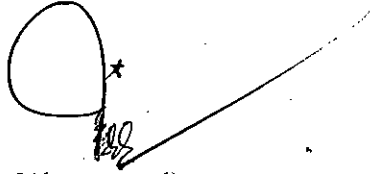


25.10.2022

Appellant alongwith his counsel present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 12.12.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

12.12.2022

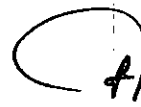
Appellant present through counsel.

Muhammad Adeel Butt learned Additional Advocate General Iftikhar Ghani DEO Buner for the respondents present.

Former made a request for adjournment in order to further prepare the brief. Last chance is given. To come up for arguments on 03.02.2023 before D.B.



(Fareeha Paul)
Member (E)




(Rozina Rehman)
Member (J)


SCANNED
KPST
Peshawar

3rd Feb, 2023

Clerk of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Lawyers are on strike, therefore, case is adjourned. To come up for arguments on 11.05.2023 before D.B. Office is directed to notify the next date on notice board as well as on the website of the Tribunal.

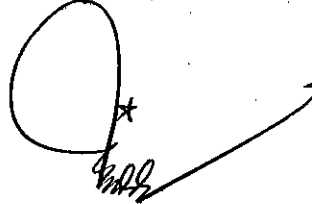

(Muhammad Akbar Khan)
Member (E)


(Kalim Arshad Khan)
Chairman

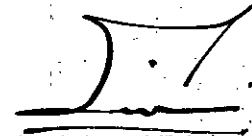
26.05.2021

Mr. Afrasyab Khan Wazir, junior ^{of learned} counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Former sought adjournment on the ground that the issue involved in the present appeal is pending adjudication before Larger Bench of this Tribunal in other appeals. Adjoined. To come up for arguments before D.B on 14.09.2021.



(Mian Muhammad)
Member (E)



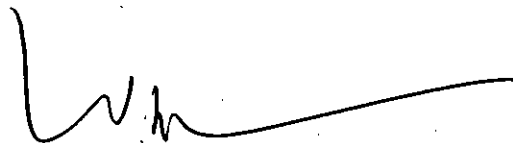
(Salah Ud Din)
Member(J)

14.09.2021

Mr. Kamran Khan, junior of learned counsel for the appellant present. Mr. Javed Ullah, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjoined. To come up for arguments before the D.B on 21.12.2021.

D



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)

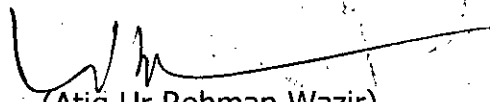


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

21.12.2021

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Obaid-Ur-Rehman ADO for respondents present.

Clerk of learned counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 05.04.2022.

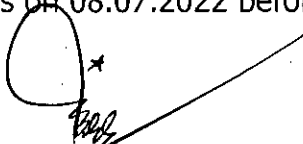

(Atiq Ur Rehman Wazir)
Member (E)


Chairman

05.04.2022

Learned counsel for the appellant present. Mr. Kabirullah, Addl. AG for the respondents present.

Former seeks adjournment to properly assist the court. Adjourned. Last opportunity is granted. To come up for arguments on 08.07.2022 before the D.B.


(Mian Muhammad)
Member(E)


Chairman

8-7-2022

Due to Holidays of Eid Ul Azha
the case is adjourned to 28-10-2022


Reader

23.11.2020

Counsel for the appellant and Addl. AG for the respondents present.

As the proposition has not been settled by the Larger Bench in other cases, instant matter is, therefore, adjourned to 12.02.2021 for hearing before the D.B.



(Mian Muhammad)
Member


Chairman

12.02.2021

Junior to counsel for the appellant and Addl. AG for the respondents present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant matter is adjourned to 26.05.2021 for hearing before the D.B.


(Atiq-ur-Fehman Wazir)
Member(E)


Chairman

09-4.2020

Due to COVID19, the case is adjourned to
07/07/2020 for the same as before.

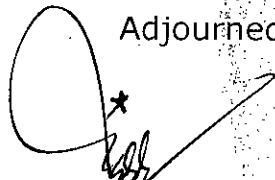

Reader

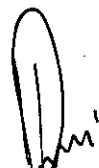
07.07.2020

Nemo for the appellant. Mr. Kabirullah Khattak
learned Addl. AG for the respondents present.

On the last date the matter ^{was} adjourned through
a reader's note, therefore, notice be issued to the
appellant/counsel.

Adjourned to 02.09.2020 before D.B.


Member


Chairman


02.09.2020

Counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate
General for respondents present.

Learned counsel for appellant seeks adjournment as
issue involved in the present case is pending before
Larger Bench of this Tribunal.

Adjourned to 23.11.2020 for arguments, before D.B.


(Attiq ur Rehman)
Member (E)


(Rozina Rehman)
Member (J)

02.09.2019

Counsel for the appellant present. Mian Amir Qadir, DDA for respondents present. Learned counsel for the appellant submitted an application for transfer of the present service appeal at principal seat Peshawar. Learned DDA showed his no objection if the present application is allowed. In the interest of justice the present appeal is transferred to principal seat at Peshawar. To come up for arguments on 14.11.2019 before D.B at Peshawar.


Member


Member
Camp Court Swat

14.11.2019

Counsel for the appellant present. Asst: AG alongwith Mr. Obaid Ur Rehman, ADEO for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 14.01.2020 before D.B.


Member


Member

14.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Ziaullah, Deputy District Attorney for the respondents present. Adjourned to 27.02.2020 for arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

27-2-20


The learned Member is on tour therefore case is adjourned to 9-4-2020


Readeh

08.01.2019

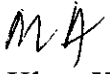
Junior counsel for the appellant present. Mr. Obaid-ur-Rehman, Assistant alongwith Mr. Mian Ameer Qadir, District Attorney for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 02.04.2019 before D.B at camp court Swat.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member
Camp Court Swat

02.04.2019


Counsel for the appellant and Mr. Mian Ameer Qadir, District Attorney alongwith Mr. Obaid-ur-Rehman, Assistant for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 10.06.2019 before D.B at Camp Court Swat.



(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

10.06.2019

Mr. Mir Zaman, junior counsel for the appellant and Mian Ameer Qadir learned District Attorney alongwith Mr. Obaid-ur-Rehman, Assistant for the respondents present. Junior counsel for the appellant seeks adjournment as senior counsel for the appellant is not available today. Adjourn. To come up for arguments on 02.09.2019 before D.B at Camp Court Swat.


(M. Amin Khan Kundi)
Member
Camp Court Swat


(M. Hamid Mughal)
Member
Camp Court Swat

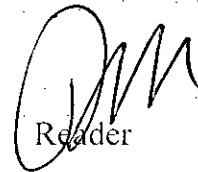
24.09.2018

Mr. Noor Muhammad Khattak, Advocate, counsel for the appellant present. Mr. Ubaidur Rahman, ADO alongwith Mr. Kabirullah Khattak, Addl. AG for the respondents present. Written reply submitted. The case pertains to territorial limits of Malakand Division. To come up for rejoinder, if any, and arguments on 07.11.2018 before S.B at camp court, Swat.


Chairman

07.11.2018

Due to retirement of the Hon'ble Chairman Service Tribunal is incomplete. Tour to Camp Court Swat has been cancelled. To come up for the same on 08.01.2019 at camp court Swat.


Reader

21.06.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that 730 days leave without pay was granted to him vide order dated 3.01.2008. It was further extended for a period of one year vide order dated 02.12.2009. That the appellant applied for further extension in leave which was sanctioned vide order dated 10.01.2011. Another extension in leave was granted to him for 180 days from 03.03.2012 to 29.08.2012. That the appellant again applied for extension in leave which was not acceded by the respondents. Vide impugned order dated 14.11.2012 major penalty of removal from service w.e.f 30.08.2012 was imposed on him. He preferred departmental appeal on 30.01.2018 which was not responded within the stipulated period, hence, the instant service appeal. As impugned order was passed with retrospective effect so the same was void ab-initio and no limitation runs against a void order. He has not been treated according to law and rules.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit, subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 16.08.2018 before S.B.


(AHMAD HASSAN)
MEMBER

16.08.2018



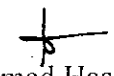
Clerk to counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply/comments not submitted. Learned AAG sought some time to submit the same. Case to come up for written reply/comments on 24.09.2018 before S.B.


Chairman

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 749/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/05/2018	<p>The appeal of Mr. Sawab Khan presented today by Mr. Noor Muhammad 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 29/05/18</p>
2-	30/05/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/06/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	08.06.2018	<p>Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 21.06.2018 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 749 /2018

SAWAB KHAN

VS

EDUCATION DEPTT:

INDEX

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4.	Charge Report	B	8
5.	Service Book	C	9 - 12
6.	Sanction of 730 Days Leave	D	13
7.	Sanction of 365 Days Leave	E	14
8.	Sanction of 366 Days Leave	F	15
9.	Application for Leave	G	16
10.	Leave Proforma	H	17
11.	Order of Leave	I	18
12.	Extension application	J	19
13.	Impugned Order dated 14-11-2012	K	20
14.	Departmental Appeal	L	21
15.	Vakalat Nama	22

APPELLANT

THROUGH:

NOOR MOHAMMAD KHATTAK,

ADVOCATE HIGH COURT,

PESHAWAR

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____ 749 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1004

Dated 29-5-2018

Sawab Khan s/o Faqir Khan (Ex-PST),
R/O Kalpanai, P.O & Tehsil Daggar, District Buner

..... **APPELLANT**

VERSUS

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer (Male), District Buner.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED
ORDER DATED 14-11-2012 WHEREBY THE APPELLANT WAS
REMOVED FROM SERVICE w.e.f. 30-08-2012 AND AGAINST
NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL
DATED 05-02-2018 OF THE APPELLANT WITHIN THE
STATUTORY PERIOD OF NINETY DAYS**

PRAYER:

**That on acceptance of this appeal the impugned order dated
14-11-2012 may very kindly be set aside and the appellant
may kindly be re-instated in to service with all back benefits.
Any other remedy which this august Tribunal deems fit that
may also be awarded in favor of the appellant.**

R/SHWETH:

ON FACTS:

1. That appellant was appointed as PST (BPS-07) now (BPS-12) in the respondent after fulfilling all the codal formalities required for the posts vide order dated 18-11-2005. Copy of appointment order is attached as annexure **A.**
2. That the appellant took over the charge of the post at the assigned duty station i.e. Govt. Primary School, Kalakhela vide Charge Report dated 19-11-2005 and as such the service book of the appellant was also prepared. Copy of the Charge Report & Service Book is attached as annexure **B&C.**
3. That, the appellant after submitting his charge report performed the respondent department quite efficiently, whole heartedly and upto the entire satisfaction of his superior.

Filed to-day

Registrar.

29/5/18

4. That, the appellant due some domestic problems applied for the grant of 730 days Leave Without Pay which was properly sanctioned by the competent authority vide order dated 30-01-2008 and after the expiry applied for further extension of the leave for the next 365 days the same was also approved vide order dated 02-12-2009. That after the expiry of leave the appellant further applied for extension of Extra Ordinary Leave which was also sanctioned vide order dated 10-01-2011. Copies of orders are attached as annexure **D, E & F.**
5. That, the appellant filed another request before the competent authority for the grant of extension in the Leave which was allowed and the appellant was granted Extraordinary Leave without Pay for 180 days from 03-03-2012 to 29-08-2012. Copy of application, Leave proforma & order is attached as annexure **G, H & I.**
6. That on expiry of the said leave the appellant requested the concerned authority for extension of his leave but no reply has been received. Copy of the extension application is attached as annexure **J.**
7. That, astonishingly the appellant received the impugned order dated 14-11-2012 whereby the appellant was removed from service w.e.f. from 30-08-2012 in utter violation of law & rules. Copy of the impugned order dated 14-11-2012 is attached as annexure **K.**
8. That, the appellant feeling aggrieved filed Departmental Appeal dated 06-02-2013 which was not responded till date, hence, the appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others. Copy of Departmental Appeal is attached as annexure.... **L.**

GROUND:

- A- That impugned removal order dated 14-11-2012 issued by the respondents is void ab initio, against the law, facts and norms of natural justice hence not tenable and is liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the codal formalities required for the major penalty of removal from service was not fulfilled by the respondents while issuing the impugned order dated 14-11-2012.

- D- That, the respondents acted in an arbitrary and malafide manner while issuing the impugned removal order dated 14-11-2012.
- E- That, the impugned removal order dated 14-11-2012 issued the respondent is void-ab initio in a sense that no retrospective punishment is permissible under the law.
- F- That no charge sheet & statement of allegation has been issued before issuance of the impugned order dated 14.11.2012 against the appellant.
- G- That, no chance of personal hearing/personal defense has been given to the appellant while issuing the impugned order dated 14-11-2012.
- H- That, no Show Cause notice has been served upon the appellant while issuing the impugned removal order dated 14-11-2012.
- I- That, no regular inquiry is conducted in the matter which is prerequisite as per the judgments of the Apex Supreme Court of Pakistan in punitive matters against Civil Servants.
- J- That no publication has been made in the case of appellant by the respondents before issuing the impugned removal order dated 14-11-2012.
- K- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that appeal of the appellant may be accepted as prayed for, please.

Dated: 25-05-2018


APPELLANT


SAWAB KHAN

THROUGH:


NOOR MOHAMMAD KHATTAK

&


MUHAMMAD MAAZ MADNI
ADVOCATES,
High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2018

SAWAB KHAN

VS

EDUCATION DEPTT:

APPLICATION FOR CONDONATION OF
DELAY IN FILING THE ABOVE NOTED
APPEAL

R/SHEWETH:

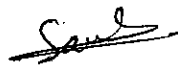
- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal inter alia on the following grounds:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in the case hence the appeal deserve to decide on merit.
- B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather on technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT



SAWAB KHAN

THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS &
LITERACY BUNER**

OFFICE ORDER:

Consequent upon the recommendation of the Departmental Selection Committee (S&L) Buner (as contained in the minutes of the meeting held on 18/11/2005), the following PST (M&F) Candidates are hereby appointed/posted against the vacant posts of the schools noted against their names from the date of taking over charge subject to terms & conditions given at the end.

S.No.	R.No	Name of Candidate	F/Name	Residence	Date of Birth	Total Score	School where appointed
DISABLE @ 2% ONE POST							
1	429	AHMAD GHAFOOR	ABDUR RAZIQ	NAVAGAI	15/4/1983	49.5018	GPS Sar Patay
2	246	SAWAB KHAN	FAQIR KHAN	KALPANAI	09/04/1979	58.687	GPS Kalakhela
3	85	SHER MUHAMMAD KHAN	FAQIR GUL	KAT KALA	14.08.1982	56.9668	GPS Shoprang

Terms & Conditions:-

- 1). They will be governed under Civil Servants Acts 1973 except Section 19.
- 2). They will be governed under the rules and regulations as may be prescribed from time to time by the Govt: for the category of the Govt: Servants to whom they belong.
- 3). They will be liable to termination on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- 4). They will be take over charge within one month.
- 5). They will be required to produce Health & Age certificate from the concerned Medial Superintendent.
- 6). They will be required to furnish copies of all their Degrees/certificates along with the original receipts & photo copies thereof pertaining to the verification fee of the concerned examining bodies (Board/University) to the undersigned pay bill should not be submitted to Accounts Office before its verification.
- 7). Charge report should be submitted to all concerned.

(SHER AFZAL KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY BUNER

A-5

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY BUNER

OFFICE ORDER:

Consequent upon the recommendation of the Departmental Selection Committee (S&L) Buner (as contained in the minutes of the meeting held on 18/11/2005), the following PST (M&F) Candidates are hereby appointed against the vacant posts at the schools noted against their names from the date of taking over charge subject to terms & conditions given at the end

PST (MALE)

S.No	R NO	NAME OF CANDIDATE	FNAME	RESIDANCE	Date of Birth	Total Score	School Where Appointed
DISABLE @ 2% ONE POST							
1	439	AHMED GHIFOR	ABDUR RAZIQ	NAWAGA	15/04/1983	49.5018	GPS Sar Palay
OPEN MERIT @ 25 % 09 POSTS							
2	246	SAWAB KHAN	FAQIR KHAN	KATI PABAI	09/04/1979	58.687	GPS Kalakhetla
3	85	SHER MUHAMMAD KHAN	FAZIL GUL	KATI KALA	14/08/1982	56.9665	GPS Sheopang
4	84	AMIR FATMA	AMIR FATMA	KATI KALA	03/01/1983	55.5676	GPS Fama Banda
5	285	ASLAM KHAN	ABU BAZAY	GUMBAI	04/07/1974	55.3856	GPS Setay Banda
6	230	ANSURULLI KHAN	TIMUR SHAH	SHARIF NAGRA	17/02/1981	54.2556	GPS Kwasar
7	454	SHAKIR ULLAH	BURHAN ULLAH	NAWAGA	05/04/1980	53.6877	GPS Yasin Banda
8	447	MURAD ULLAH	RAZWAN ULLAH	SUGA	20/03/1978	53.1	PS Ashraf
9	219	MUHAMMAD RAZIQ	MANA GUL	SOOHER	05/03/1984	53.1189	GPS Tadhah
10	366	REHMAT ALI	HAKIM ZADA	TAKHTABUND	13/03/1982	52.1938	GPS Rega No 3
UNION COUNCIL WISE @ 75 % 27 POSTS							
U/C ABKHEL							
11	39	MUHAMMAD ISLAM	MUHAMMAD AMIN	GIRARAI	01/03/1982	47.6927	GMPS Chor Banda
12		MUHAMMAD AJMAL	MUHAMMAD AMIN	GIRARAI	18/10/1974	47.0893	GPS Sar Banda
MALI KHEL							
13	68	ABDUL AKBAR	MOHD ZAREEN	JCWAR	03/03/1981	47.6971	GPS Karakar Jaba
U/C ELAI							
14	99	FIDAULLAH	MOHIBULLAH	ELAI	01/04/1981	51.7813	GPS Naqay
15	107	MERARULLAH	NATEEMULLAH	ELAI	07/01/1982	47.6494	GPS Abneso Mawa
16	106	MUHAMMAD ASLAM	KHAKKAS AMAN	ELAI	07/02/1978	41.6023	GPS Abneso Nawakaly
U/C FORWARD							
17	123	NADAR KHALI	REHMAN KHAN	TAKHTABUND	07/03/1982	49.8426	GPS Al Sner
U/C GADAZAI							
18	155	MIAN SYED AFZAL	MIAN SYED AFZAL	PIKASAI	04/04/1979	51.3139	GPS Ghazikhanay
19	160	GUL SHER	GUL BAR	BAI JOKANAY	15/12/1978	37.9755	GPS Bang Kanay
20	124	AFSAR HUSSAIN	AFSAR HUSSAIN	BAI JOKANAY	07/01/1979	37.1273	GPS Khatkhat
21	144	SAID WALI	KHAIR FAQIR	GHANIKHANAY	03/03/1977	34	GPS Ghazikhanay
22	159	SHER AFZAL KHAN	BAHRAMAND KHAN	SUI FAN WAS	18/12/1978	31	PS Akbar Abad
U/C MALAK PUR							
23	174	AURANGZEB	IBRAHIM SHAH	DCP ADA	02/02/1970	43.8096	GPS Toti Dohrai
24	182	AHMAD NISAR	AMIR SHER	BESHONAI	07/03/1977	42.78324	GPS Puland
25	185	AHMAD RIAZ	JAMSHER	BESHONAI	10/07/1976	42.1344	GPS Mula Banda
26	124	AHMAD JAVID	JAMSHER	BESHONAI	15/06/1972	41.61364	GPS Tanta
U/C PANDIR							
27	328	NOOR ZAHID SHAH	SHARIF SHAH	SHANGRA	13/07/1980	45.934	GPS Rajkanc
28	332	NASEEB ZAHID	NASIR JODIN	PANDIR	01/03/1979	42.395	GPS Pandir
29	330	MISBAHULLAH	KAMAL ZAY	KASS	06/03/1970	31.79	GPS Danda

Handwritten signature and notes in the bottom right corner.

6

S.No	R.NO	NAME OF CANDIDATE	FNAME	RESIDANCE	Date of Birth	Total Score	School Where Appointed
UIC KARAPA							
30	352	SHER KHAN	NAMAZI KHAN	KARAPA	02/05/1980	46.0494	GPS Bughdara
UIC MORIZAI							
31	380	SHER ZAMAN KHAN	NOOR ALI KHAN	GHANSA	31/03/1975	49.6643	GMPS Ghundakal
UIC AMAZAI							
32	509	JAWHAR ALI	ALAM DAD	NAGRA	01/01/1974	54.969	GPS Zar Malka
33	516	BAKHIT SHER ALI	ZAMEEN	TARIKHAN	05/06/1972	49.6259	GPS Langov
UIC SARWAI							
34	567	BASHIR AHMED	SAHIB ZAR	QASIM KHIL	13/04/1979	42.7102	GPS Goro
35	570	BAKHIT AMIN KHAN	MIAN KHAN	HAL	02/01/1976	39.822	GPS Qabroono Kamfow
36	568	AZIZ ULLAH	SYED HABIB ULLAH	PANJHAR	02/03/1969	38.4882	GPS Dakara
37	569	BAKHIT ZADA	FARID KHAN	HAL	14/05/1983	39.4717	GPS Dakara

S NO	R NO	NAME	FATHER NAME	RESIDENCE	D.O. BIRTH	Total Score	School Where Appointed	Re
------	------	------	-------------	-----------	------------	-------------	------------------------	----

PST (FEMALE)
DISTRICT OPEN MERIT @ 25 % 05 POSTS

38	157	RUBINA BIBI	MUHAMMAD HANIF	BAZAFKOT	13/4/1980	52.9046	GGPS Chamo Bazarkot	UC So
39	213	KALSOORI	FAZLI RASHID	NAWAZAI	01/07/1986	50.2843	GGPS Khadar Khan	UC Am
40	75	ZENUB MUMTAZ	MUMTAZ SHAHZADA	HISAR	02/02/1985	48.2389	GGPS Kuzshannal	UC Bati
41	146	MARJAN	SHER AKBAR KHAN	AMINAWAR	18/1/1986	48.0109	GGPS Barshannal	UC Balak
42	139	MEHNAZ	UMBARAS KHAN	BAJKATA	07/01/1986	46.9677	GGPS Shaigra	UC Panc

UNION COUNCIL WISE @ 75 % 12 POSTS

UIC MALIKHIL							
43	12	UDMA BEGUM	M SHOHAB	CHAR	01/03/1985	31.2390	GGPS Salarzo Maira
44	8	FATMA BIBI	BAKHSHAD	JOWAI	09/04/1984	22.9241	GGPS Leganai
UIC MALAK PUR							
45	40	JAMEEL SABI	MUHAMMAD KHAN	MALAKPUR	12/03/1985	46.5570	GGPS Etkon
46	49	BAKHIT SABA	MASOOL KHAN	NANAKHAYAL	12/07/1986	44.3601	GGPS Lulan
UIC PANDIR							
47	153	RAHAT SABA BIBI	MUHAMMAD RAHMAN	PANDIR	01/01/1987	17.4000	GGPS Chajandra
UIC SORAY							
48	161	ABIDI BIBI	AMIR RAHMAN	TOPAI	03/04/1981	41.0787	GGPS Bartiraji
UIC KAWGA							
49	154	UMMA SALMA	ZIA UL HAQ	AGARA	10/03/1985	45.5255	GGPS Agarai
UIC AMAZI							
50	229	SHAZIA PERVIN	RAMIZ	KANDAR	02/02/1984	44.6184	GGPS Mithun
51	228	SAMIYANAZ	ZIA UL HAQ	NAGRA	10/07/1984	38.7272	GGPS Mithun
52	221	LAILA	MURAD ALI	FARBAN	05/12/1979	28.9588	GGPS Malka
UIC CHINGALI							
53	230	SHAHNAT	HABIB GUL	CHINGALI	14/4/1984	46.8477	GGPS Dandikot
UIC GHURGHUSHTO							
54	249	TAYABA BEGUM	SAID CASIM	GHURGHUSHTO	01/03/1983	46.0415	GGPS Bagh

COMMUNITY PRIMARY SCHOOL UNION COUNCIL WISE LIST 5 POSTS

Roida Khan JIC

UIC PACHKALAY

TESTED

56	59	BAKHT FARIDA	MIAN MAHMOOD	BATAI	10/04/1981	37.9000	CPS Hakinna
U/G REGA							
57	111	KHAIR RUL WARA	ALI BAHADAR	REGA	10/01/1982	28.3200	CPS Baranidu
U/G SHALBANDAI							
58	144	INCORIN	MASIN ZADA	SHALBANDAI	08/02/1973	20.4100	CPS Parshalai
59	142	SADIOA NUREEN	SAHIB SAID	ANAWAR	01/01/1981	26.3	S Ghukh Dara

7

Terms & Conditions:-

- i) They will be governed under Civil Servants Acts 1973 except Section 19.
- ii) They will be governed by rules & regulations as may be prescribed from time to time by the Govt for the category of the Govt Servants to whom they belong.
- iii) They will be liable to termination on one month notice from either side. In case of resignation without notice, one month pay will be forfeited in full.
- iv) They will take over charge within One Month.
- v) They will be required to produce Health & Age Certificate from the concerned Medical Superintendent.
- vi) They will be required to furnish copies of all their Degrees/Certificates along with the original receipts & photocopies thereof pertaining to the verification fee of the concerned examining bodies (Board/University) to the undersigned. Pay bill should not be submitted to Accounts Office before its verification.
- vii) Charge Report should be submitted to all concerned.
- viii) All appointed teachers will get salary as per their academic & professional qualification as prescribed by the Govt.
- ix) The Candidates at S No. 10, 32, 36 are appointed on regular basis being already in service.
- x) All the fresh appointed teachers will serve at least for two years in their place of posting.
- xi) No TADA is allowed.

(SHER AFZAL KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY BUNER

Endst No 11318-11416

Dated 18/11/2005

1. Director Schools & Literacy NWFP Peshawar.
2. District Coordination Officer Buner at Daggar.
3. District Naib Buner.
4. District Officer (M&F) (SSL) Buner.
5. District Accounts Officer Buner.
6. Deputy District Officer (M) Prgy. Buner.
7. Deputy District Officer (F) Prgy. Buner.
8. Assistant District Officer (B&A) Local Office.
9. Head Teachers concerned.
10. Officials concerned.

EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY BUNER

ATTESTED

(For use in Police Department only)

C-9

Heirs:--

Passed S.S.C Examination under Roll No 207371, from Session Annual 1995, obtained marks 588 out of 850.

Dy. D.O. (M)
Pry: Edu: Buner.

Note:--

1. N
2. R
3. R

Verification Roll No. dated received back.

Passed F.A Examination under Roll No 229225 from Session Annual 1999 obtained marks 725 out of 1100.

Left Thumb-Impression

Dy. D.O. (M)
Pry: Edu: Buner.

4. F
5. D
6. E
7. Pe
8. Le of
9. Sig
10. Sig the

Qualifications	Date	Qualifications	Date
English	Passed B.A Examination	First Arts	
Pushto	Under Roll No 26529	B.L. or B.A.	
Urdu	from Peshawar University Session July 2001	Pledership Examination	
Plan-Drawing	obtained 282 marks out of 550 marks	Training School Final Examination	
Finger Print		Other Qualifications:--	
Drill Instructing	Dy: D.O. (M) Pry: Edu: Buner.	Passed P.T.C examination under Roll No 1787 from Govt Elementary College (Men) Bari Kot Swat	
Court Duties		obtained 785 marks out of 1200 marks	
Reserve Duties			

Dy: D.O. (M)
Pry: Edu: Buner.

N.B-- Line to be drawn under the qualification possessed.

ATTESTED

[Signature]

Note: -- The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Sawab Khan

2. Race: Afghan

3. Residence: Kalpani


Father's name and residence: Fajiz Khan.

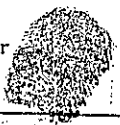

Date of birth by Christian areas nearly as can be ascertained: (9-4-1979)
Nine April, one thousand nine hundred Seventy nine

Exact height by measurement: 5-5"

Personal marks for Identification: nil

Left hand thumb and Finger Impression of (non-Gazetted) Officer.

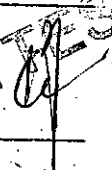
Little Finger  Ring Finger 

Middle Finger  Fore Finger 

Thumb 

Signature of Government Servant: 

Signature and Designation of the Head of the Office, or other Attesting Officer:  D.O. (M) 17/6/00
Pry: Edu: Buner.

ATTESTED 

Vertical text on the right margin: 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

11

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 Servant
RS. Name of post K. Lakshmi Devi K. Lakshmi Devi	Substantive		BPS (7) =	2555-	140/-	12/2005	[Signature]
Do	Do		Rs =	2555/-		12/2005	[Signature]
Do	Do		Rs =	2555/-		13/2006	[Signature]
Do	Do		Rs =	2695/-		12/2006	[Signature]
Charan M. J.		BPS No =	7 (2940 -	160 -	7740)		
Do	Do		Rs =	3100/-		1/07	[Signature]
Do	Do		Rs =	3260/-		1/07	[Signature]

Signature of the officer testing of attestation columns

[Signature]
Dy. Dir. P. & E.

[Signature]
Dy. Dir. P. & E.

[Signature]
Dy. Dir. P. & E.

[Signature]
Dy. Dir. P. & E.

[Signature]
Dy. Dir. P. & E.

ATTACHED

[Signature]

12

9	10	11	12	13		14	15
				Leave			
				Nature and duration of leave taken	Allocation of period of leave upto four months for which leave salary is debitable to another Government		
Signature and designation of the head of the office or other attesting officer in attestation of columns 10 to 13	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	Period	Government to which debitable	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
<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.	6 12-2-06	Transfer	<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.		Appointed as pST at G.P.S. Kalakhele		11318-1416
<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.	11 30-2-06	A/Bnc	<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.		vide EDC SL Endorsive dated 18-11-2005		
<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.	6 07	Scale	<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.				
<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.	11 30-2-06	A/Bnc	<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.		paid Allowance		
<i>(Signature)</i> Dy. D.O. (M) Pry. Edu: Buner.					upto 12-12-06 to 30-6-06		
					Net Rs 2556/-		
					Paid		

ATTESTED

District Accounts Officer,
BUNER AT DAGGAR.

Service Verified w.e.f. 6-12-2005
to 30-6-06 from acc. Roll &
other records of office.

(Signature)
Dy. D.O. (M)
Pry. Edu: Buner.

Signature
of
the
officer
in
charge
of
the
office

D-13

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY BUNER.

SANCTION.

Sanction is hereby accorded to the grant of leave in respect of Mr, Sawab Khan PST Govt;Pry;School No, 1 Chanar for the period with effect from 03-03-2008 to 02-03-2010 (730 days) on with out pay as recommended by the Dy;District Officer (M) Pry; Buner.

Necessary entry to this effect should be made in his S/Book accordingly.

(SULTAN ZEB)
EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY BUNER.

Endst;No, 126-28 / Dated 30/11 /2008.

Copy forwarded to the ;-

1. Dy; District Officer (M) Pry;Buner along with S/Book.
2. District ~~Officer~~ Accounts Officer Buner at Daggar.
3. Official Concerned.

(Signature)
EXECUTIVE DISTRICT OFFICER
SCHOOLS AND LITERACY BUNER.

(Signature)
ATTESTED

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS &
LITERACY BUNER**

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION BUNER

EXTENSION IN LEAVE:


Extension in Extra Ordinary leave in respect of Mr. Sawab Khan PST BPS-07 GPS Chanar without pay for the period of 03/03/2010 to 02/03/2011 (365) days is hereby accorded under the revised rules 1981, read with District Rules of Business 2001, amendment made vide No. SO(LG-1)/3-196/EM/5 recommended by Deputy District Officer (Male) Primary Buner vide No. 10800 dated 11/11/2009.

Note:

Necessary entry to this effect should be made in his service book accordingly.

(SHER AFZAL KHAN)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

Endst: No. 5828-30/ dated 2/12/2009

ATTESIED


Extention no - (1)

one year

E-14

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION BUNER

EXTENTION IN LEAVE.

Extention in Extra Ordinary leave in respect of Mr. Sawab Khan PST BPS-07 GPS Chanar without pay for the period of 03/03/2010 to 02/03/2011 (365) days is herby accorded under the revised rules, 1981 read with District Rules of Business, 2001, an addment made vide No. 5041/2009 196/BE/13 recommended by Deputy District Officer (Male) Primary Buner vide No. 70800 dated 11/11/2009.

Note:

1. Necessary entry to this effect should be made in his Service Book accordingly.

(SHER AFZAL KHAN)

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

Endst: No. 5028-30 / Dated 2/12 /2009.

Copy of the above is forwarded for information to the

1. District Accounts Officer Buner at Daggat
2. Deputy District Officer (M) Primary Buner
3. Teacher Concerned.

ATTESTED

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY
AND SECONDARY EDUCATION BUNER**

SANCTION OF LEAVE/EXTENSION:

Sanction is hereby accorded to the grant of Earned leave/Extension of leave in respect of the following officials their names and schools noted against each read with District Govt: Rules of Business 2001, amendment made vide SO.(LG-1)3-196/EM/2005.

Necessary entry to this effect should be made in their service Books accordingly.

S. No.	Name & Designation	School	Period of leave	Remarks
1.	Sawab Khan PST B-7	GPS Chanar	3-3-2011 to 2-3-2012	(366 days E.O.L Extension
2.	Shah Karim Khan PST B-7	GPS Nath	3-3-2011 to 31-3-2011	Earned leave (28 days on full pay.
3.	Fazli Rabi PST B-7	GPS Daggar No.2	3-3 2011 to 19-5-2011 & 20-5-2011 to 30-6-2011	78 days on half pay 10 days w/o pay

(HANIFULLAH)
EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECONDARY EDUCATION
BUNER

No. 6591-93/F-No.20/DA/No.6/7

Dated 10/01/2011

Copy forwarded to all concerned.

ATTESTED


Extension - No-2 One Year

P-15

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECY: EDUCATION BUNER
SANCTION OF LEAVE / EXTENSION

Sanction is hereby accorded to the grant of Earned leave/Extension of Leave in respect of the following Officials their names and schools noted against each, read with District Govt; Rules of Business 2001, amendment made vide So.(LG-1)3-196/EM/2005

Necessary entry to this effect should be made in their service Books accordingly

S.No.	Name & Designation	School	Period of leave	Remarks
✓	Sawab Khana PSTB-7	GPS Chanar	3-3-2011 to 2-3-2012	(366 days E.O.L. Extension)
	Shah Karim Khan PST B-7	GPS Nath	3-3-2011 to 31/3/2011	Earned leave (28 days on full pay)
	Fazli Rabi PST B-7	GPS Daggar No.2	3-3-2011 to 19/5/2011 & 20/5/2011 to 30/6/2011	78 days on half pay 40 days w/o pay

(HANI FULLAH)
EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECY: EDUCATION BUNER

Indst. No. 6591-93/W No.20/DA No.6/7

Dated 10/01/2011

- Copy forwarded for information to the District Accounts Officer Buner
- By District Officer(M)Pry, Buner with his office memo No 3444 dated 7/12/2010, 3396 dated 1/12/2010 and 3472 dated 15/12/2010 along with original service Books
- Officials Concerned

EXECUTIVE DISTRICT OFFICER,
ELEMENTARY & SECY: EDUCATION BUNER

ATTACHED
[Signature]

بخدمت جناب ایڈیٹنگ ڈسٹرک ایجوکیشن ایفٹر ملز ضلع کوئٹہ
(16) عنوان درخواست برائے طویل چھٹی
Extension in (long leave)

جناب عالی

مکرمہ یادگندہ تشریحی ہے کہ میں مہنگی نقاب خان گورنمنٹ پرائمری

مکتول چناڈ میں بحیثیت ٹی ایس ٹی مراکز سرانجام دے رہا ہوں
Extension in (long leave) کی ضرورت ہے۔

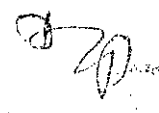
اس لیے بذریعہ درخواست حکم عرصہ تدارک سے لیا کہ جسے

مورخہ 3/3/2012 سے 29/8/2012 تک طویل چھٹی (6 چھ مہینے) دینے

کے احکامات صادر فرمائیں تو میں نوازش سے ہو کر حقیق

عمر لیکھ

نقاب خان ٹی ایس ٹی

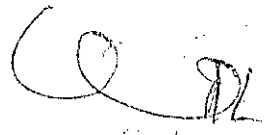


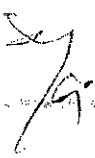
All provision

Can

ATTESTED







APPLICATION FOR GRANT OF LEAVE FROM BPS-1 TO BPS-16

- 1- Name & post of employees _____
 2- Earned available with pay during the service. _____

No.	From	To	No. of days
1.	<u>NIL</u>	<u>NIL</u>	<u>NIL</u>
2.	<u>/</u>	<u>/</u>	<u>/</u>
3.	<u>/</u>	<u>/</u>	<u>/</u>
4.	<u>/</u>	<u>/</u>	<u>/</u>
5.	<u>/</u>	<u>/</u>	<u>/</u>


3. Extra ordinary leave without pay during the service.

1.	<u>NIL</u>	<u>NIL</u>	<u>NIL</u>
2.	<u>/</u>	<u>/</u>	<u>/</u>
3.	<u>/</u>	<u>/</u>	<u>/</u>
4.	<u>/</u>	<u>/</u>	<u>/</u>
5.	<u>/</u>	<u>/</u>	<u>/</u>

4. Leave applied for. _____
 5. period of leave applied for. _____

	From	To	No of days	Remarks
1.	<u>3-3-2012</u>	<u>to 29-8-2012</u>	<u>E-O-L</u>	<u>without pay</u>
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____

Signature of servant

ATTESTED


Handwritten initials and a circled number 17.

Name of Employee Sawab Khan PST
 Period available with pay during the service.

NO. DATE	To	Amount Days
1. <u>Nil</u>	<u>Nil</u>	<u>Nil</u>
2. <u>/</u>	<u>/</u>	<u>/</u>
3. <u>/</u>	<u>/</u>	<u>/</u>
4. <u>/</u>	<u>/</u>	<u>/</u>
5. <u>/</u>	<u>/</u>	<u>/</u>

Amount Ordinary Leave Without Pay during the service.

NO. DATE	To	Amount Days
1. <u>Nil</u>	<u>Nil</u>	<u>Nil</u>
2. <u>/</u>	<u>/</u>	<u>/</u>
3. <u>/</u>	<u>/</u>	<u>/</u>
4. <u>/</u>	<u>/</u>	<u>/</u>
5. <u>/</u>	<u>/</u>	<u>/</u>

Reason of Leave applied for _____

Period of leave from _____
 To _____

Extension in E-O-L

NO. OF Days _____
 Reason _____

3-3-2012 To 29-8-2012 E-O-L with out pay

1. Verified that 26 days leave is available at his credit, it is further certified that no other _____ is on leave during the period.
2. Certified that the foregoing entries are correct or per entries in his service book which I have.

ATTESTED
[Signature]
 BY: D. C. (M)
 (E & S) _____

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY &
SECONDARY EDUCATION BUNER**

EXTENSION LEAVE:

Extension in Extra Ordinary leave in Mr. Sawab Khan PST GPS Chanar without pay for the period of 03/03/2012 to 29/8/2012 (180 days) is hereby accorded under the NWFP revised leave rules 1981 read with the District Govt: rules of business 2001 and Amendment made vide No.SO(LG-I)3-196/EM/05 Dated 07/10/2005 recommended by Deputy District Officer (M) Primary Buner vide No.2486 Dated 31/10/2011.

Necessary entries to this effect should be made in the service book of the official concerned.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

Endst: No. 4420-22/EDO/DO/ADO (Estb) (F) Dated: 31/12/2011.

ATTESTED



Extension no ③ 6 month

J-①⑧

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECY:EDU: BUNER.

EXTENSION OF LEAVE.

Extension in Extra Ordinary leave in Mr.Sawab Khan PST GPS Charar with out pay for the period of 03/03/2012 to 29/8/2012 (180days) is hereby accorded under the NWFP revised leave rules 1981 read with the District Govt. rules of business 2001 and Amendment made vide No.SO(LG-I)3-196/EM/05 Dated 07/10/2005. recommended by Deputy District Officer (M) Primary Buner vide No.2486 Dated 31/10/2011.

Necessary entries to this effect should be made in the service book of the official concerned.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

Indst: No. 442 of 92/EDO/DO/ADO (Estb) (F) Dated. 31/10/2011.

Copy of the above is forwarded to the:-

1. District Account Officer Buner.
2. Dy: District Officer (M) Primary Buner.
3. Official concerned


DISTRICT OFFICER
ELEMENTARY & SECONDARY
EDUCATION BUNER

ATTESIED



سرکار صاحب ڈی جی ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ ضلع لوہاڑہ

(19) - J

عنوان درخواست ہرا کے توسیع چھٹی

صاحب عالی

مؤدبان گزارش ہے کہ میں صحتی نواب خان گورنمنٹ ہائی اسکول چتر پرا میں بحیثیت جی ایس ٹی فرائض سرانجام دے رہا ہوں۔ مجھے چھٹی میں توسیع (Extension in Long leave) کی ضرورت ہے۔

کہاں نذر پور درخواست حیدرآباد میں تازہ ہوں کہ مجھے حوالہ 30-8-2012 سے حوالہ 29-8-2012 تک یعنی ایک سال چھٹی میں توسیع دینے کے احکامات صادر فرمائیں جس میں لوہاڑہ میں موجود

المکتوب 30-8-2012

میرا لہجہ
نواب خان جی ایس ٹی

225

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEM: & SECY: EDUCATION

BUNER

No. _____ /

Dated. _____ /2012

K-20

NOTIFICATION:

Whereas Mr. Sawab Khan PST BPS-07 GPS Chanar No.1 remained absent from his duty w.e.f 29/08/2012, three notices have already been issued to him under registered cover vide Deputy District Officer (M) Primary Buner office Endst: No. 925-26 dated 01/09/2012, Registry No. 1512 dated 04/09/2012, No. 1001-1004 dated 17/09/2012 Registry No. 1456 dated 20/09/2012 and letter No. 1085-86 dated 01/10/2012 Registry No. 1384 dated 02/10/2012 to resume his duty, but he did not resume the duty. Final enquiry No. 1157-58 dated 11/10/2012 was conducted and he was recommended for major penalty, then final notice was served / published in the daily "AAJ" on 24/10/2012 and was directed to resume the duty within 15 days of publication of notice in the daily but neither he resumed his duty nor reported this office in the stipulated period.

Now I Mr. Raj Muhammad Khan Executive District Officer Elementary & Secondary Education Buner having satisfied that he is not interested in Govt: duty and has been proved guilty of misconduct, hereby order his removal from service w.e.f 30/08/2012 under Section 4 (1) (b) (iii) Khyber Pakhtunkhwa (Efficiency and Discipline) rules 2011.

(RAJ MUHAMMAD KHAN)
EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION BUNER

Endst: No. 10480-37 / DATED. 14/11 /2012.

Copy of the above is forwarded for information to the,

1. PS to Minister E & S Education Khyber Pakhtunkhwa Peshawar.
2. Secretary E & S Education Khyber Pakhtunkhwa Peshawar.
3. Director E & S Education Khyber Pakhtunkhwa Peshawar.
4. District Coordination Officer Buner at Daggar.
5. District Accounts Officer Buner.
6. Dy: District Officer (M) pry; Buner.
7. Official concerned.
8. PA to EDO E & SE Buner.

ATTESTED

EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION BUNER

6th PST کو بائو ان
سرویس میں داخلہ

14/11/12
مہرزین

محکمہ تعلیم و ترقی، سندھ، حکومت سندھ، حکومت سندھ

(21) - L

حکومت سندھ، حکومت سندھ، حکومت سندھ

ص - عالی

مؤدبانہ گزارش ہے کہ میں گورنمنٹ پرائمری سکول ضلع میرا
میں ریور PST ایس ڈی کی پمپروٹھا - اور دوران دوران میں
نے ایک درخواست پر اس کے گھنٹے صاف - ڈسٹرکٹ ایجوکیشن آفیسر صاحب
کو دی جو کہ منظور ہوئی اور بعد ازاں گھنٹے مذکورہ ہال کی توسیع کے
درخواستیں دی - فورم 30/8/2012 کو گھنٹے میں توسیع دینے کے لیے
درخواست جمع کیا - لیکن بعد میں مجھے علم ہوا کہ میری درخواست پر
کوئی غور کیا گیا نہ مذکورہ بالا آفیسر نے مجھے نوٹری سے ہر طرف کر دیا ہے
ص - عالی میں ایک عزیز گھرانے سے تعلق رکھتا ہوں اور کوئی دوسرا ذریعہ
معاوض نہیں ہے - اس لیے نوٹری پر دوبارہ حال کرنے کے لیے درخواست
گزار رہوں

لہذا آپ صاحبان سے التجا ہے کہ مجھے واپس اپنی نوٹری پر حال
کرنے کے اطمینان کے ساتھ فرمائیں کہ میں تمام عمل دعا گوار ہو گیا

الدعا

نواب خان
جی ایس ٹی

المترجم 30/01/2018

VAKALATNAMA

Before the KPK Service Tribunal Peshawar

OF 2018

Sawab Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Department

(RESPONDENT)
(DEFENDANT)

I/We Sawab Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2018



CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK

&

MUHAMMAD MAAZ MADNI

ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.

Phone: 091-2211391

Mobile No. **0345-9383141**

O. S. Zameer

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 749/2018

Sawab Khan -----Appellant.

VERSUS

District Education Officer (Male) Buner & Others -----Respondents.

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S.No.	Description of Documents	Annexure	Page No.
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4	2 nd Absence Notice Dated 17-09-2012	B	6-7
5	3 rd Absence Notice Dated 01-10-2012	C	8-9
6	Final Enquiry Dated 11-10-2012	D	10
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O. S. Zameer
DEPONENT

CNIC No.15101-0882586-3

(7)

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 749/2018

Sawab Khan S/O Faqir Khan (Ex-PST) Resident of Village Kalpani P.O & Tehsil Daggar

District Buner _____ Appellant

Versus

1. Director Elementary & Secondary Education Khyber Pukhtunkhwa Peshawar
2. District Education Officer Male District Buner

Respondents

Written reply / Para wise comments for & on half of Respondent No. 1 & 2.

Respectfully Sheweth

Preliminary Objections.

1. The Appellant has no cause of action/locus standi
2. **The instant appeal is badly time barred.**
3. The Appellant has concealed the material facts from this honourable Tribunal, hence liable to be dismissed.
4. The Appellant has not come to this honourable Tribunal with clean hands.
5. The Appellant has filed the instant appeal just to pressurise the respondent.
6. The appellant has filed the instant appeal on malafide motives.
7. The instant appeal is against the prevailing law and rules.
8. That the appellant has been estopped by his conduct to file the appeal.

Facts

1. Correct, to the extent that the appellant was appointed as PST teacher on 18/11/2005.
2. Correct, to the extent that the appellant took over charge the post of PST teacher on 19/11/2015.
3. Correct, pertains to record.
4. Correct, to the extent that the appellant was granted leave (730 days) without pay which was properly sanctioned by the competent authority vide this office No. 426-28 dated 30/01/2018, after the expiry of leave the appellant applied for extension for further leave without pay (365-days) which was approved by the competent authority vide this office order dated 02/12/2009, after the expiry of (365 days) leave the appellant further requested for extension ordinary leave which was also sanctioned by the competent authority vide this office order dated 10/01/2011.
5. Correct, to the extent after the expiry of leave of the appellant (366 days) the appellant requested the competent authority for extra ordinary leave without pay for (180 days) which was also granted by the competent authority.
6. After the expiry of leave 03/03/2012 to 29/08/2012 neither the appellant requested for further leave nor he approach to the competent authority for grant of leave.
7. incorrect, before the removal from service the Deputy District Office (Male) Primary District Buner issued 03 notices in the name of appellant namely Sawab Khan PST GPS Chanar No.1 vide this office Memo No. 925-26 dated 01/09/2012, registry No. 1512 dated 04/09/2012, No. 1001-1004 dated 17/09/2012 registry No. 1456 dated 20/09/2012 and letter No. 1085-86 dated 01/10/2012 registry No. 1384 dated 02/10/2012 to resume his duty but no response receive from the official concerned nor the appellant resume his duty. Final enquiry was conducted against the appellant due to his will full absence from duty, enquiry committee was recommended to major penalty imposed him from removal from service under the rules. At last the Executive District officer E&SE District Buner issue

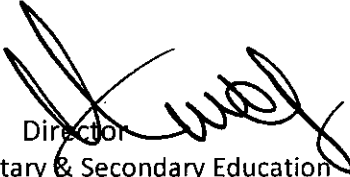
show cause notice in Daily "AAJ" dated 24-10-2012 and Disciplinary action under the rules against the appellant and he was removed from service w.e.f 30-08-2012 under section 4(l) (b) (III) Khyber Pakhtunkhwa (Efficiency and Discipline) rules 2011, issued 14-11-2012 as Annexure A, B, C, D, E, F

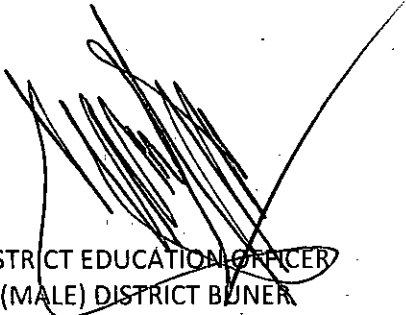
8. Incorrect, no departmental appeal has been filed by the appellant.

Grounds.

- A. Incorrect, before the removal from service the competent authority has fulfilled legal formalities against the appellant.
- B. Incorrect, neither the respondent violated Article 4 and 25 of the constitution of Islamic Republic of Pakistan.
- C. Incorrect, as per Para No. 7 of the Facts.
- D. Incorrect, and denied before the removal from service all codal formalities have been observed by the respondents.
- E. Incorrect, the removal order dated 14/11/2012 is in accordance with law rules and policy.
- F. Incorrect, already explained in para No. 7 of the facts.
- G. Incorrect, as per para No. 7 of the facts.
- H. Incorrect, already explained in para No. 7 of the facts.
- I. Incorrect, as per Para No. 7 of the facts.
- J. Incorrect, as per Para No. 7 of the facts.
- K. Legal, however the respondents seek leave of the honourable Court to submit additional ground and record at the time of arguments.

In wake of the above noted submission it is requested that this honourable Tribunal may very graciously be pleased to dismiss the instant appeal and favour of the respondent department.


 Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar


 DISTRICT EDUCATION OFFICER
 (MALE) DISTRICT BUNER

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 749/2018

Sawab Khan -----Appellant.

VERSUS

District Education Officer (Male) Buner & Others -----Respondents.

AFFIDAVIT

I Ubidur Rahman ADEO (litigation) office of the District Education officer (Male) Buner do hereby solemnly affirms & state on oath that the whole contents of the reply are true & correct to the best of my knowledge & belief & nothing has been concealed from this August Court.


DEFONENT
15101-0882586-3

for loss or damage in the case of inland register
The Post Office is not responsible for (1) -

Annexure (A)

(2)

OFFICE OF THE DEPUTY DISTRICT OFFICER (Male) PRIMARY DAGGAR BUNER.

NO. 924

Dated:- 1 / 08 / 2012

To

Sawab khan PST


GPS Chanar No 1 District Buner.

Subject:- ABSENCE NOTICE.

Memo:

The undersigned noticed that you were on long leave till 29/8/2012. You have ~~neither submitted your arrival report nor report for further adjustment.~~


Therefore you are directed to insure your presence within one week and show cause of your willful absence since 29/8/2012.


DEPUTY DISTRICT OFFICER
(M) PRIMARY DISTRICT BUNER.

No. 925-26 Dated:- 1 / 08 / 2012.

Copy forwarded to the:

- 1-Executive District Officer Elem:&SEC EDU: District Buner. ✓
- 2-Head Teacher GPS Chanar.No1 Buner.


DEPUTY DISTRICT OFFICER
(M) PRIMARY DISTRICT BUNER

Office of The Deputy District Officer (Male) Primary Dargah Buner

Dated, 17/9/2012

No 1001-1004

To Samab Khan P.S.T
G.P.S Chanar No1 Distt. Buner.

Annexure (B)

6

subject: Absence Notice

The undersigned has already directed you to insure your presence vide Endst. No 925-26 dated 1-09-2012. You have neither submitted report nor insure presence.

Therefore you are once again directed to insure your presence with in one week along with cogent reason, otherwise n/ disciplinary action will be taken against you, and resultantly you will be terminated from service.

Dy: Distt. Officer (M)
(E & S) Education Buner,

No _____ Dated _____
copy forwarded to the

① Executive Distt. Officer E/S Education Buner.

② Head Teacher G.P.S Chanar No1 Buner.

Dy: Distt. Officer (M)
(E & S) Education Buner,

No. 1456

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgment is due.

Rs. Ps.

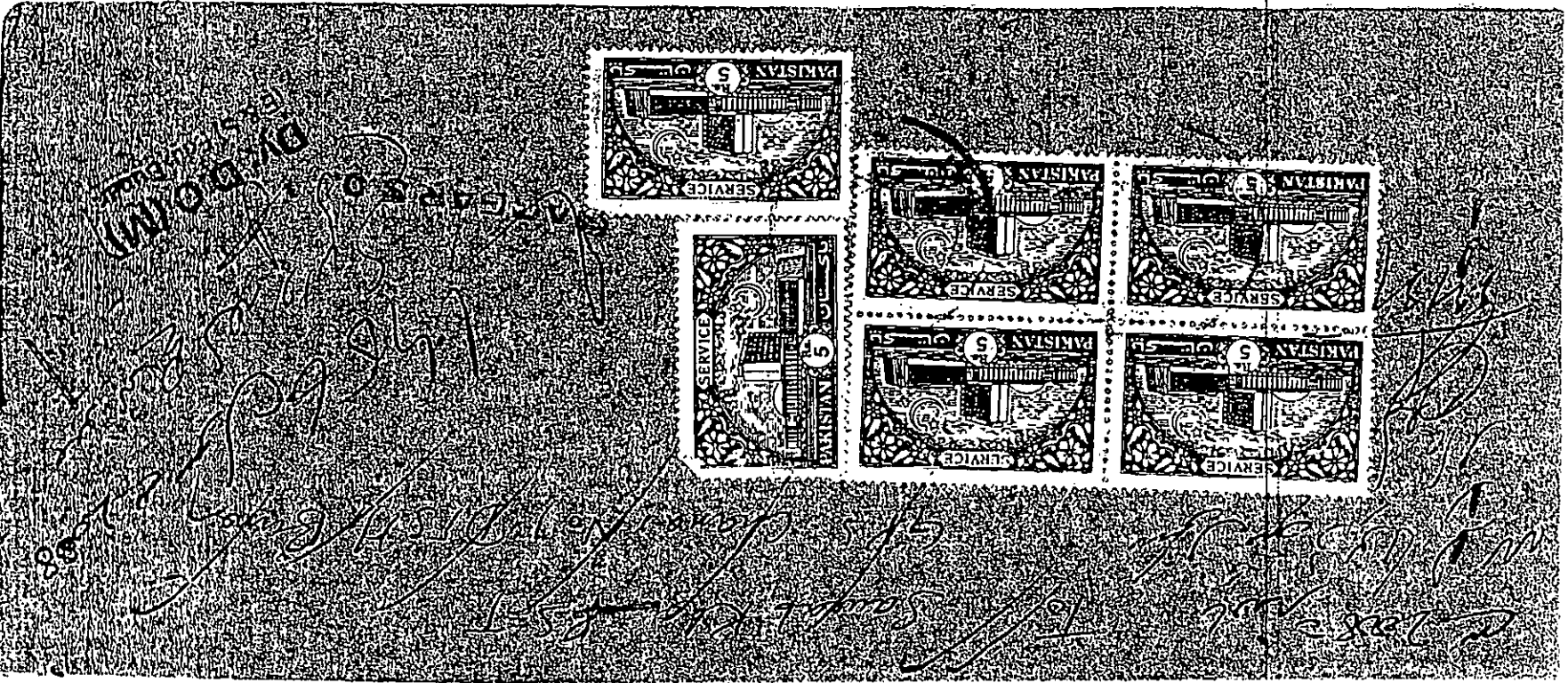
Received a registered
addressed to _____

Date Stamp NZ

Initials of Receiving Office _____
Insured for Rs. (in figures) _____
Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.
(in words) _____

If insured:
Insurance fee Rs. _____ Ps. _____
Name and address of sender _____
Weight (in words) _____ Kilo Grams

7



Ann. exure (6)

(8)

OFFICE OF THE DEPUTY DISTRICT OFFICER E&SE (MALE) PRIMARY DAGGAR BUNER.

No:- 1085-86

Dated:- 01/10/2012

To

Mr. Sawab Khan PST

GPS Chanar No1 Distt: Buner.

Subject:- Absence Notice.

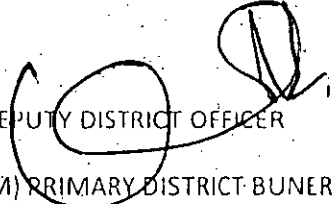
Memo:

As you were directed by the undersigned vide Endst No 925-26 dated 1-9-2012

Registry No 1512 dated 4/9/2012 And Endst No 1001-1004 dated 17/9/2012 Registry No 1456 dated 20/9/2012 to insure your presence within one week.

You have neither submitted arrival report nor insured presence. Therefore you are hereby directed for the last time to insure your presence with in one week positively along with cogent reason, other wise necessary disciplinary action (Removal/termination from service)

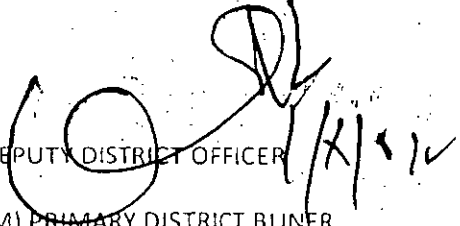
Will be Taken against you.


DEPUTY DISTRICT OFFICER
(M) PRIMARY DISTRICT BUNER.

NO: 1085-86 Dated: 01/10/2012

Copy forwarded to The:-

1. Executive District Officer E&SE Distt: Buner.
2. Head Teacher GPS Chanar No1.


DEPUTY DISTRICT OFFICER
(M) PRIMARY DISTRICT BUNER.

پشاور ایسٹ آباد اسلام آباد اور کراچی سے بیک وقت شائع ہونے والا اکثر الاشاعت قومی روزنامہ

روشنی کی شامت، آج کا نصب العین

روزنامہ

پشاور پاکستان

ایڈیٹر عبدالواحد ریوسفی



صفحات 12

جلد 23 بدھ 24 اکتوبر 2012ء 7:20 بجے 1433۔ قیمت 10 پیسے۔ ای 1991 شماره 286

بازہ میں آپریشن 150

سیکورٹی فورسز نے آپریشن کے تیسرے روز بھی بازہ اکاخیل میں کارروائی جاری رکھی لو آپریشن کے باعث علاقہ غیر سے متصل پشاور کے نواحی علاقوں میں پولیس اور فائر فائر کا سن

پشاور (کراچی پور) خیبر ایجنسی بازہ اکاخیل میں سیکورٹی فورسز نے آپریشن کے خلاف ایک بار کی جانب سے پشاور آنے والے پھر آپریشن شروع کرتے ہوئے 150 سے زائد مسلح افراد کو گرفتار کر لیا آپریشن کے دوران پڑھتے ہوئے حملوں کے پیش نظر 2 عسکریت پسند ہلاک ہو گئے سیکورٹی فورسز نے نواحی علاقوں میں گھروں کو سہار کرنا اور علاقہ غیر کے خلاف آپریشن کے تیسرے روز

مناسک کے حج کا آغاز زائرین آج منیٰ پہنچیں گے

دنیا بھر سے لاکھوں مسلمان مکہ مکرمہ پہنچ گئے حج کا رکن اعظم توقف عرفات کل ہوگا سیکورٹی کے خصوصی انتظام مکہ المکرمہ (آئی این پی) دنیا بھر سے لاکھوں مسلمان حج کے لئے مکہ مکرمہ کو آ رہے ہیں ان کے ساتھ ساتھ ہجرت کے خلاف ایک بار کی جانب سے پشاور آنے والے پھر آپریشن شروع کرتے ہوئے 150 سے زائد مسلح افراد کو گرفتار کر لیا آپریشن کے دوران پڑھتے ہوئے حملوں کے پیش نظر 2 عسکریت پسند ہلاک ہو گئے سیکورٹی فورسز نے نواحی علاقوں میں گھروں کو سہار کرنا اور علاقہ غیر کے خلاف آپریشن کے تیسرے روز

کراچی میں آئی جی کی حکمرانی اور سیکورٹی

حکومت قانون سازی کرنا چاہے تو آدھے گھنٹے میں سب کام ہو جاتا ہے ججوں کے بلاٹوں پر قبضہ ہو رہا ہے ججوں کا یہ حال ہے کہ تو عوام آدمی کیا کرے گا جسٹس انور ظہیر جماد آئی جی بغیر سکوڈ کے شہر کا روزانہ چکر لگائیں جسٹس گلزار سیکورٹی ضروری ہے تو صدر مملکت سڑک خرید لیں جسٹس سرد جلال عثمانی، کراچی کی تمام سڑکیں کھولنے کا حکم

کراچی (شاہ نیوز) سپریم کورٹ نے کہا ہے کہ اگر حکومت قانون سازی کرنا چاہے تو آدھے گھنٹے میں سب کام ہو جاتا ہے ججوں کے بلاٹوں پر قبضہ ہو جاتا ہے ججوں کا یہ حال ہے کہ تو عوام آدمی کیا کرے گا جسٹس انور ظہیر جماد آئی جی بغیر سکوڈ کے شہر کا روزانہ چکر لگائیں جسٹس گلزار سیکورٹی ضروری ہے تو صدر مملکت سڑک خرید لیں جسٹس سرد جلال عثمانی، کراچی کی تمام سڑکیں کھولنے کا حکم

ایڈیشنل سیکرٹری محکمہ داخلہ خیبر پختونخوا محمد رمضان کراچی سے اغواء

گریڈ 19 کا ای ایس ایس آفسر چار ماہ کے تربیتی کورس کیلئے نیشنل انسٹی ٹیوٹ آف مینجمنٹ کراچی گیا ہوا تھا اغواء کاروں نے گونگی پہنچا دیا پہلے دو کروڑ اور پھر پچاس لاکھ روپے تاوان کا مطالبہ منوی افسر کی رہائی کیلئے خیبر پختونخوا حکومت کے سندھ حکومت سے رابطے

پشاور (آصف نیوز) ایڈیشنل سیکرٹری محکمہ داخلہ خیبر پختونخوا محمد رمضان کراچی سے اغواء ہوئے تاوان کی رقم سے تاوان کا مطالبہ منوی افسر کی رہائی کیلئے خیبر پختونخوا حکومت کے سندھ حکومت سے رابطے

516 ہاؤس آفیسرز کی بھرتی کی منظوری دیدی گئی

حکومت نے سری حکومت کو ارسال کردی تین تینوں کا اعلامیہ چند روز میں جاری ہوگا پشاور (خلاف رپورٹ) سرکاری حکومت نے سرکاری واپس حکومت کو ارسال کردی ہے حکومت خیبر پختونخوا میں 516 ہاؤس آفیسرز کی بھرتی کی منظوری دیدی گئی حکومت نے سری حکومت کو ارسال کردی تین تینوں کا اعلامیہ چند روز میں جاری ہوگا



غیر ملکی سفیر سید سید علی شاہ اور دیگر افسران کے ساتھ پشاور میں ایک اجلاس کے دوران

دیر بالا ڈگریوں میں فائونڈیشن کا تبادلہ 15 افراد جاں بحق مالہ حملہ 2 ہفتے گزار گئے کیس میں پیش رفت نہ ہو سکی

تیس دنوں کے لیے صرف کتابیں کافی نہیں، کراچی میں ناگزیر ہے مسعود کو شہر

تیس دنوں کے لیے صرف کتابیں کافی نہیں، کراچی میں ناگزیر ہے مسعود کو شہر کے طلباء کو شہر کے لیے روشن مستقبل کی امید ہیں آئندہ نسلوں کی کامیابی میں اساتذہ کا کردار اہمیت کا حامل ہے خطاب

7 صوبائی افسروں کی تقرریوں و تبادلوں کے احکامات

صوبائی افسروں کی تقرریوں و تبادلوں کے احکامات

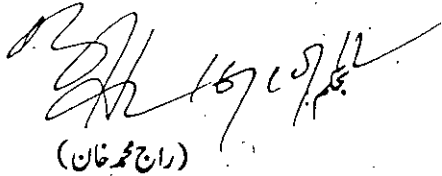
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نوٹس غیر حاضری

ایگزیکٹو ڈسٹرکٹ آفیسر ایلمنٹری اینڈ سیکنڈری ایجوکیشن ضلع بونیر کی دائرہ اختیار میں آنے والے پرائمری مدارس (مردانہ) میں آپ توابع ولد فقیر خان پی ایس ٹی GPS چٹاڑ نمبر 29/08/2012 سے تا حال اپنی ڈیوٹی سے غیر حاضر ہے۔ آپ کو بالترتیب چھٹی نمبر 26-925 مورخہ 01/09/2012 رجسٹری نمبر 1512 مورخہ 04/09/2012 و چھٹی نمبر 1001-1004 مورخہ 17/09/2012 رجسٹری نمبر 1456 مورخہ 20/09/2012 اور چھٹی نمبر 86-1085 مورخہ 01/10/2012 رجسٹری نمبر 1384 مورخہ 02/10/2012 کے مطابق سکول / گھر کے مستقل پتہ پر ڈیوٹی پر حاضر ہونے کے لئے اطلاعات دی جا چکی ہیں۔ لیکن آپ ان اطلاعات کے باوجود اپنی ڈیوٹی پر حاضر نہیں ہوئے۔

لہذا یہ دفتر بذریعہ اشتہار ہذا آپ کو اطلاع دیتا ہے کہ اس اشتہار کی اشاعت کے پندرہ (15) یوم کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر خود اپنی غیر حاضری کی وجوہات بیان کریں۔ بصورت دیگر آپ کے خلاف رولز کے تحت محکمانہ انضباطی کارروائی عمل میں لائی جائیگی جس میں آپ کی ملازمت سے برطرفی بھی ہو سکتی ہے۔



(راج محمد خان)

ایگزیکٹو ڈسٹرکٹ آفیسر

ایلمنٹری اینڈ سیکنڈری ایجوکیشن ضلع بونیر

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Ammeer (F)

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEM. & SECY. EDUCATION BUNER

No. _____ /

Dated. _____ /2012

NOTIFICATION:

Whereas Mr. Sawab Khan PST BPS-07 GPS Chanar No.1 remained absent from his duty w.e.f 29/08/2012, three notices have already been issued to him under registered cover vide Deputy District Officer (M) Primary Buner office Endst: No. 925-26 dated 01/09/2012, Registry No. 1512 dated 04/09/2012 , No. 1001-1004 dated 17/09/2012 Registry No. 1456 dated 20/09/2012 and letter No. 1085-86 dated 01/10/2012 Registry No. 1384 dated 02/10/2012 to resume his duty, but he did not resume the duty. Final enquiry No. 1157-58 dated 11/10/2012 was conducted and he was recommended for major penalty, then final notice was served / published in the daily "AAJ" on 24/10/2012 and was directed to resume the duty within 15 days of publication of notice in the daily but neither he resumed his duty nor reported this office in the stipulated period.

Now I Mr. Raj Muhammad Khan Executive District Officer Elementary & Secondary Education Buner having satisfied that he is not interested in Govt. duty and has been proved guilty of misconduct, hereby order his removal from service w.e.f 30/08/2012 under Section 4 (1) (b) (iii) Khyber-Pakhtunkhwa (Efficiency and Discipline) rules 2011.

(RAJ MUHAMMAD KHAN)
EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION BUNER

Endst: No. 10420-37 /

DATED. 14/11 /2012.

Copy of the above is forwarded for information to the,

1. PS to Minister E & S Education Khyber Pakhtunkhwa Peshawar.
2. Secretary, E & S Education Khyber Pakhtunkhwa Peshawar.
3. Director E & S Education Khyber Pakhtunkhwa Peshawar.
4. District Coordination Officer Buner at Daggar.
5. District Accounts Officer Buner.
6. Dy. District Officer (M) pry; Buner.
7. Official concerned.
8. PA to EDO E & SE Buner.

EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION BUNER

[Handwritten signature]
14/11/12

[Handwritten notes in Urdu]

[Handwritten signature]

[Handwritten notes and date]

Before Khyber Pakhtunkhwa Service Tribunal, Comp Court

Swat.

Sawab Khan \checkmark Education Deptt.

Application for Transfer of above mentioned

Appeal To principle seat Peshawar.

R/shawath;

- 1 That the above mentioned appeal is pending before this court and is fixed for today.
- 2 That the above mentioned appeal have question of retrospective punishment, for determination of which larger bench has been constituted by worthy Chairman on 14/11/2019.
- 3 That the above mentioned appeal may kindly be transferred, so as to fix before larger bench.

It is therefore, most humbly prayed that on acceptance of this application the above mentioned appeal may kindly be transferred to the principle seat. Applicant
Date 2/09/2019 through Sh. Shawath