


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 1838/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/09/2023	<p>The appeal of Mr. Sajid Ali resubmitted today by registered post through Mr. Muhammad Mohsin Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal submitted by Mr. Muhammad Mohsin Ali on 21/08/2023 is incomplete on the following score which is subject to the appeal and its resubmission within 15 days.

1. Checklist is not attached with the appeal.
2. Appeal has not been flagged/marked with a number.
3. Affidavit is not attested by oath commissioner.
4. Separate file cover for member and spare copies.

No. 313<sup>3</sup>

Dt. 31-8/2023




REGISTRAR  
SERVICE TRIBUNAL  
PESHAWAR.

Mr. Muhammad Mohsin Ali Adv.  
Supreme Court.

Respected Sir

Resubmitted after  
removing the objections.

  
Muhammad Mohsin Ali  
Advocate Supreme Court of Pakistan  
(5434)

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

Appeal No. 1838 /2023

Sajid Ali \

.....APPELLANT

**VERSUS**

Govt. of KPK and others

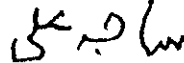
.....RESPONDENTS

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Dated:

Humble Appellant



Sajid Ali

Through Counsel



Muhammad Mohsin Ali  
Advocate Supreme Court,  
District Courts, D.I.Khan.

(1)

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

Appeal No. 1838 /2023

Sajid Ali son of Inayatullah resident of Gara Baloch District Tank

.....APPELLANT

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male), Tank.
4. SDEO (Male) Tank, Education Department, Tank.
5. Head-Teacher, Govt. Primary School No. 2 (Boys) Tank City, Tank.
6. District Account Officer, Tank.

.....RESPONDENTS

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**APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNALS ACT, 1974 TO DIRECT THE RESPONDENTS TO ALLOW THE APPELLANT FOR PERFORMING HIS DUTIES IN GPS NO. 2 (BOYS), TANK AND TO RELEASE THE MONTHLY SALARY OF THE PETITIONER FROM THE DATE OF JOINING OF HIS DUTY ALONGWITH ALL BACK BENEFITS.**

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**Respectfully sheweth;**

1. That the brief facts of the case are that the present appellant was appointed as Chowkidar in Education Department Tank vide office dated 26-03-2018 against disable quota in GPS No. 2 Tank City. Copy of appointment order of the appellant alongwith disable certificate is enclosed as **Mark-A.**

②

2. That after getting the medical certificate, the appellant made the arrival and performing his duty till date; but the respondents did not release the monthly salary of the appellant, therefore, the appellant filed a complaint against the respondent No. 3 the then DEO (Male) Tank before the Consumer Court, District Tank and during the proceeding, the respondent No. 3 appeared before the court and an agreement dated 16-09-2019 was executed between the appellant and respondent No. 3 to the effect that the entire remaining salary of the appellant will be released within four months. But till date, the salary of the appellant was not released by respondents and the appellant approached to respondents for redressal of his grievances time and again, but the respondents paid no heed. Thereafter, the appellant filed the W.P No. 336-D/2020 before Honourable Peshawar High Court D.I.Khan Bench but in the meanwhile the respondents stopped the appellant from performing his duty. Therefore, the appellant withdrew his Writ Petition with the permission to file the fresh petition. After that, the appellant filed a W.P No. 214-D/2021 before Honourable Peshawar High Court, D.I.Khan Bench, and on 09.12.2021, the learned AAG produced copies of appointment order coupled with attendance sheet of appellant and stated that the appellant has been performing the duties. Therefore, the petitioner was decided on 09.12.2021. But, the respondents again restrained the appellant from performing the duty and also refused to release the monthly salary of the appellant. Copies of medical certificate, arrival report alongwith attendance register and Writ petition alongwith order are enclosed as **Mark-B to D** respectively.

3. That, on 15/05/2023 the appellant submitted the departmental appeal before the Respondent No. 2, but the same was not decided by authority; hence the appellant filling the instant appeal on the following grounds; (Copy of Departmental Appeal is enclosed as **Mark-E**)

**GROUND:**

1. That the act of the respondents while they stopped the appellant from performing his duty and refused to release the monthly salary of the appellant is illegal, against the natural justice, ulterior motives, based on malafide and without jurisdiction.

(3)

2. That the appellant was appointed after fulfilling all the codal formalities and the appellant is performing his duties but the respondents did not paid the monthly salary to appellant and now stopped the appellant from performing his duty, thus the respondents violated the fundamental right of the appellant which is protected under Article 11 of the Constitution of Islamic Republic of Pakistan, 1973.
3. That the Constitution of Islamic Republic of Pakistan, 1973 protected the rights of every citizen and provides the equality amongst the citizen, but the respondents clearly violated the fundamental right of the appellant protected by the Constitution of Islamic Republic of Pakistan.
4. That the appellant is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by the respondents and it has caused an immense mental torture and agony to the appellant.
5. That the counsel for the appellant may kindly be allowed to raise the additional grounds at the time of arguments.
6. That the appeal is being filed within the statutory period prescribed in section 4 of The KPK Service Tribunals Act, 1974.

It is, therefore, prayed that on acceptance of this appeal this court may be pleased to pass orders as prayed for in the heading of this appeal.

Dated:

Humble Appellant

ساجد علی

Sajid Ali

Through Counsel

محمد حسین علی

Muhammad Mohsin Ali  
Advocate Supreme Court,  
District Courts, D.I.Khan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. \_\_\_\_\_/2023

Sajid Ali

.....APPELLANT

VERSUS

Govt. of KPK and others

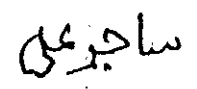
.....RESPONDENTS

AFFIDAVIT

I, the appellant, do hereby solemnly affirm and declare on oath that all the para-wise contents of the appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Court.



*Identified by Counsel*



*Deponent*

5

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

Appeal No. \_\_\_\_\_/2023

Sajid Ali

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

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**ADDRESSES OF THE PARTIES**  
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Sajid Ali son of Inayatullah resident of Gara Baloch District Tank.

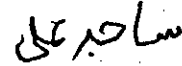
.....APPELLANT

- 
1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
  2. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
  3. District Education Officer (Male), Tank.
  4. SDEO (Male) Tank, Education Department, Tank.
  5. Head-Teacher, Govt. Primary School No. 2 (Boys) Tank City, Tank.
  6. District Account Officer, Tank.

.....RESPONDENTS

Dated:

Humble Appellant



Sajid Ali

Through Counsel



Muhammad Mohsin Ali  
Advocate Supreme Court,  
District Courts, D.I.Khan.





# OFFICE OF THE DISTRICT EDUCATION OFFICER-M TANK

Phone: 0963-510356, 0963-510381  
Email address: emistank@yahoo.com

ANNEX-1  
Page = 6  
Appointment order Class-W (BPS-03)

## APPOINTMENT ORDER:

Consequent upon the recommendations/approval of the Departmental Selection Committee, as contained in its minutes of the meeting, held on 19-03-2017 the undersigned is pleased to appoint the following 03 candidates against the vacant posts of Chowkidar (BPS-3) @Rs. (9610-390-21310) plus all usual allowances under 100% deceased sons / incapacitated & invalidated persons quota as admissible under the rules in the light of notification issued vide No. SO(R-IV)E&AD/1-3/2015 Dated: 19-04-2016, on the terms and condition given below from the date of their taking over charge.

### 25% Retired Employees Son Quota

S#	Name of Candidate	Father's Name	CNIC No	Address	Desig:	Place of Posting
1.	Asmat Ullah	Haibat Khan	1220125817073	Village Gara Budha, Tank	Chowkidar	GPS Tank Cantt.

### 100% Deceased Son Quota

S#	Name of Candidate	Father's Name	CNIC No	Address	Desig:	Place of Posting
1.	Hamid Ullah	Wali Muhammad	1220135775803	Village Pai, Tank	Chowkidar	GPS No. 3 Tank

### Disable Quota

S#	Name of Candidate	Father's Name	CNIC No	Address	Desig:	Place of Posting
1.	Sajid Ali	Ghulam Qamar	1220182955845	Village Gara Baloch, Tank	Chowkidar	GPS NO. 2 Tank City (Branch)

## TERMS & CONDITIONS

1. No TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. They should not be handed over charge if exceed 40 years or below 18 years of age, except that appointee to whom age relaxation is granted by the competent authority.
4. Appointment is subject to the condition that the domicile certificate & CNIC must be verified from the concerned authorities by the DEO. In case of fake / bogus domicile certificate/CNIC their appointment orders would be automatically cancelled from the date of appointment and will be reported to the law enforcing agencies for further action.
5. Their services are liable to terminate on one month's notice from either side. In case of resignation without notice their one-month pay / allowances shall be forfeited to the Government.
6. Pay will not be drawn until and unless a certificate regarding verification of their domicile certificate / CNIC is issued by this office.

7

7. They should join their posts within 15 days of the issuance of this notification. In case of failure to join the post within stipulated period, their appointment will stand expired automatically and subsequent no appeal etc shall be entertained.
8. Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. They will be governed by such rules and regulations as may be issued from time to time by the Govt. of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
10. The appointment is made subject to the condition that the candidate is permanent Domicile holder of District Tank.
11. Before handing over charge, once again their domicile certificate / CNIC may be checked by the DDO concerned.
12. If deceased / medical board quota has already been availed then the present appointment will be considered as null & void and such person will be reported to law enforcing agencies for further action.

--Sd--


(BAKHTULLAH SHAH)  
District Education Officer  
(Male) Tank

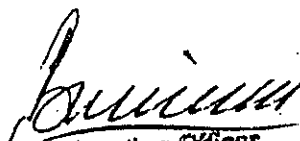
Endst. No. 1836-42 / Ministerial Staff/2018

Dated Tank the 26/03/2018

Copy forwarded for information & necessary action to:-

1. The District Accounts Officer, Tank.
2. The District Monitoring Officer (IMU) Tank.
3. The Sub-Divisional Education Officer (Male) Tank.
4. The Assistant Sub-Divisional Education Officer Circle Concerned.
5. The Head Teacher Schools Concerned.
6. The Official Concerned.
7. Office File.

  
District Education Officer  
(Male) Tank

  
Distt. Education Officer  
E & SE, Distt. Tank


MEDICAL CERTIFICATE

ANNEX-B  
Page = (8)

Name of Official Said Ali  
 Caste or Race Baloch  
 Father's Name Ghulam Samad  
 Residence Gara Block Distt. Tank  
 Date of Birth 01/01/1990 / N.I.C. Number 12261-8295584-5  
 Height 5-8  
 Personal marks of Identification Nil  
 Signature of the Official [Signature]  
 Signature of \_\_\_\_\_  
 Head of Office \_\_\_\_\_

Seal of Office \_\_\_\_\_

I do hereby certify that I have examined Mr. Said Ali  
 a candidate for employment in the Office of  
 the District Education Officer (M) Tank  
 And cannot discover that he had any disease communicable or other constitutional affection or bodily  
 infirmity except Disable I do not consider this as disqualification for employment  
 in the office of the DISST. EDUCATION (M) TANK  
 His age according to his own statement 01-01-1990 year and by appearance about  
 Years 29 (APPROX)

  
 LEFT HAND THUMB AND FINGER  
 IMPRESSIONS \_\_\_\_\_

[Signature]  
 Medical Superintendent  
 D.H.Q Hospital Tank  
 MEDICAL SUPERINTENDENT  
 D.H.Q HOSPITAL TANK  
 Dated 7/4/2018

# چارچ رپورٹ

میں سی مساجد علی ذمہ سی عنایت اللہ PSHT

سے جو کہ آج مورخہ 27/3/18 قبل بعد از دوپہر بموجب حکم نمبری 42-1836

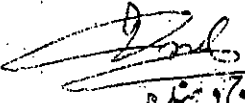
آدھ از دفتر (DEO CM) ٹانک

تعمیرات تبدیل ہوا ہے Chawki idar پوسٹ کا چارج سنبھال لیا ہے

مقام ٹانک گورنمنٹ ہائی اسکول سرائچ ٹانک

مورخہ 27/3/2018

سی مساجد علی  
چارچ گیر ہندہ

  
چارچ دہندہ  
Head Teacher  
BPS-15 G.P.S  
No. 2 Branch Tank

لاہور جیٹر حاضر کی ملازمین کی لسٹ  
 GPS No 2 Branch Tank بابت ماہ سروری سال 2019

2019

رقم		التم اللہ خان		رقم		رقم		رقم		رقم	
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راجہ سید طاہر حاضری امداد لکھنؤ گورنمنٹ ہائی اسکول گلبرگ، ایچ بی بابت ماہ مئی سال 2019

2019

۲۶: ساجد علی

پتہ: گلبرگ

قومی شناختی کارڈ نمبر: 35-8295584-12201

فون نمبر: 0343-9073153

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راجسٹر حاضری مدرسہ اسلامیہ علامہ اقبال پبلک اسکول، باہت ماہ اگست سال 2019

راجسٹر حاضری مدرسہ اسلامیہ علامہ اقبال پبلک اسکول، باہت ماہ اگست سال 2019										
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11										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
12										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30
13										
14										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
15										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
16										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
17										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
18										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
19										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30
20										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
21										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
22										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
23										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
24										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
25										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
26										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30	7:30	11:00	7:30
27										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
28										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
29										
ساجد علی			ساجد علی			ساجد علی			ساجد علی	
12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30	7:30	12:35	7:30
30										
31										
مرکز	مرکز	مرکز	مرکز	مرکز	مرکز	مرکز	مرکز	مرکز	مرکز	مرکز
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*(Handwritten signature)*

(Your suggestions will be welcome)





(14)

رجسٹر حاضرین مدرسہ اسلامیہ کراچی، کراچی، پاکستان  
پہلا سہ ماہی سال 2019ء

نام: ساجد علی  
پتو: کراچی  
قومی شناختی کارڈ نمبر: 8295584-12201-1  
فون نمبر: 0343 9073153

تاریخ	وقت	موضوع	موضوع	موضوع	موضوع	موضوع	موضوع	موضوع	موضوع
1	8:30	ساجد علی	1:35	ساجد علی					
2	8:30	ساجد علی	1:35	ساجد علی					
3	8:30	ساجد علی	1:35	ساجد علی					
4	8:30	ساجد علی	1:35	ساجد علی					
5	8:30	ساجد علی	1:35	ساجد علی					
6	8:30	ساجد علی	1:55	ساجد علی					
7	8:30	ساجد علی	1:35	ساجد علی					
8	8:30	ساجد علی	1:35	ساجد علی					
9	8:30	ساجد علی	1:35	ساجد علی					
10	8:30	ساجد علی	1:35	ساجد علی					
11	8:30	ساجد علی	1:35	ساجد علی					
12	8:30	ساجد علی	1:35	ساجد علی					
13	8:30	ساجد علی	1:55	ساجد علی					
14	8:30	ساجد علی	1:35	ساجد علی					
15	8:30	ساجد علی	1:35	ساجد علی					
16	8:30	ساجد علی	1:35	ساجد علی					
17	8:30	ساجد علی	1:35	ساجد علی					
18	8:30	ساجد علی	1:35	ساجد علی					
19	8:30	ساجد علی	1:35	ساجد علی					
20	8:30	ساجد علی	1:55	ساجد علی					
21	8:30	ساجد علی	1:35	ساجد علی					
22	8:30	ساجد علی	1:35	ساجد علی					
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31									

ساجد علی  
19/12/19

تاریخ	وقت	موضوع	موضوع	موضوع	موضوع	موضوع	موضوع
1							
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(Your suggestions will be welcome)

(15)

رجسٹر حاضر کی مدد میں گورنمنٹ ہائی اسکول پشاور، خیبر پختونخوا، پاکستان

ماہ اکتوبر سال 2019ء

تاریخ: 11/10/19  
 قومی شناختی کارڈ نمبر: 8295584-12201-  
 فون نمبر: 03439073153

تاریخ	وقت	موضوع	نوٹس
1	8:30	ساجد علی	ساجد علی
2	8:30	ساجد علی	ساجد علی
3	8:30	ساجد علی	ساجد علی
4	8:30	ساجد علی	ساجد علی
5	8:30	ساجد علی	ساجد علی
6	8:30	ساجد علی	ساجد علی
7	8:30	ساجد علی	ساجد علی
8	8:30	ساجد علی	ساجد علی
9	8:30	ساجد علی	ساجد علی
10	8:30	ساجد علی	ساجد علی
11	8:30	ساجد علی	ساجد علی
12		leave	
13			
14	8:30	ساجد علی	ساجد علی
15	8:30	ساجد علی	ساجد علی
16	8:30	ساجد علی	ساجد علی
17	8:30	ساجد علی	ساجد علی
18	8:30	ساجد علی	ساجد علی
19	8:30	ساجد علی	ساجد علی
20			
21	8:30	ساجد علی	ساجد علی
22	8:30	ساجد علی	ساجد علی
23	8:30	ساجد علی	ساجد علی
24	8:30	ساجد علی	ساجد علی
25	8:30	ساجد علی	ساجد علی
26	8:30	ساجد علی	ساجد علی
27			
28	8:30	ساجد علی	ساجد علی
29	8:30	ساجد علی	ساجد علی
30	8:30	ساجد علی	ساجد علی

Kindly attend the  
 No. of Teachers are (3)  
 and (1) Chalkboard.

PSAT is directed to  
 ensure quality education

Strictly observe the  
 time.

Please attend for  
 the upcoming annual  
 exam.

Do promptly while washing,  
 cleanliness and to  
 keep puncture

Give time immediately

Keep up-to-date all school  
 record.

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(Your suggestions will be welcome)









روزانه مشرف حضرت مولانا سید حسین گورکھپوری صاحب کمالیہ دارالافتاء کراچی پاکستان ماہ ستمبر سال 2020ء

20

تاریخ: ساجد علی  
محلہ: رنو کراچی  
قومی شناختی کارڈ نمبر: 5-84-2955-7-2201  
فون نمبر: 9073153-0343

1-2201

3/2-

روزانہ	آرام	دستخط	روزانہ	دستخط	آرام	دستخط	روزانہ	دستخط	آرام	دستخط	روزانہ	
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آغاز												
اختتام												
تاریخ												
محلہ												

Checked  
19/9/2020  
ASD/EO

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دیکھو



سال 2018  
 لاجپٹر حاضری مدیرین  
 BPS No 2 Bannu, T.M.U  
 بابت ماہ اگست - سال 2018

روز	تاریخ	وقت	حاضر	غائب	بیمار	سزا	نوٹس
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15	21/8/18	7:30	○	○			
16	22/8/18	7:30	○	○			
17	23/8/18	7:30	○	○			
18	24/8/18	7:30	○	○			
19	25/8/18	7:30	○	○			
20	26/8/18	7:30	○	○			
21	27/8/18	7:30	○	○			
22	28/8/18	7:30	○	○			
23	29/8/18	7:30	○	○			
24	30/8/18	7:30	○	○			
25	31/8/18	7:30	○	○			
26							
27							
28							
29							
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31							
مجموعاً			3	2	1		

روز	تاریخ	وقت	حاضر	غائب	بیمار	سزا	نوٹس
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12							
13							
14							
15	21/8/18	7:30	○	○			
16	22/8/18	7:30	○	○			
17	23/8/18	7:30	○	○			
18	24/8/18	7:30	○	○			
19	25/8/18	7:30	○	○			
20	26/8/18	7:30	○	○			
21	27/8/18	7:30	○	○			
22	28/8/18	7:30	○	○			
23	29/8/18	7:30	○	○			
24	30/8/18	7:30	○	○			
25	31/8/18	7:30	○	○			
26							
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مجموعاً			3	2	1		

(Your suggestions will be welcome)

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رجسٹر حاضر کی مدد سے سیدین  
GP No 2, Brand, TANK بابت ماہ مئی سال 2018

2018

کارکن کی تفصیلات		محلہ				انڈسٹری				تاریخ	
اسماء	پست	محلہ	اسماء	پست	محلہ	اسماء	پست	محلہ	محلہ	تاریخ	
ساجد علی	پست	محلہ	ساجد علی	پست	محلہ	ساجد علی	پست	محلہ	محلہ	1	
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				مبارک				1			
				میراث				1			

پست - 6  
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قومی شناختی کارڈ نمبر - 90-116530-12201  
PST - DPS - 12

فون نمبر: 03469491853

Sh. F. L 12:30  
Sh. F. L 12:30  
Sh. F. L 11:00  
Sh. F. L 12:30  
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2018 ل 2018 ل  
 لاجپٹر جا مشرقی ملہ لیبین  
 GPS No. 2, Bannet, T.H.V.K  
 بابت ماہ مارچ 2018 سال

نام		نمبر		تاریخ		وقت		ملاحظات	
نام	نمبر	تاریخ	وقت	نام	نمبر	تاریخ	وقت	ملاحظات	ملاحظات
محمد عمران خان	PST - RPS - 12	12201-8295584-5	0343-9073153	12201-9116530-9	03469491857				
1	8:30	11:35							Sh.F.L 11:30
2	8:30	11:55							Sh.F.L 11:30
3	8:30	11:35							Sh.F.L 11:30
4	8:30	11:35							Sh.F.L 11:30
5	8:30	11:35							Sh.F.L 11:30
6	8:30	11:35							Sh.F.L 11:30
7	8:30	11:35							Sh.F.L 11:30
8	8:30	11:35							Sh.F.L 11:30
9	8:30	11:35							Sh.F.L 11:30
10	8:30	11:35							Sh.F.L 11:30
11	8:30	11:35							Sh.F.L 11:30
12	8:30	11:35							Sh.F.L 11:30
13	8:30	11:35							Sh.F.L 11:30
14	8:30	11:35							Sh.F.L 11:30
15	8:30	11:35							Sh.F.L 11:30
16	8:30	11:55							Sh.F.L 11:30
17	8:30	11:35							Sh.F.L 11:30
18	8:30	11:35							Sh.F.L 11:30
19	8:30	11:35							Sh.F.L 11:30
20	8:30	11:35							Sh.F.L 11:30
21	8:30	11:35							Sh.F.L 11:30
22	8:30	11:35							Sh.F.L 11:30
23									Sh.F.L 11:30
24									Sh.F.L 11:30
25									Sh.F.L 11:30
26	8:30	11:35							Sh.F.L 11:30
27	8:30	11:35							Sh.F.L 11:30
28	8:30	11:35							Sh.F.L 11:30
29	8:30	11:35							Sh.F.L 11:30
30	8:30	11:55							Sh.F.L 11:30
31	8:30	11:55							Sh.F.L 11:30

دیکھو

(Your suggestions will be welcome)

لاہور جیٹرو جاٹری ملز لیمیٹڈ  
گورننگ بورڈ سربراہان کل ذمہ دار  
سیکریٹری ایجنسٹری  
۲۰ سال ۱۱/۱۰/۲۰۲۰ء

۲۰ سال ۲۰۲۰ء

اسم: مساجد علی پتہ: جم کپور قومی شناختی کارڈ نمبر: ۵-8295524-12201-۱۸۲ فون نمبر: ۰۳۰۲۳۹۰۷۳۱۵۳											
سلاخ	روزانگی	دستخط	آراء	دستخط	روزانگی	دستخط	آراء	دستخط	روزانگی	دستخط	آراء
1									8:30	مساجد علی	1:35
2									8:30	مساجد علی	1:35
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5									8:30	مساجد علی	1:35
6									8:30	مساجد علی	1:35
7									8:30	مساجد علی	1:35
8									8:30	مساجد علی	1:35
9									8:30	مساجد علی	1:35
10									8:30	مساجد علی	1:35
(11)											
12									8:30	مساجد علی	1:35
13									8:30	مساجد علی	1:35
14									8:30	مساجد علی	1:35
15									8:30	مساجد علی	1:35
16									8:30	مساجد علی	1:55
17									8:30	مساجد علی	1:35
(18)											
19									8:30	مساجد علی	1:35
20									8:30	مساجد علی	1:35
21									8:30	مساجد علی	1:35
22									8:30	مساجد علی	1:35
23									8:30	مساجد علی	1:55
24									8:30	مساجد علی	1:35
(25)											
26									8:30	مساجد علی	1:35
27									8:30	مساجد علی	
28											
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(Your suggestions will be welcome)

دیکھ کر



رجسٹر حاضری ملازمین  
 CPS No 2 B Tank بابت ماہ نومبر سال 2018

فون نمبر: 9116530-12-201		فون نمبر: 9491257-0348-9073153	
پست: PST - RPS - 12		پست: PST	
عمر: 12		عمر: 12	
تاریخ: 05/11/2018		تاریخ: 05/11/2018	
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رجسٹر نمبر: 70/11/18  
 تاریخ: 24/11/18

(Your suggestions will be welcome)





لاہور چتر حاضری اور لیون سٹیشن GPS No 2 By Tank بابت ماہ اکتوبر سال 2018

سال 2018

محلہ		رقبہ		رقبہ		رقبہ		رقبہ		رقبہ	
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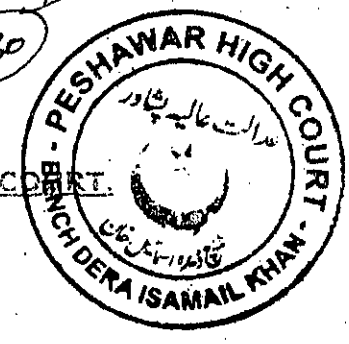
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رکن دور

(Your suggestions will be welcome)

29/10





BEFORE THE HONOURABLE PESHAWAR HIGH COURT.  
DERA ISMAIL KHAN BENCH.

Writ Petition No. \_\_\_\_\_ of 2020

Sajid Ali son of Inayatullah resident of Gara Baloch District Tank.  
(Petitioner)

Filed today 16/3  
Addl. Registrar  
Dera Ismail Khan

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Secretary Elementary & Secondary Education Govt. of K.P.K, Peshawar.
3. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male), Tank.
5. Musarat Hussain Khan, Ex-DEO (Male), Tank.
6. SDEO (Male) Tank, Education Department, Tank.
7. Head-Teacher, Govt. Primary School No. 2 Tank City, Tank.
8. District Account Officer, Tank.

(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN, 1973.

Respectfully Sheweth:

- I. That the addresses of the parties as given above are correct and sufficient for the purpose of service.
- II. That the brief facts of the case are that the present petitioner was appointed as Chowkidar in Education Department Tank vide office dated 26-03-2018 against

WP NO. 314-D of 2021 (DB) (Grounds)

ATTESTED  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

13/12/21

(2)

(31)

disable quota in GPS No. 2 Tank City. Copies of CNIC and appointment order of the petitioner alongwith disable certificate are enclosed as Mark-A & B respectively.

**III.** That the after getting the medical certificate the petitioner made the arrival and performing his duty till date. But the respondents have not released the salary of the petitioner, therefore, the petitioner filed a complaint against the respondent No. 5 the then DEO (Male) Tank before the Consumer Court, District Tank and during the proceeding, the respondent No. 5 appeared before the court and an agreement dated 16-09-2019 was executed between the petitioner and respondent No. 5 to the effect that the entire remaining salary of the petitioner will be released within four months. But till date, the salary of the petitioner was not released by respondents and the petitioner approached to respondents for redressal of his grievances time and again, but the respondents paid no heed. Thereafter, the petitioner filed the W.P No. 336-D/2020 before this Honourable Court but in the meanwhile the respondents stopped the petitioner from performing his duty. Therefore, the petitioner withdrew his Writ Petition with the permission to file the fresh petition. Copies of medical certificate, arrival report alongwith attendance register and compliant to Consumer Court alongwith relevant record, Writ petition and order are enclosed as Mark-C to F-1 respectively.

Filed today  
Add: Registrar  
27/12/21

W.P. No. 336-D/2020

That being aggrieved, the petitioner approaches this Honourable Court for redressal of his grievances, having no other alternative remedy but to invoke the constitutional jurisdiction of this Honourable court, inter alia, on the following grounds:

WP NO.214-D of 2021 (DB) (Grounds)

ATTESTED  
EXAMINOR  
Pesnawar High Court Bench,  
Dera Ismail Khan

12/12/21

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**GROUNDS:**

1. That the act of the respondents while they stopped the petitioner from performing his duty and refused to release the salary of the petitioner is illegal, against the natural justice, ulterior motives, based on malafide and without jurisdiction.
2. That the petitioner was appointed after fulfilling all the codal formalities and the petitioner was performing his duties but the respondents did not paid the monthly salary to petitioner and now stopped the petitioner from performing his duty, thus the respondents violated the fundamental right of the petitioner which is protected under Article 11 of the Constitution of Islamic Republic of Pakistan, 1973.
3. That the Constitution of Islamic Republic of Pakistan, 1973 protected the rights of every citizen and provides the equality amongst the citizen, but the respondents clearly violated the fundamental right of the petitioner protected by the Constitution of Islamic Republic of Pakistan.
4. That the petitioner is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by the respondents and it has caused an immense mental torture and agony to the petitioner.
5. That the counsel for the petitioner may kindly be allowed to raise the additional grounds at the time of arguments.

Filed today 16/3  
 Addl. 16/3

*Handwritten signature/initials*

WP NO.214-D of 2021 (DB) (Grounds)

**ATTESTED**  
**EXAMINOR**  
 Pesnawar High Court Bench,  
 Dera Ismail Khan

13/12/21

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It is therefore, humbly prayed that may please be directed the respondents to allow the petitioner to perform his duties and to release the salary of the petitioner or any other relief may being deems fit by this Honourable court in the interest of the petitioner.

**INTERIM RELIEF**

It is humbly prayed that by granting interim relief to direct the respondents to release the monthly salary of the petitioner till the disposal of main writ petition.

Filed today  
Addl. Registrar  
27/03/2021

Your Humble Petitioner

*Sajid Ali*

Sajid Ali  
Through Counsel

*Muhammad Mohsin Ali*

Muhammad Mohsin Ali  
Advocate High Court

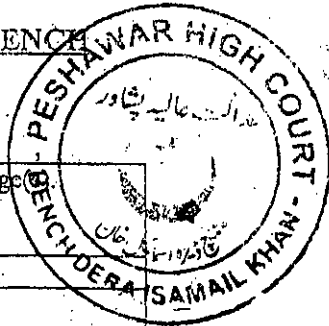
Dated: 27/03/2021



ATTESTED  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
13/12/21

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PESHAWAR HIGH COURT, D.I. KHAN BENCH

FORM OF ORDER SHEET



Date of Order or proceedings	Order or other proceedings with signature of Judge
(1)	(2)
09.12.2021	<p><u>W.P No. 214-D/2021 with C.M No.480-D/2021.</u></p> <p><b>Present:</b> Muhammad Mohsin Ali, Advocate, for the petitioner.</p> <p>Mr. Rehmat Ali Khan, Asstt. Advocate General for respondents.</p> <p>***</p> <p><u>Abdul Shaheer, J.-</u> At the very inception of proceedings, in compliance with the order dated 08.12.2021, learned Assistant Advocate General produced the copies of appointment order coupled with attendance sheet of petitioner and stated that the petitioner has been performing his duties and nobody obstructing him in performance of such duties. Being faced with this situation, learned counsel for the petitioner could not rebut the Court and remained answerless.</p> <p>2. In view of above, this petition being devoid of any force, is dismissed accordingly.</p> <p>Announced Dt: 09.12.2021</p> <p style="text-align: right;">   <b>JUDGE</b>    <b>JUDGE</b> </p> <p>(D.B)  Hon'ble Mr. Justice Abdul Shaheer  Hon'ble Mr. Justice Sahibzada Asadullah</p>

Office  
10/12

Hasnaini\*

ATTESTED  
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan  
13/12/21

To

ANNEXI - E  
Page (35)

The Director  
Education, Khyber Pakhtunkhwa,  
Peshawar.

Subject: Departmental Appeal through Proper Channel

Respected Sir:

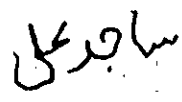
- i. That the present appellant was appointed as Chowkidar in Education Department Tank vide office dated 26-03-2018 against disable quota in GPS No. 2 Tank City. Copy of appointment order of the appellant alongwith disable certificate is enclosed.
- ii. That after getting the medical certificate, the appellant made the arrival and performing his duty till date; but the process in respect of monthly salary of the appellant was not initiated, therefore, the appellant filed a complaint against the then DEO (Male) Tank before the Consumer Court, District Tank and during the proceeding, the he appeared before the court and an agreement dated 16-09-2019 was executed to the effect that the entire remaining salary of the appellant will be released within four months. But the salary of the appellant was not released, hence, the appellant approached to DEO (Male) Tank for redressal of his grievances time and again, but the DEO (Male) Tank paid no heed. Thereafter, the appellant filed the W.P No. 336-D/2020 before Honourable Peshawar High Court D.I.Khan Bench but in the meanwhile the DEO (Male) Tank, SDEO and Head Teacher of the school stopped the appellant from performing his duty. Therefore, the appellant withdrew his Writ Petition with the permission to file the fresh petition. After that, the appellant filed a W.P No. 214-D/2021 before Honourable Peshawar High Court, D.I.Khan Bench, and on 09.12.2021, the learned AAG produced copies of appointment order coupled with attendance sheet of appellant and stated that the appellant has been performing the duties. Therefore, the petitioner was decided on 09.12.2021. But, the DEO (Male) Tank, SDEO and Head Teacher of the school again restrained the appellant from performing the duty and also refused to release the monthly salary of the appellant.

- iii. That, on 17/02/2023 the appellant submitted an application to the Head-Teacher of the school for redressal of his grievances but he paid no heed.
- iv. That the act of the DEO (Male) Tank, SDEO and Head Teacher of the school while they stopped the appellant from performing his duty and refused to release the monthly salary of the appellant is illegal, against the natural justice, ulterior motives, based on malafide and without jurisdiction.
- v. That the appellant was appointed after fulfilling all the codal formalities and the appellant is performing his duties but the DEO (Male) Tank, SDEO and Head Teacher of the school did not paid the monthly salary to appellant and now stopped the appellant from performing his duty.

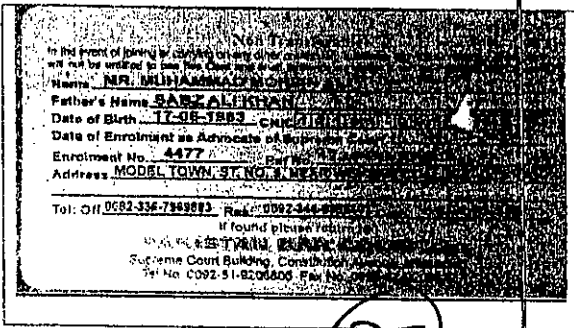
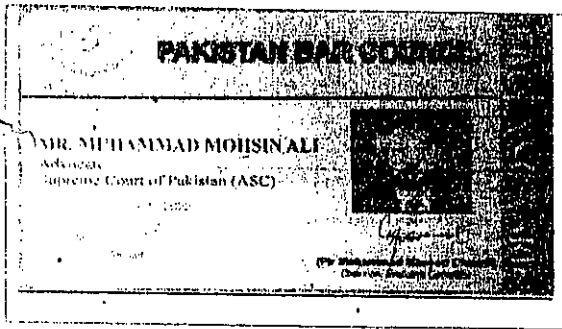
It is therefore, humbly prayed that may please be directed the DEO (Male) Tank, SDEO and Head Teacher of the school to allow the appellant to perform his duties and to release the salary of the appellant.

Dated: 15/05/2023

Your's Sincerely,



Sajid Ali son of  
Inayatullah  
resident of Gara Baloch District Tank.



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**VAKALATNAMA**

BEFORE THE COURT OF

*Service Tribunal Peshawar*  
*Camp Dikhu*

*جسولہ*

Plaintiff /Appellant /Petitioner/Complainant/ Accused

*وہی HPH*

**Vs**

Defendant/Respondent/ Complainant/ Accused

*جسولہ*

I/KNOW ALL to whom these present shall come that I/We.....  
do hereby appoint **Muhammad Mohsin Ali Advocate Supreme Court** (herein after called the advocate/s) to be my/our Advocate in the above noted case authorize him:-

1. To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.
3. To file and take back documents, to admit and/or deny the documents of opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.
8. And I/We the undersigned do hereby agree to rectify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and proposes.
9. And I/We undertake that I/We or my/our duly authorized agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned to hereby agree that in the event of the whole or part of the fee agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the above case and above Court. I/we hereby agree that once fee is paid, I/We will not be entitled for the refund of the same in any case whatsoever and if the case prolongs for more than 3 years the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this.....day .....

Accepted

*محمد حسین علی*  
**Muhammad Mohsin Ali**  
Advocate Supreme Court

*جسولہ*

122d-8295584-5

*جسولہ*

0343-9073153