

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 781 /2022

SCANNED
KPST
Peshawar

MR. M. SHOAB

V/S

GOVT: OF K.P DEPTT:

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Dated: ____/.05./2022

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE

0345-9383141

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

SERVICE APPEAL NO. 781 /2022

Diary No. 765

Mr. Muhammad Shoaib, Ex-KPO (BPS-16),
Ex-FATA Tribunal, Home & Tribal Affairs Department, Peshawar.

Dated 11/5/2022

.....APPELLANT

VERSUS

- 1- The Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2- The Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDERS DATED 17-01-2022 WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT AND AGAINST THE IMPUGNED INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUARY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this service appeal the impugned order dated 17-01-2022 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be granted in favor of the appellant.

Filed to day
Registrar

11/5/22

R/SHEWETH:
ON FACTS:

- 1- That appellant is the law abiding citizen and is a highly qualified person. That before the promulgation of the 25th constitutional amendment Act the Registrar Ex-FATA tribunal advertised certain posts in the daily news papers. That the appellant being eligible and qualified applied to the post of Key Punch Operator. Copies of the advertisement and educational testimonials are attached as annexure
.....A&B.

- 2- That after appearing in the selection process the appellant was selected for the subject post and was appointed in the Ex-FATA

2

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

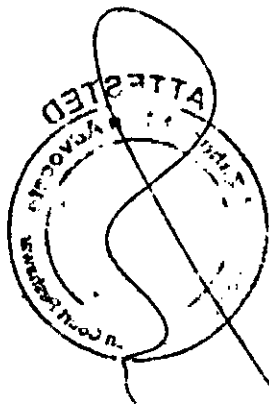
SERVICE APPEAL NO. _____ / 2022

MUHAMMAD SHAIKH V/S GOVT. OF K.P. DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.

DEPONENT



CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

CERTIFICATION

9/10/2020

IMG-20200909-WA0030.jpg

Logo of the Government of Punjab, Pakistan, featuring the national emblem and the text 'GOVERNMENT OF PUNJAB' and 'پنجاب حکومت'.

Logo of the Rehabilitation Institute of Punjab, featuring the text 'Rehabilitation Institute of Punjab' and 'ریاست ترمیمی پنجاب'.

JOB OPPORTUNITIES

Applications are invited from highly motivated candidates having domicile of Khyber, Pakhtunkhwa and newly merged areas against the following vacant posts on regular basis.

S.No	Name of Post	BPS	No. of Post	Age	Qualification
1	Assistant Motorist	14	04	18-32	BA/BSc II Com & Equivalent with 6 years experience
2	Key Punch Operator	12	03	18-32	BA/BSc II Com & Equivalent
3	Stenographer	12	01	18-32	BA/BSc with 6 years exp. Typing speed up to 40 WPM
4	Junior Clerk	07	04	18-32	BA/BSc or Pass with typing speed up to 40 WPM
5	Driver	01	01	18-40	BA/BSc pass having 11th Driving License
6	Sub Guard	01	01	18-40	10-10 Middle Pass
7	Chowkidar	01	01	18-40	10-10 Middle Pass

Terms of conditions:
 1. Applications will be accepted up to 10th October 2020.
 2. Shortlisted candidates will be called for interview.
 3. Candidates must be from the specified areas.
 4. Candidates must have their own copies of certificates and documents.
 5. Candidates must submit a recent passport size photograph.
 6. Candidates must submit their own copies of certificates and documents.
 7. Candidates must submit their own copies of certificates and documents.
 8. Candidates must submit their own copies of certificates and documents.
 9. Candidates must submit their own copies of certificates and documents.
 10. Candidates must submit their own copies of certificates and documents.

JOB OPPORTUNITIES

Applications are invited from highly motivated candidates having domicile of Khyber Pakhtunkhwa and newly merged areas against the following vacant posts on regular basis.

S.No	Name of Post	BPS	No. of Post	Age	Qualification
1	Abstract Assistant	14	04	18-32	BA/BSc II Com & Equivalent with 6 years experience
2	Key Punch Operator	12	03	18-32	BA/BSc II Com & Equivalent
3	Stenographer	12	01	18-32	BA/BSc with 6 years exp. Typing speed up to 40 WPM
4	Junior Clerk	07	04	18-32	BA/BSc or Pass with typing speed up to 40 WPM
5	Driver	01	01	18-40	BA/BSc pass having 11th Driving License
6	Sub Guard	01	01	18-40	10-10 Middle Pass
7	Chowkidar	01	01	18-40	10-10 Middle Pass

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 7. Candidates must submit their own copies of certificates and documents.
 8. Candidates must submit their own copies of certificates and documents.
 9. Candidates must submit their own copies of certificates and documents.
 10. Candidates must submit their own copies of certificates and documents.

ATTENDED

S. No. 818088

Roll No. 2858

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ



Board of Intermediate and Secondary Education
Peshawar

N. W. F. P. Pakistan

Secondary School Certificate Examination

SESSION 2007- SUPPLEMENTARY

(Science Group)



INSTITUTION (P/W)

This is to Certify that Muhammad Shoab Son of Jehan Zeb Khan
and a resident of Peshawar District has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in October, 2007 as a Private
candidate. He obtained 443 Marks out of 900 and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- | | | | |
|------------|------------|---------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat (Comp) | 4. Pakistan Studies |
| 5. Maths | 6. Physics | 7. Chemistry | 8. Biology |

Date of birth according to admission form September 2, 1991

Asstt. Secretary
M/S

[Signature]
Secretary

This certificate is issued without alteration or erasure.

ANEX B
7

ATTESTED

GRADING FORMULA

Maximum Marks 900

Percentage of Marks

- 90% and above
- 80% and below 80%
- 70% and below 70%
- 60% and below 60%
- 50% and below 50%
- Below 40% and Minimum Pass Marks

Grades

- A One 720 and above
- A 630 to 719
- B 540 to 629
- C 450 to 539
- D 360 to 449
- E 359 and below

Remarks

- Outstanding
- Excellent
- Very Good
- Good
- Fair
- Satisfactory

[Signature]
DAWOOD KHAN
 Assistant Protocol Officer
 06 MAY 2015
 Ministry of Foreign Affairs
 Camp Office Peshawar

Comp Office
 Peshawar Attestation
 No. 12411

8

ATTESTED

479572
 INTERBOARD
 COMMITTEE
 OF CHAIRMEN
 RIGHT TIME RIGHT PLACE
 IBCC
 ATTESTED

MUHAMMAD
 Deputy
 INTER BOARD CHAIRMEN
 GOVERNMENT OF PAKISTAN
 MINISTRY OF INTER PROVINCIAL COORDINATION
 ISLAMABAD

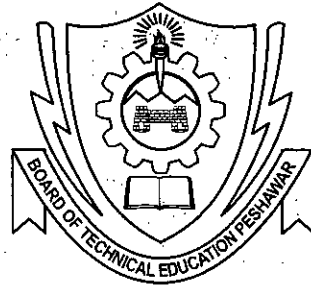
10 APR 2015

MINISTRY OF FOREIGN AFFAIRS, GOVT. OF PAKISTAN
 OFFICE
 ATTESTATION
 STAMP

9

265448

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION



PESHAWAR DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 1ST YEAR ELECTRICAL TECHNOLOGY

Name of Candidate MUHAMMAD SHOAIB
 Father's Name JAN ZEB
 Roll.No. 301824 Session ANNUAL 2010
 Reg. No. BRAVO/P/ET/08-15257
 Institute/College BRAVO PROFESSIONAL COMPUTER COLLEGE PESHAWAR



DUPLICATE

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
1 GEN-111 Islamyat / Pak. Studies	50	25	-	25	Twenty-five
2 GEN-112 English	100	43	-	43	Forty-three
3 MATH-123 Applied Mathematics	150	67	-	67	Sixty-seven
4 CH-132 Applied Chemistry	50 / 50	31	40	71	Seventy-one
5 COMP-122 Computer Applications	50 / 50	33	39	72	Seventy-two
6 ET-115 Principles of Electrical Engineering	150 / 100	60	75	135	One hundred thirty-five
7 ET-146 WorkShop Practice	50	24	-	24	Twenty-four
8 i) Wiring	100	-	70	70	Seventy
9 ii) Metal Work	50	-	36	36	Thirty-six
10 iii) Wood Work	50	-	38	38	Thirty-eight
11 iv) Welding	50	-	44	44	Forty-four
12 ET-121 Basic Electrical Drawing	50	-	35	35	Thirty-five

1100

660 Six hundred sixty

WATTEL

Prepared by Rizwan Ullah
 Checked by _____

CONTROLLER OF EXAMS

Theory Passing Marks=40% Practical Passing Marks=50%
 Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

11/09/2013

10

310125

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION

PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 2ND YEAR ELECTRICAL TECHNOLOGY

Name of Candidate MUHAMMAD SHOAIB
 Father's Name JAN ZEB
 Roll.No. 329094 Session ANNUAL 2011
 Reg.No. BRAVO/P/ET/08-15257
 Institute/College BRAVO PROFESSIONAL COMPUTER COLLEGE PESHAWAR



Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
Ist year Marks	1100			660	
1. GEN-211: Islamyat/Pak. Studies	50	31		31	Thirty-one
2. MATH-233: Applied Mathematics	150	87		87	Eighty-seven
3. MGM-221 Business Management & Industrial Economics	50	24		24	Twenty-four
4. PHY-222 Applied Physics	50 / 50	24	46	70	Seventy
5. ET-213 DC Machines & Batteries	100 / 50	41	36	77	Seventy-seven
6. ET-223 Electrical Instruments and Measurement	100 / 50	64	47	111	One hundred eleven
7. ET-233 Utilization of Electrical Energy	100 / 50	42	42	84	Eighty-four
8. ET-242 Installation, Planning & Estimating	50 / 50	36	46	82	Eighty-two
9. ET-263 Basic Electronics	100 / 50	44	48	92	Ninety-two
10. ET-251 Applications of Computers in Electrical Technology	50		46	46	Forty-six
11. ET-271 Workshop Practice-II (Basic Machine Shop)	50		46	46	Forty-six

2250

1410 One thousand four hundred ten

Prepared by Atif Khalil

Checked by _____

Theory Passing Marks=40% Practical Passing Marks=50%

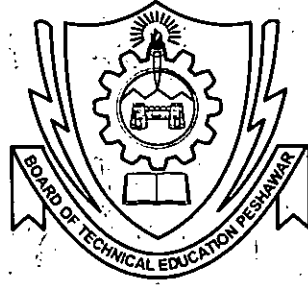
Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

ATTESTED

[Signature]
CONTROLLER OF EXAMS

14/09/2011

KHYBER PAKHTUNKHWA BOARD OF TECHNICAL EDUCATION



PESHAWAR

DETAIL MARKS CERTIFICATE DIPLOMA OF ASSOCIATE ENGINEER 3RD YEAR ELECTRICAL TECHNOLOGY

Name of Candidate MUHAMMAD SHOAIB
 Father's Name JAN ZEB
 Roll.No. 471485 Session ANNUAL 2011
 Reg.No. BRAVO/P/ET/08-15257
 Institute/College BRAVO PROFESSIONAL COMPUTER COLLEGE PESHAWAR



REVISED

Subject	Total Marks	Obtained Marks			
		Th	Pr	Total	In Words
2nd Year Marks	2250			1,410	
1 GEN-311 Islamyat/Pak. Studies	50	25	-	25	Twenty-five
2 MGM-311 Industrial Manag: Human Relation	50	37	-	37	Thirty-seven
3 MGM-321 Business Communication	50	27	-	27	Twenty-seven
4 ET-316 A.C. Machines	200 / 100	97	97	194	One hundred ninety-four
5 ET-322 Power Plant & Energy Conservation	100	29	-	29	Twenty-nine (Pass by GM)
6 ET-335 Trans: Dist: & Project of Elect Power System	200 / 50	89	46	135	One hundred thirty-five
7 ET-343 Telecommunication	100 / 50	47	47	94	Ninety-four
8 ET-353 Repair & maintenance of Electrical Equipment	50 / 100	28	95	123	One hundred twenty-three
9 ET-364 Digital & Industrial Electronics	150 / 50	60	46	106	One hundred six

3550

2180

Two thousand one hundred eighty

Prepared by Fazal Ghaffar

Checked by _____

Theory Passing Marks=40% Practical Passing Marks=50%

Error(s) & Omission(s) excepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

CONTROLLER OF EXAMS

27/10/2011

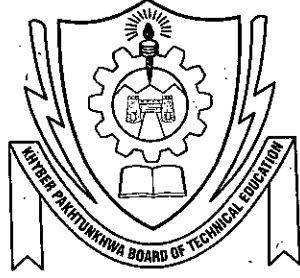
Serial No. 05453

12

Roll No 471485



Khyber Pakhtunkhwa Board of Technical Education



PESHAWAR (PAKISTAN)

DIPLOMA OF ASSOCIATE ENGINEER

Electrical Technology

Session Annual 2011

Certified that Mr./Miss MUHAMMAD SHOAIB

Son/Daughter of JAN ZEB

Registration No. BRAVO/P/ET/08-15257

of BRAVO PROFESSIONAL COMPUTER COLLEGE PESHAWAR

has passed the Diploma of Associate Engineer ELECTRICAL TECHNOLOGY

Examination held by the Khyber Pakhtunkhwa Board of Technical Education, Peshawar in the month
of May 2011

He/She secured 2180 Marks out of 3550 and has been placed in
Grade B

*In recognition thereof, this
Diploma of Associate Engineer*

is awarded to him/her at Peshawar on the 27Th day of February 2012


ASSISTANT SECRETARY

ATTESTED


SECRETARY

This Diploma is issued without any alteration or eraser

DIPLOMA OF ASSOCIATE ENGINEER ISSUED BY THE BOARD OF TECHNICAL EDUCATION IS HELD EQUIVALENT TO F.A/F.Sc(PRE-ENGINEERING) OF THE BOARDS OF INTERMEDIATE AND SECONDARY EDUCATION IN PAKISTAN VIDE A BOOK OF EQUIVALENCY OF EDUCATIONAL QUALIFICATIONS IN PAKISTAN, PU GOVERNMENT OF PAKISTAN MINISTER INTER BOARD COMMITTEE OF CHAIR

ATTESTED
 493650
ATTESTED
IBCC
 COMMITTEE OF CHAIRMEN
 DEPARTMENT OF TECHNICAL EDUCATION
 GOVERNMENT OF PAKISTAN
 OFFICE OF INTER-PROVINCIAL COORDINATION
 ISLAMABAD

EVALUATION PLAN

1. 80% and above.....Distinction
2. 70% and above but less than 80% "A" Grade
3. 60% and above but less than 70% "B" Grade
4. 50% and above but less than 60% "C" Grade
5. 40% and above but less than 50% "D" Grade
6. 33% and above but less than 40% "E" Grade

Comp Office
 Peshawar Attestation
 No: 12411

MINISTRY OF FOREIGN AFFAIRS
 CAMP PESHAWAR
 ATTESTATION STAMP
 RS25

Composed/Prepared by

Checked by Steer Muhammad

DAWOOD KHAN
 Assistant Protocol Officer
 Ministry of Foreign Affairs
 Camp Office Peshawar

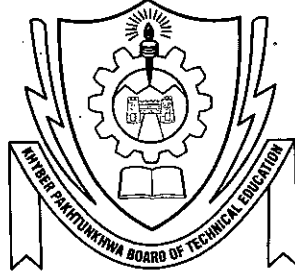
ATTESTED

Serial No. 05982

Roll No 66121

(13)

Khyber Pakhtunkhwa Board of Technical Education



PESHAWAR (PAKISTAN)

DIPLOMA IN INFORMATION TECHNOLOGY

Session 1st Term 2013

This is to certify that

Mr./Miss. MUHAMMAD SHOAB
Son/Daughter of JAN ZEB
Registration No. GCT/P/DITR/2ND-12/6238
of GOVERNMENT COLLEGE OF TECHNOLOGY PESHAWAR

has satisfactorily completed the one year duration Information Technology course titled " Diploma in Information Technology" and passed the Examination held by the Khyber Pakhtunkhwa Board of Technical Education, peshawar, in the month of February 2013

He/She secured 1020 Marks out of 1400 and has been placed in Grade A

In recognition thereof, this Diploma In Information Technology is awarded to him/her at Peshawar,

on the 18th day of September 2013

ATTESTED


ASSISTANT SECRETARY


SECRETARY

EVALUATION PLAN

1. 80% and above.....Distinction
2. 70% and above but less than 80%....."A" Grade
3. 60% and above but less than 70%....."B" Grade
4. 50% and above but less than 60%....."C" Grade
5. 40% and above but less than 50%....."D" Grade
6. 33% and above but less than 40%....."E" Grade

Composed/Prepared by

Checked by

~~MAA~~
~~2017~~

14



University Of Peshawar

Pakistan

Detailed Marks Certificate

Bachelor of Arts

Part-I

Annual Examination 2013

District Peshawar



Private

Name: MUHAMMAD SHOAIB

Gender: Male

Roll No: 16765

Father's Name: JEHANZEB

Registration No: 2012-PE-45578

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English(Compulsory)	75	29	Twenty Nine
Urdu	75	48	Forty Eight
Islamic Studies	75	40	Forty Only
Islamiyat (Compulsory)	60	35	Thirty Five
	285	152	One Hundred and Fifty Two

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken in Parts

Examination held From 05-Jun-2013 to 08-Jul-2013

Result Declared on Thursday, September 12, 2013

Issue Date: 13-Sep-2013

10:54 am

Computerized by RTC

City Area

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

ATTESTED

15



University of Peshawar

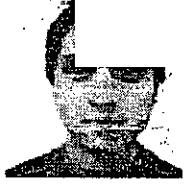
Pakistan

Detailed Marks Certificate

Bachelor of Arts.

Part-II
Annual Examination 2014

District Peshawar



Private

Name: MUHAMMAD SHOAIB

Gender: Male

Roll No: 70753

Father's Name: JEHANZEB

Registration No: 2012-PE-45578

Division: 2nd

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
English (Compulsory)	75	27	Twenty Seven
Urdu	75	25	Twenty Five
Islamic Studies	75	35	Thirty Five
Pakistan Studies	40	13	Thirteen
Part-I 16765:Annual-2013	285	152	One Hundred and Fifty Two
Part-II	550	252	Two Hundred and Fifty Two

Errors & omissions are subject to subsequent rectification

Chances Availed: 3

The Examination was taken In Parts

Examination held From 28-May-2014 to 28-Jun-2014

Result Declared on Monday, September 15, 2014

Issue Date: 16-Sep-2014

1:04 pm

(Prof. Dr. Rashid Khan)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

ATTACHED

ANNEX . C

16



OFFICE OF THE
REGISTRAR FATA TRIBUNAL,
PESHAWAR

ORDER

No. R/11/2018-19/1119 dated: 08.03.2019 On Recommendation of the Departmental Selection Committee, the Competent Authority is pleased to appoint Mr. Muhammad Shoab S/o Jehanzeb Khan against the vacant post of Key Punch Operator BPS-12 (13320-960-42120) in FATA Tribunal at Peshawar under rule 10 sub rule 2 of Civil Servant (Appointment, Promotion and Transfer) Rules 1989 on the following terms and conditions:

Terms & conditions;

1. He will get pay at the minimum of BPS-12 including usual allowances as admissible under the rules. He will be entitled to annual increment as per existing policy.
2. He shall be governed by Civil Servant Act 1973, for purpose of pension or gratuity. In lieu of pension and gratuity, he shall be entitled to receive such amount as would be contributed by him towards General Provident Fund (GPF) along with the contributions made by Govt: to his account in the said fund, in prescribed manner.
3. In case, he wishes to resign at any time, 14 days notice will be necessary and he had thereof, 14 days pay will be forfeited.
4. He shall produce medical fitness certificate from Medical Superintendent/ Civil Surgeon before joining duties as required under the rule.
5. He has to join duties at his own expenses.
6. If he accepts the post on these conditions, he should report for duties within 14 days of the receipt of this order.

REGISTRAR
FATA TRIBUNAL

Copy to;

01. The Accountant General Pakistan Revenues Sub Office, Peshawar.
02. PS to ACS FATA, Peshawar.
03. PS to Secretary Law & Order FATA, Peshawar.
04. PS to Secretary Finance FATA, Peshawar.
05. Personal File
06. Official Concerned.

REGISTRAR
FATA TRIBUNAL

~~ATTACHED~~

MEDICAL CERTIFICATE

Name of official Muhammad Shauib ✓
 Caste or race Khadil
 Father's name Jalauzal
 Residence Mihalla Mustafa Khel Tal & Dist. H. Peshawar
 Date of birth 02-09-1991 ✓
 Exact height by measurement 5' 8"
 Personal mark of identification nil
 Signature of the official (Signature)
 Signature of head of office _____

Seal of office _____

I hereby certify that I have examined Muhammad Shauib a candidate
 for employment in the Office of the FAIA Tribunal
 and do not discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except nil

I do not consider this as disqualification for employment in the office of the FAIA Tribunal
 His age according to his own statement (27) year and by appearance about
27 years T. Khan & J. Khan

(Signature)
 MEDICAL SUPERINTENDENT

CIVIL HOSPITAL
 PESHAWAR

14/03/19

LEAD PENCIL IMPRESSIONS



ANNEX "E"
18

GOVERNMENT OF
KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar the 17/6/2021

NOTIFICATION

No. E & A (HD) 2 - 5 / 2021. The following posting/transfer of staff of Ex-Fata Tribunal is hereby ordered with immediate effect till further order:

S/No	Name & Designation	Posted in
1	Muhammad Adnan Assistant	Court Section
2	Tahir Khan Assistant	L&K Section NMAs
3	Kafil Ahmad Assistant	SO(L&O)NMAs
4	Muhsin Nawaz Stenographer	Litigation Section NMAs
5	Sami Ullah KPO	Security-I Section
6	Adnan Khan KPO	SO (Defence Planning Cell)
7	Muhammad Shoaib KPO	SO L&O NMAs
8	Asad Iqbal Junior Clerk	Litigation Section NMAs
9	Ikram Junior Clerk	O/O DS (Admn)
10	Khair Ul Bashir Junior Clerk	Security-II Section
11	Sadiq ullah Driver	O/O DS (Dev)
12	Ziafat ullah Driver	General Branch
13	Yaseen Driver	O/O DS (Judicial)
14	Owais Driver	General Branch
15	Amjid Driver	O/O DS(L&O) NMAs
16	Farman Driver	Pool Duty (PCMC)
17	Aleem Shah Driver	O/O DS Security
18	Farman Afridi Driver	O/O AS (L&O)NMAs
19	Gohar Ali Naib Qasid	O/O Planning Officer
20	Sher Khan Naib Qasid	O/O DS L&O NMAs
21	Farooq Azam Naib Qasid	SO L&O NMAs
22	Ishafaq Naib Qasid	SO litigation NMAs
23	Muhammad Shoaib Naib Qasid	Distribution of Mail NMAs
24	Fahim Shehzad Naib Qasid	O/O DS Dev Home
25	Nasir Gul Naib Qasid	IT Cell
26	Ikramullah Naib Qasid	O/O DS Admn
27	Naveed Ahmad Naib Qasid	O/O DS Judicial
28	Asif Khan Naib Qasid	Budget section
29	Falak Niaz Naib Qasid	Police-II
30	Habib Ali Chowkidar	General Branch
31	Sadam Hussain Chowkidar	O/O Special Secretary-II
32	Hassan Ali Chowkidar	General Branch
33	Ishafaq Chowkidar	General Branch
34	Ziaur Rehman Chowkidar	Judicial Section
35	Bahar Ali Chowkidar	General Branch
36	Reedad Khan Chowkidar	General Branch

Deputy secretary (Admn)

Copy is forwarded to:

1. Section Officer(Courts) Home Department
2. Section Officer Security-I&II Home Department
3. Section Officer Budget Home Department
4. Section Officer Judicial Home Department
5. Section Officer L&K NMAs Home Department
6. Section Officer L&O NMAs Home Department
7. Section Officer litigation NMAs Home Department
8. Section Officer DPC Home Department
9. Planning officer Home Department
10. PS to Secretary Home Department
11. PS to Special Secretary I&II Home Department

P.T.O



10

19

GOVERNMENT OF
KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar the 17/6/2021

12. PA to Additional Secretary L&O Home Department
13. PA to Deputy secretary Admn Home Department
14. PA to deputy secretary dev Home Department
15. PA to deputy secretary L&O Home Department
16. PA to deputy secretary security Home Department
17. Officials concerned

Section Officer (General)

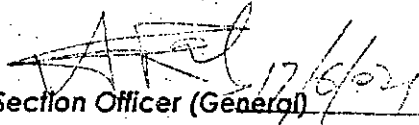
14



GOVERNMENT OF
KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT

Dated Peshawar the 17/6/2021

12. PA to Additional Secretary L&O Home Department
13. PA to Deputy secretary Admn Home Department
14. PA to deputy secretary dev Home Department
15. PA to deputy secretary L&O Home Department
16. PA to deputy secretary security Home Department
17. Officials concerned


Section Officer (General)


SECRET

Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (November-2021)

ANNEX F

20

Personal Information of Mr MUHAMMAD SHOAB d/w/s of JEHANZEB KHAN

Personnel Number: 50497513 CNIC: 1730136363583 NTN:
Date of Birth: 02.09.1991 Entry into Govt. Service: 08.03.2019 Length of Service: 02 Years 08 Months 024 Days

Employment Category: Active Temporary

Designation: COMPUTER OPERATOR 80877270-GOVERNMENT OF KHYBER PAKH
DDO Code: PR8073-FCR Tribunal Merged Areas
Payroll Section: 005 GPF Section: 002 Cash Center:
GPF A/C No: Interest Applied: Yes GPF Balance: 101,677.00
Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 16 Pay Stage: 1

Wage type	Amount	Wage type	Amount
0001 Basic Pay	20,430.00	1004 House Rent Allow 45% KP21	9,024.00
1210 Convey Allowance 2005	5,000.00	1500 Computer Allowance	1,500.00
1974 Medical Allowance 2011	1,500.00	2211 Adhoc Relief All 2016 10%	1,588.00
2224 Adhoc Relief All 2017 10%	2,043.00	2247 Adhoc Relief All 2018 10%	2,043.00
2264 Adhoc Relief All 2019 10%	2,043.00	2309 Adhoc Relief All 2021 10%	2,043.00
2315 Special Allowance 2021	3,500.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3016 GPF Subscription	-3,340.00	3501 Benevolent Fund	-1,500.00
3534 R. Ben & Death Comp Fresh	-650.00	3609 Income Tax	-71.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 850.00 Recovered till NOV-2021: 355.00 Exempted: 0.25- Recoverable: 495.25

Gross Pay (Rs.): 50,714.00 Deductions: (Rs.): -5,561.00 Net Pay: (Rs.): 45,153.00

Payee Name: MUHAMMAD SHOAB

Account Number: 0002257900638603

Bank Details: HABIB BANK LIMITED, 220225 MEWA MANDI, PESHAWAR. MEWA MANDI, PESHAWAR., PESHAWAR

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: peshawar

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: shoabkhan55567@gmail.com

~~ATTESTED~~



ANNEX "9"
GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT
KHYBER ROAD PESHAWAR

21

HD/B&A/FATA Tribunal/55/2021/1430-35

Dated: 25-10-2021

To:

✓ Muhammad Shoaib,
Key Punch Operator (BPS-16)
Ex-FATA Tribunal.

Subject: **SHOW CAUSE NOTICE.**

I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice (in original) duly signed by the Competent Authority for your compliance within stipulated time period and further necessary action.

Section Officer (B & A)

Encl: As above

Copy to:

1. PS to Secretary Home & TAs Department Khyber Pakhtunkhwa.
2. PS to Special Secretary Home & TAs Department Khyber Pakhtunkhwa.
3. PS to Additional Secretary (L & O) Home & TAs Department NMAs.
4. PA to Deputy Secretary (L & O) Home & TAs Department NMAs.
5. Section Officer (E-II) Government of Khyber Pakhtunkhwa Establishment Department with reference to his letter No. SOE-II(ED)2(9)2010 dated: 13.09.2021.

Section Officer (B & A)

~~RECEIVED~~

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SHOW CAUSE NOTICE

I Mr. Ikram Ullah Khan Secretary Home & Tribal Affairs Department as Competent Authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve upon you, Muhammad Shoaib, Key Punch Operator (KPO) employees of Ex-FATA Tribunal as follows:-

“That Consequent upon the findings & recommendations of the Inquiry Committee it has been proved that the recruitment process for selection of 24 employees in Ex-FATA Tribunal was unlawful and all 24 appointment orders were issued without lawful Authority and liable to be cancelled”.

I am, therefore, satisfied that you have been found guilty of **“Misconduct”** as specified in rule-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 read with Rule-2, Sub-Rule (I) (vi) “appointed in violation of law and rules”.

2. To, dispense with the Inquiry and serve you with a show cause notice under Rule-7 of the ibid Rules.

3. As a result thereof, I, as Competent Authority, have tentatively decided to impose upon you the following penalty under the Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rule, 2011:-

i. Removal from service

4. you are therefore required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven days or not more than of fifteen days of this delivery, it shall be presumed that you have no defense to put in, and in that case ex-parte action shall be taken against you.


(IKRAM ULLAH KHAN)
HOME SECRETARY
(Competent Authority)

Muhammad Shoaib,
Key Punch Operator
Ex-FATA Tribunal

ATTESTED

To,

Home Secretary,
Khyber Pakhtunkhwa,
Peshawar,

Subject: Reply to the show cause notice dated 25.10.2021.

Respected Sir,

I very humbly submit the following few lines for your kind and sympathetic consideration:

1. That 23 posts including the post of the undersigned i.e. Key Punch Operator, were advertised in daily AJJ and Aeen newspaper dated 09.02.2019 for open competition, being fit and eligible in all respect the undersigned applied for the post of Key Punch Operator.
2. That after gone all the rigors and selection process i.e test and interview, the undersigned was duly recommended for the post of Key Punch Operator and was appointed on the said post vide office order dated 08.03.2019.
3. That since my appointment I performed my duties with great zeal and devotion to the entire satisfaction of my superiors without any complaint whatsoever regarding my performance.
4. That while serving in the said capacity, the undersigned received a show Cause Notice dated 25.10.2021 by leveling false and baseless allegation which was never committed by the undersigned by any malafide intention nor any connection or relation with authority issued my appointment order and even have no relation with the recruitment process, the allegations are the following

“That consequent upon the findings & recommendations of the inquiry committee it has been proved that the recruitment process for selection of 24 employees in Ex-FATA Tribunal was unlawful and all 24 appointment orders were issued without lawful authority and liable to be cancelled’

I am therefore satisfied that you have been found guilty of “Misconduct” as specified in rule-3 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011.

RECEIVED

5. That proper procedure was adopted in the process of recruitment i.e. advertisement, test and interview and the undersigned was appointed on the post after gone all the rigors and selection process provided under the law.
6. That the allegation so leveled against me regarding the misconduct is false and baseless in have never committed any act or omission which could be term as misconduct and the allegations leveled against me does not come in the orbit of misconduct.
7. That there is nothing on the part of undersigned which term as misconduct as undersigned applied for the advertised post while having all the request eligibility criteria and also compete along with all other candidates who applied for the post and when found fit and eligible for the post declare recommended for the post of Key Punch Operator.
8. That the members of Tribunal attended the test and interview on the said date and all the committee members were agreed principally on the selection and recommendation of the selection committee and on such principle on the same date issued the appointment orders and the copy of the recommendation of selection committee was handed over to section officer and further process, and on the same issued when the inquiry officer called upon the selected candidates they given on Oath the statement that they duly appeared before the selection committee.
9. That the so-called inquiry committee called upon all the selected candidate and given Oath regarding the favoritism an nepotism if so made in favor of any of the candidate which they duly replied on oath that no such act of favoritism and nepotism were exist in the present selection process, furthermore none of the member of the selection committee were duly inquired in the matter as all the process was taken place in their presence nor any sort of evidence was taken on record which can proof any of the allegation.

~~ATTACHED~~



10. That the industry committee did not associate me with the industry proceedings. Not a single witness has been examined during the industry in my presence nor I have been given opportunity to cross examine any of the witnesses which show my involvement in any outside action or any eligibility for the post in question.

11. That the undersigned was not even served with a charge sheet and statement of allegation, neither any fact finding nor regular industry was conducting which can show any sort of involvement of the undersigned in the recruitment process, which is mandatory provision under the law.

12. That the undersigned is a responsible, cautious citizen and cannot even think of the display of the charges leveled against me.

13. That the industry committee did not associate me properly with the industry proceedings. Not a single witness has been examined during the industry in my presence nor I have been given opportunity to cross examine those who may have deposed anything against me during the industry.

14. That the undersigned has never committed any act or omission which could be termed as misconduct, I duly performed my duties as assigned with full devotion, zeal and loyalty albeit I have been roped in the instant false and baseless charges.

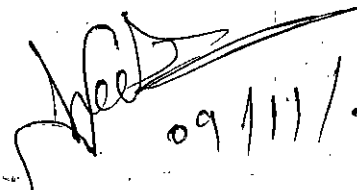
15. That the charges leveled against me were neither proved during the industry proceedings, nor any independent and convincing proof evidence has been brought against me in the industry that could even remotely associate me with the charges, as such the charges remained unproved during the industry and the industry officer has thus rendered his findings on mere surmises and conjectures regarding charges, further to add that the so called industry was conducted in sly and Rahman registrar.

16. That the undersigned has at his credit an unblemished and spotless service career, during entire service career, I have never given any chance of complaint whatsoever regarding my performance. I always protected the interests of the department over and above my personal interests. The proposed penalty if imposed upon me, it would be too harsh and would stigmatized the bright and spotless service record of the undersigned.

17. That I also desire to be heard in person.

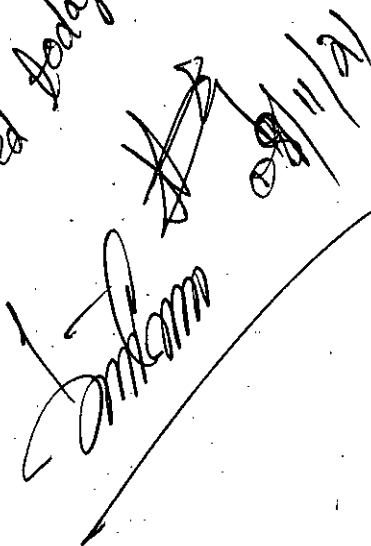
It is, therefore, humbly prayed that on acceptance of this reply the subject Show cause may kindly be dropped and I may be exonerated of the charges leveled against me.

Yours Faithfully,

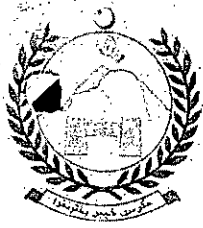

09/11/2021

**Muhammad Shoaib,
Key Punch Operator (BPS-16)
Ex-FATA Tribunal.**

Received today i.e. 09/11/21


09/11/21

ATTESTED



ANNEX I

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GOVERNMENT OF KHYBER PAKHTUNKHWA
HOME & TRIBAL AFFAIRS DEPARTMENT
KHYBER ROAD PESHAWAR

Dated Peshawar 17th January, 2022

ORDER

HD/FATA Tribunal/B&A/55/2022 68-77 WHEREAS, Muhammad Shoaib, Key Punch Operator (BPS-16) of Ex-FATA Tribunal was proceeded against under the Rule-4 of Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) Rules, 2011, for the charges mentioned in the statement of show cause notice served upon him.

2. AND WHEREAS, the Department gave opportunity of personal hearing to Muhammad Shoaib, Key Punch Operator (BPS-16), Ex-FATA Tribunal as required under the rule 7(d) of Government Servant (Efficiency & Disciplinary) Rules, 2011, AND WHEREAS, Muhammad Shoaib, Key Punch Operator (BPS-16), Ex-FATA Tribunal was not able to produce any favorable record.

3. NOW, THEREFORE, the Competent Authority has been pleased to impose major penalty of "Removal from Service" on Muhammad Shoaib, Key Punch Operator (BPS-16), Ex-FATA Tribunal under Khyber Pakhtunkhwa (Efficiency & Disciplinary) Rules, 2011, with effect from 11-01-2022.

-Sd-

Secretary to Govt. Khyber Pakhtunkhwa
Home & Tribal Affairs Department

Endst No & Date even

Copy for information forwarded to:

1. The Accountant General Govt. of Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Home & Tribal Affairs Department.
3. Secretary to Govt. of Khyber Pakhtunkhwa Finance Department.
4. Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department.
5. Special Secretary-II Home & Tribal Affairs Department Khyber Pakhtunkhwa.
6. Additional Secretary (Judicial) Home & TA's Deptt: Khyber Pakhtunkhwa.
7. PSO to Chief Secretary Khyber Pakhtunkhwa.
8. PS to Chief Minister Khyber Pakhtunkhwa.
9. Account Section Home & TAs Department (NMAs).
10. Official concerned.

Section Officer (B & A)

ANNEX I

CS No: 514

Page 1 of 2

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Date: 24/1

HS

ANNEX J

To

The Honourable Chief Secretary,
Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE REMOVAL ORDER
DATED 17-01-2022

R/Sir,

Most respectfully, it is stated that I am a resident of District Peshawar and was initially appointed as Key Punch Operator (BPS-12) now BPS-16 in FATA Tribunal at Peshawar after fulfilling all the legal & codal formalities required for the post vide order dated 08-03-2019.

I started performing my duty quite efficiently whole heartedly and up to the entire satisfaction of my high ups after receiving the appointment order dated 08-03-2019 and submitting arrival report.

The FATA Tribunal was abolished after the 25th Constitutional Amendment the FATA was merged in the Khyber Pakhtunkhwa Province. After the abolition of the FATA Tribunal all the staff working in FATA Tribunal was deputed to Secretary Home & Tribal Affairs and as such the staff of FATA Tribunal started performing duty in the office of Secretary Home & Tribal Affairs Khyber Pakhtunkhwa.

Astonishingly, I received Show Cause notice dated 25-10-2021 with the allegation that "appointment/recruitment process so made in my as well as other 24 staff is without Lawful Authority". Which was properly replied by denying the entire allegation leveled against me in the ibid show cause notice.

In this connection it is stated in your honour that my appointment was made after fulfilling all the codal formalities i.e. which includes Advertisement, other relevant selection process and appearance before the Departmental Selection Committee for interview.

It is well settled principle of law that one should not be punished for the fault of others and accordingly I am punished for no fault on my part.

The impugned removal order dated 17-01-2022 is not issued in accordance with Law as no charge sheet and statement of allegation have been served upon me; no proper regular inquiry was conducted nor the inquiry report was handed over to me.

~~APPROVED~~


Only I am been prosecuted in the matter while issuing the impugned order date 17-01-2022 in such a way that the only the inquiry is conducted against me and not against those authority that issued appointment order dated 08-03-2019. Hence, the authority did not look into the matter in accordance with Law & Rules while issuing the impugned order dated 17-01-2022.

Therefore, it is, most kindly requested that the impugned order dated 17-01-2022 whereby major penalty of Removal from Service has been impose upon me may very kindly be cancelled and I may be reinstated into service with all back benefit.

I shall be very thankful to you for this kindness.

Dated: 21/01/2022

Obediently Yours,


(MUHAMMAD SHOAIB s/o Jehanzeb)
KPO (Ex-FATA Tribunal),
0300-5840707

ATTACHED

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: _____ OF 2022

M. Shaaib (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Gort of K.P 7 others (RESPONDENT)
(DEFENDANT)

I/We Muhammad Shaaib
Do hereby appoint and constitute **NOOR MUHAMMAD 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. ____/____/2022

[Signature]
CLIENTS

[Signature]
ACCEPTED

NOOR MUHAMMAD KHATTAK

[Signature]
UMER FAROOQ MOHMAND

[Signature]
KAMRAN KHAN

[Signature]
HAIDER ALI

&
KHANZAD GUL
ADVOCATES

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO.781/2022

Muhammad Shoaib

(APPELLANT)

VERSUS

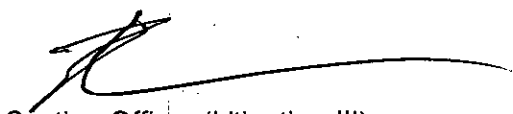
SCANNED
KPST
Peshawar

Govt: of Khyber Pakhtunkhwa etc.

(RESPONDENTS)

INDEX

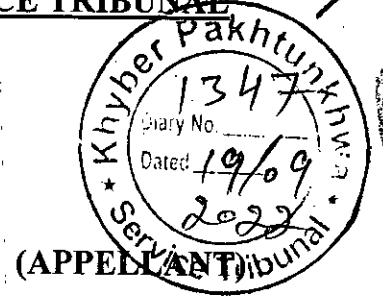
s.#	Particulars	Annexure	Pages
1.	Parawise comments	-	1-4
2.	Authority letter	A	5
3.	Affidavit	B	6


Section Officer (Litigation-III)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No.781 /2022

1. Muhammad Shoab



VERSUS

1. Govt. of Khyber Pakhtunkhwa etc.

(RESPONDENTS)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No.779 /2022

2. Muhammad Adnan

(APPELLANT)

VERSUS

2. Govt. of Khyber Pakhtunkhwa etc.

(RESPONDENTS)

JOINT PARA-WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 (CHIEF SECRETARY, KHYBER PAKHTUNKHWA), RESPONDENT NO.2 (SECRETARY HOME & TRIBAL AFFAIRS DEPARTMENT, KHYBER PAKHTUNKHWA) AND RESPONDENT NO. 3 (SECRETARY ESTABLISHMENT DEPARTMENT, KHYBER PAKHTUNKHWA)

RESPECTFULLY SHEWETH:-

PRELIMINARY OBJECTIONS:-

1. That this Hon'ble Tribunal with profound respect has got no jurisdiction to entertain and adjudicate the instant appeal.
2. That the appellant is estopped by his own words and conduct to file the instant service appeal before this Hon'ble Tribunal.
3. That the appellant has got no locus standi to invoke the jurisdiction of this Hon'ble Tribunal.
4. That the appellant has concealed the entire material facts from this Hon'ble Tribunal.

- 64
5. That the appellant has not come with clean hands. Therefore, he is not entitled for any relief by this Hon'ble Tribunal.
 6. That the appellant has got on cause of action to file the instant service appeal before this Hon'ble Tribunal.
 7. That the service appeal is not maintainable in its present form.
 8. That the service appeal is based on surmises and conjectures.
 9. That the appellant is not an aggrieved person within the meaning of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. Hence, the instant service appeal is liable to be dismissed on this score alone.

ON FACTS:

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1. The appellant may satisfy the Hon'ble Tribunal regarding the contents mentioned in Para 1.
2. That Para 2 needs no comments.
3. That Para 3 also needs no comments.
4. That Para 4 is correct.
5. Reference to Para 5, a full fledged inquiry was conducted in the matter to check the credibility and authenticity of the process of advertisement and selection and it was held that the entire process of selection from top to bottom was "*Coram Non Judice*". *Furthermore, inquiry was conducted against Mr. Sajjad ur Rehman ex-Registrar, FATA Tribunal under rule 10 of Khyber Pakhtunkhwa Govt. Servant (E&D), Rules, 2011 wherein the inquiry report held that the same selection Committee was constituted without any lawful authority. The said Committee comprised of temporary/contract/daily wages employees of FATA Tribunal who themselves were candidates against these posts. The inquiry proceedings further revealed that there were exists no attendance sheet, minutes of the meeting and even the appointment orders were found ambiguous. The said Departmental Committee unlawfully increased the number of posts from 23 to 24 illegally and issued 24 orders without any recommendations of legitimate Departmental Selection Committee. Else then, the Inquiry Committee has termed all the said 24 appointments illegal and without lawful authority and recommended to be cancelled/withdrawn.*
6. That Para 6 pertains to the appellant.
7. That Para 7 is totally incorrect, misconceived and hence denied as there was sufficient material exists in shape of documentary proof and after issuance of show cause notice and fulfilling all legal and codal formalities, major penalty of removal from service was imposed upon the appellant under the relevant rules/law.
8. That Para 8 needs no comments.
9. That Para 9 also needs no comments.

GROUNDS:-

- A. Ground A is incorrect. The appellant was treated according to law.
- B. That Para B is totally incorrect and hence denied as the respondents have treated the appellant in accordance with Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- C. Detail reply furnished in Para 5 and 7 of the facts above.
- D. Same reply as offered in Para C.
- E. That Para E is incorrect and hence denied to the extent that no retrospective effect is given in the removal order. The Authority acted in accordance with the mandate of law and constitution.
- F. That Para F is also incorrect detail reply offered in Para C.
- G. That Para G is incorrect and denied. Detail reply given in facts.
- H. Same reply as furnished in Para C above.
- I. That Para I is incorrect as no law, rules and judgments of the apex court has been violated. The appellant was treated in accordance with law, rules and constitution. Furthermore, detail reply already offered in Para 5 and 7 of the facts.
- J. That the respondents may also seek permission to take some other additional grounds at the time of arguments where necessary.

PRAYER:-

In view of the above narrated facts and grounds, it is, therefore, most humbly prayed that the instant service appeal may graciously be dismissed with special cost been devoid of merits and substances.

Handwritten signature and date: 5/8/2022

**Secretary, Home & TA's Department
Govt. of Khyber Pakhtunkhwa
(Respondent No.2)**

Handwritten signature

**Secretary, Establishment Department
Govt. of Khyber Pakhtunkhwa
(Respondent No.3)**

Handwritten signature and date: 5/8/2022

**Chief Secretary,
Govt. of Khyber Pakhtunkhwa
(Respondent No.1)**

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO.781/2022

Muhammad Shoaib

(APPELLANT)

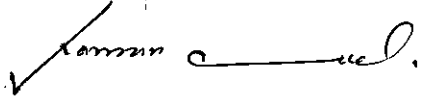
VERSUS

Govt: of Khyber Pakhtunkhwa etc.

(RESPONDENTS)

AUTHORITY

Mr. Shah Wali Khan Section Officer (Litigation) Home & T.As Department Peshawar do hereby authorized to submit reply in Service appeal No. 781/2022 titled Muhammad Shoaib Versus Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa on behalf of respondent No. 2 in the Service Tribunal Peshawar.


Deputy Secretary (Litigation-)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL NO.781/2022

Muhammad Shoaib

(APPELLANT)

VERSUS


Govt: of Khyber Pakhtunkhwa etc.

(RESPONDENTS)

Affidavit

Mr. Shah Wali Khan Section Officer (Litigation-III) Home & T.As Department Peshawar do hereby solemnly affirm and declares on oath that the contents of reply Service appeal No. 781/2022 titled Muhammad Shoaib Versus Government of Khyber Pakhtunkhwa and others on behalf of respondent No. 2 in the Service Tribunal Peshawar are true and correct as per record and nothing has been concealed from the Honorable Court .




Section Officer (Litigation-III)