

Respected Sir,


It is submitted that the present appeal was received on 31.07.2023, which was returned to the counsel for the appellant for removing objections (Flag-A). Today i.e. 11.08.2023 he re-filed the same without removing the objection 3 with a note (Flag-B). It is pertinent to mention here that annexure-D is order of removal from service but not a dismissal order.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.


REGISTRAR

Worthy Chairman
|

*objection stands removed.
Pr filed before the bench*


21/08/23

The appeal of Mr. Pir Nosh son of Muhammad Nisar Ex-PTC GPS No.1 Kalabat Swabi received today i.e on 27.07.2023 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Annexure-A of the appeal is illegible.
- 2- Annexures of the appeal be attested.
- ③ Copy of dismissal order mentioned in the heading of the appeal is not attached with the appeal be placed on it.

No. 2054/S.T.

Dt. 31/7/2023.

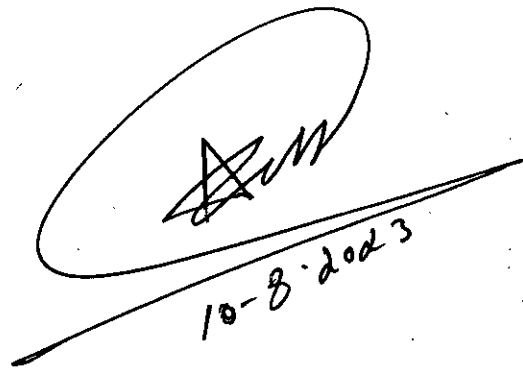


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ased Zeb Khan Adv.
High Court Peshawar.

R/sir,

Better copy of Annex-A attached. All annexures
is made original order of dismissal is attached
as Annex-D while appellate order is attached
as Annex-F.
Re-submitted for Ration.



10-8-2023

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1713 /2023

PIR NOSH _____ Appellant

Versus

GOVT. OF KHYBER PAKHTUNKHWA & OTHERS

_____ Respondents

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Dated: -12/07/2023

Through


Appellant


~~ASAD ZEB KHAN~~

Advocate High Court, Peshawar
Off: 202, 2nd Floor, City Gate Plaza, G.T.
Road, Peshawar
0346-9800565

①

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. 1713 /2023

Pir Nosh S/O Muhammad Nisar, Mohallah Mazid Khel, Village & Post Office Kalabat, Tehsil Topi, District Swabi. (Ex-PTC/PST Govt. Primary School No. 1, Kalabat, Swabi). _____ **Appellant**

Versus

1. **Govt. of Khyber Pakhtunkhwa** Through Secretary Elementary & Secondary Education Department, Peshawar.
2. **Director**, Elementary & Secondary Education Department, Peshawar.
3. **District Education Officer (M)**, Swabi.

_____ **Respondents**

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER OF RESPONDENT No. 2 WHO DISMISSED THE APPEAL OF APPELLANT VIDE ORDER DATED: 06-07-2023 AND AGAINST THE IMPUGNED ORDER OF RESPONDENT No. 3 WHO VIDE ORDER DATED: 10-02-2015 DISMISSED THE APPELLANT FROM SERVICE.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDERS DATED: 10-02-2015 & 06-07-2023 MAY KINDLY BE SET ASIDE, RESULTANTLY APPELLANT MAY KINDLY BE RE-INSTATED IN SERVICE WITH ALL BACK BENEFITS.

Respectfully Sheweth:

The appellant most humbly presents his grievances as under:-

1. **That** appellant was appointed as PTC/PST vide appointment order dated: 21-05-1987 and was posted at Govt. Primary School No. 1, Kalabat, Swabi.
{True copy of appointment order is attached, as mark Annex-A}

2. That appellant on 11-12-2013 submitted an application to the respondent No. 3 for his adjustment, as his/appellant's father was seriously ill in those days and he was looking after him.

{True copy of application for adjustment is attached, as mark Annex-B}

3. That when no action has been taken upon adjustment application of the appellant, then he moved another application for three months leave w.e.f 17-02-2014 to 16-05-2014. Appellant was kept on waiting for the outcome of his applications.

{True copy of application for leave is attached, as mark Annex-C}

4. That appellant was waiting for the result of his application when he received the impugned letter/order dated: 10-02-2015 vide which appellant was removed from service.

{True copy of impugned order dated: 10-02-2015 is attached, as mark Annex-D}

5. That after passing of impugned order, appellant moved departmental appeal to the respondents but to no avail. It would be noteworthy that appellant moved several applications/appeals to the respondents and finally on 06-07-2023 respondent No. 2 dismissed the appeal of the appellant.

{True copies of appeals & impugned order dated: 06-07-2023 is attached, as mark Annex-E & F}

6. That appellant feeling dissatisfied and aggrieved from the impugned orders, actions and inactions of the respondents, having no other alternate and adequate remedy is invoking the jurisdiction of this august tribunal on the following grounds inter-alia:-

GROUND:

- A. **Because** the impugned orders, actions and inactions of the respondents vide which he has been removed from service & his departmental appeal is rejected is against law, facts and in utter disregard of the material available on record, hence the same is untenable.
- B. **Because** neither any charge sheet is issued nor statement of allegation is served upon the appellant which is against the settled provision of service law.
- C. **Because** neither show cause notice is issued nor served upon the appellant.

- D. **Because** no notice has been served upon the appellant which have been mentioned in the impugned order dated: 10-02-2015.
- E. **Because** appellant has served the department for more than 26 years regularly and his fate can't be decided in cursory manner.
- F. **Because** respondents instead of deciding application of the appellant for his adjustment and allowing him to go on three months leave, issued/passed the impugned order of removal from service which is unwarranted.
- G. **Because** it has been clear from the record of the case that E & D rules have blatantly been violated while dealing with the case of appellant.
- H. **Because** no chance of personal hearing was given by the respondents while dealing with the rights of the appellant in service and the whole episode was done in a cursory manner, which is alien to the norms of justice.
- I. **Because** neither the charges (if any) against the appellant were never proved nor any fair inquiry proceedings were conducted.
- J. **Because** the appellant was condemned unheard while imposing major penalty upon him, hence the impugned orders are against the service laws and rules.
- K. **Because** the appellant had been made victim of discrimination, demerits, partiality and favoritism without any just and reasonable cause thereby offending the fundamental rights of the appellant as provided by the constitution of 1973, hence the impugned orders detailed above are liable to be set at naught.
- L. **Because** the respondents in utter disregard to the principles of the fairness, merit and transparency, passed the impugned orders which are against the law, illegal, unlawful and void ab initio and liable to be turned down.
- M. **Because** the appellant is very hardworking and punctual in his duty, therefore, no complaint received by the Respondents against the appellant but the Respondents unlawfully and illegally proceeded against the appellant by ordering his removal from service, which is against the law and fundamental rights of the appellant.
- N. **Because** the present impugned orders are illegal, illogical, against facts, without jurisdiction and suffering from material irregularity, hence they are untenable and liable to be struck down.

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- O. Because the Respondents erroneously exercised their powers against judicial principle and have passed the impugned orders and opened a new pandora box in clear violation of Service law, hence, the said impugned orders are liable to be set aside, and the appellant may kindly be re-instated in service with all back benefits.
- P. **Because** the impugned action and inaction on the part of respondents is against the directions of Hon'ble Superior Courts of Pakistan, given in plethora of verdicts.
- Q. **Because** the appellant craved for leave to add further grounds at the time of oral arguments before this Hon'ble Court highlighting further contraventions of the provisions of the Constitution which adversely affected the appellant.

PRAYER

In view of the above, it is humbly prayed that this Hon'ble Tribunal may graciously be pleased to:

- (I) **Set aside** the impugned order dated: 06-07-2023 of respondent No. 2 who dismissed departmental appeal of the appellant being illegal, unlawful, void ab initio and against the settled provisions of law.
- (II) **Set aside** the impugned order dated: 10-02-2015 vide which respondent No. 3 removed the appellant from his service being illegal, unlawful, void ab initio and against the settled provisions of law.
- (III) **Re-instate** the appellant into service from the date of removal from service with all back benefits.
- (IV) **Direct** the respondents to treat the appellant in accordance with law.
- (V) **Any other relief** deemed appropriate in the circumstances, not specifically for, may also be given to the appellant.

Dated: 12-07-2023

Through

Appellant

ASAD ZEB KHAN

Advocate High Court, Peshawar

VERIFICATION:

It is verified that all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Deponent

Note: That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

⑤

BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____ /2023

PIR NOSH _____ Appellant

Versus

GOVT. OF KHYBER PAKHTUNKHWA & OTHERS

_____ Respondents


AFFIDAVIT

I, Pir Nosh S/O Muhammad Nisar, Mohallah Mazid Khel, Village & Post Office Kalabat, Tehsil Topi, District Swabi. (Ex-PTC/PST Govt. Primary School No. 1, Kalabat, Swabi); do hereby solemnly affirm and declare on oath that all the contents of the accompanying appellant are true and correct to the best of my knowledge and belief and nothing has been kept concealed intentionally from this Hon'ble Tribunal.

Identified By:

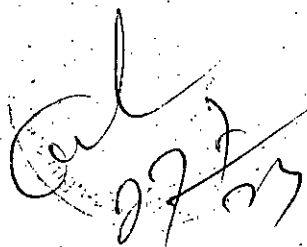

ASAD ZEB KHAN

Advocate High Court, Peshawar:


Deponent

CNIC # 16202-0897244-3.

Cell# 0340-9355824


27/03

6

**BEFORE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. _____ /2023

PIR NOSH _____ **Appellant**

Versus

GOVT. OF KHYBER PAKHTUNKHWA & OTHERS

_____ **Respondents**

ADDRESSES OF THE PARTIES

Pir Nosh S/O Muhammad Nisar, Mohallah Mazid Khel, Village & Post Office Kalabat, Tehsil Topi, District Swabi. (Ex-PTC/PST Govt. Primary School No. 1, Kalabat, Swabi). _____ **Appellant**

Versus

1. **Govt. of Khyber Pakhtunkhwa Through Secretary Elementary & Secondary Education Department, Peshawar.**
2. **Director, Elementary & Secondary Education Department, Peshawar.**
3. **District Education Officer (M), Swabi.**

_____ **Respondents**

Dated: 12-07-2023

Through

_____ **APPELLANT**

_____ **ASAD ZEB KHAN**

_____ **Advocate High Court, Peshawar**

(7)

T. S. Swabi

01

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

APPOINTMENT:-

OFFICE ORDER.

Appointment of ~~Headmaster/Teacher~~ Teacher s/are hereby ordered against the post of _____ on temporary basis @ Rs. P.M Fixed plus usual allowances as admissible under the rules in the BPS No. _____ (Rupees. ~~1200~~ 1200 p/m) or his/their own pay and grade, which is beneficial to him/their at the school noted against each name:-

S.No.	Name & Designation/Address.	Post/Post	Remarks.
1-	Abdul Razin S/O Said Geyan PA(493)/Vill: Balda	CPD, No. 22, Kurram 2. Kote.	A.N.O. Post.
2-	Salim Iqbal S/O Aurang Sab PA(442)/Vill: Korobi.	CPD, No. 1, Korobi	do
3-	Mir Noor S/O Akbar Muhammad PA(620)/Vill: Alabat.	CPD, No. 1, Kalabat.	do

CONDITION OF APPOINTMENT:-

1. His/Their services is/are liable to termination/reversion at any time without any reason being assigned.
2. In case of resignation he/they will have to submit one Month's prior notice to the Deptt: of forefiet one month's pay in lieu thereof to Govt:
3. He/They is/are required to produced Health and Age certificate from Medical Supdtt: D.H.Q. Hospital Mardan before taking over charge.
4. Charge reports should be submitted to all concerned.
5. He/They should not be allowed to take over charge if his/their age is are less than 18 years and above 25 years.
6. If/ he/they fails to take over charge of the post within 14 days after the issue of these orders the ocer of appointment shall stand cancelled.
7. Certificate should checked before handing over charge.

(GUL ZAMAN KHAN)
DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

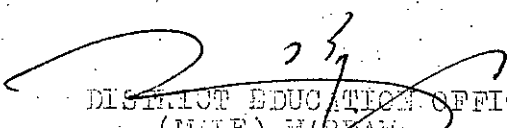
11244/47

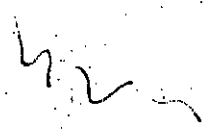
Endst: No. _____ /PTC Dated Mardan the, 16/5 /198

Copy forwarded for information to the:- 7.

1. Sub Divisional Education officer, (Male)
2. Headmaster/H. Teacher concerned. Mr Swabi.
3. Candidate concerned.

"HAYAT"/


DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.



7A

Better Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN T.S SWABI

APPOINTMENT:-

OFFICE ORDER.

Appointment of the following teacher in Swabi Tehsil is/are hereby ordered against the post of PTC U/T on temporary and adhoc basis @ Rs. 550 P.M fixed plus usual allowances as admissible under the rules in the BPS No. _____ (Rupees: _____) on or his/their own pay and grade, which is beneficial to him/them at the school notes against each name:-

S.No.	Name & Designation /Address.	Posted at.	Remarks
1:-	Abdul Hakim S/O Said Qayum F.A (483) Vill: Zaida	GPS No. 2 Kote	A.N.C Post
2:-	Salim Iqbal S/O Aurang Zeb F.A (442) Vill: Zarobi	GPS No. 1 Zarobi	----do-----
3:-	Pir Nosh S/O Nisar Muhammad SSC (620) Vill: Kalabat	GPS No. 1 Kalabat	----do-----

CONDITION OF APPOINTMENT:-

1. His/Their services is/are liable to termination /reversion at any time without any reason being assigned.
2. In case of resignation he/they will have to submit one Month's prior notice to the Deptt: of forefeet one month's pay in lieu thereof to Govt.
3. He/They is/are required to produced Health and Age certificate from Medical Suptt: D.H.Q Hospital Mardan before taking over charge.
4. Chare reports should be submitted to all concerned.
5. He/They should not be allowed to take over charge if his/their age is /are less than 18 years and above 25 years.
6. If he/they fails to take over charge of the post within 14 days after the issue of these orders the order of appointment shall stand cancelled.
7. Certificate should checked before handing over charge.

(GUL ZAMAN KHAN)
DISTRICT EDUCATION OFFICER
(MALE) MARDAN.

Endst: No. 11244/47/PTC Dated: Mardan the, 16/05/1987

Copy forwarded for information to the:-

1. Sub Divisional Education Officer, (Male) Swabi
2. Headmaster / H. Teacher concerned.
3. Candidate concerned.

"HAYAT"/

Sd/-
DISTRICT EDUCATION OFFICER,
(MALE) MARDAN.

(8)

کثرت بنا۔ ڈسٹرکٹ ایجوکیشن آفیسر صاحب (پرائمری اسکول)

دہلی۔ درخواست بابت ایڈجسٹمنٹ

صاحب عالی

زیر اس ہے کہ درخواست نے ۲ مہینے وصال کے لئے

مختص کی درخواست جمع کی تھی۔ درخواست

گزار کی گئی۔ فورم 15/12/2013 کو ختم ہو رہی

ہے۔ اس لئے غائب ہونے کی وجہ سے 16/12/2013

پر ڈسٹریکٹ ایجوکیشن آفیسر صاحب کے احکامات صادر

فرمائش۔

لنڈن بیگ

اپنے اہل خانہ

پرائمری اسکول، گورنمنٹ پرائمری اسکول

کلاں

فورم 11-12-2013

ملرز 295 مورخہ 11-12-2013

درخواست بابت ضروری کارروائی ارسال

خدمت سے

امین

HEAD TEACHER
G.P.S. 14, 140

(9)

کابینہ جناب ڈیپٹی سیکرٹری ایجوکیشن انیسر وہاب (عوامی) مہادی

درخواست بابت جس کا (3) کاپی

16-05-2014 تا 17-02-2014

جناب عالی

گزراؤں ہے کہ در خواست گزار کو جسے ضروری گورنمنٹ
اور کھانے کے لئے جس کا (3) کاپی درکار ہے
اسد عا ہے کہ در خواست گزار کو 3 ماہہ چھٹی
منتظر حزمائش۔

نواز شاہوگی

العارض

پیرنٹس، PST، گورنمنٹ پرائمری سکول

کلاڈ مہادی

فورم 17-2-2014

No: 296

Dated: 17/02/2014

Forwarded to - the SDO (M) Lopi
for n/a please.

T
m

HEAD TEACHER
GPS No 1 Kalab
Dist Swabi

(10)

(23)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) SWABI

NOTIFICATION.

Pir Nosh PST Removal from Service

WHEREAS Mr. Pir Nosh S/O Muhammad Nisar PTC/PST/GPS No.1 Kalabat Mohalla Mazid Khel Village & Post Office Kalabat Tehsil Topi District Swabi was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 on account of his willful and un-authorized absence from duty w.e.f. 17.02.2014 and was directed to resume duty by the SDEO(M) concerned vide his office No.1137 dated 23.10.2014, No.35 dated 12.11.2014 and No.107 dated 03.12.2014, but he failed to resume his duty.

AND WHEREAS absentee notice was served upon the accused official Mr. Pir Nosh S/O Muhammad Nisar PTC/PST/GPS No.1 Kalabat Mohalla Mazid Khel Village & Post Office Kalabat Tehsil Topi District Swabi through "Daily News Paper" Mashriq Peshawar dated 12.01.2015 to resume duty within 15 days but he remained absent and did not report for duty in response of the above absence notice.

AND WHEREAS the competent authority i.e the DEO (Male) Swabi after having considered the charges and evidence on record is of the view that the charges of willful and un-authorized absence from duty against the accused have been proved.

NOW, THEREFORE, in exercise of the powers conferred under Section 3 b (iii) of the Khyber Pakhtunkhwa Removal from service under (Efficiency & Discipline) Rules 2011, the competent authority is pleased to impose the major penalty of removal from service upon Mr. Pir Nosh S/O Muhammad Nisar PTC/PST/GPS No.1 Kalabat Mohalla Mazid Khel Village & Post Office Kalabat Tehsil Topi District Swabi with immediate effect. The period of his absence from duty w.e.f. 17.02.2014 till the issuance of this order be treated as un-authorized absence from duty with out pay.

(NISAR MUHAMMAD)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Encls: No. 2 ⁶³⁻⁰⁷ / F.No: 1/4-DA-15/Absent PTC (M) dated Swabi the 10/2 2015.

Copy of the above is forwarded for information and n/action to the:-

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Swabi.
3. Sub-Divisional Education Officer (Male) Topi w/r to his No.153 dated 15.12.2014.
4. Head Teacher GPS No.1 Kalabat Tehsil Topi District Swabi.
5. Mr. Pir Nosh S/O Muhammad Nisar PTC/PST/GPS No.1 Kalabat Mohalla Mazid Khel Village & Post Office Kalabat Tehsil Topi District Swabi (Under Registered cover).

379
16-02-2015

E/B
Endorse and

DISTRICT EDUCATION OFFICER
(MALE) SWABI

Keep it in your office file for record

09/02/15

کستور چٹاب ڈائریکٹر تعلیمات، ابتدائی و ثانوی مدارس پشاور

عنوان۔ درخواست بھراؤ بجائی مدرست

جناب عالی!

گزارش ہے کہ درخواست گزار مورخہ 1987-5-21 سے حکمہ تعلیم میں
فن سٹڈی، انگریزی سکول ٹیچر فرائض منصبی نبھارہا تھا۔ مورخہ 2013-12-11
کو درخواست گزار نے جناب ڈی ای او (مردانہ) ہوائی کے نام درخواست پرائے
ابڈ جسٹس جمع کی۔

وقتاً فوقتاً دفتر سے رابطہ کیا۔ اس دوران نہ ابڈ جسٹس ہوائی کوئی رد کرد
پیرسٹ ہو سول ہوئی۔ والد صاحب کی بیماری کی وجہ سے درخواست گزار نے سن
جھٹی (17 فروری 2014ء کاٹی 2014ء) کیلئے درخواست جمع کی۔

جناب عالی! تقریباً دو برسوں میں درخواست گزار کو نہ ابڈ جسٹس لیا گیا اور
نہ عملی پہلو بتلور کی گئی۔ بلکہ جناب ایس ڈی او (میل) کو پی نے جناب ڈی ای او
(میل) ہوائی کے آرڈر نمبر 07-2003 جاری شدہ مورخہ 10 فروری 2015ء کے تحت
لوکری برخواست کیا۔

جناب عالی! لوکری سے برخواستگی پر درخواست گزار ذہنی گھٹت ہوا۔ والد
صاحب کی بیماری، گھریلو مسائل، بچوں کی اخراجات اور مدرست سے برخواستگی
انہ مسائل سے درخواست گزار ذہنی گھٹت اور پھینچیدہ حساسی بیماری میں مبتلا ہو گیا
جناب عالی! درخواست گزار کی تقریباً 6 سالہ کا ماکہ اور 2 دنہ مدرست

(1987-5-21 سے 1987-12-11)۔ مذکورہ بالا ~~حفاظت~~ حفاظت کی روشنی میں بجائی مدرست

مناسب احکامات صادر فرمائیں۔ انکرتوم : 2015-02-26

العاریضہ
سرٹیفکیٹ ایف بی ایس پی / جی پی ایس غلٹ ضلع ہوائی

E

(12)

محکمہ جنس ڈائریکٹر تعلیمات، ابتدائی و ثانوی مدارس سندھ

مستوفان دور خواست بمسرا اوبکالی ملازمت

جناب عالی

گزارش ہے کہ دور خواست گزار مورخہ 21-05-1987 سے محکمہ تعلیم میں من حیث پرائمری سکول ٹیچر منسرا محلی بمسرا ہمت مورخہ 11-12-2013 کو دور خواست گزار نے جناب ڈی ای او (مسرا مان) سوہلی کے نام دور خواست برائے ایڈجسٹمنٹ جمع کی۔ (ٹولو کاپی منسلک ہے)

وقت نوشتہ دور خواست گزار نے قسریہ سہ ماہی تک دفتر سے رابطہ کیا اس دوران منسرا ایڈجسٹمنٹ آرڈر جاری ہوا اور منسرا محلی کوئی دور سہ ماہی نہ موصول ہوئی۔

والد صاحب کی شدید عسالت کے سبب دور خواست گزار نے تین ماہ معطلی (17 مئی 2014 تا 16 مئی 2014) کے لئے دور خواست بمسرا جناب ڈی ای او (مسرا مان) سوہلی جمع کی۔ (ٹولو کاپی منسلک ہے)

جناب عالی اقسریہ سہ ماہی میں دور خواست گزار کو منسرا ایڈجسٹمنٹ کیا گیا اور منسرا تعلیم والد صاحب کی دیکھ بھال کے لئے معطلی حلقہ کی گئی۔ بلکہ جناب ایس ڈی او (سہیل) لوہی نے جناب ڈی ای او (سہیل) سوہلی کے آرڈر نمبر 07-2503 جاری شدہ مورخہ 10 مئی 2015 کے تحت دور خواست گزار کو نوکری سے برخواست کیا۔

جناب عالی نوکری سے برخواستگی پر دور خواست گزار کو سخت ذہنی کوفت ہوا۔ والد صاحب کی عسالت، گسٹوں مسائل، بچوں کی تعلیمی اہمیت اور ملازمت سے برخواستگی۔ ان مسائل سے دور خواست گزار ذہنی کوفت کے ساتھ ساتھ جسمانی عوارض کا شکار ہو گیا۔

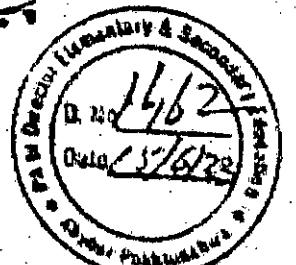
جناب عالی دور خواست گزار کی قسریہ سہ ماہی 26 مئی، 6 ماہ اور 21 دن ملازمت (21/05/1987 تا 11/12/2013) اور منسرا کو منسرا اوبکالی کی بخش نظر بمسرا ملازمت کے لئے منسرا احکامات صادر منسرا منسرا۔

المسرا نومبر 2023-06-13

المسرا

پیر وائس سیکریٹری ایس ڈی ای او (سہیل) سوہلی ضلع سوہلی

موبائل نمبر: 0313-9400215



13



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

No. 538 of No./06/Re-Instatement in Service/Estab-1

Dated Peshawar the 06/07 /2023.

To

The District Education Officer
(Male) Swabi.

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

Memo:

I am directed to refer to the subject cited above and to ask you that appeal in r/o Mr. Pir Nosh Ex-PST GPS No.1 Qalabat District Swabi has been rejected.

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

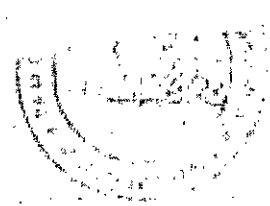
(Signature)
Assistant Director (Estab-1)
Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa, Peshawar.

Endst; No. 538



Copy forwarded to the: -

1. Mr. Pir Nosh Ex-PST GPS No.1 Qalabat District Swabi.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

(Signature)
Assistant Director (Estab-1)
Directorate of Elementary & Secondary Edu:
Khyber Pakhtunkhwa, Peshawar.



(14)

قیمت 50 روپے	79795			
ایڈوکیٹ: اسد زب خان		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: B.C 591517				
رابطہ نمبر: 03469800565				

بعدالت جناب: سر جسٹس بیونل ایڈووکیٹ

مخاطب: چیف جسٹس	دعوی:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
چیف جسٹس بنام خدمت	
باعث تحریر آنکہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ مقدمہ میں خان ایڈووکیٹ کے آج کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف 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 کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا احد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 27-7-2023

Artist
Accept
کے منظور ہے

العبد
مقام

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔

دیر نوٹس