

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Dismissed as withdrawn.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 A/Abad.

20.10.15

Form- A  
FORM OF ORDER SHEET

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

Case No. 953 /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. Muhammad Amir 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;"><i>[Signature]</i> 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;"><i>[Signature]</i> 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;"><i>[Signature]</i> Chairman Camp Court A/Abad</p>

The joint appeal of M/S Muhammad Amir, Naseer Ahmad, Khizar Aziz and Muhammad Tabarak received to-day i.e. on 10.08.2015 is incomplete on the following score which is returned to their counsel for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately/individually, therefore the appeal of the above named appellants may be filed separately/individually.
- 3- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each case may also be submitted.

No. 1193 /S.T,

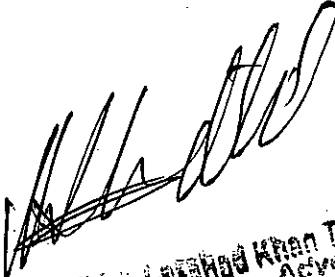
Dt. 11/8 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Arshad Khan Tanooli  
Advocate, High Court Abbottabad

Sir,

objections mentioned above,  
have duly been removed  
and the appeal is re-submitted  
for your further necessary  
action.

  
Muhammad Arshad Khan Tanooli  
Advocate  
Distt. Court Abbottabad  
17/08/15

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

Service Appeal No. 953 /2015

Muhammad Amir son of Ali Asghar resident of Kasala, Union Council Nagri Bala, District Abbottabad, PST GPS Danna Khann Kalan, District Abbottabad.  
...APPELLANT

**VERSUS**

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

**SERVICE APPEAL**

**INDEX**

<b>S.#</b>	<b>Description</b>	<b>Page No.</b>	<b>Annexure</b>
1.	Service appeal along with affidavit	1 to <del>10</del> 9	
2.	Copy of advertisement	10	"A"
3.	Copy of appointment order dated 14/03/2015	11-12	"B"
4.	Copy of impugned withdrawal order dated 13/04/2015	14	"C"
5.	Copy of departmental appeal of Appellant	15-17	"D"
6.	Wakalatnama.	18	

  
...APPELLANT

Dated: 17/08 /2015

Through

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

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

Service Appeal No. 953 /2015

Muhammad Amir son of Ali Asghar resident of Kasala, Union Council Nagri Bala, District Abbottabad, PST GPS Danna Khann Kalan, District Abbottabad.  
**...APPELLANT**

**VERSUS**

*Resubmitted date*  
S.W.F. Province  
Service Tribunal  
Diary No. 990  
Dated 21-8-2015

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*  
*[Signature]*  
Registrar  
21/8/15

*Re-submitted to-day and filed.*  
*[Signature]*  
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 Danna Khann Kalan 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. Bakot 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 Bakot which is nearby Union Council of Union Council Nagri Bala, as no candidate appeared for the post of PST from Union Council Bakot. 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.



...APPELLANT

Through

Dated: 17/08 /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.



...APPELLANT

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

Service Appeal No. \_\_\_\_\_/2015

Muhammad Amir son of Ali Asghar resident of Kasala, Union Council Nagri Bala, District Abbottabad, PST GPS Danna Khann Kalan, District Abbottabad.

...APPELLANT

**VERSUS**

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

....RESPONDENTS

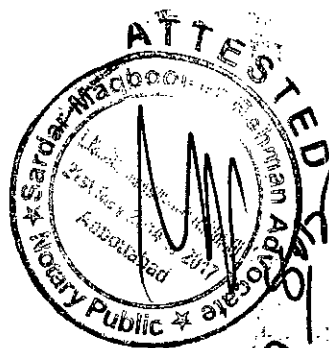
**SERVICE APPEAL**

**AFFIDAVIT**

I, Muhammad Amir son of Ali Asghar resident of Kasala, Union Council Nagri Bala, District Abbottabad, PST GPS Danna Khann Kalan, District 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.



DEPONENT







PST (M)

Annex B

15

Phone: 0992-9310102  
Email: edu.education.utt@gmail.com

APPOINTMENT

P-17

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered against the post of PST, School based, in GPS-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:-

Sr. No	Roll No.	Name	NIC	Merit	Place of Posting	DC
1.	111701796	MUHAMMAD TAHIR	13101-9186253-3	94.76	GPS Rian	Bagnatar
2.	111701770	AMIR PERVAZ	13101-4968641-9	104	GPS Saranda	Bakot
3.	111791517	MUHAMMAD AFTAB	13101-6235041-9	91.47	GPS NAKAR PAKHO	Bakot
4.	111701494	MUHAMMAD AMIR ABBASI	13101-1014689-3	78.49	GPS Dhakan Molia	Bakot
5.	111701766	MUHAMMAD JUNAID	13101-7818807-7	130.7	GPS Qalandarabad	Banda Pir Khan
6.	111700280	SYED AQEEL HUSSAIN SHAH	13101-6048509-1	124	GPS Riata	Banda Pir Khan
7.	601700473	MUHAMMAD WAQAS	13101-6939026-9	98.92	GPS Bundaili	Beerin Gali
8.	111791537	MUHAMMAD SONAIL	13101-5924611-3	98.58	GPS Bunj Beerin Gali	Beerin Gali
9.	111700278	ABDUL SAMAD KHAN ABBASI	13101-8630996-3	114.9	GPS KARHU	Birote
10.	111701680	QAMMER HUSSAIN	13101-3836788-7	66.36	GPS Hatrol	Birote
11.	111701637	SARDAR SHUDA UR REHMAN	13101-4539012-9	109.3	GPS Doodal	Boi
12.	111701711	IBRAR HUSSIAN SHAH	13101-0260621-7	93.81	GPS Dhani Boi	Boi
13.	111701690	SYED ABDUL GHAFUOR SHAH	13101-2325854-3	92.75	GPS Chariali	Boi
14.	111701495	ABDUL QAYYUM KHAN ABBASI	37404-3081560-1	115.7	GPS Dinnah	Gorzeni
15.	111701808	ABBAS HUSSAIN	13101-8611933-3	115.9	GPS Jabbi	Jureni
16.	111701767	GULFARAZ	13101-4346239-5	77.18	GPS Tarbandi	Kuknang

Attested  
Mubashir Ahmad  
Advocate  
Distt: Courts Abbottabad

Attested  
Mubashir Ahmad  
Advocate

	11170023	NAHEED GUL	13101-6440386-3	115.9	GPS Maira Rehma Khan	Kustwal
18.	11170025	FAISAL NASEER	13101-9406253-7	84.73	GPS Baungi No 1	Lora
19.	831700246	ADEEL AKHTAR	13302-6448819-3	92.94	GPS Nagri Tutial	Nagri Tutial
20.	111701552	AZAD HUSSAIN	17301-5876281-1	97.13	GPS Nakhater	Nammal
21.	111701373	MUHAMMAD TARIQ	13101-4047650-7	91.15	GPS Majoth	Nammal
22.	111701598	WAQAS AHMED ABBASI	13101-6348989-7	88.75	GPS LANGALOOT	Nammal
23.	111701531	SHAFQAT HUSSAIN	13101-7552964-7	85.6	GPS Trhatti	Nammal
24.	111701619	ADMAN KHAN	13101-8758312-5	115.6	GPS Beri Bagla	Nara
25.	111701736	MUHAMMAD IMKAN	13101-6360862-1	117.6	GPS Duhri Maira	Sahad.
26.	111701493	MUHAMMAD AIMAL	13101-2407265-5	97.33	GPS Batnara	Seer
27.	111701727	HAROON UR KASHID	13101-5609383-9	102.6	GPS Madar	Tajwal
28.	111701520	MUHAMMAD AAMIR	37405-7990315-7	99.96	GPS Chanoch	Tajwal
29.	111701560	SAQIB HANIF LODHI	13101-6383183-1	110	GPS Dara	Dalola

ADJACENT UNION COUNCILS

Sr.No	Roll No	Name	Candidate UC	CMC	Merit	Place of Posting	School UC
30	111701547	Muhammad Aamir	Nagri Bala	13101-2740208-3	115.56	GPS Dana Khan Kalan	Bakot
31	111701634	HABIB REHMAN	Nathia Gali	13101-7990340-9	113.36	GPS Lundimandri	Bakot
32	111701525	ARSLAN HAZIR	Nagri Bala	13101-1365889-1	109.42	GPS NAKAR KHAN KALAN	Bakot
33	111701687	TAHIR HALEEM LODHI	Mirpur	13101-1784827-7	122.12	GPS Hill Maira Zareen	Baldheri
34	111700340	ABDUL HAMEED KHAN	Mirpur	13101-7001774-3	99.51	GPS Mangal	Baldheri
35	111701810	GIRLAM MUHAMMAD	Nathia Gali	13101-2772545-1	130	GPS Bandi Birote	Birote
36	111701579	AFROZ GUL	Nathia Gali	13101-4818607-7	123.26	GPS Chaloota	Birote
37	111701628	MUHAMMAD KHALID	Nathia Gali	13101-4477273-9	108.95	GPS Hutral	Birote
38	111701811	NASEER AHMED	Nagri Bala	13101-1945133-3	97.68	GPS Kotalian	Birote
39	111701781	MUHAMMAD RAMEZ	Namli Maira	13101-5792719-9	96.52	GPS Bandi Birote	Birote
40	111701538	YASIR BASHIR	Nathia Gali	13101-7595749-7	91.13	GMPS BASSAN DE KERI	Birote
41	111700320	MUHAMMAD ABID KHAN	Nathia Gali	13101-0824276-5	89.99	GPS Soli Khaizer	Birote
42	111700353	HABIB UR REHMAN	TAJWAL	13101-4240896-7	99.27	GPS Chahoor	Birote

Attested

Muhammad Asghar  
Tajwal

Attested  
Muhammad Asghar  
District Courts Abbottabad



P-13

(13)

43	111700298	GHULAM IMRAN		13301-1355635-1	103.96	GPS No 6 Abbottabad	City Urban
44	111700287	ZAHID HUSSAIN	Patlan Kalan	13101-6666776-7	98.6	GMPS Jabri Harala	Kukmang
45	111700311	KHALID MEHMOOD	Patlan Kalan	13101-3931116-7	94.22	GMPS Chapra Gali	Kukmang
46	111701785	SHAKES AHMED		13101-3847874-3	95.87	GPS Tannaki	Langra
47	111701577	KHIZAR AZIZ		13101-0478725-7	97.69	GPS Khaira Gali Nergol	Pluck
48	111701782	MUHAMMAD TABAKK		13101-6673635-5	91.35	GPS Patti Bardi	Pluck

**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.SCE-III(E&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 DED, 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 10 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 proceeded 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 DDD 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 E&SED Notification No. SO(PE)-13/PSI/2014 Dated 17/09/2014 is attached with the appointment order.

Endst No 1891-97/EB/PSI

Copy forwarded for information and necessary action to the:-

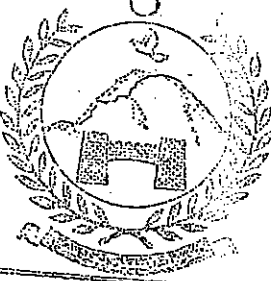
1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Abbottabad.
3. PS to Secretary to Govt. of Khyber Pakhtunkhwa E&SED Peshawar.
4. Sub Divisional Education Officer (Male) Abbottabad.
5. EMIS Cell Local Office.
6. Candidates concerned.
7. Master File.

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

District Education Officer (M)  
Abbottabad

Advocate  
District Courts Abbottabad

Zia-ud-Din  
District Education Officer (M)  
Abbottabad



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. 1897/97/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 Applt: 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	111701525	ARSLAN HAZIR	Nagri Bala	13101-1365889-1	GPS NAKAR KHAN KALAN	Bakot
3	38	111701811	NASEER AHMED	Nagri Bala	13101-1945133-3	GPS Kelalian	Birote
4	47	111701577	KHIZAR AZIZ	Nagri Bala	13101-0478725-7	GPS Khaira Gali Nergul	Pluck
5	48	111701782	MUHAMMAD TABARIK	Nathia Gali	13101-5673635-5	GPS Patti Bandi	Pluck

1-  
2

File No. 13-4  
ZIA-UD-DIN  
District Education Officer (M)  
Abbottabad  
Dated 13-4 /2015

Endst No. 26/5-71 /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. Farhanullah  
13/4/15

District Education Officer (M)  
Abbottabad

M. Farhanullah  
Advocate  
District Courts Abbottabad

The director  
(E&SE) KPK Peshawar

P-16  
Annex D

201

Subject: Departmental Appeal

1. Reference is made to impugned withdrawal order of the applicant Endst No: 2655-71EB/PST dated 13-04-2015. (Copy of withdrawal order is attached).
2. That, the applicant appeared before NTS test for the Post of PST. The applicant qualified test of NTS and thereafter passed interview for the post of PST.
3. That, following this the applicant was appointed as PST in GPS DANA KHUN KALAN in UC Bakote which is nearby to UC Nagri Bala i.e. the UC of the applicant purely on the basis of merit as well as rules in vogue vide appointment order no 1891-971EB/PST Dated 14-03-2015.
4. That the applicant took over the charge of PST post on 17-03-2015 and served the deptt with complete devotion and dedication.
5. That, DEO (M) Abbottabad without issuing Showcase notice, explanation and charge sheet, with drew appointment order of the applicant after one month referred in para 1 above, which is illegal, discriminatory without lawful justification, mala fide and is a result of political pressure.
6. That, appointment of the applicant was made in the nearby UC of the applicant as per rules and advertisement.
7. That, DEO (M) Abbottabad illegally withdrew appointment order of the applicant just to accommodate some other blue eyed chaps.
8. That, it is worth mentioning that permanent resident (Candidate) of Nathigali has been appointed in UC Berote which is not adjacent to Nathigali. Similarly candidate from UC Tajwal and Namli Maira have also been appointed in UC Berote which are not adjacent to each other. Therefore, DEO (M) Abbottabad clearly discriminated the applicant. Hence, the applicant is entitled to serve in UC Bakote on the analogy of above mentioned candidate who are serving in UCs which are event not adjacent to their UC.

In view of the above, it is prayed that impugned withdrawal order of appointment of the applicant may be set aside and appointment order dated 14-03-2015 may be restored. Beside salary of the applicant wef 14-03-2015 onwards may also be paid to him and obliged.

Attested  
Muhammad  
Dist. Abbottabad

Your's sincerely

13-04-2015

Muhammad Amir  
PST (BPS-12)  
Village Kasala P.O Nagri Bala  
Tehsil & District Abbottabad  
0344-4140040

Muhammad Amir  
PST (BPS-12)  
Village Kasala P.O Nagri Bala  
Tehsil & District Abbottabad  
0344-4140040

Copy to:

1. Secretary (E&SE) KPK Peshawar
2. DEO (Male) Abbottabad

For information

از دست یوسف کوثر ایف اے ۱۹۶۶ء

P-16 ایف اے

ایف اے باب ۱۱ میں یوسف کوثر ایف اے کوثر  
کوثر ایف اے

P-24

(۱) یہ کہ یوسف کوثر ایف اے کے شرف میں درجہ ۱۰

اور کوثر ایف اے - صورت ۱۱-۱۵-۱۹۶۶ء -

(۲) یہ کہ یوسف کوثر ایف اے کے سرکار میں جانے اور

یہ یوسف کوثر ایف اے -

یہ نشان میں یوسف کوثر ایف اے -

یہ عید عید میں یوسف کوثر ایف اے اور سرکار

مقرر کے یہ یوسف کوثر ایف اے کے ساتھ یوسف

کوثر ایف اے -

ایف اے میں یوسف کوثر ایف اے

ایف اے

Attested

یوسف کوثر ایف اے

29/06/015

Muhammad Ashraf Khan  
Advocate  
Osht: Court Abbottabad

یوسف کوثر ایف اے

P-17

چارے رپورٹ

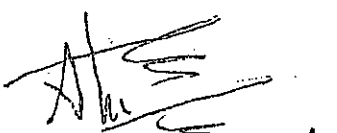
P-207

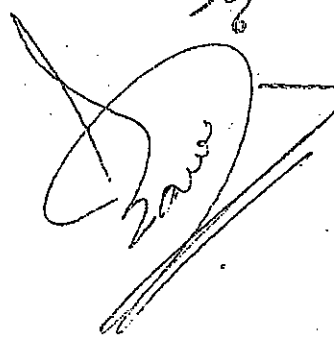
تصدیق کیا جاتا ہے کہ مستحق محمد عامر ولد علی اصغر نے  
آنے مورخہ 17 مارچ 2015ء قبل از دویم آفس آرڈر نمبر  
1891-97 آمدہ از دفتر E.O.D. (M) پر امری ایٹ آباد  
گورنمنٹ پرائمری سکول ڈیہ کھن حیدر میں P.S.T کی حالی  
آسامی پر اپنے عہدہ کا چارے منتقل کیا ہے۔

صدر کا چارے دینے ہوئے ہدایت کی جاتی ہے کہ چارے  
رپورٹ کی مصدقہ نقول جلد از جلد دفتر چارج کروا کر اپنے فرانسس بھیجی  
انجام دینا شروع کریں۔

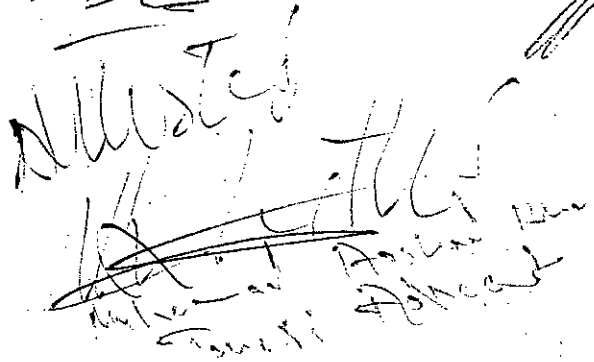
العبد  
چارے گرنیزہ۔

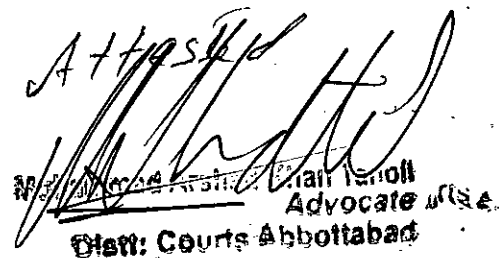
العبد چارے دھنڈہ۔





Head Teacher  
Govt Primary School  
Danna Khan Kalan



  
Advocate  
Distt: Courts Abbottabad

in Before the Service Tribunal of Peshawar بعدالت

محمد امیر بنام Govt of Peshawar عنوان

Service 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

At the Mohammad Arshad Ichan Tanoli Adv

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

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف 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 پر داختم 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 بمراد 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۔

المترجم:

بمقام: Ashtabae

Accepted

Mohammad Arshad Ichan Tanoli  
Advocate High Court Abbottabad