 / 2014 as during the relevant days this Hon'ble Tribunal was not functional.
3. That the Hon'ble Peshawar High Court Peshawar is hearing the Writ Petition in subject matter which is fixed for 07/10/2015 and therefore, final directions / order is yet to be made by the Hon'ble High Court.

It is therefore, most humbly prayed that the applicant/
appellant may kindly be allowed to withdrawn this APPEAL with the

permission to file fresh Service Appeal in the lights of directions of Hon'ble Peshawar High Court, Peshawar.

Dated. 31 / 07 / 2015

Applicant / Petitioner

Through

Shahab Khattak
&
Qasim Khan,
Advocates,
Peshawar.

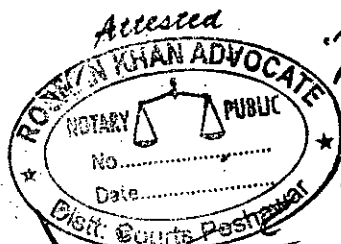
AFFIDAVIT

I, Mushtaq Ali S/O Abdul Ghani R/O Musazai Gul Abad, Inqilab road, Peshawar, Senior Clerk District Education Office (M), Battagram, do hereby solemnly affirm and declare on oath that as per instructions of my client, the contents of above "Application" are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble court.

Dated. 31 / 07 / 2015

Mushtaq Ali
DEPONENT

"Mushtaq Ali"



17301-7488978-7

Mushtaq Ali
31.7.2015