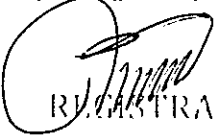


Form- A

FORM OF ORDER SHEET

Court of _____

Implementation Petition No. 557/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
	07.08.2023	<p>The implementation petition of Mr. Muhammad resubmitted today by registered case through Mr. Muhammad Abid Advocate. It is noted that implementation report before touring Single Bench at D.I.Khan on _____ . Original _____ requisitioned. AAG has noted the next date.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The Execution petition of Noor Muhammad Sweeper GHS Musazai D.I.Khan received today i.e. 13.7.2023 is incomplete on the following scores which is returned to the counsel for the applicant for completion and resubmission within 15 days.

- 1- Annexures of the petition are unattested.
- 2- Annexures of the application are not in sequence be annexed serial wise as mentioned in the memo of application.
- 3- Two more copies/sets of the application along with annexures i.e. complete in all respect may also be submitted with the application

No. 1916 /S.T,

Dt. 14/7 /2023.



REGISTRAR
KHYBER PAKHTUNKHA
SERVICE TRIBUNAL
PESHAWAR

Muhammad Abid Adv.
High Court D.I.Khan.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Implementation/~~COC~~ Petition 557 /2023

In Service Appeal No. 608/~~2023~~ 2018

Noor Muhammad Versus Govt. of KPK etc

INDEX

S.No.	Description of document	Annexure	Pages
1	Implementation/COC Petition with affidavit	--	1-4
2	Copy of the order dated 26/02/2020	A	5-9
3	Copy of implementation petition	B	10-14
4	Copies of order dated 18/04/2023 and appointment order dated 17/04/2023	C & D	15-16
5	Wakalat Nama		17

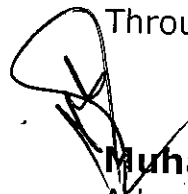
Dated: 10/07/2023

Your Humble Petitioner



Noor Muhammad

Through Counsel



Muhammad Abid
Advocate High Court

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Implementation/~~EOC~~ Petition 557 /2023

In Service Appeal No. 608/2018

Khyber Pakhtunkhwa
Services Tribunal

Diary No. 6462

Dated 13/07/23

Noor Muhammad son of Noor Ahmad caste Dahotar r/o
village Matwala Shah Tehsil Paharpur District Dera Ismail
Khan, sweeper GHS (B) Musazai Dera Ismail Khan.

.....(Petitioner/Appellant)

Versus

1. **Musarat Hussain Baloch** District Education Officer (M) Dera
Ismail Khan.
2. **Atlas Khan** Principal GHSS Kot Jai, Tehsil Paharpur District
Dera ismail Khan.

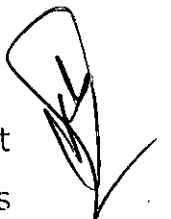
.....Respondents

IMPLEMENTATION PETITION OF THE ORDER DATED
18/04/2023/CONTEMPT PETITION UNDER ARTICLE
204-A OF THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN READ WITH ORDER 39 RULE 2(3) CPC
AND SECTION 3 OF THE CONTEMPT OF COURT
ORDINANCE 2003.

Respectfully Shewith,

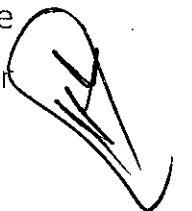
That the petitioner/appellant humbly submits as under,

1. That the petitioner/appellant instituted a Service Appeal No.
608/2018 titled "Noor Muhammad Vs. Govt. of KPK etc" in
this Honourable Tribunal against the removal from service
order dated 31/012/2017 issued by respondents on the basis
of baseless allegations. Copy of service appeal is annexed as
Annexure-A.
2. That this Honourable Tribunal was pleased to partially accept
the service appeal of appellant by directing the respondents



to set aside the impugned dismissal from service order conduct de-novo inquiry in the matter and reinstate the service of petitioner with all back benefits vide judgment dated 26/02/2020. Copy of the order dated 26/02/2020 is annexed as **Annexure-B**.

3. That the respondents conducted the inquiry in the matter but not reinstated the service of petitioner and the petitioner filed an implementation petition No. 477 of 2022 before this Honourable court. Copy of implementation petition is annexed as **Annexure-C**.
4. That during the course of implementation petition, the representative of respondent presented an appointment No. 7420-30 dated 17/04/2023 whereby petitioner has reinstated into service with immediate effect and appellant has been posted as Sweeper at GHSS Kot Jaji Dera Ismail Khan, hence, the implementation petition was disposed of accordingly vide order dated 18/04/2023. Copies of order dated 18/04/2023 and appointment order dated 17/04/2023 are annexed as **Annexure-D & E**.
5. That although the respondents issued the appointment order in favour of petitioner but are reluctant to appoint the petitioner by making lame excuses on one pretext or the other.
6. That the respondent has been violating the order dated 18/04/2023 passed by this learned tribunal, hence, the respondent is committing contempt of court.
7. That the act of respondents is not only against the law but amounts to willful defiance of the order of this Tribunal.
8. That the respondents are liable to be proceeded in accordance with and also be ordered not to create hurdles for implementation of order of this Honourable Tribunal.
9. That respondents have been guilty of disobedience of the lawful orders passed by this Honourable Tribunal and

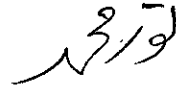


therefore, a penal action be initiated against respondents under the law.

It is therefore, respectfully prayed that the order dated 18/04/2023 may please be implemented in its true letter and spirit and respondents may be proceeded for defiance of the court order as required by law.

Dated: 10/07/2023

Your Humble Petitioner



Noor Muhammad

Through Counsel



Muhammad Abid

Advocate High Court

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Implementation/COC Petition _____/2023

In Service Appeal No. 608/2023

Noor Muhammad Versus Govt. of KPK etc


AFFIDAVIT

I, **Noor Muhammad** son of Noor Ahmad caste Dahotar r/o village Matwala Shah Tehsil Paharpur District Dera Ismail Khan, the petitioner, do hereby solemnly affirm and declare on Oath that contents of the accompanying contempt petition are true and correct and nothing has been deliberately concealed from this Hon'ble Court.

Deponent

Dated: 10/07/2023

نور محمد

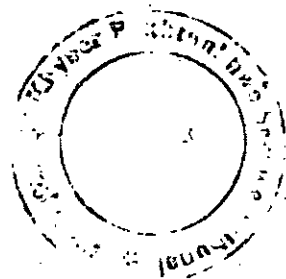
Identified by: 

Anexure "A" 5 6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
CAMP COURT D.I.KHAN

SERVICE APPEAL NO. 608/2018

Date of institution ... 23.04.2018
Date of judgment ... 26.02.2020



Noor Muhammad S/O Noor Ahmad Caste Dahotar
R/o Village Matwala Shah Tehsil Pharpur District D.I.Khan
Sweeper GHS for Boys Musazai D.I.Khan. ... (Appellant)

VERSUS

1. Director Elementary & Secondary Education Department Peshawar.
2. District Education Officer Elementary & Secondary Education Department D.I.Khan.
3. Sub-Divisional Education Officer (Male) Tehsil Darabin Kalan D.I.Khan.
4. District Account Officer Kechary Road Dera Ismail Khan.
5. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar.
6. Head Master GHS Musazai Sharif Daraban D.I.Khan. ... (Respondents)

APPEAL UNDER SECTION-4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,
AGAINST THE ILLEGAL AND MALAFIDE REMOVAL
FROM SERVICE ORDER ON THE BACK OF APPELLANT.

Mr. Muhammad Anwar Awan, Advocate.
Mr. Ziaullah, Deputy District Attorney

For appellant.
For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI
MR. MIAN MOHAMMAD

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER:- Appellant

alongwith his counsel and Mr. Ziaullah, Deputy District Attorney alongwith Mr. Muhammad Kamran ADO for the respondents present. Arguments heard and record perused.

M. Amin
26.2.2020

[Signature]

2. Brief facts of the case as per present appeal are that the appellant was appointed as Sweeper vide order dated 28.03.2013 by the competent authority. He was imposed major penalty of removal from service vide order dated 30.12.2017 on the allegation of absence from duty. The appellant filed departmental appeal on 18.01.2018 which was not responded hence, the present service appeal on 23.04.2018.

3. Respondents were summoned who contested the appeal by filing written reply/comments.

4. Learned counsel for the appellant contended that the appellant was serving as Sweeper in Education Department. It was further contended that the appellant was performing his duty regularly but during service, the father of the appellant became seriously ill and the appellant filed application for grant of leave to attend his ailing father which was allowed and after expiry of leave, the appellant wanted to resume his duty but the respondent No. 6 i.e Headmaster of the said school restrained the appellant from performing duty, therefore, the appellant filed application to respondent No. 2 i.e District Education Officer regarding the illegal behavior of respondent No. 6 but no action was taken. It was further contended that despite such application, the competent authority imposed major penalty of removal from service. It was further contended that neither any absence notice was issued to the appellant nor any notice regarding absence of the appellant was advertised in the newspaper nor any charge sheet, statement of allegation was served upon the appellant nor

26.1.2020
M. M. M. M.

4/2

proper inquiry was conducted nor any final show-cause notice was issued to the appellant, therefore, the appellant was condemned unheard, therefore, it was contended that the impugned order is illegal and liable to be set-aside and prayed for acceptance of appeal.

5. On the other hand, learned Deputy District Attorney for the respondents opposed the contention of learned counsel for the appellant and contended that the appellant was serving in Education Department as Sweeper. It was further contended that the appellant remained absent from duty without the permission of competent authority. It was further contended that absence notice was also issued to the appellant at his home address but the appellant did not attend the duty. It was further contended that the show-cause notice was also advertised in the two newspapers but again the appellant did not attend the duty, therefore, it was vehemently contended that the appellant was rightly imposed major penalty of removal from service after fulfilling of all the codal formalities and prayed for dismissal of appeal.

6. Perusal of the record reveals that the appellant was serving as Sweeper in Education Department. He was imposed major penalty of removal from service vide order dated 30.12.2017. The record further reveals that the appellant has claimed in service appeal that his father was seriously ill and he was granted leave to attend his ailing father but after expiry of the leave when the appellant wanted to resume the duty, the respondent No. 6 i.e Headmaster of the said school

Amun
26.2.2020

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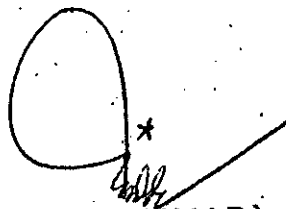
restrained the appellant from performing his duty due to some grudges. The record also reveals that the appellant also submitted application on 01.02.2017 to the competent authority i.e District Education Officer Male regarding the said allegation that the headmaster of the said school has restrained him from resuming his duty and if he has submitted any wrong report regarding the absence of the appellant than the same may be considered as wrong. The record further reveals that the appellant has submitted second application regarding the same allegation against the Headmaster on 08.04.2017 to District Education Officer but the said applications were not considered by the competent authority and despite the applications dated 01.02.2017 & 08.04.2017, the competent authority imposed ^{on} him major penalty of removal from service vide order dated 30.12.2017. The record further reveals that the appellant also filed departmental appeal to departmental authority wherein he also taken the same plea but the departmental authority did not decide the departmental appeal nor probed into the matter regarding the plea taken by the appellant in his departmental appeal. Admittedly, the appellant has claimed in service appeal as well as in departmental appeal that he was restrained by the Headmaster from resuming his duty and in this respect he also submitted two applications to the competent authority but the competent authority did not bother to probe into the matter although the competent authority was required to consider the plea taken by the appellant in the aforesaid two applications through regular

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M. J. M.

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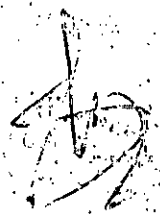
inquiry but the competent authority has straight away without considering the applications of the appellant, imposed major penalty of removal from service, therefore, the impugned order is illegal and liable to be set-aside. As such, we partially accept the appeal, set-aside the impugned order, reinstate the appellant into service with the direction to the respondents to conduct de-novo regular inquiry as to whether the appellant was restrained by the Headmaster from resuming duty or he remained absent from duty deliberately by issuing him charge sheet, statement of allegation, associating the appellant into regular inquiry, providing him opportunity of cross examination and issuing him final show-cause notice alongwith copy of inquiry report, within a period of 90 days from the date of receipt of copy of this judgment. The issue of back benefits will be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
26.02.2020



(MIAN MOHAMMAD)
MEMBER
CAMP COURT D.I.KHAN

Muhammad Amin
(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
CAMP COURT D.I.KHAN



26/2
4/2
30/2

16/8/22

16/8/22
16/8/22

10

**BEFORE THE KHYBER PAKHTOON KHAWA SERVICE TRIBUNAL
PESHAWAR CAMP AT D.I.KHAN.**

Implementation/Execution Petition No. 477 of 2022.



Noor Muhammad S/O Noor Ahmad Caste Dhoter R/O Village Matwala
Shah Tehsil Pharpur, D.I.Khan. Sweeper GHS for Boys Musazai D.I.Khan.

Khyber Pakhtoon Khwa
Service Tribunal

Diary No. 1037

Dated 22/8/2022

VERSUS

1. Director Elementary and Secondary Education Department Peshawar.
2. District Education Officer Elementary and Secondary Education Department D.I.Khan.
3. Sub-Divisional Education Officer (Male) Tehsil Daraban Kalan D.I.Khan.
4. District Account Officer Kachery Road Dera Ismail Khan.
5. Government of KP Through Secretary Elementary And Secondary Education Department Peshawar.
6. Head Master GHS Musazai Sharif Daraban D.I.Khan.

**IMPLEMENTATION PETITION/EXECUTION PETITION
OF JUDGMENT DATED; 26-02-2020 REGARDING
REINSTATEMENT OF PETITIONER.**

Annexure

That the brief facts of the case are as under:

1. That petitioner joined the services as Sweeper on 28-03-2013 by the competent authority. The petitioner was removed from service on the allegation of absence from duty vide order dated 31-12-2017. The appellant filed departmental appeal and thereafter file service appeal which was partially accepted by the Hon'ble Court Vide Judgment Dated 26-02-2020. Copy of Service Appeal and Judgment is Annexure A.
2. That after the lapse of more than two years, Department is hesitating to reinstate the according to Judgment of Hon'ble Service Tribunal dated; 26-02-

Certified to be true copy


Khyber Pakhtoon Khwa
Service Tribunal
Peshawar

2020 in Service Appeal No. 608/2018 nor concluded the de-novo inquiry so petitioner has no other remedy but to file implementation petition.

- 3. That respondents are legally bound to issue the reinstatement order of petitioner and conclude the inquiry within 90 days but they are hesitating to implement the judgment of this Hon'ble Court.

In view of the above, it is, therefore, most respectfully prayed that on acceptance this petition, may kindly implement the judgment dated; 26-02-2020 issued in Service Appeal No 608/2018. Any other appropriate relief this Hon'ble court may deem fit in the best interest of justice may also be granted to the appellant.

YOUR HUMBLE APPELLANT

نو محمد

Noor Muhammad
Through Counsel.

Dated;

Anwar

Mohammad Anwar Awan
Advocate Supreme Court

AFFIDAVIT

Noor Muhammad do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.

نو محمد

Deponent.

12103-1499871-7

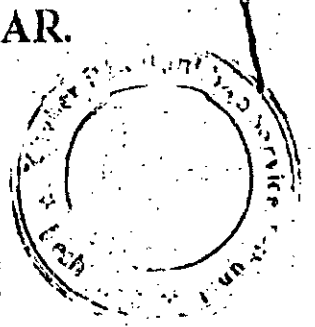


Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

12
BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal no. 608 of 2018.



Noor Muhammad S/O Noor Ahmad Caste Dahotar R/O Village Matwala Shah Tehsil Pharpur District D.I.Khan Sweeper GHS for Boys Musazai D.I.Khan.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 609

Dated 23-4-2018

VERSUS

1. Director Elementary and Secondary Education Deptt: Peshawar.
2. District Education officer Elementary and Secondary Education Deptt: D I Khan.
3. Sub-Divisional Education Officer (Male) Tehsil Darabin Kalan D.I.Khan.
4. District Account Officer Kechary Road Dera Ismail Khan.
5. Government of KPK through secretary Elementary and Secondary Education Deptt: Peshawar.

6. Head Master GHS Musa Zai Sharif Daraban D.I.Khan

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST ILLEGAL AND MALAFIDE REMOVAL FROM SERVICE ORDER ON THE BACK OF APPELLANT.

Anwar

That the brief facts of the case are as under:

1. That Appellant's father, Noor Ahmad, was serving as Sweeper and was retired from service. The petitioner applied for appointment as class IV on son's quota but was refused

ed to - da petitioner filed a civil suit seeking his employment in accordance with the policy of

Government but the suit was dismissed. The petitioner challenged the judgment and decree

14/18 by way of appeal which was accepted and petitioner was appointed as Sweeper at GHS

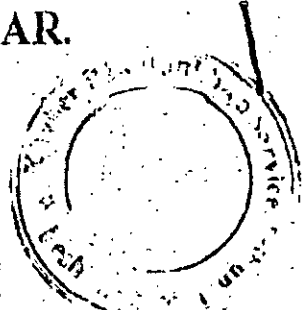
Musazai Sharif vide Office order dated; 28-03-2013. Copy of Appointment Order is Annexure A.

2. That the Appellant was performing his duties to the entire satisfaction of his high ups but during the service Appellant's father was seriously fell ill and appellant filed application for grant of leave to attend his ailing father. After the expiry of leave the appellant wanted to resume his duty but the respondent No.6, Headmaster, restrained the petitioner from

Resubmitted to - day

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

12
Appeal no. 608 of 2018.



Noor Muhammad S/O Noor Ahmad Caste Dahotar R/O Village Matwala Shah Tehsil Pharpur District D.I.Khan Sweeper GHS for Boys Musazai D.I.Khan.

Khyber Pakhtunkhwa Service Tribunal
Office No. 609
Dated 23-4-2018

VERSUS

1. Director Elementary and Secondary Education Deptt: Peshawar.
2. District Education officer Elementary and Secondary Education Deptt: D I Khan.
3. Sub-Divisional Education Officer (Male) Tehsil Darabin Kalan D.I.Khan.
4. District Account Officer Kechary Road Dera Ismail Khan.
5. Government of KPK through secretary Elementary and Secondary Education Deptt: Peshawar.
6. Head Master GHS Musa Zai Sharif Daraban D.I.Khan

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST ILLEGAL AND MALAFIDE REMOVAL FROM SERVICE ORDER ON THE BACK OF APPELLANT.

Amwdu

That the brief facts of the case are as under:

1. That Appellant's father, Noor Ahmad, was serving as Sweeper and was retired from service. The petitioner applied for appointment as class IV on son's quota but was refused. The petitioner filed a civil suit seeking his employment in accordance with the policy of Government but the suit was dismissed. The petitioner challenged the judgment and decree by way of appeal which was accepted and petitioner was appointed as Sweeper at GHS Musazai Sharif vide Office order dated; 28-03-2013. Copy of Appointment Order is Annexure A.
2. That the Appellant was performing his duties to the entire satisfaction of his high ups but during the service Appellant's father was seriously fell ill and appellant filed application for grant of leave to attend his ailing father. After the expiry of leave the appellant wanted to resume his duty but the respondent No.6, Headmaster, restrained the petitioner from

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performing his duty. The appellant filed applications to respondent No.2 regarding the

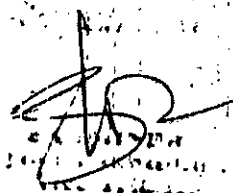
illegal behavior of respondent No.6 but no action was taken. Copy of application and postal receipts is Annexure B.

3. That, on 16-01-2018 appellant visited the Education Office regarding injustice done by the respondent No.6 but surprised to know that he is removed from the service vide order dated; 30-12-2017 without initiating any proceeding under E & D Rules. Copy of removal order is Annexure C.
4. That, feeling aggrieved the appellant filed departmental appeal against the removal order dated; 30-12-2017 to respondent No.1 but till now appeal is not decided. Copy of departmental appeal along with postal receipt is Annexure D.
5. That feeling aggrieved from above said action appellant is constrained to approaches this honorable court on the following amongst other:

GROUNDS;

- Anwar*
1. That the appellant is not treated in accordance with law and the actions of the respondents are malafide besides being discriminatory and harsh.
 2. That appellant is being penalized without giving him any opportunity of hearing, he was neither associated with any proceeding nor have given any show cause notice by the department, which is against the principal of natural justice.
 3. That it is an admitted fact that petitioner filed application to respondent No.2 through post office regarding the conduct of respondent no.6 but no action was taken against him but appellant was removed from service without conducting any inquiry. It is also an admitted fact that appellant was condemned unheard.

In view of the above, It is, therefore, most respectfully prayed that on acceptance this appeal this honorable court may please to declare the office order No. 30061-66 dated; 30-



12-2017 is illegal, void, without lawful authority and of no legal effect and respondents may pleased be directed to reinstate the appellant with all back benefits.

YOUR HUMBLE APPELLANT

Noor

Noor Muhammad
Through Counsel

Dated; 17-04-2018.

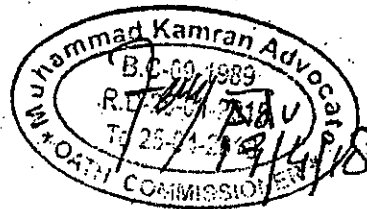
Anwar

Mohammad Anwar Awan
Advocate Supreme Court

AFFIDAVIT

Noor Muhammad do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court.

Deponent.



Noor

16/8/22

[Signature]

12/12/20
14/1/18
18/1/18

16/8/22
16/8/22

18.04.2023

Learned counsel for the petitioner present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Musarrat Hussain DEO (Male) D.I. Khan for the respondents present.

02. Representative of the respondents submitted copy of order bearing Endst. No. 7420-30 dated 17.04.2023 whereby the petitioner has been reinstated into service with immediate effect and he has been posted as Sweeper at GHSS Kot Jai, D.I.Khan. Placed on file and copy thereof provided to learned counsel for the petitioner who expressed his satisfaction. The Service Tribunal judgment delivered in service appeal No. 608/2018 dated 26.02.2020 stands implemented. On compliance of the court orders, salary of respondents No. 2, 3 & 6 attached vide order dated 20.03.2023 are, hereby, ordered to be released. Consign.

03. Pronounced in open court at camp court D.I.Khan and given under my hand and seal of the Tribunal this 18th day of April, 2023.

Certified to be true copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar
Kameemullah

(Muhammad Akbar Khan)
Member (E)
Camp Court D.I.Khan

Asif Masood Ali

Date of Presentation of Application 30-5-23
Number of Words 1-P
Copying Fee 5/-
Urgent 5/-
Total 10/-
Name _____
Date of _____ 30-5-23
Date of Delivery of Copy 30-5-23



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN**

Phone No. 0966-9280131

RE-INSTATEMENT ORDER

Whereas Noor Muhammad was appointed as Sweeper on 28/03/2013 at GHS Musazai Sharif DIKhan.

Whereas he performed his duties for some months.

Whereas he remained absent from school.

Whereas Headmaster GHS Mosazai submitted report for his absentee.

Whereas the then DEO (M) DIKhan proceeded him under E&D rules 2011 and imposed major penalty of removal from service on 30/12/2017 after observing all codal formalities.

Whereas he filed service appeal No. 608/2018 on 23/04/2018 in Honourable Service Tribunal.

Whereas Honourable Service Tribunal set aside the order of DEO (M) DIKhan in his judgment dated 26/02/2020.

Whereas he filed EP No. 477/2022 in honourable Service Tribunal.

Therefore, the competent authority I Mr. Mussarat Hussain Khan DEO (M) DIKhan is pleased to implement the orders of Honourable Service Tribunal and Mr. Noor Muhammad is hereby reinstated into service with immediate effect.

He is posted as sweeper at GHSS Kot Jai DIKhan against vacant post.

- sd -

(Mussarat Hussain)

**DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN**

Endst: No. 7420-30 SW

Dated: 17 / 1 / 2023

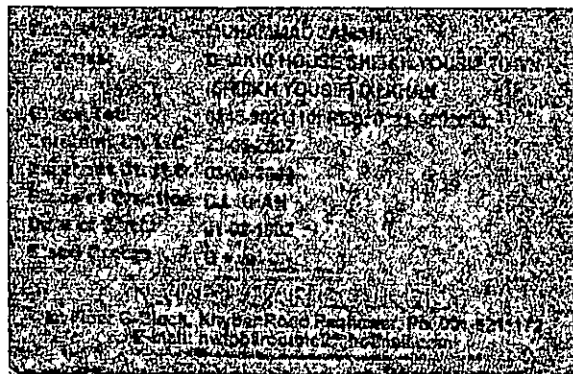
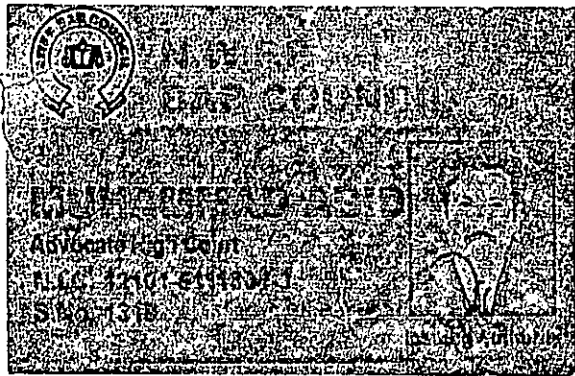
Copy forwarded to the:

- 1- PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2- PA to Deputy Secretary Legal E&SE Khyber Pakhtunkhwa, Peshawar.
- 3- Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 4- Registrar Honourable Service Tribunal RPK, Peshawar.
- 5- District Monitoring Officer (BMA), Dera Ismail Khan
- 6- Deputy DEO (Male) D.I.Khan.
- 7- District Accounts Officer, D.I.Khan.
- 8- Principal GHSS Kotjai DIKhan.
- 9- Assistant Director (IT) EMIS local office with request to upload at HRIS.
- 10- Dealing Assistant concerned.
- 11- Master file.

**PRINCIPAL
G. H. S. S. Kot Jai
Dera Ismail Khan**

Alisland

Mussarat Hussain
**DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN**



VAKALATNAMA

Before Honorable Khyber Pakhtunkhwa Service Tribunal
Peshawar
Noos Muhammad **VERSUS** Govt. of Kpk etc

COC Petition

No. of 2023

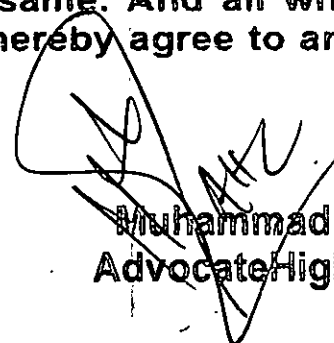
I/We the undersigned do hereby nominate and appoint Shri
Muhammad Abid

Advocate
to be counsel in the above matter and for me/us and on my/our behalf to appear, plead act and answer in the above Court or any appellate Court or any Court to which the business is transferred in the above matter, and to sign and file petitions, statements accounts, exhibits compromises or other documents whatsoever, in connection with the said matter arising there from and also to apply for and receive all documents or copies of documents, depositions, etc. and to apply for issue of summons and other writs or subpoena and to apply for and get issued any arrest, attachment or other execution warrant or order and to conduct any proceeding that may arise thereout and to apply for and receive payment of any or all sums or submit the above matter to arbitration.

Provided, however, that, if any part of the Advocate's fee remains unpaid before the first hearing of the case or if any hearing of the case be fixed beyond the limits of the town, then, and in such an event my/our said Advocate shall not be bound to appear before the court and if my/our said advocate does appear in the said case he shall be entitled to an out station fee and other expenses of travelling, lodging, etc. Provided also that if the case be dismissed by default, or if it be proceeded ex parte, the said advocate(s) shall not be held responsible for the same. And all what ever my/our said advocate(s) shall lawfully do, I/We do hereby agree to and shall in future ratify and confirm.

Noos Muhammad --- Petitioner
12103-1499871-7

3/19


Muhammad Abid
Advocate High Court