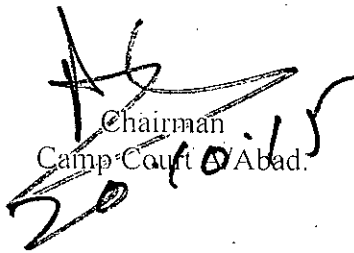


20.10.2015

Counsel for the appellant present. Learned counsel for the appellant requested for withdrawal of appeal as he intends to seek redressal of his grievances before the competent forum.

Dismissed as withdrawn. The appellant may seek his grievances before the competent forum, if so advised. File be consigned to the record room.




ANNOUNCED
20.10.2015


Chairman
Camp Court Abad.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 955/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21.08.2015	<p>The appeal of Mr. Khizar Aziz resubmitted today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	24-8-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>15-9-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	15.9.2015	<p>Counsel for the appellant present. Learned counsel for the appellant requested for adjournment as he is to study the point as to whether the service of the appellant is on contract basis or otherwise. Adjourned to 20.10.2015 for preliminary hearing before S.B at Camp Court A/Abad.</p> <p style="text-align: right;"> Chairman Camp Court A/Abad</p>

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

Service Appeal No: 955 /2015

Khizar Aziz son of Aziz ur Rehman, resident of Village Nagri Bala, Mohallah Dakhan Nalota, PST, GPS, Khaira Gali, Union Council Pluck, Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, KPK, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No:	Annexure
1.	Service appeal along with affidavit	1 to 9	
2.	Copy of advertisement	10	"A"
3.	Copy of appointment order dated 14/03/2015	12-13	"B"
4.	Copy of impugned withdrawal order dated 13/04/2015	14-	"C"
5.	Copy of departmental appeal of Appellant	15-18	"D"
6.	Wakalatnama.	19	

R. Aziz

...APPELLANT

Dated: 17/08 /2015

Through

(Muhammad Arshad Khan Taholi)
Advocate High Court, Abbottabad

1

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

G.W.F. Province
Service Tribunal
Resubmitted
date
Diary No. 992
dated 21-8-15

Service Appeal No. 955 /2015

Khizar Aziz son of Aziz ur Rehman, resident of Village Nagri Bala, Mohallah Dakhan Nalota, PST, GPS, Khaira-Gali, Union Council Pluck, Abbottabad.

....APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer (Male), Abbottabad.

....RESPONDENTS

SERVICE APPEAL UNDER SECTION 4-OF-KPK

SERVICE TRIBUNAL ACT 1974, FOR THE DECLARATION TO THE EFFECT THAT THE APPELLANT APPEARED FOR TEST THROUGH NTS AS PER ADVERTISEMENT PUBLISHED IN THE DAILY "THE AAJ" AND QUALIFIED TEST AS WELL AS INTERVIEW FOR THE POST OF PST. THEREAFTER THE APPELLANT WAS APPOINTED BY RESPONDENT -NO. 3 IN NEARBY UNION

Filed to-~~day~~

Registrar

Re-submitted to-day
and filed.

Registrar

21/8/15

COUNCIL OF THE APPELLANT VIDE ORDER NO. 1891-97-EB/EST DATED 14/03/2015. RESPONDENT NO. 3 WITHOUT ISSUING SHOW CAUSE NOTICE TO THE APPELLANT WITHDREW HIS APPOINTMENT ORDER VIDE IMPUGNED ENDST. ORDER NO. 2665-71/EB PST DATED 13/04/2015 WHICH IS ARBITRARY, DISCRIMINATORY, MALAFIDE, WITHOUT LAWFUL JUSTIFICATION AGAINST THE LAW, AS A RESULT OF POLITICAL PRESSURE AND THE IMPUGNED ORDER IS LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPEAL, IMPUGNED WITHDRAWAL ORDER OF THE APPELLANT DATED 13/04/2015 MAY BE DECLARED ILLEGAL AND RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO RESTORE APPOINTMENT ORDER DATED 14/03/2015 AND RELEASE SALARY OF THE APPELLANT W.E.F THE DATE OF APPOINTMENT I.E. DATED 14/03/2015 ONWARDS.

Respectfully Sheweth: -

Following are the facts, giving rise to the instant appeal:-

FACTS:

1. That the respondent No. 3 announced vacant posts of PSTs in District Abbottabad vide advertisement published in the Daily "The Aaj". Copy of advertisement is attached as Annexure "A".
2. That the appellant appeared before National Testing Services (NTS) for the post of PST. The appellant qualified test and thereafter interview conducted by respondent No. 3.
3. That following this, respondent No. 3 issued appointment order of the appellant in GPS Khaira Gali vide order Endst No. 1891-97/EB/Est dated 14/03/2015. Copy of appointment order dated 14/03/2015 is attached as Annexure "B".
4. That after a period of one month, respondent No. 3 without issuing, explanation and show cause notice etc. as per service rules withdrew appointment

order of the appellant dated 14/03/2015 vide impugned withdrawal Endst. order 2665-71/EB/PST dated 13/04/2015 which is against the law and liable to be declared null and void. Copy of impugned withdrawal order dated 13/04/2015 is attached as Annexure "C".

5. That the appellant feeling aggrieved from impugned withdrawal order dated 13/04/2015, filed departmental appeal to respondent No. 2 for redressal of his grievances. Copy of departmental appeal of appellant is attached as Annexure "D". Hence the instant service appeal is filed, inter-alia, on the following grounds;-

GROUND:

- a. That the appellant is permanent resident of Union Council Nagri Bala. The appellant has been appointed as PST in nearby Union Council i.e. Pluck vide order dated 14/03/2015. Purely on merit as well as according to rules mentioned in their advertisement. Hence withdrawal order

dated 13/04/2015 on the plea that the appellant Union Council is not adjacent where he was appointed is not maintainable.

- b. That it is worth mentioning that some candidates of other councils have been appointed in Union Councils which are not adjacent to their Union Councils and their appointment orders have not been withdrawn by respondent No. 3. Therefore, appellant has been discriminated and their withdrawal order issued by respondent No. 3 is discriminatory and liable to be set aside.

- c. That, appellant got appointment as PST in Union Council Pluck which is nearby Union Council of Union Council Nathiagali, as no candidate appeared for the post of PST from Union Council Pluck. Therefore, the appellant has been appointed according to the Rules and recruitment policy.

- d. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. Hence withdrawal order of the appellant is illegal against the recruitment policy and liable to be cancelled.
- e. That withdrawal appointment order of the appellant has been issued by respondent No. 3 due to political pressure as respondent department is going to appointment some blue eyed chaps at the alter of the appellant. Hence conduct of respondent No. 3 towards the appellant is malafide and discriminatory.
- f. That this fact may not be left to fade in oblivion that the appellant is entitled to serve as PST teacher in his respective school. Because after issuing of appointment order in favour of the appellant valuable rights has been accrued to serve PST in Education Department.

- g. That respondent No. 3 has led the appellant to the place which is utterly unknown to the principle of jurisprudence, law and the principles of natural justice.
- h. That once the appellant has been appointed as per requisite prescribed procedure as PST, his appointment order cannot be withdrawn without observing prescribed procedure.
- i. That, there is no other prompt effective and efficacious remedy available to the appellant except the invocation of constitutional jurisdiction of this Honourable Tribunal.
- j. That, other points will be raised at the time of arguments.

It is therefore, humbly prayed that on acceptance of the instant appeal, impugned withdrawal order of the appellant dated 13/04/2015 may be declared illegal and respondents may graciously be directed to restore

appointment order dated 14/03/2015 and release salary of the appellant w.e.f the date of appointment i.e. dated 14/03/2015 onwards.

INTERIM RELIEF:

It is, further prayed that the appellant has brought a good prima facie case, balance of convenience also lies in favour of appellant. His appointment order has been withdrawn without issuing show cause notice. It is humbly prayed that impugned withdrawal order dated 13/04/2015 may graciously be suspended and status quo be ordered to be maintained till final disposal of the instant appeal.

R. A. Z.

...APPELLANT

Through

Dated: 07/08 /2015

(Muhammad Arshad Khan Tanoli)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

R. A. Z.

...APPELLANT

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

Service Appeal No. _____/2015

Khizar Aziz son of Aziz ur Rehman, resident of Village Nagri Bala, Mohallah Dakhan Nalota, PST, GPS, Khaira Gali, Union Council Pluck, Abbottabad.

....APPELLANT

VERSUS

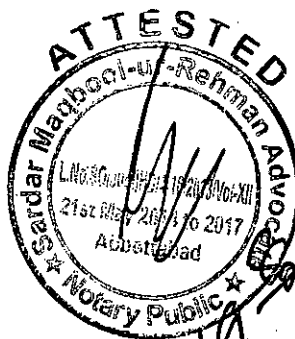
Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, KPK, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Khizar Aziz son of Aziz ur Rehman, resident of Village Nagri Bala, Mohallah Dakhan Nalota, PST, GPS, Khaira Gali, Union Council Pluck, Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



Khizar Aziz

DEPONENT



PST (M)

Annex B

6

Phone: 0992-9310102

Email: eda.education.utt@gmail.com

APPOINTMENT

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of PST, School based, in DPS-12 (Rs.700-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge:-

P-11

Sr. No	Roll No	Name	NIC	Marks	Place of Posting	UC
1.	111701796	MUHAMMAD TAHIR	13101-9186253-3	94.76	GPS Rian	Bagnatar
2	111701770	AMIR PERVAZ	13101-4968641-9	104	GPS Saranda	Bakot
3.	111791317	MUHAMMAD AFTAB	13101-6233041-9	91.47	GPS NAKAR PAKHO	Bakot
4.	111701494	MUHAMMAD AAMIR ABBASI	13101-1014639-3	74.49	GPS Dinkan Molia	Bakot
5.	111701766	MUHAMMAD JUNAID	13101-7818807-7	130.7	GPS Qalandarabad	Banda Pir Khan
6.	111700280	SYED AQEEL MUSSAIN SHAH	13101-6048509-1	124	GPS Riala	Banda Pir Khan
7.	601700473	MUHAMMAD WAQAS	13101-6939026-9	98.92	GPS Bandaili	Becrin Gali
8.	111791537	MUHAMMAD SOHAIL	13101-5924611-3	98.58	GPS Bunj Becrin Gali	Becrin Gali
9.	111700278	ABDUL SAMAD KHAN ABBASI	13101-8630996-3	114.9	GPS KAHU	Birote
10.	111701680	QAMMER HUSSAIN	13101-5856788-7	66.36	GPS Hutrot	Birote
11.	111701637	SANDAR SHUA UR REHMAN	13101-0539012-9	109.3	GPS Decdal	Boi
12.	111701711	IBRAR HUSSAIN SHAH	13101-0260621-7	93.81	GPS Dhani Boi	Boi
13.	111701690	SYED ABDUL GHADOOR SHAH	13101-2325854-3	92.73	GPS Chariali	Boi
14.	111701495	ABDUL QAYYUM KHAN ABBASI	37404-8081560-1	115.7	GPS Dinnah	Gorseni
15.	111701808	ABBAS HUSSAIN	13101-8611933-3	115.9	GPS Jabbi	Jartai
16.	111791767	GULFARAZ	13101-4346239-5	77.18	GPS Talkandi	Kuknang

Attested

Muhammad... Advocate Distt: Courts Abbottabad

Attested... Advocate

6

18.	11170033	NATHEED GUL	13101-6440386-3	115.9	GPS Maira Rehmat Khan	Kutubad
19.	11170035	FAISAL NASEER	13101-0406253-7	84.73	GPS Baungli No.1	Lora
20.	851700340	ADEEL AKHTAR	13302-6848819-3	92.94	GPS Nagri Tutial	Nagri Tutial
21.	111701530	AZAB HUSSAIN	17301-5876281-1	97.13	GPS Nakhater	Nammal
22.	111701573	MUHAMMAD TARIQ	13101-4047550-7	91.15	GPS Majoth	Nammal
23.	111701598	WAQAS AHMED ABBASI	13101-6348989-7	88.75	GPS LANGALOOT	Nammal
24.	111701531	SHAFQAT HUSSAIN	13101-7352984-7	85.6	GPS Trhatti	Nammal
25.	111701619	ADNAN KHAN	13101-8758312-3	115.6	GPS Bcri Bagla	Nara
26.	111701756	MUHAMMAD IMKAN	13101-6360862-1	117.6	GPS Dehri Maira	Saihad.
27.	111701493	MUHAMMAD AJMAL	13101-2407265-5	97.33	GPS Bannara	Seer
28.	111701727	HAROON UR KASHID	13101-5609383-9	102.6	GPS Madar	Tajwal
29.	111701320	MUHAMMAD AAMIR	37405-7990315-7	99.96	GPS Chanoch	Tajwal
29.	111701560	SAOIB HANIF LODHI	13101-6383183-1	110	GPS Dara	Dalala

ADJACENT UNION COUNCILS

Sr.No	Roll No	Name	Candidate UC	CMC	Merit	Place of Posting	School UC
30	111701747	Muhammad Aamir	Nagri Bala	13101-2740208-3	115.56	GPS Dana Khan Kalan	Bakot
31	111701634	HABAR REHMAN	Nathia Gali	13101-7990340-9	113.36	GPS Lundimndri	Bakot
32	111701525	ARSLAN MAZIR	Nagri Bala	13101-1365889-1	109.42	GPS NAKAR KHAN KALAN	Bakot
33	111701687	FAIHR HAQUEM LODHI	Mirpur	13101-1784827-7	122.12	GPS Hill Maira Zareen	Baldheri
34	111700340	ABDUL HAMIED KHAN	Mirpur	13101-7901774-3	99.51	GPS Mangal	Baldheri
35	111701810	GIBRAN MUHAMMAD	Nathia Gali	13101-2772545-1	130	GPS Bandi Birote	Birote
36	111701579	AFROX GUL	Nathia Gali	13101-4818607-7	123.26	GPS Chaloota	Birote
37	111701628	MUHAMMAD KHALID	Nathia Gali	13101-4472273-9	108.98	GPS Hutrol	Birote
38	111701811	NASEER AHMED	Nagri Bala	13101-1945133-3	97.68	GPS Kotalian	Birote
39	111701781	MUHAMMAD RAMEZ	Nanli Maira	13101-6793719-9	95.52	GPS Bandi Birote	Birote
40	111701538	YASIR BASHIR	Nathia Gali	13101-7395749-7	91.13	CMPS BASSAN DE KERI	Birote
41	111700330	MUHAMMAD ABID KHAN	Nathia Gali	13101-0824276-5	89.99	GPS Sei Khaiteer	Birote
42	111700333	HABIB UR REHMAN	TAJWAL	13101-4240896-7	99.21	GPS Lihcor	Birote

Attested

Muhammad Aslam
Tajwal Adm.

Attested
Muhammad Aslam
Advocate
Distt: Courts Abbottabad

P-107

(13)

14	111700298	GHULAM IMRAN	(X) Saltad	13301-1355635-7	103.96	GPS No 6 Abbottabad	City Urban
15	111700297	ZAHID HUSSAIN	Pattan Kulan	13101-6666776-7	98.6	GMPS Jabri Harala	Kukman
15	111700311	KHALID MEHMOOD	Pattan Kulan	13101-3931116-7	94.22	GMPS Chapra Gali	Kukman
16	111701785	SHAKEEL AHMED	(X) Dhamour	13101-5647874-3	95.87	GPS Tannuki	Langra
17	111701377	KHIZAR AZIZ	(L) Nagri Hala	13101-0478725-7	97.69	GPS Khaira Gali Nergol	Pluck
18	111701782	MUHAMMAD TABARIK	(L) Naithal Gali	13101-6673635-5	97.85	GPS Patti Dairdi	Pluck

P-13

TERMS & CONDITIONS

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year from the date of issuance.
4. He should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (if required).
5. Age relaxation is granted to S.No.03 in the light of Govt. of Khyber Pakhtunkhwa Establishment and Administration Department (Establishment Wing) Notification No.SOE-III(ES&AD)2-1/2007 dated 01-03-2008 & of Even Number dated 25-10-2011.
6. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO, anyone found producing bogus Certificate will be reported to the law enforcing agencies for further action.
7. His services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
8. Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
9. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within stipulated period, his appointment will stand expired automatically and no subsequent appeal etc shall be entertained.
10. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
11. Before handing over charge, he will have to sign an agreement with the Department; otherwise this order will not be valid.
12. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
13. His services shall be terminated at any time, in case his performance is found unsatisfactory during his contract period, in case of misconduct, he shall be preceded under the rules framed from time to time.
14. His appointment is made on school based, He will have to serve at the place of posting, and His service is not transferable to any other station.
15. Before handing over charge, once again their document may be checked by the DDO concerned, if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.
16. In case of miscalculation affecting merit at any stage will be rectified accordingly which may effect the place of posting resultantly.
17. Copy of professional standards, core competencies and job description issued vide Govt. of Khyber Pakhtunkhwa ES&SED Notification No. SO(PE)-III/PST/2014 Dated 17/09/2014 is attached with the appointment order.

Endst No 1891-97/EO/PST

Copy forwarded for information and necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Abbottabad.
3. PS to Secretary to Govt. of Khyber Pakhtunkhwa ES&SED Peshawar.
4. Sub Divisional Education Officer (Male) Abbottabad.
5. EMIS Cell Local Office.
6. Candidates concerned.
7. Master File.

s.d/
 ZIA-UD-DIN
 District Education Officer (M)
 Abbottabad
 Dated 14/3/2015

Attested
[Signature]
 District Education Officer (M)
 Abbottabad

[Signature]
 District Education Officer (M)
 Abbottabad

Attested

[Signature]
 Advocate
 Distt: Courts Abbottabad



P-14

Annex C

Phone: 0992-9310102
Email: edo.education.abb@gmail.com

WITHDRAWAL OF APPOINTMENT ORDER

In the light of clarification regarding Adjacent Union Councils received from Assistant Director, Local Govt & Rural Dev: Deptt: Abbottabad vide Memo No. 1-1. LG/UC/Atd/517 Dated 26-03-2015, appointment order of the following PSTs issued under this office Endst No. 1899/97/EB/PST Dated 14-03-2015 on Adjacent Union Councils basis is hereby withdrawn from the date of its issuance as they do not belong to the Adjacent Union Councils :-

S.No	Sr. No of Appnt: Order	Roll No	Name	Candidate UC	CNIC	Place of Posting	School UC
1	30	111701747	Muhammad Aamir	Nagri Bala	13101-2740208-3	GPS Dana Khan Kalan	Bakot
2	32	111701523	ARSLAN NAZIR	Nagri Bala	13101-1565889-1	GPS NAKAR KHAN KALAN	Bakot
3	38	111701811	NASEER AHMED	Nagri Bala	13101-1945133-3	GPS Kelalian	Dirore
4	47	111701577	KHIZAR AZIZ	Nagri Bala	13101-0478725-7	GPS Khaira Gali Nergul	Pluck
5	48	111701782	MUHAMMAD TABARIK	Nathia Gali	13101-6573635-5	GPS Patti Bandi	Pluck

1-
2

File
ZIA-UDDIN
District Education Officer (M)
Abbottabad
Dated 13-4/2015
Muhammad Anwar Khan

Endst No 2615-71 /EB/PST
Copy forwarded for information and necessary action to the:-

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Abbottabad.
3. PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SED Peshawar.
4. Sub Divisional Education Officer (Male) Abbottabad.
5. EMIS Cell Local Office.
6. Candidates concerned.
7. Master File.

M. Fakhruddin
For record + m/a
13/4/15

(Signature)
District Education Officer (M)
Abbottabad

Affected
(Signature)
Muhammad Anwar Khan
Advocate
Distt: Courts Abbottabad

Attested

Annex D

Muhammad Ali Akbar
District Courts Abbottabad

P-18

P-15

بخدمت جناب ڈائریکٹر ایلمینٹری اینڈ سیکنڈری خیبر پختون خواہ پشاور

عنوان:- برائے بحالی آڈر PST

جناب عالی!

مکرمی خضر عزیز ولد عزیز الرحمن ساکنہ نگری بالا دکن نلوٹھہ ضلع و تحصیل ایبٹ آباد کارہائشی ہے۔ اور گورنمنٹ پرائمری سکول دکن نلوٹھہ میں عرصہ 6 سال سے چوکیدار کی پوسٹ پر فرائض منصبی انجام دے رہا تھا۔ سائل نے دسمبر 2014 کو ضلع ایبٹ آباد خیبر پختون خواہ حکومت کی طرف PST کے لیے NTS کا امتحان دیا ہے۔ سائل کا آڈر Endst No. 1891-97/EB/PST گورنمنٹ پرائمری سکول خیراگلی نیرگول میں PST پوسٹ پر بذریعہ NTS میرٹ پر 14/03/2015 کو ڈسٹرکٹ ایجوکیشن آفیسر مردانہ ایبٹ آباد جاری ہوا۔

جناب عالی!

سائل نے سکول ہذا میں 13/04/2015 یعنی 26 دن اپنے فرائض منصبی PST پوسٹ پر انجام دیے۔ 13/04/2015 کو ڈسٹرکٹ ایجوکیشن آفیسر مردانہ ایبٹ آباد کی طرف سے Withdrawal of Appointment Order کی لسٹ جاری کی گئی جس میں سائل کا S.No.4 میں نام بھی شامل ہے۔ جس کی وجہ بتائی گئی کہ سائل متعلقہ پوسٹ پر کنسل کارہائشی نہیں ہے۔ جس کی فوٹو کاپی بمعہ آڈر Endst No. 1891-97/EB/PST کی فوٹو کاپی اور سائل کے چار پورٹ فوٹو کاپی بھی ہذا درخواست کے ساتھ لف ہے۔

جناب عالی!

متعلقہ پوسٹ پر کنسل پبلک میں موجودہ NTS میرٹ میں وہاں کا کوئی بھی Candidate موجود نہیں ہے اور سائل محکمہ تعلیم میں 6 سال سے چوکیدار کی پوسٹ پر فرائض انجام دینے اور موجودہ NTS میں میرٹ پر PST پوسٹ پر بھرتی ہونے کی وجہ سے اس پوسٹ پر حق رکھتا ہے۔

جناب عالی!

آپ سے مودبانہ گزارش ہے کہ! آپ ڈسٹرکٹ ایجوکیشن آفیسر مردانہ ایبٹ آباد کو خضر عزیز ولد عزیز الرحمن کا PST پوسٹ پر تعیناتی کا حکم صدر فرما کر سائل کو مشکور ہونے کا موقع فراہم کریں۔

جناب سے امید ہے کہ سائل کی درخواست کو ذریعہ غور لا کر سائل کو تاحیات دعا گو ہونے کا موقع فراہم کریں گے۔

جناب کی عین نوازش ہوگی

سائل خضر عزیز ولد عزیز الرحمن نگری بالا دکن نلوٹھہ ضلع و تحصیل ایبٹ آباد 18/4/2015

P/o. سمنڈر کٹ

7745-9635474



Approved
District Collector, Abbottabad

P-16

OFFICE OF THE ASSISTANT DIRECTOR
LOCAL GOVERNMENT & RURAL DEV: DEPAR
ABBOTRTABAD
Ph: No. 0992-9310

No: 1-1.LG/UC/Atd/ 517
Dated: 26/03/2015.

To

The District Education Officer (Male)
Abbottabad.

Subject: -

CLARIFICATION REGARDING THE ADJACENT UNION COUNCIL

Memo:

Kindly refer to your letter No.2014/EB dated 20-03-2015 on the subject noted above.

In this context the clarification is as under:-

S.No.	Union Councils	Adjacent /Next adjacent Union Council
1.	Bakote	Nathia Gali, Namli Maira, Nammal, Berote
2.	Berote	Bakote Pluck.
3.	Baldehri	Banda Pir Khan, Mir Pur,
4.	City Urban.	Salhad.
5.	Kukmang	Pattan Kalan, Boi,
6.	Langra	Dhamtour, Salhad, Jhangra, Chari Phulhraan,
7.	Pluck.	Birote, Tajwal, Seer Gharbi.

It is worth to be mentioned here that:-

1. Union Council Nagri Bal & Phalkot are not adjacent to UC Bakote.
2. Union Council Jhangi is not adjacent to UC Baldehri.
3. Union Council Nathia Gali is not adjacent to UC Pluck.

Approved
District Collector, Abbottabad

[Signature]
ASSISTANT DIRECTOR
LG&RDD ABBOTTABAD

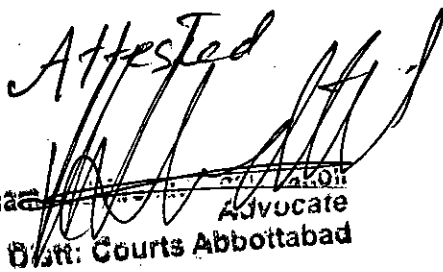
P-17

CHARGE REPORT

P-209

Certified that ~~We~~I have on the fore/afternoon of
this day respectively made over and receive charge of this
office G.P.S Neargoal AFD of the

KHIZAR AZIZ S/O AZIZ UR REHMAN
(PST) office / No 1891-97/EB. PST

Attested

Muhazir Advocate
Distt: Courts Abbottabad

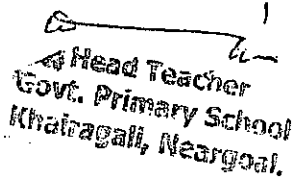
Signature of Relieved

Govt Servant Rumi AZ

Designation P.S.T

Station G.P.S Khairagali Neargoal.

Charge Taken over by A.F.D

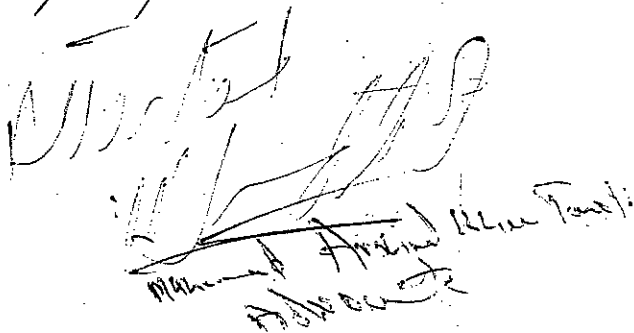

Head Teacher
Govt. Primary School
Khairagali, Neargoal.

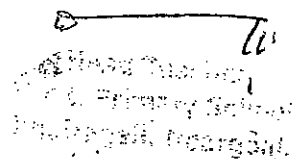
Signature of Relieving

Govt Servant _____

Designation _____

Dated 18/03/2015


Muhazir Advocate


Head Teacher
Govt. Primary School
Khairagali, Neargoal.

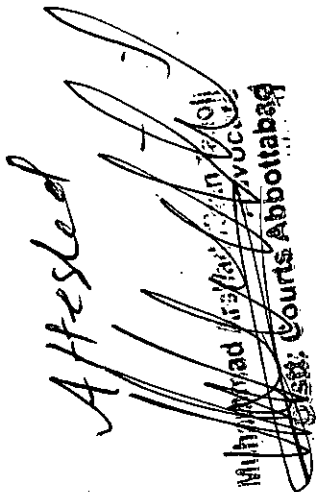
P-18

U.C. BEROT

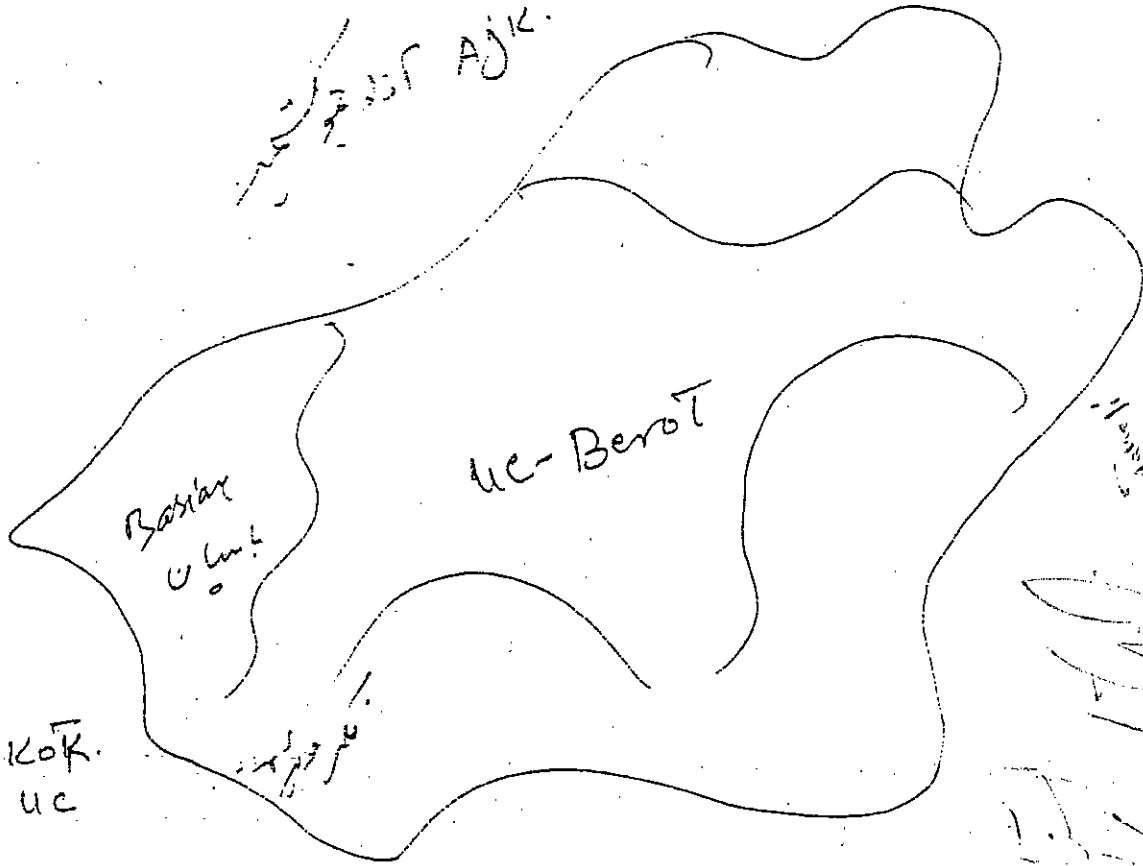
P-25

MAP OF UNION COUNCIL

Berot

Attested

M. Ahmad
District Courts Abbottabad

Bokor U.C.



Paluck U.C.

Dawal
پانچ
Jaga
Ejaz Saeed
Berot 21/6/15

Before the Service Tribunal eple Peshawar بعد ازاں

Chizar Aziz عنوان: Govt of eple بنام

Appellant منجانب:

Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Adv. Mohammad Arshad Ichan Tanoli Adv. the Abbottabad

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المترقوم:

Abbottabad بمقام:

Accepted

Mohammad Arshad Ichan Tanoli

Adv High Court - Abbottabad