


FORM OF ORDER SHEET

Court of _____

Appeal No. 1267/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/06/2023	<p>The appeal of Mr. Aurangzeb presented today by Mr. Muhammad Irshad Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>06-06-2023</u>.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
AT PESHAWAR

Service Appeal No: 1267 /2023

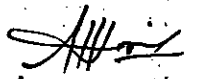
Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

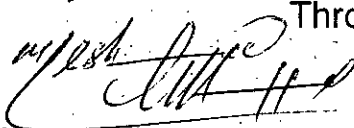
VERSUS

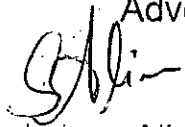
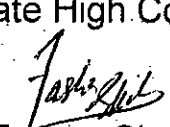
Government of Khyber Pakhtunkhwa through Secretary Elementary
& Secondary Education Department KPK Peshawar & others
(Respondents)

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Application for condonation of delay		8-10
4.	Address of parties		11
5.	Copy of orders	"A"	12-17
6.	Copy of impugned Office Order Endst No 8474-75 dated 12-10-2022	"B"	18
7.	Copy of Departmental Appeal	"C"	19-20
8.	Copy of application / complaint along with letter dated 17-05-2023 & letter No 3905 dated 07-04-2022 regarding rejection of Departmental appeal.	"D"	21-23
9.	Other Documents	"E"	24-25
10.	Wakalat Nama		26


Appellant: -Aurangzeb
Through


Muhammad Irshad Mohmand
Advocate High Court



Suleman Ali & Fathan Sheikh
Advocate

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
AT PESHAWAR

Service Appeal No: 1267 / 2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department KPK Peshawar
2. Director Education Elementary & Secondary Education Department KPK Peshawar
3. District Education Officer (Male) Mardan
4. Sub Divisional Education Officer (Male) Takhtbhai
5. District Account Officer Mardan (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER ENDST NO 8474-75 DATED 12-10-2022 PASSED BY RESPONDENT NO 3 / DEO (Male) MARDAN, WHEREBY MAJOR PENALTY OF COMPULSORY RETIREMENT FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT, WHICH IS ILLEGAL, UNLAWFUL AND IN DISREGARD OF LAW & FACT AS WELL AS AGAINST REJECTION ORDER PASSED ON THE DEPARTMENTAL APPEAL OF THE APPELLANT BY THE RESPONDENT NO 2 / DIRECTOR E & SE DEPARTMENT KPK PESHAWAR BUT THE REJECTION ORDER OF DEPARTMENTAL APPEAL HAS NOT BEEN CONVEYED TO THE APPELLANT AND THE APPELLANT GOT THE KNOWLEDGE OF REJECTION OF DEPARTMENTAL APPEAL ON 24-05-2023.

②

PRAYER:-

On acceptance of this Appeal, the impugned Office Order Endst No 8474-75 dated 12-10-2022 passed by Respondent No.3 / DEO (Male) Mardan as well as Rejection Order passed on the Departmental Appeal of the appellant by Respondent No 2 / Director E & SE Department KPK Peshawar may kindly be set aside, and the appellant be reinstated into his service with all back benefits.

Any other remedy, which this Honorable Tribunal deems appropriate, may also be granted to the appellant

Respectfully Sheweth: -

The brief facts leading up to the filing of this appeal are as under:

1. That the appellant was initially appointed as Primary School Teacher on 12-03-1995 and with the passage of time the appellant was promoted as Senior Primary School Teacher 26-03-2013 and thereafter as Primary School Head Teacher (PSHT) in the year 2019. **(Copy of orders are attach as Annex "A")**
2. That the Appellant has performed his duty with great zeal & zest in the department for more than 25 years with honesty to the entire satisfaction of his high ups and no complaint whatsoever has been made against the appellant.
3. That the Respondent No.3 / DEO (Male) Mardan without issuance of charge sheet & statement of allegation and without conducting any departmental inquiry straightaway issued the impugned Office Order Endst No 8474-75 dated 12-10-2022 whereby major penalty of compulsory retirement has been imposed on the appellant **(Copy of impugned Office Order Endst No 8474-75 dated 12-10-2022 is attach as Annex "B")**

3

4. That the appellant then filed departmental appeal against the impugned Office Order Endst No 8474-75 dated 12-10-2022, before the Respondent No 2 / Director E & SE Department KPK Peshawar which was kept pending without taking any action on the representation of appellant by Respondent No 2 and the appellant was kept busy on one pretext & other **(Copy of Departmental Appeal is attach as Annex "C")**

5. That thereafter the appellant was constrained to file application / complaint to the Respondent No 1 / Secretary Elementary & Secondary Education Department KPK Peshawar and on the application of appellant, the Respondent No 1 issued letter dated 17-05-2023 to the Respondent No 2 / Director E & SE Department KPK Peshawar with certain direction and thereafter when the appellant inquired about the complaint & ibid letter dated 17-05-2023, the appellant was informed on 24-05-2023 by the Respondent No 2 / Director E & SE Department Peshawar that the departmental appeal of the appellant has been rejected vide letter No 3905 dated 07-04-2023 issued to DEO Mardan, but the same has not been conveyed to the appellant till date and the appellant has got the knowledge of rejection of departmental on 24-05-2023 **(Copy of application / complaint along with letter dated 17-05-2023 & letter No 3905 dated 07-04-2023 are attach as Annex "D")**

6. That the appellant being aggrieved from the impugned Office Order Endst No 8474-75 dated 12-10-2022 & against the rejection order passed on departmental appeal, prefer the instant service appeal before this Honorable Tribunal on the following Grounds: -

GROUNDS:-

- A. That the impugned Office Order Endst No 8474-75 dated 12-10-2022 of Respondent No.3 as well as rejection order passed on departmental appeal of the appellant by the Respondent No 2 are manifestly illegal, unlawful, without lawful authority, void ab-initio, without jurisdiction and ineffective upon the valuable rights of the appellant, hence not tenable and liable to be set aside by reinstating the appellant into his service.
- B. That the appellant has regularly performed his duty to the entire satisfaction of his high ups and always remain punctual in the duty, but without issuing any charge sheet & statement of allegation and what to speak of charge sheet & statement of allegation, no inquiry proceeding has been conducted, even the appellant was not put under suspension as provided in Rule 6 of E & D Rule 2011, if there was any alleged inquiry against the appellant, therefore without conducting any departmental inquiry in the matter & in disregard of law with one stroke of pen major penalty of compulsory retirement from service has been imposed on the appellant which is against the law & natural justice.
- C. That the august Supreme Court as well as this Honorable Tribunal in various judgment have held that the major penalty of removal from service should not be imposed without conducting detail inquiry
- D. That no inquiry has been conducted nor any opportunity of defense has been provided under the law and all the proceeding have been conducted on the back of the appellant, therefore the impugned order of compulsory retirement from service is not only illegal but also against the constitutional right guaranteed under the Constitution of Islamic Republic of Pakistan, 1973.
- E. That the appellant has been compulsory retired from service on the alleged anonymous complaint without any solid or

5

authentic evidence regarding the alleged allegation, which is totally illegal, baseless and not supported by any evidence, therefore the impugned order of compulsory retirement of appellant is against the law and not sustainable under the law.

- F. That the appellant has more than 25 years' service on his credit and the appellant retirement is due in the year 2033 but at this stage a very harsh punishment of compulsory retirement has been imposed on the appellant without any authentic evidence & on baseless allegation, which has no legal foundation, therefore the impugned order of compulsory retirement is illegal & unjustified and liable to be set aside.
- G. That before issuing the impugned order no reasons & grounds have been supplied to the appellant nor the appellate authority has provided any opportunity of hearing to the appellant, which amount to condemned unheard & against natural justice as well as fair play and in violation of Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973.
- H. That the Respondents while issuing the impugned order has not only violated the law but also infringed the constitutional rights provided under Article 4, & 25 of the Constitution of Islamic Republic of Pakistan 1973.
- I. That the Appellant is will qualified person and had obtained service through proper procedure, therefore without adopting the proper procedure of inquiry in the matter as provided under the law, therefore imposing major penalty of compulsory retirement on the appellant from service is illegal & unjustified.
- J. That as per the reported judgment of the Apex Supreme Court of Pakistan as well as delivered by this Honorable Service Tribunal, that no person / official should be condemned / penalized without solid reasons, proof of allegation, as the same is against the spirit of services law


and the punishment could only be awarded to the official, if there is solid proof & evidence towards the allegation, but the appellant has been compulsory retired from service illegally on general allegations without any proof, it is also pertinent to mention here that there are no adverse remarks of monthly monitoring office which is clear from attendance sheet of the appellant, therefore the impugned order is not sustainable under the law and is liable to be set aside.


- K. That the appellant has not been treated in accordance with law nor extended equal protection of law which is inalienable right of the appellant.
- L. That any other ground will be raised at the time of final arguments with the permission of this Honorable Tribunal.

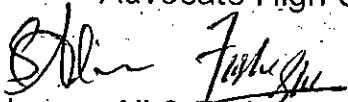
Prayer:-

It is therefore most humbly prayed, that on acceptance of this Service Appeal, the impugned Office Order Endst No 8474-75 dated 12-10-2022 passed by Respondent No 3 / DEO (Male) Mardan as well as rejection order passed on departmental appeal of the appellant by Respondent No 2 / Director E & SE KPK Peshawar may kindly be set aside, and the appellant be reinstated into his service with all back benefits.

Any other remedy which this august tribunal deems appropriate may also be granted to the appellant.


Appellant:-Aurangzeb

Through

Muhammad Irshad Mohmand
Advocate High Court


Suleman Ali & Farhan Sheikh
Advocate

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
AT PESHAWAR

Service Appeal No: /2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary
& Secondary Education Department KPK Peshawar & others
(Respondents)

AFFIDAVIT

I Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan, do hereby solemnly affirm and
declare that all the contents of the accompanied writ petition are true
and correct to the best of my knowledge and belief and nothing has
been concealed or withheld from this Honorable court.

Aurangzeb

DEPONENT

Identified by

Muhammad Irshad Mohmand
Muhammad Irshad Mohmand
Advocate
High Court Peshawar

0346-9466118



8

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
AT PESHAWAR**

CM No 12023

In Service Appeal No: 12023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary
& Secondary Education Department KPK Peshawar & others
(Respondents)

**APPLICATION FOR CONDONATION OF
DELAY, IF ANY IN FILLING OF ABOVE
NOTED APPEAL**

Respectfully sheweth:-

The applicant / appellant submits as under:-

1. That the applicant / appellant is filling the instant application for condonation of delay, if any in the above mentioned appeal, though the appeal of the appellant is well within time as the impugned appellate order has not been conveyed to the appellant.
2. That furthermore the impugned Office Order Endst No 8474-75 dated 12-10-2022 whereby major penalty of compulsory retirement from Service has been imposed on the appellant is totally illegal, unwarranted, void ab-initio and against the set procedure of law as no charge sheet & statement of allegation has been issued to the appellant, even no inquiry has been conducted in the matter, therefore being void order is liable to be set aside and under the law no limitation is run against the void order.

9

3. That after the impugned Office Order Endst No 8474-75 dated 12-10-2022, the appellant filed departmental appeal before the Respondent No.2 / Director E & SE Department Kpk Peshawar within time but the same was kept pending without taking any action on the departmental appeal of the appellant, thereafter the appellant was constrained to made complaint to Respondent No 1 / Secretary Elementary & Secondary Education Department KPK Peshawar and on the application of appellant, the Respondent No 1 issued letter dated 17-05-2023 to the Respondent No 2 and when the applicant / appellant inquired about the application / complaint & ibid letter, the appellant was informed on 24-05-2023 by the Respondent No 2 / Director E & SE KPK Peshawar that the departmental appeal of the appellant has been rejected vide letter No 3905 dated 07-04-2023 but the same has not been conveyed to the appellant and the appellant has got the knowledge of rejection of departmental appeal on 24-05-2023, therefore the instant service appeal is well within time.
4. That if there is any delay in filling of instant service appeal, the same is not intentional but due to above mentioned reason, as the appellant has filed the departmental appeal within time but the appellant was kept busy on one pretext and others, and the matter has been delay by the Respondent No 2.
5. That furthermore the applicant / appellant has not committed any miss-conduct during his entire service and the appellant has been penalized just for nothing, therefore the impugned order of compulsory retirement from service is illegal and liable to be set aside.

- 6. That while issuing the impugned office order of appellant, no opportunity of hearing & defense was provided to the applicant / appellant, which is against natural justice.
- 7. That the departmental appeal as well as present service appeal of the appellant is well within time, but due to precautionary measure the appellant is filling the instant application for condonation of delay if any.
- 8. That there is no legal bar on the power of this Honorable Tribunal to condone the delay for the end of justice.

Prayer:-

It is therefore most humbly requested, that on acceptance of this application, if there is any delay the same may kindly be condone in the larger interest of justice.

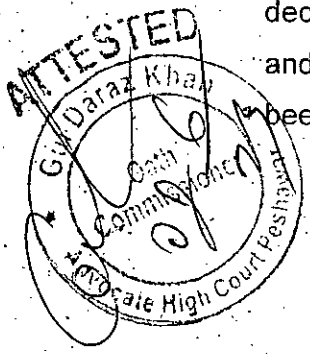
Aurangzeb
Applicant / Appellant: -Aurangzeb
Through

Muhammad Irshad Mohmand
Muhammad Irshad Mohmand
Advocate High Court

Suleman Ali & Farhan Sheikh
Suleman Ali & Farhan Sheikh
Advocate

AFFIDAVIT

I Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel Tehsil Takhtbhai District Mardan, do hereby solemnly affirm and declare that all the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.



Aurangzeb
DEPONENT

0346-9466118

11

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
AT PESHAWAR

Service Appeal No: /2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

VERSUS

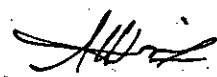
Government of Khyber Pakhtunkhwa through Secretary Elementary
& Secondary Education Department KPK Peshawar & others
(Respondents)

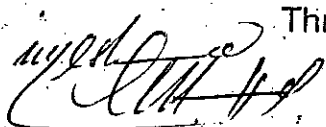
ADDRESSES OF PARTIES


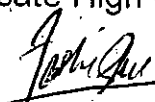
Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel
Tehsil Takhtbhai District Mardan (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary
& Secondary Education Department KPK Peshawar
2. Director Education Elementary & Secondary Education Department
KPK Peshawar
3. District Education Officer (Male) Mardan.
4. Sub Divisional Education Officer (Male) Takhtbhai
5. District Account Officer Mardan (Respondents)


Appellant: -Aurangzeb
Through


Muhammad Irshad Mohmand
Advocate High Court

 
Suleman Ali & Farhan Sheikh
Advocate

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY MARDAN.

AFFOINTMENT.

Consequent upon the advertisement published in the Daily Mashriq Peshawar dated 25/09/1994 interview held on 11, 12, 13/10/1994 by the Departmental selection committee Mardan District and Merit list prepared according to Govt:rules the following PTC trained candidates (AIOU Islam Abad) are hereby appointed as PTC trained Teacher in BFS(O7) (1480-81-2695) plus usual allowances as admissible under the rules w.e.f. the date of taking over charge in the school noted against each in the interest of public service on the following terms and conditions:-

S.No.	Name of Candidate/ Home Address/ Qualification.	PTC Marks.	School where posted.	Remarks:
<u>PF-18 Mardan-1.</u>				
1.	M: Sher Zada S/O Amir Zada R/O PSM Colony Mardan.	64 %	GMPS, Mayee Khel.	AT: Post:
2.	S: Khalid Shah S/O Rahman Gul R/O Bacha Garhi (Mardan).	63 %	GMPS, Nana Khel G/Garhi.	-do-
<u>PF-19 Mardan-2.</u>				
3.	Abdul Wadood S/O Abdul Halim R/O Mohib Banda.	67 %	GMPS, Siraj	-do-
4.	Waliullah S/O Sher Ullah R/O G.D. Zai	60 %	GMPS, Nakhtar Banda.	-do-
5.	Mohammad Sajjid S/O Fida Mohd: R/O Toru.	59 %	GPS, Subbat Abad	-do-
6.	Rashidur Rahman S/O Abdur Rahman R/O Zando Dheri.	58 %	GMPS, Durani Kaka	-do-
7.	S; Ahmad Hussain Shah S/O S; Qamer R/O Mohib Banda.	55 %	GPS, Dhakki	-do-
8.	Mohammad Fayaz S/O Bashir Ahmed R/O Toru.	50 %	GPS, Qasim(T)	-do-
<u>PF-20 Mardan-3.</u>				
9.	Mir Nawaz S/O Haya Khan R/O Gujarat.	69 %	GrS, Aman Kot	-do-
10.	Mohammad Ishaq S/O Mir Dad Khan R/O Gul Bahar Gujarat.	62 %	GPS, Shah Tori	-do-
11.	Zulfiqar Ali S/O Mohd: Baz R/O Cham Dheri.	61 %	GPS, 2 Jalil.	-do-
12.	Said Jamal S/O Abdul Jamal R/O Jaffer Abad.	60 %	GMPS, Bagi Banda.	-do-
13.	Mohammad Tahir S/O Sarfaraz R/O Char Guli.	59 %	GMPS, Tango.	-do-
14.	Ghulam Azim S/O Ghulam Rahman R/O Gujarat.	59 %	GrS, Shin Khal(SAP)	-do-
15.	Nasir Ahmad S/O Mohammad Rafiq R/O Gujarat.	56 %	GMPS, Akhun Baha. (R)	-do-
16.	Bacha Said S/O Saeed Ullah R/O Garyala.	55 %	GrS, Burkh Dheri.	-do-
17.	Mohammad Khalid S/O Wali Said R/O Sher Abad.	52 %	GMPS, Tahir Abad.	-do-
18.	Gul Wahab S/O Niaz Mohammad R/O Landai.	52 %	GMPS, Shaheer	-do-

ATTESTED

19.	Nisar Ahmad S/O Imaan Khan R/O Dheri Lak Fani.	62 %	Taro Banda -do-
FF-22 Mardan-5.			
20.	M:Noor Khan S/O Baz Gul R/O Sheikh Yousaf.	58 %	GMPS, Mingawar Kili -do-
21.	Abdul Shakoor S/O Niaz Gul R/O Jandai.	56 %	GMPS, Sari Bahlol. -do-
22.	Faqir Taj S/O Khair Gul R/O Said Abad.	55 %	GMPS, Mir Hassan Kili. -do-
FF-23 Mardan-6.			
23.	Furhad Ali S/O Anwar Shah R/O Hussai.	65 %	GMPS, Momin Khan Kili -do-
24.	Mohammad Azam S/O Murtaza Khan R/O Chiragh Din Kili.	58 %	GMPS, Dilroz Khan Kili. -do-
25.	Zaman Khan S/O Khalid Khan R/O Pati Kalan.	58 %	GMPS, Bakhtair Kili. -do-
26.	Fervaiz Khan S/O Shah Zad Gul R/O Zarghar Koroona.	54 %	GMPS, Dilawar Khan Kili. -do-
<u>GENERAL MERIT LIST.</u>			
27.	S: Mohd: Iftikhar Hussain S/O Noor Hassan R/O Noor Mankhel.	63 %	GPS, Far Hoti (MDN) -do-
28.	Hayatullah S/O Ajab Khan R/O Moh: Allah Dad Khel.	52 %	GPS, Mizla Kai (R) -do-
29.	Imran Ali S/O Farman Ali R/O Muslim Abad Mardan.	62 %	GMPS, Jamdad -do-
30.	Irshid Akbar S/O Mohammad Akbar R/O Noor Man Khel.	60 %	GMPS, Mure Banda. -do-
31.	Mohammad Islam S/O Zardad Khan R/O New Muslim Abad.	60 %	GPS, Nodah (R) -do-
32.	Zawar Mohammad S/O Ghulam Nabi. R/O Landakai Hoti Mardan.	60 %	GPS, Bahader Shah Banda. -do-
33.	Zakir Hussain S/O Mohammed Hussain R/O Fazi Colony.	50 %	GPS, Nadar Khan Banda (SAF) -do-
34.	Khan Baz S/O Wali Dad R/O Qasmi.	59 %	GMPS, Anwar Khan Kili. -do-
35.	Ajmal Shah S/O Afzal Shah R/O Haji Koroona.	59 %	GMPS, Akbar Abad. -do-
36.	Khalid S/O Mohammad Akbar R/O Noor Man Khel Hoti Mardan.	58 %	GMPS, Umer Khan Kili. -do-
37.	Aurang Zeb S/O Zahir ud Din R/O Fohan Colony Mardan.	58 %	GMPS, Amir Abad Rustam -do-
38.	Maqbool Ahmad S/O Ali Akbar R/O Rurya Qadeem	57 %	GPS, Kass Kili -do-
39.	Abdul Hakim S/O Abdul Manan R/O Bicket Gunj	56 %	GMPS, Ferman Banda. -do-
40.	Fazal Dad Shah S/O Rahim Dad Shah R/O Umer Khan Khel.	55 %	GMPS, Afzal Abad -do-
41.	Islam Gul S/O Hamid Gul R/O Katlang.	55 %	GMPS, Chimbar. -do-
42.	Zainul Abideen S/O Noor Alahi Qureshi R/O Baricham.	53 %	GPS, Surkh Dheri. -do-
43.	Mohammad Asif S/O Abdullah R/O Kass Koroona.	52 %	GMPS, Bagh Koroona -do-
44.	Mohammad Nazeer S/O Shamroz R/O Guli Bagh.	52 %	GPS, Jungara. -do-
45.	Moad: Ijaz Hussain S/O Noor Hassan R/O Noor Man Khel.	52 %	GMPS, Jawar Kili -do-

ATTESTED

46.	Muslim Khan S/O Said Karim R/O Chail Banda.	50 %	GMPS, Hayat Abad TAKHT BHAI.	-do-
47.	Nisar Mohammad S/O Fatah Mohd: R/O Sarfaraz Gunj.	49 %	GMPS, Firano Kili TAKHT BHAI.	-do-
48.	Liaqat Ali S/O Safoor R/O Moh: Mohammad Ali Khan Hoti.	46 %	GFS, Maho Naray TAKHT BHAI.	-do-
49.	Mohammad Ghawas S/O Amir Ghawas R/O Guli Bagh S:Dher	45 %	GMPS, Umer Khan Kili.	-do-

TERMS AND CONDITION.

- 1). Their appointment are made purely on Temp: basis in liable to termination at any time assigning any reason or notice.
- 2). In case of resignation they will have to submit one Months prior notice to the Deptt: or forfeith one months pay in lieu thereof to the Govt;
- 3). They are required to produce Health and age certificate from the M/s DHQ Hospital Mardan before taking over charge.
- 4). Their original certificate should be checked before handing over charge.
- 5). They shall governed by such services discipline and conduct rules as may be prescribed there after by the Govt;
- 6). They should not be allowed to take over charge in a case their age is less than 18 years and above than 30 years.
- 7). If they fail to take over charge of the post within 15 days on the issued of this order their appointment order will be cancelled.
- 8). No.TA/DA etc is allowed to any one.

N O T E:-

Mr. Khaleefatul Muslameen S/O Amir Ayaz R/O Takker R-23, will be appointed on ~~re: liq~~ obtaining sanction of upper age limit from the authority concerned as he is over age.

(MR. KARIM ULLAH KHAN)
DISTRICT EDUCATION OFFICER,
(M.L.E) PRIMARY M A R D A N

Endst; No. 863-922 / P.No. 25/ Apptt: ITC/Vol: III/I-AE/ dt: 12-03-95.

Copy to the:-

1. The Director Primary Education M.E.P, Hayat Abad Peshawar.
2. The Sub-Div: Education Officer (Male) Mardan / Takht Bhai.
3. The Registrar Peshawar High Court for information please.
4. The District Accounts Officer Mardan.
- 5-52. Candidates concerned.
53. Manager Employment exchange Mardan for information please.

ATTESTED

DISTRICT EDUCATION OFFICER
(M.L.E) PRIMARY M A R D A N

an Ullah

15

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

ADJUSTMENT ORDER

Consequent upon the promotion/upgradation of PSTs B-12 to SPST B-14 and SPSTs B-14 to PSHT B-15 vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education notification No. SO(B&A)/1-18/E & SE/2012 dated 11-07-2012 & No. SO (PE) 4-5/SSRC/meeting/2012 teaching cader dated 13-11-2012, the following transfer/adjustment of PSTs, SPSTs & PSHTs are hereby ordered on their own pay and BPS to the schools as noted against each in the interest of public service

S.No	Post	BPS	Name	Present School	Proposed School	Remarks
1	PSHT	15	Kaza khan	GPS Kaudari	GPS Kaudari	
2	PST	12	Suleman	GPS Kaudari bala	GPS Kaudari	
3	PSHT	15	Khurshaid ahmad	GPS, Spalano Dheri	GPS, Spalano Dheri	
4	PSHT	15	Ihsan Ullah	GPS, Jamal Abad	GPS, Jamal Abad	
5	PSHT	15	Zahid Anwar	GPS, Gul Abad	GPS, Gul Abad	
6	PSHT	15	Shamshad khan	Spalano Dheri	Fazli Akbar koroona	
7	PSHT	15	Missal khan	Kaudari	Kaudari Data	
8	PSHT	15	Mumtaz Mohd	Gul Pur kalay	Gul Pur kalay	
9	PSHT	15	Nascer Ahmad	No-1 Shahdand	No-1 Shahdand	
10	PSHT	15	Rahmat Ullah	Gul Roz banda	Gul Roz banda	
11	PSHT	15	Abdullah Gul	Izzat Khan kalay	Izzat Khan kalay	
12	PSHT	15	M. Shoaib	Baba kalay	Baba kalay	
13	PSHT	15	Khalid hussain	Spalano Dheri	GPS, Jeweer	
14	PST	12	Riaz	Jalil Abad	Habib Noor Killi	
15	PSHT	15	Fazli Akbar	Gul Roz Banda	GPS, Shah Dhand	
16	PSHT	15	Ihsan-ul-Haq	GPS, Kamala	GPS, Kamala	
17	PSHT	15	Ihsan Ullah	GPS, Miskeen Abad	GPS, Miskeen Abad	
18	PSHT	15	Abdul Latif	GPS, Dad Mohd kalay	GPS, Dad Mohd kalay	
19	PSHT	15	Mohib Gul	Tariq Abad	Tariq Abad	
20	PSHT	15	Mohammad Ghani	Hathian	Hathian	
21	PSHT	15	Said kamal	Essa khan kalay	Essa khan kalay	
22	PSHT	15	Javed	Akbar Abad	Akbar Abad	
23	PSHT	15	Mohammad Ishaq	GPS, Hathian	Lebas khan kalay	
24	PST	11	Fazil Haq	GPS, Libas Khan Killi	GPS, Hathian	
25	PSHT	15	Mohammad Kamal	Hashitnagaro kalay	Hashitnagaro kalay	
26	PSHT	15	Qaisar khan	Lala Jan kalay	Lala Jan kalay	
27	PSHT	15	Murad Ali	Hathian	Sali Abad	
28	PSHT	15	Mohammad Ishaq	GPS, Akbar Abad	GPS, Kalim Abad	
29	PST	12	Aziz ur Rahman	GPS, Sharif Malak Killi	GPS, Kalim Abad	
30	PSHT	15	Ghabor-ur-Rehman	GPS, Shahid Abad	GPS, Shahid Abad	
31	PSHT	15	Amin Ullah	GPS, No-2 Shergarh	GPS, Mela Masjid	
32	PST	12	Habib Shah	GPS, Mela Masjid	GPS, No.2. Sher Garh.	
33	PSHT	15	Sikandar khan	GPS, No-1 Shergarh	GPS, No-1 Shergarh	
34	PSHT	15	Mohammad Hani	GPS, Khan Mohammad	GPS, Nadir She kalay	
35	PST	12	Rafiqar Ahmad	GPS, Nadir She Kalay	GPS, Khan Mul ammad Killi	

ATTESTED

No	Post	BPS	Name	Present School	Proposed School	Remarks
241	PST	12	Raj Wali	GPS, Qamar Abad	GPS, Habibnoor Kili	
242	PSHT	15	Mukamil Khan	GPS, Peshla	GPS Usman Banda	
243	PSHT	15	Mukaram Khan	GPS, Habibnoor Kili	GPS, Habibnoor Kili	
244	PSHT	15	Muhammad Israr	GPS, Karim Kili	GPS, Karim Kili	
245	PSHT	15	Gul Hassan	Khadi Kili	Khadi Kili	
246	PSHT	15	Noor ul Haq	M/Garo Shah	M/Garo Shah	
247	PSHT	15	Riaz Ahmad	Sadiq Abad	Sadiq Abad	
248	PSHT	15	Javed Iqbal	Nawab Deri	Nawab Deri	
249	PSHT	15	Mohd Irshad	M/Garo Shah	Akbar Khan Kili	
250	PST	12	M.FAROOQ	Sada Bahar	M/Garo Shah	
251	PSHT	15	Wajid Ali	Kalu Shah	Sada Bahar	
252	PST	12	Jamshed	Akbar Khan	Kalu Shah	
253	PSHT	15	Mushtaq Ali	Kalu Shah	Kalu Shah	
254	PSHT	15	Khushdil Khan	No1 Fazal Abad	No1 Fazal Abad	
255	PSHT	15	Ayub Khan	Garo Shah	Garoshah	
256	PSHT	15	Rasool Khan	Shekhano Banda	Shekhano Banda	
257	PSHT	15	Latif Khan	Mehtar Ghundi	Methar Ghundi	
258	PSHT	15	Sameul Haq	Shah Noor Kili	ShahNoor Kili	
259	PSHT	15	Mohd. Bostan	Patikhurd	Patikhurd	
260	PSHT	15	Mahboob Khan	Chail Banda	No2 Takkar	
261	SPST	14	Ajmir Khan	Bakhtiar Kili	GPS, Chail Banda	
262	PSHT	15	Bostan	Yeh Kohi	Bakhtiar Kili	
263	PST	12	Shaukat Ali	Ahmad Abad Garo	Yeh Kohi	
264	PSHT	15	Muhammad Akbar	No1 Chiragh Din	Ahmad Abad Garo	
265	PST	12	Zahid Shah	Mohammad Din Kili	GPS, Cheraghdin - I	
266	PSHT	15	Dervesh	Kanda Ghar	Mohammad Din Kili	
267	PST	12	Muhammad Zia ul Haq	GPS, No. 1, Cheraghdin	GPS, Kanda Ghar	
268	PSHT	15	Afsar Ali	Kanda Ghar	GES Ghazi Shah	
269	PST	12	Alam Khan	GES Ghazi Shah	M/ Roze Kili	
270	PSHT	15	Hadi Mohd	M/ Roze Kili	GPS, Akram Abad	
271	SPST	14	Amir Sultan	GPS, Akram Abad	No1 Chiragh Din	
272	PST	12	Muhammad Farooq	GPS, Cheraghdin - I	GPS, Amir Zada Kili	
273	SPST	14	Gauhar Zaman	Ameer Zada Kili	Kanda Ghar	
274	PSHT	15	Farid Khan	Amirzada Kili	No2 Mdey Baba	
275	SPST	14	Aurang Zeb ✓	Ghaffar Serai ✓	M/ Roze Kili ✓	
276	PSHT	15	Tahseen Ullah	No2 Fazal Abad	Ghaffar Serai	
277	SPST	14	Zubairul Haq	Feroz Banda	No2 Fazal Abad	
278	PSHT	15	Akbar Ali	No1 Takkar	Feroz Banda	
279	PST	12	Riaz Ahmad	Mir Bad Shah Banda	No1 Takkar	
280	PSHT	15	Sartaj Ali	No1 Fazal Abad	Mir Bad Shah Banda	
281	SPST	14	M. Tariq	Dandaw	No1 Fazal Abad	

ATTESTED
 [Signature]

S.No	Post	BPS	Name	Present School	Proposed School	Remarks
721	SPST	14	Saeed ur rehman B14	Akhtar abad	Khani kotij	
722	PST	12	Mohib Ur Rehman B12	Kagan	Mohib Banda 2	
723	PST	12	Muhammad ayaz B12	Garyala,2	Garyaka khas	
724	PST	12	Habib Ur Rehman B12	Krum gumbat	Anar baig.1	
725	SPST	14	Qamresh B14	shago wand	Wahid abad	
726	SPST	14	Aman Khan B14	Garyala khas	Baroo.1	
727	SPST	14	Irshad ul haq B14	Wahid abad	Mohib banda.1	
728	PST	12	Muhammad yasir B12	Kodinaka	GIZai.2	
729	PST	12	Aqil muhammad B12	Chogra	Bhai Khan	
730	PST	12	Mohsin N12	Javed abad	GDZai.2	
731	PST	12	Kishwar said B12	Said rasan banda	Bhai Khan	
732	PST	12	Akhtar ali B12	GIZai.3	GIZai.1	
733	PST	12	Muhammad Nadeem B12	Asara dheri	Hussai	
734	PST	12	Noorul Basar B12	Chembar	GDZai.2	
735	SPST	14	Alam zeb B14	Garkul	But seri.1	
736	SPST	14	Nawab ali B14	Shamas korooni	Mohib Banda.3	
737	SPST	14	Fasih ur rehman B14	Mohib banda.4	Mohib Banda No.3	
738	SPST	14	Hussain ahmed B14	Garyala.2	But seri.1	
739	PST	12	Saeed Akbar B12	Wahid abad	Madeena gumbat	
740	PST	12	Asad ali B12	GIZai.2	Pani allahdad khel.1	

Note

- 1- No TA/DA is allowed
- 2- Charge Report should be submitted to all concerned.
- 3- The terms and conditions will be the same as mentioned in the promotion order
- 4- They will take over charge on their new station within 15 days.
- 5- Any kind of discrepancy found at any stage against the promotees teachers, the promotion/transfer will stand cancelled automatically.

(BAHADAR KHAN MARWAT)
 DISTRICT EDUCATION OFFICER
 (MALE) MARDAN

Endst No. 3062-G Transfer/Adjustment file

dated. 26-3 /2013

Copy forwarded to the:

- 1- PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2- DAO Mardan
- 3- SDEOs (male) Piry Mardan & T.Bhai
- 4- ASDEOs Circle concerned
- 5- Official concerned
- 6- MIS branch Local office
- 7- Personal file

ATTESTED

DISTRICT EDUCATION OFFICER
 (MALE) MARDAN

26/3/13

Annex "B"

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN

18

OFFICE ORDER

WHEREAS, Mr. Aurangzeb PSHT GPS Wana Khel was reported by SDEO(M) concerned that he is habitual late comer irregular in duties and non cooperative.

AND WHEREAS, a show cause notice has been issued to him vide this office order No:6813 dated 01-09-2022.

AND WHEREAS, the concerned teacher has submitted reply of show cause notice through SDEO concerned vide letter No:1438 dated 08-09-2022.

AND WHEREAS, several other complaints have been filed by community members against head teacher concerned for taking labour work from students.

AND WHEREAS, he was called for personal hearing vide letter No:7808 dated 01-10-2022.

AND WHEREAS the Competent Authority is not satisfied from his written statement at the time of personal hearing.

And Where As he found guilty of gross misconduct, under the KPK Govt servant E&D rules 2011.

Therefore, in exercise of the power conferred under Khyber Pakhtunkhwa Govt servants E&D rules 2011 (4b-ii), and on the basis of evidence on the record, the undersigned being Competent Authority is pleased to impose the penalty of Compulsory Retirement upon, Mr. Mr. Aurangzeb PSHT GPS Wana Khel with immediate effect.

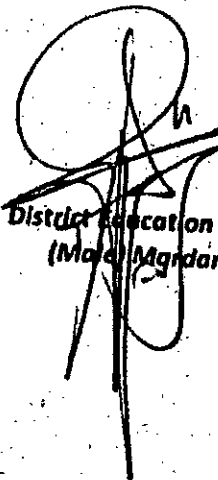
(Zulfiqar ul Mulk)
District Education Officer
(Male) Mardan

Endst No. 8474-75 /com T.Bhi/ Dated: 12-10 /2022

copy forwarded for information and necessary action to the:-

1. Director E&SE Education KPK, Peshawar.
2. DAO Mardan
3. SDEO(M) Takht Bhal.
4. Official concerned.

DA B & A/c amount
As endorse &
at of pay
19/10/2022


District Education Officer
(Male) Mardan

ATTESTED

بھنور جناب ڈائریکٹر صاحب محکمہ تعلیم KPK پشاور

عنوان: وضاحت Compulsory Retirement شوکار نوٹس

جناب عالی:

Endst نمبر 8424/75 مور نمبر 12/10/2022 (میل) تحت بھائی

مورد بانہ گزارش عرض ہے۔

- ۱۔ یہ کہ آپ صاحبان ایمان اور صحت کے بہترین حالت میں ہو گئے انشاء اللہ۔
- ۲۔ یہ کہ اورنگزیب PSHT، جو کہ GPS داخل سرکل تحت بھائی، تحصیل تحت بھائی ضلع مردان میں ڈیوٹی سرانجام دے رہا ہے۔
- ۳۔ یہ کہ مسائل کے خلاف SDO تحت بھائی (میل) نے الزام عائد کی ہے جو کہ مندرجہ ذیل ہیں۔

۱۔ یہ کہ مسی اورنگزیب PSHT، GPS داخل Habitual Late Comer اینڈ

Irregular Come to School اینڈ Non Cooperative ہے۔

وضاحت پیش کی جاتی ہے کہ آپ صاحبان کو اطلاعاً عرض ہے کہ مذکورہ ہیڈ ٹیچر سکول کو AM7:30 حاضر ہو جاتے ہیں۔ جبکہ سکول حاضری AM8:30 ہے۔

- ii۔ یہ کہ SDO (میل) تحت بھائی نے الزام عائد کی ہے کہ کیوٹی کے لوگوں نے اسے رپورٹ کیا ہے۔ وضاحت پیش کی جاتی ہے۔ کہ مسائل کے خلاف کوئی ایسے الزام نہیں۔ جو کہ کیوٹی کے لوگ مجھ پر عائد کرے۔

iii۔ یہ کہ SDO (میل) تحت بھائی نے مذکورہ ہیڈ ٹیچر کو KPK گورنمنٹ Servant & Rules

2011ء کے مطابق Compulsory ریٹائرمنٹ کے احکامات جاری کرنے کے لئے سفارش کی گئی ہے۔ جو کہ DEO (میل) مردان کی طرف سے جاری کردہ ہے۔

وضاحت پیش کی جاتی ہے۔ کہ سپریم کورٹ آف پاکستان نے اپنے حالیہ فیصلے میں قرار دیا ہے۔

”کہ چاہے ملازم انکوآری Join نہ بھی کرے پھر بھی محکمہ کے ذمے ہے کہ ملازم پر لگائے گئے

الزامات کو شہزاد اکھٹے کر کے ثابت کرے کہ اگر ٹیوشن شہزاد موجود نہ ہوں۔ تو محض انکوآری رپورٹ

ملازم کے خلاف آنے پر اسے نوکری سے نہیں نکالا جاسکتا، بحوالہ نمبر

1291(C-S)2020 PLS غیر حاضری کی صورت میں ملازم کو صرف اس صورت میں

نوکری سے برحالت کیا جائے گا۔ اگر غیر حاضری کا دورانیہ ایک سال سے زائد ہوگا۔

(رولز 16)(07)00 سپریم کورٹ آف پاکستان۔

ATTESTED

مندرجہ بالا بیان آپ صاحبان کو عرض ہے کہ مندرجہ بالا بیان کی وضاحت کو مقبول جان کر جو کچھ ہم نے درج کیا ہے سچ لکھا ہے سچ کے سوا کچھ نہیں۔

- ۱۔ سکول حاضری مدرسین کی دستخط والی کاپی درخواست کے ساتھ منسلک ہے۔
- ۲۔ لاک بک کی ریمارکس درخواست کے ساتھ منسلک ہے۔ جو کہ آفسران بالا کی طرف سے کوئی غیر حاضری درج کی گئی ہے اور نہ EMA والوں کی طرف سے کوئی غیر حاضری درج ہے۔

لہذا آپ صاحبان اور نگزیب PSHT و ناخیل کی طرف سے مندرجہ بالا وضاحت کی روشنی میں مذکورہ آرڈر DEO میل مردان کو واپس کرنے کی احکامات صادر فرما کر عنایت و مشکور فرمائیں۔

العارضہ

عین نوازش ہوگی نقد زیادہ آداب مورخہ: 12/10/2022

نوٹ: PTC کونسل اور نائب مدرسین کی ریمارکس بھی درخواست کے ساتھ منسلک ہے۔

اور نگزیب PSHT GPS و ناخیل سرکل تحت بھائی تحصیل تحت بھائی ضلع مردان سائل

دستخط ہیڈ ٹیچر

ATTESTED

اکبر متضارب: سیکرٹری ایجوکیشن، ایف پی سی، ایف پی سی، ایف پی سی، ایف پی سی

SO (PE) M
Please look into
the matter and
forward to proper
authority for
approval

درخواست میں Re-statement order

زارش و عرض یہ کہ امید ہے کہ آپ مہاسبان اعلان اور صحت کے بہترین حالت میں ہونگے! (1) یہ کہ میں من مہسی اور گنریٹ (PSHT) جی ای این فاضل کیمیا تحت بجائی سرکل تحت بجائی، ضلع سردان، ڈیوٹی انجام دے رہا ہوں۔

(2) یہ کہ آپ مہاسبان کے عیلم میں مندرجہ ذیل کئی اثرات پیش کرنا چاہتا ہوں۔

(3) یہ کہ میں من مہسی اور گنریٹ جو کہ پیدہ میں جی ای این فاضل ڈیوٹی انجام دے رہا تھا۔ دوران ڈیوٹی جو کیدار کو حاضر ہونے نہیں کیا گیا تھا۔

(4) یہ کہ جو کیدار حاضر ہونے کی بجائے میرے ساتھ لڑ پڑے، اور اس کے دو ایپ کول سے؟ حقیقت ڈیوٹی کرنے والے، لہذا آپ اس سکول سے جیلے جا رہے ہیں۔

بعد آزان ایلون نے میرے خلاف گاڈن والوں کو جمع کیا۔ اور میرے خلاف (DE-O) میل سردان - کو شکایات کا ڈھیر لگایا۔ اور مجھ پر جے جے الزامات مائد کر کے (D-E-O) میل سردان میں جمع کرائی۔ اور میرے خلاف لوگوں کو اکسایا۔ کیونکہ مذکورہ فولدہ اور عدالتے کا بار اسوخ شخص ہے۔ اسلئے میرے خلاف کارروائی کرے، عیب (Compulsory retirement) کا آرڈر جاری کیا گیا۔ عیب 2022-10-12 کو فارغ نامہ یعنی جبری ریٹائرمنٹ کی کارروائی جاری کی گئی ہے (5)۔ بعد آزان میں نہ ڈائریکٹ ایجوکیشن ڈسٹور میں میں دائر کر کے اپیل کر دی گئی۔ لیکن 2022-12 سے لے کر تھاکا کوئی کارروائی عمل میں نہیں لائی گئی۔ لہذا آپ مہاسبان ہر ماہ فرما کر ڈائریکٹ ایجوکیشن کو بدانت نامہ جاری کرنے کے ارغانات ہمارے فرما کر مشکور فرماویں۔

القاص

ATTESTED

سیکریٹری (PSHT) اور گنریٹ جی ای این فاضل

12/10/2022



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(Phone No.091-9223587)

22

No. SO(Primary-M)E&SED/5-19/Reinstatement/Aurangzeb/PSHT/Takht Bai/2023
Dated Peshawar the May 17th, 2023

To

The Director
Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: - APPEAL FOR RE-INSTatement ORDER INTO SERVICE.

I am directed to refer to the subject noted above and to enclose herewith a copy of an application which is self-explanatory received from Mr Aurangzeb PSHT Tehsil Takht Bai District Mardan to look into the matter for further necessary action as per rules, please.

Encl: AA

(MUHAMMAD ISHAQ)

SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. District Education Officer (M), Mardan.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)

17/5/23

DDE-I

[Handwritten signature]

[Handwritten signature]

702
24/5/23

ATTESTED



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 3905 /F.No./19/Appeal for Re-instatement/Estab(M-1)
Dated Peshawar the 17-04/2023.

42

To

23

The District Education Officer
(Male) Mardan.

Subject: **APPEAL FOR RE-INSTATEMENT INTO SERVICE**

Memo:

I am directed to refer to the subject cited above and to ask you that appeal in r/o Mr. Aurangzeb PSHT GPS Wana Khel Takht Bhai District Mardan has been rejected.

I am further directed to ask to inform the teacher concerned accordingly, please.


Assistant Director (Estab-1)

Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa, Peshawar.

ok

Self

Endst; No. _____/

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.


Assistant Director (Estab-1)

Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa, Peshawar.

ok

Self

ATTESTED

Annex "E"

24

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT GOVT. OF KHYBER PAKHTUNKHWA



OFFICE OF THE HEAD MASTER GHS
JEHANGIR ABAD TAKHTBHAI MARDAN

VISITING COMMITTEE OF GHS JEHANGIR ABAD

As per the directives of the honourable DEO (M) Mardan, I paid a visit to GPS Wanna Khel (Jehangir Abad) along with my team and checked the following points comprehensively.

1. The free books are distributed properly among the students.
2. All staff are present i.e 06/06, The students attendance is 178/202.
3. Basic facilities like water system electricity and wash rooms for students and teachers are available.
4. The furniture is less than no. of students.
5. The school is clean and green.
6. The fresh enrollment is 44.

ATTESTED

30/12/2022
HEAD MASTER



GHS JEHANGIR ABAD

MARDAN

رجسٹرڈ محضری مدرسین GPS دراصل بابت ماہ سال 2023
00745629

عبد النعیم - 14			محمد علی - 13			ایم. بی. - 15			روز
PST	RPS		PST	RPS		PST	RPS		تاریخ
16102-0624048-7			16102-0491957-9			16101-7537367-7			نمبر
10802-8190033			0344-9616125			0344-9616118			
آؤ	پہنچ	ڈیپ	آؤ	پہنچ	ڈیپ	آؤ	پہنچ	ڈیپ	ڈیپ
SUNDAY									
(2)									
8:15	8:15	8:20	M	11:35	M	8:50	8:50	8:30	3
8:15	8:15	8:25	M	11:35	M	8:30	C/Leave	(18)	4
8:15	8:15	8:20	M	11:35	M	8:30	8:15	8:00	5
8:15	8:15	8:25	M	11:35	M	8:30	8:15	8:00	6
8:15	8:15	8:25	M	11:35	M	8:30	C/Leave	(19)	7
8:15	8:15	8:30	M	11:35	M	8:15	8:15	8:30	8
SUNDAY									
(9)									
8:15	8:15	8:30	M	11:35	M	8:30	8:15	8:30	10
8:15	8:15	8:20	M	11:35	M	8:30	8:15	8:30	11
8:15	8:15	8:25	M	11:35	M	8:25	8:15	8:30	12
8:15	8:15	8:25	C/Leave	(7)		8:15	8:15	8:30	13
8:15	8:15	8:20	M	11:35	M	8:30	8:15	8:30	14
SUNDAY									
(16)									
8:15	8:15	8:25	M	11:35	M	8:30	8:15	8:30	17
8:15	8:15	8:30	M	11:35	M	8:30	8:15	8:30	18
8:15	8:15	8:20	M	11:35	M	8:30	8:15	8:10	19
	8:15	8:20				8:30	8:15	7:30	20
							8:15	7:30	21
SUNDAY									
(23)									
24									
25									
26									
27									
28									
29									
SUNDAY									
(30)									
31									
میرزا	مال	مال	میرزا	مال	مال	میرزا	مال	مال	تعداد
	05			06			17		

ATTESTED

77452			
<i>Mirza Haseeb</i>	ایڈووکیٹ:	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
bc-12-3483	بیکار کونسل / ایسوسی ایشن نمبر:		
5300-5917744	رابطہ نمبر:		

بعدالت جناب: *سر محمد حسین*

مخانب: <i>اسرار علی</i>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
باعث تحریر آنکہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام *محمد ارشد و محمد سلمان* کے لیے *محمد ارشد و محمد سلمان* کے ساتھ
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز کوپیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرانے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو کوئی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا انجامختہ پر داخلہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

الموقع: *محمد ارشد*
 PESHAWAR BAR ASSOCIATION
 KHYBER PAKHTUNKHWA

نوٹ: اس وکالت نامہ کو کوئی ناقابل قبول ہوگا۔
محمد ارشد
 0300-5917744

اور علی

محمد ارشد

8119946-9460