

29th Mar, 2023

Clerk of learned counsel for the appellant present, Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel is not available today. Last chance is given to the appellant to argue the case on the next date. To come up for arguments on 14.04.2023 before D.B. P.P given to the parties.

SCANNED
KFST
Peshawar

(Salah Ud Din)
Member (Judicial)

(Kalim Arshad Khan)
Chairman

14th April, 2023

1. Nobody is present on behalf of the appellant. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

2. Called several times till last hours of the court but nobody turned up on behalf of the appellant. In view of the above, the instant appeal is dismissed in default. Consign.

3. *Pronounced in open court at Peshawar and given under our hand and seal of the Tribunal on this 14th day of April, 2023.*

(Muhammad Akbar Khan)
Member (E)

(Kalim Arshad Khan)
Chairman

31.05.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Former made a request for adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 10.08.2022 before D.B.



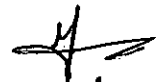
(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

10-8-2022

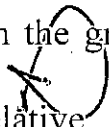
Proper DB not available the case is adjourned to come up for the same as before on 2-11-2022


Reader

02.11.2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he is proceeding to attend the funeral of his relative. Adjourned. To come up for arguments before the D. B on 26.12.2022.



(Mian Muhammad)
Member (E)



(Salah-ud-Din)
Member (J)

26.12.2022

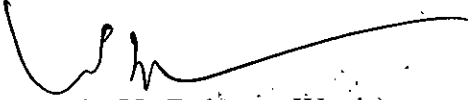
Due to winter vacation the case is adjourned to 29.03.2023 before the same


Reader

06.01.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still awaited. Learned Additional Advocate General sought time for submission of reply/comments. Another last opportunity is granted to respondents to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 20.04.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

20th April, 2022

Counsel for the appellant present. Mr. Muhammad Riaz Paindakhel, Asstt. AG present. Let fresh notices be issued to respondents No. 3 & 5 for submission of written reply/comments before the date fixed.

On previous date last opportunity was given to the official respondents for submission of written reply/comments, failing which their right to submit reply has been deemed to be struck off by virtue of that order. Neither written reply of the official respondents received nor any responsible representative is in attendance. As their right to submit reply has already been deemed to have been struck off, therefore, the appeal is fixed for final arguments on 31.05.2022 before D.B.



Chairman

14.09.2021

Counsel for the appellant present. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the 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 5/10/2021 before D.B.

Appellant Deposited
Security & Process Fee

27/8/21

(Rozina Rehman)
Member (J)

05.10.2021

Appellant in person and Mr. Usman Ghani, District Attorney for the respondents present.

Reply/comments have not been submitted despite extension of time. Last chance is given to the respondents for submission of reply within 10 days in office, failing which the right of the respondents for reply shall be deemed as struck off. To come up for arguments on 06.01.2022 before the D.B.

(Mian Muhammad)
Member(Executive)




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 4823 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/04/2021	<p>The appeal of Syed Jalil Hussain resubmitted today by Mr. Safdar Iqbal Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	<p>27/05/21</p> <p>07.06.2021</p>	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>07/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>The Worthy Chairman is on leave, therefore, case to come up for preliminary hearing on 14.09.2021 before S.B.</p> <p style="text-align: right;"> Reader</p>

The appeal of Syed Jalil Hussain SST General in GMS Mahora Tehsil Lower District Orakzai received today i.e. on 15/03/2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellatant.
- 2- Address of respondent no.4 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Appeal has not been flagged/marked annexures' marks.
- 4- Annexures of the appeal may be attested.


No. 545 /S.T,

Dt. 16/03 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Safdar Iqbal Khattak Adv. Pesh.

Re-Submitted to remove the objections raised by the office.


12/4/2021

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

Service Appeal No. _____/2021

Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others...Respondents

INDEX

S.No.	Description of documents.	Annex:	Page No
1.	Memo of appeal		1-3
2.	Affidavit		4
3.	Addresses of parties		5
4.	Copy of notification dated 07.12.2020	A	6-8
5.	Copy of application to DEO Orakzai	B	9
6.	Copies of medical documents.	C	10-14
7.	Copy of application to DEO Orakzai	D	15
8.	Copy of CNIC		16
9.	Wakalatnama		

Through

Hussain
Appellant

[Signature]
Safdar Iqbal Khattak
Advocate High Court
Cell: 0300-5980549

Dated:

①

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

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3603

Dated 15/3/2021

Service Appeal No. 4823 /2021

Syed Jalal Hussain son of Syed Zarin Hussain
Presently serving as S.S.T. General in Govt. Middle School
Mahora Tehsil Lower District Orakzai **Appellant**

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa through Director Elementary and Secondary Education, G.T. Road, Peshawar.
- 2) District Education Officer, District Orakzai at Hangu.
- 3) Kausar Ali Shah, presently serving as SST science at Govt. Middle School Starsam Lower Orakzai.
- 4) Khatib Ali, SST General Govt. High School Suleman Khel. Village Marai Balla P/O Marai Bala Dist Kohat
- 5) Iqbal Hussain ADEO Lower Orakzai..... **Respondents**

**APPEAL U/S 4 OF SERVICE TRIBUNAL
ACT, 1974 AGAINST THE NOTIFICATION
DATED 07.12.2020.**

Respectfully Sheweth:

1) That the appellant was appointed as PST in Govt. Primary School Kuraz, and performed his duty regularly, punctually since long.

2) That vide notification dated 07.12.2020, the post of the appellant was upgraded from BPS-15 to BPS-16 and was transferred from GPS Kuraz to GMS Mahura. (Copy attached)

Re-submitted to -day
and filed.

Registrar
14/4/2021

- 3) That when the above fact came into the knowledge of the appellant, he submitted an application to the respondent No.2 that he being ill and be appointed at nearest school i.e. Suleman Khel. (Copy of the application and medical document are attached).
- 4) That after issuing the above notification dated 07.12.2020, the appellant was transferred and posted at GMS Mahora.
- 5) That after issuing the impugned notification dated 07.12.2020, the appellant on 12.12.2020 again submitted another application to the respondent No.2, against his posting at GMS Mahura, but of no fruitful result, hence the instant appeal.
- 6) That the appellant being aggrieved from the impugned notification dated 07.12.2020 wherein the appellant is posted/ transferred at GMS, Mahura instead of GMS Suleman Khel or Govt. High School Starsang, and came to this hon'ble Tribunal with the following amongst other grounds:

GROUND

- A. That posting/ transfer order of the appellant at GMS Mahura instead of GHS Starsang or Suleman Khel is against the law, facts and circumstances of the case hence liable to be struck down.
- B. That newly appointed respondent No.3, is a science teacher and as posted on general post at GHS Starsang, which itself against the law.
- C. That as stated in body of the appeal that the appellant is cardiac patient but this fact was also ignored by the respondent No.2, which shows malafide on the part of respondent No.2

- D. That as the appellant was posted/ transferred to far flung area instead of vacant nearest school i.e. Starsam, Suleman Khel.
- E. That any additional ground will be raised at the time of arguments.

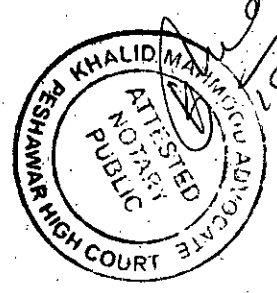
It is therefore, humbly prayed that, on acceptance of this appeal that in the impugned notification dated 07.12.2020 the transfer/ posting of the appellant Govt. Middle School Mahora instead of the nearest school i.e. Suleman Khel, Starsam is against the law and facts, hence liable to be reversed.

[Signature]
Appellant

Through *[Signature]*
Safdar Iqbal Khattak
Advocate High Court

VERIFICATION

It is verified that, the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.



[Signature]
Deponent

4

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

Service Appeal No. _____/2021

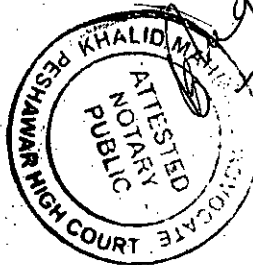
Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others...Respondents

AFFIDAVIT

I, Syed Jalal Hussain son of Syed Zarin Hussain Presently serving as S.S.T. General in Govt. Middle School Mahora Tehsil Lower District Orakzai (appellant), do hereby affirm and declare that the contents of accompanying **Service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble Tribunal.



[Signature]
Deponent

CNIC 21603-4893202-9
Cell: 0300-5980549

5

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

Service Appeal No. _____/2021

Syed Jalal Hussain.....Appellant

VERSUS

Govt. of K.P. through Director E&S and others... Respondents

ADDRESSES OF PARTIES

APPELLANT

Syed Jalal Hussain son of Syed Zarin Hussain
Presently serving as S.S.T. General in Govt. Middle School
Mahora Tehsil Lower District Orakzai

RESPONDENTS

- 1) Govt. of Khyber Pakhtunkhwa through Director Elementary and Secondary Education, G.T. Road, Peshawar.
- 2) District Education Officer, District Orakzai at Hangu.
- 3) Kausar Ali Shah, presently serving as SST science at Govt. Middle School Starsam Lower Orakzai.
- 4) Khatib Ali, SST General Govt. High School Suleman Khel. village Matai Bala P/o Matai Bala BIST/Lecher
- 5) Iqbal Hussain ADEO Lower Orakzai

Appellant

Through

Safdar Iqbal Khattak
Advocate High Court



(6) Annex 'A'

**DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA**
PHONE:
FAX:

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of District Orakzai, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and conditions given below, with immediate effect in the interest of public service.

1 SCT/CT TO SST (General) BPS-16:

S.No	Sen No	Name	School	DOB	D of App. as Regular CT	Quali	Name of School where posted
1	16	Muhammad Sadiq	GHS Mishti Bazar	3/4/1971	20/2/2013	BA/B.Ed	GMS Qasim Khel
2	17	Kumail Shah	GHS Sra Mela	7/11/1965	20/2/2013	BA/B.Ed	GMS Parh Tangi
3	19	Syed Saghir Syed	GHS Sarobi Ghari	5/4/1968	16/11/2018	BA/B.Ed	GMS Panzari
4	20	Syed Ashaq Hussain	GHS Kurez	6/4/1973	16/11/2018	BA/BE d	GMS Cheeri
5	21	Alam Khan	GHS Gulstan	10/6/1971	16/11/2018	BA/BE d	GHS Gulistan
6	22	Feroz Khan	GHS Mishti Bazar	4/4/1967	16/11/2018	BA/Bed	GMS Mirbak
7	23	Khitab Ali	GHS Kurez	1/1/1974	16/11/2018	BA/Bed	GHS Suliman Khel
8	24	Taj Wali Khan	GMS Goen	2/1/1966	16/11/2018	BA/Bed	GHS Mandati
9	25	Iftikhar Hussain	GMS Suleman Khel	12/12/1975	16/11/2018	BA/Bed	GHS Sullman Khel
10	26	Almas Khan	GHS Tooti Bagh	11/3/1972	16/11/2018	BA/Bed	GHS Anjani
11	28	M.Younas	GHS Gulistan	5/4/1972	16/11/2018	BA/Bed	GHS Manz Garhi
12	30	Fazal Kareem	GHS Saiful Darra	16/4/1968	16/11/2018	BA/Bed	GHS Saiful Dara

2 PSHT/SPST/PST TO SST (General) BPS-16:

S.No	Sen No	Name of official & place of posting	School	DOB	D of App. as Regular PST	Quali	Name of School where posted
1	70	Syed Shoab Hussain	GMPS Ghari Sra Mela	13/2/1976	1/7/2012	BA/B.Ed	GMS Mirzai

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True
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2	72	Syed Jalil Husain	GPS Kurez	1/4/1972	1/7/2012	BA/B.Ed	GM
3	81	Muhamma Idress	GPS Biland Khel No.1	5/8/1970	1/7/2012	BA/B.Ed	
4	82	Kifayat Ullah	GPS Hanif Jan Killi	11/2/1971	1/7/2012	BA/B.Ed	GHS Daradar
5	83	Noor ul Ahad	GPS Koz Koruna	1/6/1977	1/7/2012	BA/B.Ed	GMS Injawar
6	84	Fazal Akbar	GPS Baza Khel	1/12/1973	1/7/2012	BA/B.Ed	GHS Ghiljo

3 SDM/DM TO SST (General BPS-16.

S. No	Se n No	Name of official & place of posting	School	DOB	D of App: as Regular DM	Quali	Name of School where posted
1	04	Ahmad Raza	GHS Paloosi	4/2/1969	20/2/2013	BA/B.Ed	GMS Khusra

4 SIT/TT TO SST (General) BPS-16

S. No	Se n No	Name of official & place of posting	School	DOB	D of App: as Regular STI	Quali	Name of School where posted
1	21	Janib Ali	GMS Dippa	1/3/1984	20/2/2013	BA/B.Ed	GMS Saraga

5 AT/SAT TO SST (General) BPS-16.

S. No	Se n No	Name of official & place of posting	School	DOB	D of App: as Regular SAT	Quali	Name of School where posted
1	30	Nizamuddin	GHS Spidar	7/9/1970	4/12/2009	BA/B.Ed	GHS Spidar

6. S Qari/Qari TO SST (General) BPS-16.

S. No	Se n No	Name of official & place of posting	School	DOB	D of App: as Regular Qari	Quali	Name of School where posted
1	5	Khalilullah	GHS Inzer Patti	10/4/1983	7/5/2018	BA/B.Ed	GHS Daradar

Terms and conditions: -

- 1 They teachers at S.No.1-3 above would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by

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8

3. Their services can be terminated at any time; in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. No TA/DA is allowed for joining his duty.
6. They the teachers at S.No.1-3 above will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted, he will be reverted.
7. Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
8. The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the DEO concerned.

(Hafiz Dr. Muhammad Ibrahim)
Director Elementary & Secondary Education
Khyber Pakhtunkhwa

Dated Peshawar the 21/12/2020.

Endst: No. 6588-97

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer Orakzai.
3. District Accounts Officer Orakzai.
4. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. PS to Secretary Finance Khyber Pakhtunkhwa Peshawar.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. Principal/Head Mistress concerned.
8. Promotees Concerned.
9. M/File.

Deputy Director (Estab)
Merged Districts

[Handwritten Signature]
07/12/2020

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(9)

مختصر حیات - DEO صاحب

عنوان درخواست لبراد SST تعیناتی

حیات عالی

گزارش ہے کہ فدوی بحیثیت PHST میں اٹھری ہوئی کٹریں ہیں اس
ڈیوٹی انجام دینا ہے۔ اب اس SST میں آپ کی کٹریں ہیں ہوا ہے

حیات والا میں سے سٹیٹس ہوں اور انھوں نے دل کی تعلقہ سے اس سے
علاوہ GHS سلیمان کی مالک مکان کے لیے چھوڑا ہے یہ سکول
میں رہنے گا اور کٹریں ہیں

لہذا آپ صاحب کی خدمت میں عرض ہے کہ کٹریں ہیں GHS
سلیمان میں رہنے کے شکر گزار ہوں گا موقع

التعاضد

9/10/20

آپ کا نام سید علی حسن PHST - GPS

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Abamir Bilal

M.B.B.S., F.R.C.S.(Ed)
Overseas Fellow Cardio-Thoracic Surgery (London)

Professor of Cardio-Thoracic Surgery,
Post Graduate Medical Institute,
Lady Reading Hospital, Peshawar.

ڈاکٹر عامر بیلال

ایم بی بی ایس، ایف آر سی ایس (ای ڈی)
ماہر امراض دل و سینے (لندن)
پروفیسر آف کارڈیو تھوریٹک سرجری
پی جی ایم آئی، ایل آر ایچ ہسپتال

چھٹی بروز ہفتہ اتوار

Jalil, ♂, 49 yrs, Kohat.

Tab MORIK

ایک گولی سناٹہ۔ کادر

Sup VENTOLIN E
2+2+2

Tab SUSTAR ✓

ایک گولی سناٹہ

Tab SURVIVAPLUS ✓

ایک گولی سناٹہ

8819126 4150

Tab ESOLAM
(1+)

Tab OPEXAMV
ایک گولی سناٹہ

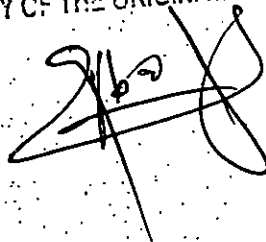
FUSROAM

2 صبر ایک گلاس سناٹہ
بن ڈی ال گورنمنٹ
ہسپتال

Clinic: 34-C, Khyber Medical Centre, Dabgari Garden Peshawar.
Tel: 2211241-9, Ext: 3178. For Appt: 2218907 / 0334-9075586

34-C خیبر میڈیکل سنٹر، ڈبگاری گارڈن پشاور

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IN QUALITY, WE BELIEVE

Fahad Medical Lab

فہد میڈیکل لیب

Consultant Biochemist

HRA Registered

Clinical Pathologist

M. Khalid Khan
M.S.C. (Biochemistry)

Dr. Kashif Ali Samin
M.B.B.S. D.C.P (CA)

Name: Jalil
Ref. by: Prof Dr. Aamir Bilal
Test Req: Lipid Profile, RBS, Urea.

Sex: Male
Date: 27-03-2018

TEST RESULT

<u>TEST</u>	<u>NORMAL</u>	<u>UNITS</u>	<u>RESULT</u>
Total Cholesterol	120-220	mg/dl	178
Triglycerides	36-150	mg/dl	199
HDL	M 35-55 F 45-65	mg/dl	45
LDL	less than 150	mg/dl	93
RBS	70-150	mg/dl	102
Urea	10-50	mg/dl	37

Incharge Laboratory

All Queries / Discrepancies if any may be referred to our lab with in 24 hours of reporting for re-evaluation / re-confirmation.

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[Signature]

12

IN QUALITY, WE BELIEVE

Fahad Medical Lab

فہد میڈیکل لیبارٹری

Consultant Biochemist

HRA Registered

Clinical Pathologist

Akhtar Jamil
DMLT (Pathology)

Dr. Kashif Ali Samin
M.B.B.S, D.C.P (CA)

Khyber Teaching Hospital

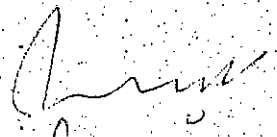
Sex: Male
Date: 04-01-2014

Name: Jalil
Ref. by: Self
Test Req: Lipid Profile, H. Pylori

TEST RESULT

TEST	NORMAL	UNITS	RESULT
Total Cholesterol	120-220	mg/dl	176
Triglycerides	36-150	mg/dl	166
HDL	M 35-55 F 45-65	mg/dl	45
LDL	less than 150	mg/dl	105
H. Pylori	Reactive (+ve)		

Method Used ICT


Incharge Laboratory

All Queries / Discrepancies if any may be referred to our lab with in 24 hours of reporting for re-evaluation / re-confirmation.

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13

Doctor

Muhammad Saeed

M.B.B.S, D.CARD

EX-HEART SPECIALIST

DIVISIONAL HEADQUARTER HOSPITAL
K.D.A KOHAT



PMDC Reg No.771N

ڈاکٹر محمد سعید

ایم بی بی ایس، ڈی کارڈ

ایکس ہارٹ سپیشلسٹ

ڈویژنل ہیڈ کوارٹر ہسپتال کے ڈی اے کوہاٹ

Pt's Name حلیہ حسن Age _____ Sex _____ Date 3 AUG 2022

Clinical Record

30/8/22

SERUM CHOLESTEROL

154 mg/dl

818

AWANT

MAJAW 2

Rx

100

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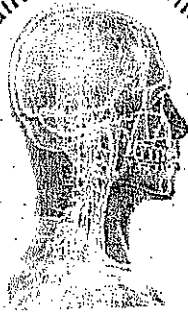
NOT VALID FOR COURT

Clinic: Near Sufaid Masjid Outside Tehsil Gate Kohat

14

Neuro Surgeon
Dr. Muhammad Nasir
M.B.B.S
M.C.P.S (General Surgery)
F.C.P.S (NeuroSurgery)

Brain & Spine Clinic



نیوروسرجن
ڈاکٹر محمد ناصر

ایم بی بی ایس، ایم سی پی ایس (جنرل سرجری)
ایف سی پی ایس (نیوروسرجری)
ماہر امراض سر درد، فالج، مہرگی، ریڑھ ہڈی
17 مشعر، جوڑوہ ٹھہ، سرچوٹ، مکرورد

Pt's Name Talib Hussain Age 43 Sex M Date 28/11/15 Area _____

Clinical Record

Rx

C1 B-8, 160/100
Depressed
Headache
Imp. at site
mandible

Ⓠ

Tab. Co-Valte 80mg

Ⓠ

Tab. Arrox 67

Ⓠ

Tab. Zarget 10mg

Ⓠ

Tab. Infexin 50mg

Ⓠ

1.71

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0346-5576877
0317-9717157

Not Valid For Court of Law

دوبارہ معائنہ کیلئے تشریف لائیں

پتہ: کلینک پاک میڈیکل سنٹر بالمقابل گرنڈ گری کالج نزد پشاور چوک کوہاٹ

محترم جناب ڈسٹرک ایجوکیشن آفیسر ضلع اورکزئی

عنوان ضلع اورکزئی کے اساتذہ آپگر یڈیشن کے ٹرانسفر، پوسٹنگ میں بڑے پیمانے پر کرپشن کا نوٹس لیا جانے سائل کے ساتھ ٹرانسفر پوسٹنگ میں زیادتی کرنے کے دوران از علاقے میں ٹرانسفر پر نظر ثانی کر کے غیر قانونی ٹرانسفر کو کینسل کیا جائے نہایت اداب سے گزارش کی جاتی ہے کہ میں سسی سید جلیل حسین عرصہ دراز سے دوران افتادہ علاقے میں اپنی خدمات سرانجام دے چکا ہوں ابھی گزشتہ دو سال سے گورنمنٹ پرائمری سکول کریز میں پی ایس ٹی پوسٹ پر اپنے ڈیوٹی سرانجام دے رہا ہوں اب چونکہ اساتذہ کی آپگر یڈیشن میں ایس ایس ٹی میرٹ لسٹ کے پورے ضلع میں دوسرے پوزیشن پر تھا سائل نے دو ماہ پہلے ایجوکیشن آفیسر کو باقاعدہ درخواست دیکر سائل دل کا مریض اور سخت بیمار ہے اس لیے سائل کو نزدیک سکول میں ایڈجسٹ کیا جائے پہلے تو مجھ سے کوثر علی ~~ایجوکیشن آفیسر پچاس ہزار روپے ڈیمانڈ کر رہا تھا سائل نے انکار کر کے ضلع کے کریٹ آفسران کے جعلی سروں بک اور جعلی ڈگری کی ویریفیکیشن کا راز فاش کرنے کے بعد ہمیں دور دراز علاقے بدل سکول ماہورہ میں پھینکا گیا جو کہ ظلم اور زیادتی ہے ضلع اورکزئی کے آپگر یڈیشن کے میرٹ لسٹ اورکزئی کے ایجوکیشن آفسران اور کمیٹی کے ممبران کی ملی بھگت سے فائنل ایجوکیشن ڈائریکٹریٹ لاکرفون پر ایک ایک بندے سے پچاس ہزار سے لیکر ایک لاکھ تک باقاعدہ رشوت وصول کی ہیں اور ہر روز الگ الگ ٹرانسفر آرڈرز اور مختلف تاریخ میں فروخت ہو رہے ہیں جو ریکارڈ پر موجود ہے آفسران بالا کو چیلنج کرتے ہیں کہ وہ ایجوکیشن کے ریکارڈ لا کر ہمیں بتائے کہ کتنے آرڈرز سابقہ تاریخ میں ایڈجسٹ کیے گئے ہیں جو آفسران بالا کے لیے لکھ کر یہ ہے جسکی وجہ سے ہمارے حقوق چھین کر میری حق تلفی کی گئی ہے~~

لہذا آپ صاحبان سے پر زور اپیل کی جاتی ہے کہ سائل کے ٹرانسفر ایڈجسٹ پر نظر ثانی کر کے گورنمنٹ بدل سکول سترسم یا گورنمنٹ ہائی سکول سیلما نخل میں ایڈجسٹ کیا جائے

12-12-2020
ماہورہ

عین لوازش ہوگی

العارض

آپکا تاجدار سید جلیل حسین ایس ایس ٹی گورنمنٹ بدل سکول ماہورہ لوئیر اورکزئی
کالی انفارمیشن

[Handwritten Signature]

1 سیکرٹری ایجوکیشن خیبر پختونخوا پشاور

2 ڈائریکٹر ایجوکیشن ایلمنٹری اینڈ سیکنڈری ایجوکیشن پشاور

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[Handwritten Signature]

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16



حکومت پاکستان
قومی شناختی کارڈ
21603-4893202-9



نام: سید ظہیر حسین
پیدائش: 20/08/2015
والد کا نام: سید ذہین حسین
شناختی پلاٹ: دائیں اٹلی پور ٹم
عمران یوسف ٹکا
تاریخ پیدائش: 01/04/1972

دستخط مال کارڈ

رشتہ دار میسرور ہنزل



شناختی نمبر: 21603-4893202-9
خانہ نمبر: X5045K
پتہ: 11/الاسی، فائونڈنگ، ڈاکھانہ، کراچی، پاکستان

14772086009

سنگل پتہ ایضاً

تاریخ اجراء: 20/08/2015
تاریخ سیر: 20/08/2025
گمشدہ کارڈ سے پرزہیں کیڑاؤ گیس میں ڈال دیں



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قیمت 50 روپے	67362	PBA PESHAWAR BAR ASSOCIATION		
ایڈوکیٹ: <u>سید ابدال حسین</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: <u>7969-10-10</u>				
رابطہ نمبر: <u>0800-5960849</u>				

بعدالت جناب: Service Tribunal Peshawar

منجانب: <u>Appellant</u>	دعویٰ: <u>S. A -</u>
<u>سید عیسیٰ حسین</u>	علت نمبر: /
<u>بنام</u>	مورثہ: /
<u>گورنمنٹ ایف جی پی ٹی پشاور</u>	جرم: /
	تھانہ: /

بابت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام سید عیسیٰ حسین کے لیے SARDAR ANWAR KHAN کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کر کے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زیریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے 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 وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب 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

المرقوم: 10.10.20
ANWAR KHAN
 مقام سید عیسیٰ حسین کے لیے منظور ہے۔