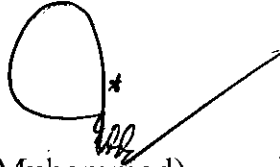


09.01.2023

Appellant alongwith clerk of his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

Appellant sought adjournment on the ground that his counsel is indisposed today. The appeal in hand is pending adjudication since the year 2019, therefore, last opportunity granted. To come up for arguments on 17.04.2023 before D.B.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

17th April, 2023 1. Mr. Abdul Nasir Khattak, Advocate present and filed wakalatnama on behalf of the appellant. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Learned counsel for the appellant seeks a short adjournment as he has newly been engaged. Last opportunity was granted on the previous date but let the newly engaged learned counsel be provided an opportunity and another last chance is given failing which this appeal will be deiced without the arguments. To come up for arguments on 03.05.2023 before D.B. P.P given to the parties.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

Adnan Shah, P.A

23th June, 2022

None for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for respondents present.

Since the respondents were directed more than a year ago to file reply but they failed to file such reply, therefore, their right for submission of written reply stands struck off and the appeal be admitted to full hearing. The appellant is directed to deposit security and process fee within 10 days. To come up for arguments on the available record on 31.08.2022 before D.B.

Rs. 7000
Appellant Deposited
Security & Process Fee

A. Arshad
7/7/22

A

(Kalim Arshad Khan)
Chairman

31.08.2022

Bench is incomplete, therefore, case is adjourned to 10.11.2022 for the same as before.

Reader


10.11.2022


Counsel for the appellant present.

Naseer Ud Din Shah learned Assistant Advocate General for the respondents present.

Former requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 09.01.2023 before D.B.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

وکالت نامہ

قیمتی

کورٹ فیس

سرورس ٹریڈونل چینز فٹو شو اپناور

بعدالت جناب:

نام صوبائی حکومت بنڈ زلفہ سکرٹری ایونو/SMBR

تجدید الہ

Service appeal

دعوے یا جرم

Appellant

منجانب:

باعث تحریک آنکہ

مقدمہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا بمقام اپناور

عبدالناہر فٹو ایجوکیشن ایڈوکیٹ کی کورٹ

ایڈوکیٹ ہائی کورٹ۔ سپریم کورٹ۔ ممبر ڈسٹرکٹ بار ایسوسی ایشن کرک

کیلئے سب ذیل شرائط پر وکیل کیا ہے۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو بروعدالت حاضر ہوتا ہوں گا اور

بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کرونگا۔ اگر پیشی پر مظہر نہ ہوا اور مقدمہ میری

غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر

بمقام پکچری کے علاوہ کسی جگہ سماعت یا بروز تعطیل یا پکچری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے

تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ کے واپس کر نیلے بھی صاحب موصوف ذمہ دار ہونگے۔ مجھ کو کل ساختہ

پرواختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرضی دعوے یا جواب درخواست اجراءے ڈگری و نظر ثانی

اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے پر ہر قسم کاروبار وصول کرنے اور رسید دینے

اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت

جانے بیرون جات از پکچری صدر اپیل ذرا آمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا ترقی یا گرفتاری و اجراءے ڈگری

بھی صاحب موصوف کو آدائیگی علیحدہ محتاز پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا

اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کی دوسرے وکیل یا ایئر سٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو

بھی ہر امر میں وہی اور ایسے ہی اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں

اور دوران مقدمہ میں جو کچھ ہر جانہ التوا پڑیگا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے آدائیگی

کرونگا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں۔ اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف

کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا یکہ سندرے مورخہ: 17 ماہ: البرمیل 2023ء

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

تسیر

Accepted

A. No. 10-4514

B.C No 10-4514

0334-9290874

اشفاق فوٹو سٹیٹ سرورس سیشن کورٹ کرک فون نمبر: 0331-8786805

CNIC No

14202-5490382-3

12.01.2022

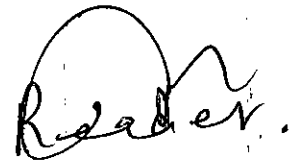
Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and sought further time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as preliminary hearing before the S.B on 08.02.2022.



(Salah-Ud-Din)
Member (J)

8-2-2022

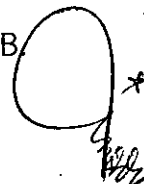
Due to retirement of the Honble Chairman the case is adjourned to come up for the same as before 22-04-2022



22.04.2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Pre-admission notice was issued to the respondents for submission of written reply/comments as is reflected in order sheet dated 10.03.2021. However, despite lapse of one year, the respondent-department could not be able to submit the requisite reply/comments. Learned AAG is therefore, directed to contact the department for submission of requisite written reply/comments well before the next date as the last chance has already been granted vide order sheet date 04.11.2021. Adjourned. To come up for written reply/parawise comments as well as preliminary hearing on 23.05.2022 before S.B.




(MIAN MUHAMMAD)
MEMBER(E)

16.09.2021

Junior to counsel for appellant present.

Muhammad Adeel Butt learned A.A.G for respondents present.


Reply on behalf of respondents is still awaited. Learned A.A.G is directed to contact the respondents and furnish reply positively within 10 days in office. Adjourned. To come up for preliminary hearing on 04.11.2021 before S.B.


(Rozina Rehman);
Member (J)

04.11.2021

Appellant alongwith his counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Representative of the respondents are not present.

Written reply not submitted. Learned AAG seeks further time to contact the respondents for submission of written reply. Granted but as a last chance. To come up for reply/preliminary hearing on 12.01.2022 before S.B.


(Mian Muhammad)
Member(E)

10.03.2021

Mr. Hidayatullah Khattak, Advocate, for appellant present.

At the outset of addressing his arguments in preliminary hearing, the impugned order dated 19.06.2019 went through which mentions the appellant as "being contract/temporary employee". Learned counsel for the appellant was confronted with the question; to produce appointment order of the appellant. He replied that request had been made for the same under Right to Information Act, 2013, however, it could not bear fruit. This plea seems to have already been taken by the learned counsel for appellant ~~ready~~ as reflected in order sheet dated 28.7.2020. Since the question of maintainability is to be addressed first, before admitting the instant service appeal, it is therefore, felt expedient to issue pre-admission notice to respondents for 16.06.2021, simultaneously, directing them to submit their reply/comments before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

16.06.2021

Appellant in person and Mr. Muhammad Adeel Butt, Addl. AG alongwith Wazir Zada, A.D for the respondents present.

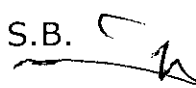
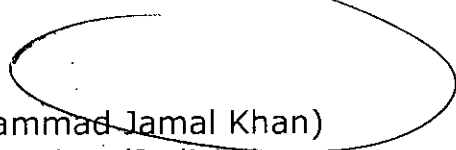
Although the respondents were required to submit their reply/comments but it was omitted from the notice. The office is directed to be careful in future and the process must be issued in compatibility of order sheets. The respondents seek time for submission of reply/comments. Request accorded. To come up for reply and preliminary hearing on 16.09.2021 before S.B.


Chairman

20.10.2020

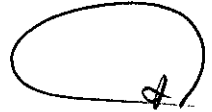
Appellant is present in person. Mr. Kabirullah Khattak, Additional Advocate General alongwith representative of the department Mr. Hameed Ullah, ADO, are also present.

Copy of the office order dated 20.06.2006 produced which is placed on file. since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today therefore, the case is adjourned to 08.12.2020 on which to come up for preliminary arguments before S.B.



(Muhammad Jamal Khan)
Member (Judicial)

08.12.2020

Junior counsel present on behalf of appellant and made a request for adjournment as senior counsel is indisposed; adjournment allowed. To come up for preliminary hearing on 10.03.2021 before S.B.


(Rozina Rehman)
Member (J)

30.01.2020 Clerk to counsel for the appellant present and seeks adjournment as lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for preliminary hearing on 19.03.2020 before S.B.


Member

19.03.2020 Nemo for the appellant. Lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourn. To come up for preliminary hearing on 22.04.2020 before S.B.


Member

22.04.2020 Due to public holiday on account of COVID-19, the case to come up for the same on 28.07.2020 before S.B.


Reader

SCANNED
KPST
Peshawar

28.07.2020 Mr. Hidayatullah, Advocate, for appellant and appellant himself are present. Learned counsel for appellant stated that since the procurement of attested copies of appointment letter dated 20.06.2006 is in process and it is expected to receive it soon in near future, therefore, requested for adjournment. Adjourned to 20.10.2020. To come up for preliminary hearing before S.B.

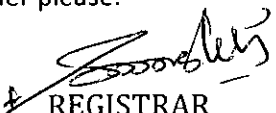




(MUHAMMAD JAMAL KHAN)
MEMBER

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1301/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/10/2019	<p>The appeal of Mr. Hameed Ullah resubmitted today by Mr. Hidayat Ullah Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/11/19.</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>28.11.2019</p> <p>Appellant present in person.</p> <p>Requests for adjournment as his learned counsel is not available due to general strike of the Bar today. Adjourned to 07.01.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	07.01.2020	<p>Counsel for the appellant present.</p> <p>Learned counsel requests for time to provide the appointment order of the appellant which is relevant for the purpose of his status as civil servant. Adjourned to 30.01.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Hamidullah son of Ahmad Jan r/o Tapiyal Garhi District Karak received today i.e. on 30.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1- Annexures of the appeal may be attested.
- ✓ 2- Annexures of the appeal may be flagged.
- X 3- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- ✓ 4- Copy of impugned order dated 19/06/2019 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- ✓ 5- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1679 /S.T,

Dt. 1-10- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hidayatullah Khattak Adv. Pesh.

10 No charge sheet statement of allegation
and No show cause notice

Resubmitted
2/10/2019

BEFORE THE WORTHY CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1301 /2019

Hamid Ullah.....Appellant

V E R S U S

Govt. of Khyber Pakhtunkhwa through Secretary/Senior member Board of Revenue & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-5
2.	Addresses of parties		6
3.	Copy of the order dated 19.06.2019	A	7
4.	Copy of representation and rejection order dated 02.09.2019	B & B1	8-10
5.	Wakalatnama		11


Appellant

Through

Dated 30/09/2019


Hidayatullah Khattak
Advocate High Court
Cell No.0300-9357757

BEFORE THE WORTHY CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1321

Dated 30/9/2019

Hamid Ullah S/o Ahmad Jan,
R/o Tapiyal Garhi
Tehsil & District Karak.....

Appellant

V E R S U S

- 1) Govt. of Khyber Pakhtunkhwa through Secretary/Senior member Board of Revenue Civil Secretariat, Peshawar
- 2) Principal Revenue School/Academy Phase-III Chowk Hayatabad, Peshawar
- 3) Director Land Record Khyber Pakhtunkhwa
- 4) Deputy Commissioner Karak
- 5) Assistant Commissioner Karak

..... **Respondents**

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST THE ORDER NO.5792/LR-1
DATED 02.09.2019 WHEREBY THE
DEPARTMENT APPEAL OF THE APPELLANT
AGAINST THE IMPUGNED ORDER

Filed to-day
Registrar
30/9/19

NO.7238/LR-1/128 DATED 19.06.2019 HAS
BE REJECTED.

Prayer in Appeal

On acceptance of this service appeal, the orders No.7238/LR-1/Appeal dated 19.06.2019 and that of No.5792-/LR-1/Appeal dated 02.09.2019 may please be set aside and the appellant may please be reinstated into services with all back benefits.

Any other relief, this Hon'ble Tribunal which deems fit and appropriate may also be awarded in favour of the appellant

Respectfully Sheweth:-

1. That the appellant was serving as Driver (BPS-06) in Revenue Academy Karak Since 2006.
2. That the appellant has been terminated from service vide impugned order dated 19.06.2019, which is to be set aside. (Copy of the order dated 19.06.2019 is attached as annexure "A")

3. That appellant preferred an appeal against the impugned order dated 19.06.2019 and the contempt authority i.e. how also rejected the representation/departmental appeal vide order dated 02.09.2019. (Copy of representation and rejection order dated 02.09.2019 is attached as annexure "B" & "B1").
4. That feeling aggrieved from the orders dated 19.06.2019 and 02.09.2019 of the respondents the appellant assails the same inter alia on the following grounds:

GROUND S:

- A. That the impugned orders dated 19.06.2019 and 02.09.2019 passed by the respondents are patently illegal, against facts and evidence available on file, hence liable to be reserved and set aside.
- B. That no fact findings inquiry, issuance of show cause notices whatsoever has been issued to

the appellant as prescribed in the services law and judgments of the superior court.

- C. That the appellant till date is performing his duty in the office of the Assistant Commissioner Karak respondent No.4 and no question of absence from duty arise in the case of appellant.
- D. That the appellant has been badly condemned unheard which is against the settled provision of law, judgments of the higher forums and equity.
- E. That all the impugned proceedings in shape of one sided inquiry has been conducted at the back of the appellant which is against the law and judgments of higher forums.
- F. That any other grounds will be raised at the time of arguments with the permission of this Hon'ble Court.

It is, therefore most humbly prayed that on acceptance of this service appeal, the orders No.7238/LR-1/Appeal dated 02.09.2019

and that of No.5792-/LR-1/Appeal dated 19.06.2019 may please be set aside and the appellant may please be reinstated into services with all back benefits.

Any other relief which deemed fit and appropriate in the circumstances of the case may also be passed in favour of the appellant.


Appellant

Through


Hidayatullah Khattak
Advocate High Court

Dated 30/09/2019

AFFIDAVIT

I, Hamid Ullah, 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 Court.


DEPONENT

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

Service Appeal No. _____/2019

Hamid Ullah.....Appellant

V E R S U S

Govt. of Khyber Pakhtunkhwa through Secretary/Senior member Board of Revenue & others.....Respondents

ADDRESSES OF PARTIES

A P P E L L A N T:

Hamid Ullah S/o Ahmad Jan,
R/o Tapiyal Garhi
Tehsil & District Karak

R E S P O N D E N T S:

- 1) Govt. of Khyber Pakhtunkhwa through Secretary/
Senior member Board of Revenue Civil Secretariat,
Peshawar
- 2) Principal Revenue School/Academy Phase-III
Chowk Hayatabad, Peshawar
- 3) Director Land Record Khyber Pakhtunkhwa
- 4) Deputy Commissioner Karak
- 5) Assistant Commissioner Karak


Appellant

Through


Hidayatullah Khattak
Advocate High Court

Dated 30.09.2019

ATTESTED

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(L)

There

H

7-A

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTOR LAND RECORDS/CHIEF SETTLEMENT OFFICER
REVENUE AND ESTATE DEPARTMENT**

Dated Peshawar the 19.06.2019

NOTIFICATION

No.7238/LR-1/1281, where, Mr. Hamid Ullah while posted as Driver (BPS-06) in Revenue school/Academy Peshawar was proceeded against under the prevailing policy/Rules for non-compliance of the orders of the competent authority as he was directed to report for official duty at the said school/Academy vide communication letters dated 27.02.2018 and dated 16.04.2018 respectively, but he failed to comply with till 17.06.2019 without any information or prior permission as per report of the principal/instructor of the School/Academy ibid.

AND WHEREAS:: he was issued Show Cause Notice but he did not bother to comply with and remained absent from duty till 17.06.2019.

AND WHEREAS: being contract/temporary employee, he was given final notice and given opportunity to mend his way but yet to report as such was show cause/notice.

AND WHEREAS: I Muhammad Khalid Zaman, Director Land records. Board of Revenue, Khyber Pakhtunkhwa after having examined the charge, evidence produced and recommendation of Principal Revenue School/Academy,

AND WHEREAS: I as competent authority in exercise of the power under Rule/policy the service as Driver (BPS-06) Revenue school/Academy of Mr. Hamid Ullah Driver (BPS-06) are hereby terminated with immediate effect.

Sd/-xxxx

Director Land Records
Khyber Pakhtunkhwa

Endst. No.7229-246/LR-1/1280...

Copy forwarded to the;

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Deputy Commissioner, Karak
3. Principal Revenue School/Academy, Peshawar
4. Assistant Commissioner (Revenue) Karak.
5. District Accounts Officer, Karak
6. Private Secretary to Senior Member, Board of Revenue, Khyber Pakhtunkhwa
7. Official concerned
8. Officer order file.

Sd/-xxxx

Director Land Records
Khyber Pakhtunkhwa

ATTESTED

2

B
Annex

To

Senior Member Board of Revenue,
Director Land Records/Chief Settlement Officer
Revenue & Estate Department
Govt. of Khyber Pakhtunkhwa, Peshawar

Subject: REPRESENTATION/APPEAL AGAINST THE IMPUGNED
NOTIFICATION No.7238/LR-I/128 DATED 19.06.2019

Respected Sir

The petitioner submits as under:

1. That the petitioner/appellant was serving as Driver (BSP-06) in Revenue Academy Karak since 2006.
2. That the petitioner/appellant has been terminated from service vide impugned order dated 19.06.2019, which is to be set aside on the following grounds:

GROUND S:

- I- That the service of the appellant has been terminated without complying the legal and codal formalities enshrined in E&D. Rules 1973.
- II- That the appellant/petitioner has been condemned unheard which is against the settled law of natural justice and equity.
- III- That the impugned order dated 19.06.2019 is against the spirit of natural justice.

ATTESTED

- IV- That there is no complaint whatsoever against the appellant.
- V- That alleged notices mentioned in the impugned order dated 19.06.2019 are one sided and not received to the appellant.
- VI- That the appellant has completed half of his services i.e. 13 years in the Revenue Department without any complaints.
- VII- That the order dated 19.06.2019 is patently illegal and unconstitutional as the higher forum has laid down certain principles for it which has not been complied in the case of the appellant.

Therefore, it is humbly submitted that the impugned order dated 19.06.2019 may please be set aside and the appellant may please be reinstated on the post according to law and rules with all back benefits

Dated 08.07.2019

Appellant

Hamid Ullah
 Hamid Ullah
 S/o Ahmad Jan
 Tapiyal Garhi, Karak
 Cell No. 03348688373

Through

Counsel

Hamid Ullah

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE AND ESTATE DEPARTMENT

PHONE # 091-9210057

FAX # 091-9213989

E-MAIL: LANDRECORD.KPK@GMAIL.COM

Facebook ID: www.facebook.com/landrecord.kpk Twitter ID: @landrecord.kpk

No. 5792 /LR-I/Appeal/Hameed Ullah
Dated Peshawar the 2 /09/2019

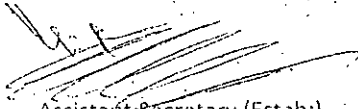
To,

✓ Mr. Hameed Ullah,
Driver, Revenue Academy, Peshawar

SUBJECT: REPRESENTATION/APEAL AGAINST THE IMPUGENED
NOTIFICATION NO. 7238/LR-I/128 DATED 19/06/2019.

Memo:

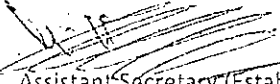
I am directed to refer to your departmental appeal dated, 08/07/2019 on the subject noted above and to state that your appeal has been examined and filed by the competent authority.


Assistant Secretary (Estab.),
Khyber Pakhtunkhwa

No. 5793-96 /LR-I/Appeal/Hameed Ullah

Copy forwarded to the the:-

- 1) Principal, Revenue Academy, Peshawar.
- 2) Assistant Commissioner (Revenue), Karak.
- 3) PS to Senior Member, Board of Revenue, Khyber Pakhtunkhwa.
- 4) District Accounts Officer, Karak.


Assistant Secretary (Estab.),
Khyber Pakhtunkhwa

ATTESTED

بعدالت لیسٹرز بیجول



۲۰ جناب سعید اللہ

سعید اللہ بنام حوص

موزخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ /
 آن مقام لہذا کیلئے للاذی اللہ علیہ وسلم
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقریر نمائندہ فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقریر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہونا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم _____ ماہ _____ 20

العاب _____ واہ العیاب _____

بمقام _____ کے لئے منظور ہے۔

(211)

Office of the Principal,
Revenue Academy, Karak

Dated, 20/6 2006

OFFICE ORDER

No. _____ RAC/KK On the recommendation of the Departmental Selection Committee - Mr. Hanif Ullah _____ T. As. S. G. No. _____ P.O. _____
Mr. Karak is hereby appointed as Driver (B. S-4) on contract basis against the existing vacancy in the Revenue Academy, Karak with immediate effect on the following terms and conditions:

1. In case of abolition of the post or want of vacancy by the Department, his services will be liable to termination.
2. He will be governed by such rules and regulations/orders as prescribed by the Government in the contract policy.
3. He will be on duty at his own expenses and no TA/DA will be allowed.
4. He will produce medical fitness certificate from authorized medical authority.
5. He will be on probation for a period of two years.

If the above terms and conditions are acceptable to him, he is directed to report to Principal Revenue Academy, Karak immediately.

sd

(Aqal Bad Shah)
Principal
Revenue Academy, Karak

No: 183-186 RAC/KK

- 1. ✓ Copy of the above is forwarded to the -
- 2. Director Land Records, NWFP, Peshawar.
- 3. Assistant Secretary, Board of Revenue NWFP, Peshawar
- 4. District Officer, Peshawar
- 5. Official concerned.

Handwritten signature and scribbles



Handwritten signature
(Aqal Bad Shah)
Principal
Revenue Academy, Karak

20/6
2006

To

The Chairman,
Right to Information Commission
Govt, of KPK, Peshawar

DISPATCHER
KP-RTI COMMISSION
7th Floor Tasneem Plaza
6-Saddar Road Peshawar Cantt

Subject:- **APPLICATION FOR ISSUANCE OF DIRECTION
TO SENIOR MEMBER BOARD OF REVENUE
PESHAWAR TO FURNISH/PROVIDE COPY OF
THE APPOINTMENT LETTER DATED
20/06/2006 OF THE APPLICANT**

Memo:

With due respect it is submitted that

1. That the applicant is citizen of Islamic Republic of Pakistan, bearing CNIC No. 14202-5490382-3
2. That this is a fundamental right in the Constitution, according to Article 39 to have an access to public record and in furtherance of the said provision, the KPK Govt. has also promulgated the law of right to access to information Act 2013.
3. That applicant while exercising his right applied to the respondent mentioned above to furnish/provide the above mentioned

documents but they refused although the same do not fall in humanity and exempted documents nor has got nexus with defense and security.

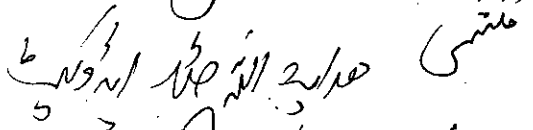
It is, therefore, requested that the above referred SMBR/respondent may kindly be directed to provide the same to the applicant with compensation for causing inconience and financial loss beside violating the right to Information Act 2013.

Applicant

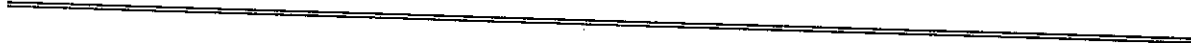


Hamid Ullah
Ex-Driver









SD3C6D 14202-5490382-3

تاریخ: 21/09/2016



مستطوبہ: 14202-5490382-3

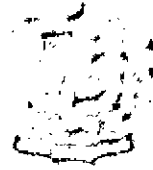
تاریخ: 21/09/2016

مشورہ کارا لے پر ترقی لیٹر بکس میں ڈال دیں



حکومت پاکستان

14202-5490382-3



تاریخ: 21/09/2016

مشورہ کارا لے پر ترقی لیٹر بکس میں ڈال دیں