

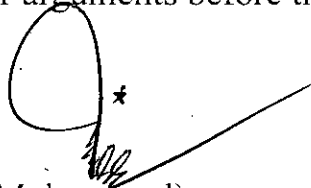
26.10.2022

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

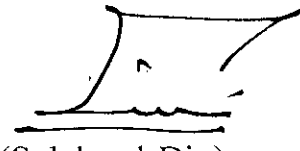
Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 01.12.2022.

SCANNED
KPST
Peshawar

01/12/22



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

Deleted from the list to come up on the next date 27/2/23



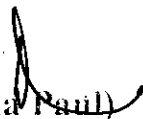
Reader.

27th Feb. 2023

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

SCANNED
KPST
Peshawar

Learned counsel for the appellant sought adjournment to further prepare the brief. Adjourned. To come up for arguments on 12.05.2023 before the D.B. P.P given to the parties.



(Farceha Paul)
Member(E)



(Salah-ud-Din)
Member (J)

08.06.2022

Clerk of learned counsel for the appellant present. Mr. Munawar Khan, ADEO (Litigation) alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for official respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 29.08.2022 before the D.B.



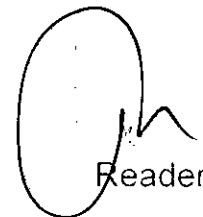
(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

29.08.2022

Bench is incomplete, therefore, case is adjourned to 26.10.2022 for the same as before.



Reader

Stipulated period passed reply not submitted.

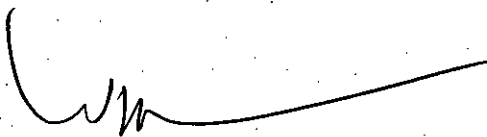
15.09.2021

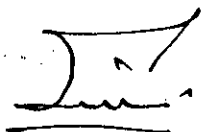
Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman

10.11.2021

Appellant alongwith his counsel Syed Noman Ali Bukhari, Advocate present. Mr. Munawar Khan ADO (Litigation) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for official respondents No. 1 to 3 present and sought time for submission of reply/comments. None present on behalf of private respondent No. 4, therefore, notice be issued to private respondent No. 4 for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as arguments before the D.B on 11.02.2022.


(ATIQ UR REHMAN WAZIR)
MEMBER (E)


(SALAH-UD-DIN)
MEMBER (J)

Due to retirement of the honorable Chairman the case is adjourned to come up for the same as before on 8-6-22.


Atiq

17.03.2021

Due to tour of Camp Court Abbottabad and shortage of Members at Principal Bench Peshawar, the case is adjourned to 24.06.2021 before S.B.


Reader

24.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 10.11.2021 before the D.B.

Appellant Deposited
Security & Process Fee




24/6/21


Chairman

FORM OF ORDER SHEET

Court of _____

Case No.- 13575 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/11/2020	<p>The appeal of Mr. Arabistan presented today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;"> REGISTRAR</p>
2-	21.12.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/12/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant present through counsel.</p> <p>Let pre-admission notice be issued to respondents for reply/comments. To come up for reply and preliminary arguments on 17.03.2021 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

13575
APPEAL NO. _____/2020

Arabistan

V/S

Education Deptt:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	01-04
2.	Copy of advertisement	A	05
3.	Copy of appointment order dated 19.06.2020	B	06-08
4.	Copy of charge report	C	09
5.	Copy of dated 28.07.2020	D	10
6.	Copy of departmental appeal	E	11
7.	Copy of PUC/Note sheet	F	12
8.	Vakalat Nama	-----	13

APPELLANT

THROUGH:

M. Asif
M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT

Taimur Ali Khan
(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,
&

(S. NOMAN ALI BUKHRI)
ADVOCATE HIGH COURT
&
SHAHKAR KHAN YOUSAFZAI
ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____/2020

Arabistan, Ex-PST (PBS-12)
GPS, Tango Zabit Khan District Khyber at Jamrud.

(APPELLANT)

VERSUS

1. The Secretary (E&SE) Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Male) District Khyber at Jamrud.
4. Zerman Ullah PST (BPS-12), GPS Tango Zabit Khan Jamrud.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 28.07.2020, WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT WAS WITHDRAWN AND RESPONDENT NO.4 WAS APPOINTED ON THE PLACE OF THE APPELLANT AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STIPULATED PERIOD OF NINETY DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 28.07.2020 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

2

**RESPECTFULLY SHEWETH:
FACTS:**

1. That the respondent department advertised posts of various cadres in which the cadre of PST was also included. In the advertisement it was mentioned that the appointment will be made on regular basis. **Copy of advertisement is attached as Annexure-A.**
2. That the appellant being eligible for the post of PST (BPS-12) applied for the said on open merit, while the private respondent No.4 applied for the post of PST on disable quota.
3. That after proper recommendation of departmental selection committee, the appellant was appointed on the post of PST (PBS-12) vide appointment order dated 19.06.2020 and was at serial No.9 in the merit list of open merit. **Copy of appointment order dated 19.06.2020 is attached as Annexure-B**
4. That the compliance of order dated 19.06.2020, the appellant submitted his charge report at GPS Tango Zibat Khan Jamrud District Khyber and has performed his duty for more than one month. **Copy of Charge Report is attached as Annexure-C.**
5. That the Respondent No. 4 namely Zerman Ullah filed a complaint to the respondent department for appointment on which inquiry was conducted on the issue without associating the appellant with the inquiry proceeding and on the basis of that inquiry report, the order dated 28.07.2020 was passed by the Respondent No. 3 in which the appointment order of the appellant was withdrawn from the date of issuance while the private respondent No. 4 namely Zarmin Ullah were appointed on the post of appellant. The inquiry report was not handed over to the appellant, therefore, he is unable to annex with the appeal. **Copy of order dated 28.07.2020 is attached as Annexure-D.**
6. That the appellant filed departmental appeal against the impugned order on 29.07.2020 on which 02 other inquiry were conducted which were culminated in the favour of the appellant, but despite his departmental appeal was not responded within the statutory period of 90-days. The inquiry reports were not handed over to the appellant, therefore, he is unable to annex with the appeal. **Copy of Departmental Appeal is attached as Annexure-E.**
7. That now the appellant has no other remedy except to file this service appeal in this august Service Tribunal on the following grounds amongst others.

GROUND:

- A) That not taking action on the departmental appeal of the appellant within the statutory period of 90-days and the impugned order dated

28.07.2020 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.

- B) That private respondent No. 4 namely Zerman Ullah has applied for the post of PST on disable quota while he was appointed on open quota merit which is violation of Rules & Regulations of initial appointment.
- C) That appointing private respondent No. 4 on open merit although he applied for the post on disable quota has deprived the appellant from his legal right of appointment on open quota and such act of shows the malafide of respondent department and as such act of the respondent department is violation of Law & Rules on the issue.
- D) That the 1st inquiry committee did not associate the appellant with the inquiry proceeding and without conducting regular inquiry to dig out the reality about the issue and on the basis of that inquiry report the respondent No3 passed an order dated 28.07.2020, which is violation of law and rules.
- E) That the 2nd & 3rd inquiries conducted in favour of appellant in which the inquiry committee recommended that the appellant may be appointed on his posts as he is eligible and qualified the requisite requirement for appointment on the post of open quota.
- F) That the appellant also applied for the post of PST in GPS Chora Jamrud and GHS Lowera Miana Jamrud Mullagori Jamrud and one post in each school became vacant due to non-joining of selected candidates and inquiry committee also recommended that the appellant will be appointed on any one of that vacant post. The vacant is evident from PUC/note sheet dated 29.09.2020. **Copy of PUC/note sheet dated 29.09.2020 is attached as Annexure-F.**
- G) That the appellant was appointed after proper recommendation of selection Committee and has worked for more than 01-month & under the principles of locus poententia valuable rights are created in favour of appellant and as such the appointment order of the appellant cannot be withdrawn so-easily.
- H) That the appellant was appointed after fulfilling all the codal formalities and the appointment order of the appellant was withdrawn was not issuing even the show cause notice to the appellant to know about the stance of the appellant which is violation of Law & Rules and as such the impugned order is liable to be set-aside.
- I) That the appellant has been condemned unheard and has not been treated according to law and rules.

(4)


J) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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


APPELLANT

THROUGH:


M. ASIF YOUSAFZAI
ADVOCATE SUPREME COURT


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT,
&

(S. NOMAN ALI BUKHRI)
ADVOCATE HIGH COURT
&
SHAHKAR KHAN YOUSAFZAI
ADVOCATE

**DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD**

PHONE: 091-5820584 FAX 091-5820584
No: _____ DATED: _____ / _____ / 2020

B 6

APPOINTMENT ORDER

Consequent upon the recommendation of Departmental Selection Committee (DSC) during its meeting held on 29/04/2020, the following 41 Nos Primary School Teacher are hereby appointed in accordance with the Govt. Khyber Pakhtunkhwa Elementary and Secondary Education Department's school based Tehsil wise existing policy in BPS 12 (13320-960-42120) P.M Fixed plus usual allowances as admissible under the rules against the post/ schools mentioned against their names from the date of their taking over charge in the interest of public service with the following terms & conditions:-

1. PST Male Tehsil Bara (Total 13)

S. No	Roll No	Name of candidates	Father Name	Score	Station/School	CNIC Number
1	47031	M MUNIR KHAN	NEK MARJAN	137.53	GPS Sandana Upper Bara	21201-6628107-1
2	47308	MUHAMMAD HUSSAIN	BANARAS KHAN	133.38	GPS Said Rehman Bara	21201-1994583-1
3	46984	MUHAMMAD AMIR AFRIDI	IBRAHIM SHAH	131.34	GPS Zangai Tirah Bara	21201-5626004-3
4	45624	MUHAMMAD RAFIQ	GUL ZAR KHAN	127.77	GPS Zafar Killa Tirah	21201-7526896-9
5	46924	MUJAHID KHAN	HAMEED GUL	127.76	GPS Khurmatang Bara	21201-3608575-3
6	48885	AMJAD KHAN	ZAKIY KHAN	126.88	GPS Sher Bahadar Bara	21201-3661281-5
7	46876	SIRAJ UDDIN	SAIFUR REHMAN	125.89	GPS Sandana Upper Bara	21201-1217948-5
8	47228	SHAH FASAL	MIRAJ GUL	125.50	GPS Jameel Garhi Upper Bara	21201-3530732-7
9	48262	ADNAN HAIDER	ZAR HAIDER	124.40	GPS Haji Dhand Bara	21201-2134037-5
10	45994	SHAHID KHAN	FAQEER REHMAN	123.80	GPS Amrozai Tirah Bara	21201-1528444-1
11	48209	ZARK ISRAFEEL	FAZAL KARIM	123.12	GPS Masri Khan Kamar Khet Bara	21201-9106017-5
12	46229	MUHAMMAD ASIF	MUHAMMAD TARIQ	121.43	GPS Hukan Khan Upper Bara	21201-4063197-7
13	45835	KHAN SHER	GULAB SHER	121.40	GPS Khwaja Tirah Bara	21201-0935759-1

2. PST Male Tehsil Jamrud (Total 09)

S. No	Roll No	Name of candidates	Father Name	Score	Station/School	CNIC Number
1	46235	MUHAMMAD YAR	BABAR KHAN	128.21	GPS Farid Killa Jamrud	21202-3318270-3
2	46606	ABDUL WAHAB	KHAN MUHAMMAD	127.48	GPS Chora Jamrud	21202-5262314-5
3	46148	MAQBOOL SHAH	SAID BADSHAH	126.22	GPS Lora Maina Jamrud	21202-3580643-5
4	47605	SABIREEN	NOOR GUL	125.82	GPS Chora Jamrud	17301-0576025-3
5	47271	MANZAR KHAN	KHAN SHAH	125.27	GPS Warmand Mela Jamrud	21202-9826366-3
6	47386	NAUMAN KHAN AFRIDI	MOHIB ULLAH	124.14	GPS Lashora Jamrud	21202-1529866-1
7	46952	ABDULLAH	GHANI UR REHMAN	123.56	GPS Kata Kushia Jamrud	21202-1564389-3
8	46985	MUJEEB ULLAH	BAHADAR KHAN	121.04	GPS Shaheed Maina Jamrud	21204-5786496-3
9	47588	Zalman Arabistan ARABISTAN	JALAT KHAN	117.08	GPS Tango Zabir Khan Jamrud	21202-1495435-7

Attested
Asst. District Education Officer
Khyber Tribal District At Jamrud

3. PST Male Tehsil LandiKotal (Total 19)

7

S.No	Roll No.	Name of candidates	Father Name	Score	Station/School	CNIC Number
1	45543	AYAS HUSSAIN	ZAR HUSSAIN	126.95	GPS Dama K. Landi Kotal	21203-0713916-5
2	47212	AKHTAR AFZAL	KHAN AFZAL	125.00	GPS Gulab Kalli LandiKotal	21203-7070299-1
3	47589	IRSHAD ALI	KHAN MUHAMMAD	123.33	GPS Asif Killi LandiKotal	21203-5929298-3
4	46479	MUHAMMAD ISHAQ	JAFAR KHAN	123.28	GPS AmanUllah LandiKotal	21203-1676779-7
5	45694	SWAHID SHAH	BACHA KHAN	122.65	GPS Nazim Khat. LandiKotal	21203-8074211-7
6	47384	ABDUL BASIT	GHULAM AKBAR	122.63	GPS Loi Shalman LandiKotal	21203-6158611-9
7	46377	ABDUL AZEEM	ZARAB KHAN	122.58	GPS Sind Ghara LandiKotal	21203-7575373-5
8	46958	NASEER UR RAHMAN	UMAR KHAN	120.91	GPS Alif Killi LandiKotal	21203-7946570-3
9	47209	SADDAM HUSSAIN	MUHAMMAD SALEEM	120.77	GPS Nazim Killi LandiKotal	21203-7033193-5
10	45988	SADDAM HUSSAIN	HAJI MIRWAIS KHAN	120.34	GPS Tood Kamar LandiKotal	21203-4685506-5
11	47630	AMIR KHAN	ARIF KHAN	120.33	GPS Sarobi Shalman LandiKotal	21203-7784201-1
12	45937	KOWSAR ALAM	NISSAR AHMAD	119.77	GPS Shareen BZK LandiKotal	21203-5754087-3
13	45570	IRFAN ULLAH	MANAN	119.56	GPS Bar Shinoi Landi Kotal	21203-9883964-3
14	46465	YASEEN KHAN	TUAWAT SHAH	119.14	GPS Bar Shinoli Landi Kotal	21203-9486051-7
15	48021	WASEED ULLAH	RASHEED KHAN	118.95	GPS Alif Killi LandiKotal	21203-4876210-5
16	48457	NAIAZ MUHAMMAD	SULTAN MIAN	118.86	GPS Nazir Killi LandiKotal	21203-3138565-7
17	46587	NAJEEB ULLAH	INAYAT KHAN	118.28	GPS Batin Shah Landi Kotal	21203-0705935-5
18	46198	KARAM SHAH	GUL SHAN	118.09	GPS Bara Kass LandiKotal	21203-3268200-7
19	46485	MATEEB ULLAH	SIAL JAN	117.41	GPS Ugda Dara Shalman Landi Kotal	21203-5159105-9

TERMS CONDITIONS

1. They should join their post within 15 days of the issuance of the appointment order in case of failure their appointment will expire automatically and no subsequent appeal should be entertained.
2. Appointment is purely made on adhoc /contract basis initially for one year , extendable to another year.
3. They should not be hunded over charge if they exceeds 35 years or below 19 years of age, a relaxation case may be submitted to competent authority if required.
4. If anyone wrong position holder candidate having low score was appointed erroneously his appointment should be considered cancelled at any time.

[Signature]
 Asst. District Education Officer
 Khayber Tribal Education District

8

5. District Accounts Officer DAO Khyber should release their salaries on the production of duty certificate duly signed by the Principal/Head Master/ DDO concerned and C/Signed by the Undersigned.
6. They will receive nine (09) months in-service mandatory professional training at FITE/ GCET/PITE
7. if the candidate wishes to resign his post he will give one month prior notice or his pay for one month will be forfeited in lieu thereof or will be terminated at any time without any notice.
8. Their Salaries will be released conditionally and the appointees will produce a Judicial Stamp Paper, that if their documents/credentials were found bogus/fake then he will refund the entire emoluments to the Govt. Treasury and their service will be terminated from the date of appointment and action will initiated under the rules.
9. They should produce their Health and Age certificate from the DHO/MS concerned.
10. If any technical legal flaw is pointed out, the appointment will stand cancelled.
11. Errors and omissions will be accepted within specified period.

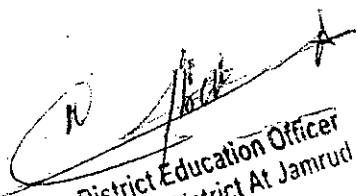
(MUHAMMAD SHAUKAT)
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

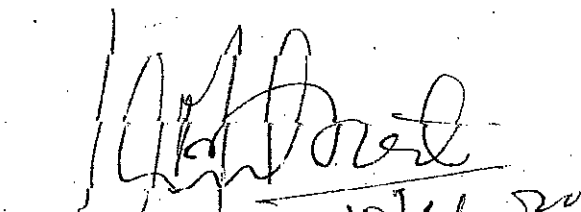
Endst: No. 18931-39 / 41 No.s Male PST/Khyber

Dated 19/06/2020

Copy of the above is forwarded to the;

1. Director E & S E Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner Khyber Tribal District at Peshawar.
3. District Health Officer District Khyber at Landi Kotal.
4. Principal/Head Master Concerned.
5. District Accounts Officer Khyber at Jamrud.
6. Superintendent local office.
7. EMIS Local office.
8. ADEO Local Office/Pay Clerk concerned.
9. Official Concerned.


Asst. District Education Officer
Khyber Tribal District At Jamrud


19/6/2020
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Charge Report

29

Certified that I Mr. Arabistan S/O Jalat Khan have on the forenoon of this day on dated 20 June 2020 received charge of this office of the PST (BPS-12) post at GPS Tango Zabita Khan Jamrud District Khyber order No. 18931-39/41 No.s PST Khyber.

Copy Forward to the:

1. DEO Khyber at Jamrud
2. ADEO Khyber at Jamrud

20/06/20
ASST District Education Officer
Khyber Tribal District At Jamrud



DISTRICT EDUCATION OFFICE
DISTRICT KHYBER AT JAMRUD

PHONE. 091-5820584 FAX 091-5820584

No: _____ DATED: _____ / _____ /2020

210

OFFICE ORDER

In continuation of appointment order already issued by this office Endst.No. 18931-39/41 No.s Male PST/Khyber Dated 19/06/2020 following necessary amendments has been made in the interest of public.

S. No	Roll No	Name	Father Name	Actual Score	School Name	CNIC Number	Remarks
1	47588	ARABISTAN	JALAT KHAN	115.68	GPS Tango Zabir Khan	21202-1495435-7	Appointment Order at S.NO 09 in Tehsil Jamrud is hereby withdrawn from the date of issue due to low score in school based policy on the recommendation of Inquiry Report.
2	47830	ZERMAN ULLAH	MANIQ SHAH	116.70	GPS Tango Zabir Khan	21202-4561484-9	Appointed V. Serial No. 01 with immediate effect.

not appl. for Tango

Note: Terms and conditions will be the same already Endorsed in appointment order of PST Male.

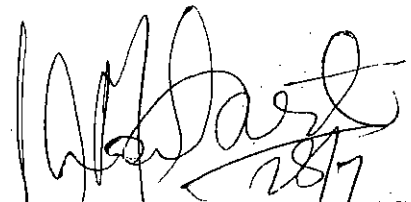
DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

Endst.No. 20414-21

Dated 28/07/2020

Copy of the above is forwarded to the;

1. Director E & S E Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner Khyber Tribal District at Peshawar.
3. District Health Officer District Khyber at Landi Kotal.
4. District Accounts Officer Khyber at Jamrud.
5. Superintendent local office.
6. EMIS Local office.
7. ADEO Local Office/Pay Clerk concerned.
8. Official Concerned.


DISTRICT EDUCATION OFFICER
DISTRICT KHYBER AT JAMRUD

بھنور جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع خیبر (11)

درخواست برائے نظر ثانی اپیل

جناب عالی:

عاجزانه گزارش کی جاتی ہے کہ فدوی عربستان ولد جلات خان کا PST آڈر گورنمنٹ پرائمری سکول مانگو ضابطہ خان پر ہو چکا ہے۔ ایک معذور بندہ جس کا نام زرمان ولد منیق شاہ ہے اس بندے کو آپ نے میرے پوسٹ پر آڈر جاری کیا۔ جو اس بندے نے معذور کوٹہ پر اپلائی بھی کیا ہے۔ اور آپ نے اس کو اوپن پوسٹ پر آڈر جاری کیا ہے۔ دوسری بات یہ ہے کہ انکوآری کمیٹی نے مجھے طلب بھی نہیں کیا اور مجھے بے خبر رکھا۔ اس لیے مجھے یہ انکوآری قبول نہیں ہے۔

تیسری بات یہ ہے کہ میرٹ لسٹ میں کس طرح زرمان ولد منیق شاہ نے 104.5 نمبر سے بڑھا کر 116.70 نمبر زدے دیئے جبکہ فدوی کے نمبر 117.08 سے کم کر کے 115.68 کر دیئے گئے۔

لہذا آپ صاحبان سے گزارش کی جاتی ہے کہ فدوی کے درخواست پر نظر ثانی کرے۔

عین نوازش ہوگی۔۔

الحاضر

ایکتابخانہ عربستان ولد جلات خان PST گورنمنٹ پرائمری سکول مانگو ضابطہ خان سکنہ غنڈی جروہ ضلع خیبر

29.7.2020 ✓
Diary NO. 1258

57) Review

F (12)

Letter No. nil dated 25/06/2020 from the Head Master
stating that Mr. Nabeel Khan S/O Sardar Azam
ETE A in CT Cadre did not take over the charge so
open merit. Mr. Swahid Shah S/O Pacha
PSI at GPS Nazar Khel BZK will be the next
replacement/appointment in CT Cadre in this
Mr. Miram Khan will be replaced with Mr.

Resignation on stamp paper from Ismail Khan S/O
through ETEA as PET at GMS Sher Afzal
Zarlan S/O Shah Toot Khan will be the
open merit.

Resignation on stamp paper from Waqar Ahmad S/O
recruited through ETEA in CT cadre at
Khyber and subsequent Letter No. nil
Dhand Bara about mentioned Ex-
mentioned station so next candidate
will be the next suitable candidate
mentioned teacher. Respected sir, Mr.
appointed as PSI at GPS Chora Jamrud in
open merit as per the attendance

dated 15/08/2020 from Principal GHS
not joining of newly appointed PST
Badshah appointed at GHS
Mr. Arabistan S/O Jalat Khan
process.

Committee
1822
29/9

VAKALAT NAMA

NO. _____/2020

IN THE COURT OF KP Service Tribunal, Peshawar

Arabis tan

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt

(Respondent)
(Defendant)

I/We, Arabis tan

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court 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 costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2020

Arabis tan

(CLIENT)

ACCEPTED

Am - Jai

M. ASIF YOUSAFZAI
Advocate Supreme Court Peshawar.

(TAIMUR ALI KHAN)
Advocate High Court Peshawar

(SYED NOMAN ALI BUKHARI)
Advocate High Court Peshawar

(SHAHKAR KHAN YOUSAFZAI)
ADVOCATE PESHAWAR

Asad Mahmood
Advocate

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