


FORM OF ORDER SHEET

Court of _____

Appeal No. 2237/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/10/2023	<p>The appeal of Mr. Muhammad Daud resubmitted today, by Mr. Hassan U.K Afridi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Pareha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Daud son of Mulla Badshah Khan Chowkdar Ch-55 Sur Sui Kohat received today i.e on 24.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Annexure-A attached with the appeal is illegible which may be replaced by legible/better one.

No. 3457 /S.T.

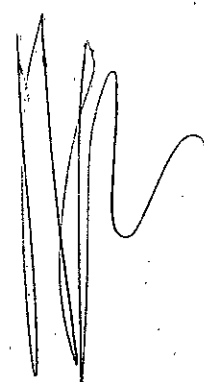
Dt. 25/10 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hassan U.K Afridi Adv.
High Court Peshawar.

Re-submitted
After completion of
bond application - 26/10/23



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 2257/2023

Muhammad Daud.....Appellant

V E R S U S

Govt. of Khyber Pakhtunkhwa
Through Secretary E&SE & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Appointment order dated 20.01.2021		8-10
5.	Corrigendum		11
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Appellant
Through

Dated 24.10.2023

Hassan U.K Afridi
Advocate
Supreme Court of Pakistan
Cell No.0300-9151963

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 2237/2023

Muhammad Daud Son of Munir Badshah
R/o Cheeshnah Ghunda, Tehsil Lachi, District Kohat,
Ex-Chowkidar, GHSS, Sur Gul Kohat

.....Appellant

V E R S U S

1. Government of Khyber Pakhtunkhwa (KPK) through Secretary Elementary & Secondary Education, Peshawar
 2. Director, Elementary & Secondary Education, Peshawar
 3. District Education Officer (DEO), Male, K.D.A, Kohat
-Respondents

**SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974, AGAINST THE
IMPUGNED ORDER OF REMOVAL FROM
SERVICE VIDE DATED 02.12.2022, PASSED
BY THE RESPONDENT NO.3 AND
IMPUGNED ORDER, VIDE DATED
20.09.2023 PASSED BY THE RESPONDENT
NO.2, WHILE HIS DEPARTMENTAL APPEAL
HAS REJECTED.**

Prayer in Appeal:-

On acceptance of this service appeal, the impugned orders of the respondents No.2 and 3 as mentioned above may kindly be set aside and the appellant may please be reinstated in service with all back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents

Respectfully Sheweth:-

Facts of the case

1. That the appellant has been appointed as class-iv in BPS-03, Chowkidar at GHSS, Surgal Kohat on 20.01.2021 in the Department of respondents.
2. That the appellant performance his duties with due diligent and with satisfaction of the authorities.

3. That due to the threat of life from some unknown persons, the appellant was absent from his duty and inform the principle of his school but in vain, for the reason, the appellant absented form his duty due to fear of his life.
4. That all of a sudden, without any intimation, the appellant has removed from his service on 02.12.2022.
5. That feeling aggrieved from the order dated 02.12.2022 the appellant filed departmental Appeal, which has been rejected by the respondent No.2, vide dated 20.09.2023, while the appellant came to know on 02.10.2023, hence this service appeal, on the following amongst others grounds:

GR OUNDS:

- A. That the impugned orders of the respondents No.2 and 3 as mentioned in the handing of the appeal, are against law and justice and are liable to be set aside.

- B. That no inquiry has been conducted under the service rules.
- C. That absence of the appellant from his duty is unintentional but due to the threats of his life from some unknown persons, for the reasons, the appellant mentally ill and did not inform the authorities within time, while the appellant informed the principle regarding threats.
- D. That the formal procedure has not been adopted under the rules.
- E. That the major penalty has been awarded/ imposed upon the appellant, which is harsh and the authorities may take a lenient view of imposing the penalty.
- F. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is, therefore most humbly prayed on acceptance of this service appeal, the impugned orders of the respondents No.2 and 3 as mentioned above may kindly be set aside

and the appellant may please be reinstated in service with all back benefits

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents

محمد داؤد

Through Appellant

Dated 24.10.2023

Hassan U.K Afridi
Advocate
Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Muhammad Daud.....Appellant

V E R S U S

Govt. of Khyber Pakhtunkhwa
 Through Secretary E&SE & others.....Respondents

A F F I D A V I T

I, Muhammad Daud Son of Munir Badshah R/o Cheeshnah Ghunda, Tehsil Lachi, District Kohat, Ex-Chowkidar, GHSS, Sur Gul Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

محمد داؤد

DEPONENT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Muhammad Daud.....Appellant

V E R S U S

Govt. of Khyber Pakhtunkhwa
Through Secretary E&SE & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT:

Muhammad Daud Son of Munir Badshah
R/o Cheeshnah Ghunda, Tehsil Lachi, District Kohat,
Ex-Chowkidar, GHSS, Sur Gul Kohat

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa (KPK) through Secretary Elementary & Secondary Education, Peshawar
2. Director, Elementary & Secondary Education, Peshawar
3. District Education Officer (DEO), Male, K.D.A, Kohat

Appellant
Through

Dated 24.10.2023

Hassan U.K Afridi
Advocate
Supreme Court of Pakistan



(8)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

APPOINTMENT ORDER

Consequent upon the recommendations of the Departmental Selection Committee, the Competent Authority is pleased to order the appointment of the following candidates against the post of Class-IV in BPS-Q3 (Rs 9510-336-21310) plus usual allowances as admissible under the Rules. The competent authority is further pleased to post them against vacant positions mentioned before their name on the terms & conditions given below with immediate effect -

S#	Name	Father Name	Dsm/ C/VIC	Designation/Place of Posting
25% Retired Son Quota				
1	Ajmal Khan	Ghulam Muhammad	Kohat	Chowkidar, GPS Teen Talab
2	Muhammad Farooq	Maveez Khan	Kohat	L/A, GHS Pacca Topi
3	Abdul Rahim	Ghulam Daud	Kohat	Chowkidar, GHS Kandiar
4	Muhammad Tariq	Mahdi Khan	Kohat	Chowkidar, GHS Pacca Topi
5	Majid Khan	Ahmad Gul	Kohat	W/O, GHSS No 1 Kohat
6	Ahmad Hakim	Hakim Khan	Kohat	W/O, GHS Khader Khel
7	Haseem Ullah	Majid Din	Kohat	Chowkidar, GPS Geedan Banda
8	Samullah Shah	Qadeer Shah	Kohat	Chowkidar, GPS Mohsin Khel
9	Ahmed Raza	Muhammad Usman	Kohat	Sweeper, GMS No 3 S/Dara
10	Kasper Gul	Hiaz Gul	Kohat	L/A, GHSS Dhoda
11	Safir Ullah	Safir Rahman	Kohat	W/O, GMS Mohsin Khel
12	Muhammad Arsalan	Asmat Ali	Kohat	Chowkidar, GHSS Biliyani
13	Faraz Muhammad	Siraj ul Din	Kohat	Chowkidar, GPS Tor Banda
14	Adil Anzafar	Muzafar Shah	Kohat	W/O, GMS Chamba
15	Tahir Mahmood	Ghuncha Gul	Kohat	Chowkidar, GPS Lab Elern
16	Enteham Ullah	Ghulam Raif	Kohat	Chowkidar, GPS Trowal Banda Dhoda
17	Muhammad Dawood	Muhammad Tayyab	Kohat	L/A, GHSS Usterzar Payan
18	Muhammad Farooq	Abdul Rehman	Kohat	Chowkidar, GPS Guddi Banda
19	Muhammad Gul	Fareed Gul	Kohat	L/A, GHSS Mandoon
02% Disable Quota				
1	Fazal Janyam	Abdul Janyam	Kohat	Sweeper, GHSS Mandoon
03% Minority Quota				
1	Fahed	Tariq Gill	Kohat	Sweeper, GMS Behzadi Railway
2	Shekhar Kumar	Ajay Kumar	Kohat	Chowkidar, O/O SDEO (M) Kohat
3	Ajay Gill	Ijaz Gill	Kohat	Sweeper, GHSS Lashi
Open Candidates				
1	Muhammad Jamil	Muhammad Raheem	Kohat	Sweeper, GMS Bahader Kot
2	Muhammad Nasir	Ajab Khan	Kohat	Chowkidar, GPS Nari Kal
3	Muhammad Niaz Haider	Muhammad Ishaq	Kohat	Chowkidar, GPS Gandialy Payan
4	Sana Ullah Khan	Khawaja Muhammad	Kohat	Chowkidar, GPS Gandialy Bala
5	Umar Khan	Naseem Gul	Kohat	Chowkidar, GPS Banda Dost Muhammad
6	Ahmed Khan	Muhammad Khan	Kohat	W/O, GHS Kiri Sheikhan
7	Abdul Mateen Khan	Toor Gul	Kohat	Chowkidar, GPS Bhora Garhi
8	Junaid Khan	Liaqat Ali Khan	Kohat	Chowkidar, GPS Kharatoo
9	Saeed Khan	Rameez Khan	Kohat	Chowkidar, GHS Kel
10	Akbar Gul	Faqir Gul	Kohat	W/O, GHS Pershai
11	Kaleem Ullah	Muhammad Ayan	Kohat	Chowkidar, GPS Dhok Ghulam Farooq
12	Khyal Zaman	Gul Zaman	Kohat	Chowkidar, GPS Darsha Khel
13	Muhammad Ishaq	Fida Muhammad	Kohat	Sweeper, GHS Pursnai
14	Muhammad Ahmed	Fida Muhammad	Kohat	Chowkidar, GPS Gul Hassan Banda
15	Wasil Shah	Taj Badshah	Kohat	L/A, GHS Banda
16	Tenzar Gul	Noor Gul	Kohat	Chowkidar, GHS ZSA Dazi
17	Muhammad Ibrahim	Ahmed Khan	Kohat	Chowkidar, GPS No 2 Togh Bala
18	Habib Ullah	Qadeer Khan	Kohat	Chowkidar, GPS No 1 Pasta Chanda
19	Umer Said	Lal Zaad Khan	Kohat	Chowkidar, GPS No 2 Muslim Abed
20	Fazal Janyam	Hameed Khan	Kohat	Chowkidar, GPS Mir Banda Jamba
21	Fazal Wahab	Masri Khan	Kohat	Chowkidar, GPS Sheikh Buland Banda
22	Ahmed Ali	Ajab Khan	Kohat	Chowkidar, GPS Ajab Khan Korana

ATTACHED

Sr	Name	Father Name	Dorm/ CNIC	Designation/Place of Posting
23	Ishiq Ahmed	Zardin	Kohat	Chowkidar GPS No 2 Chahri
24	Anam Raza	Muhammad Raza	Kohat	L/A GHSS Shakar Dara
25	Zain Ullah	Muhammad Ali Khan	Kohat	Chowkidar GPS Dervezi Banda Lachi
25	Amir Zafar	Zafar Ali Shah	Kohat	Chowkidar GPS Jalal Abad Mandoon
27	Mazin Khan	Ali Khan	Kohat	Chowkidar GPS Chapri Boghr
28	Lal Shah Jan	Muhammad Khan	Kohat	Chowkidar GPS Shargi
29	Habib Waneed	Ameer Jari	Kohat	Chowkidar GPS Sultan Aboi
30	Farranullah	Buland Khan	Kohat	Chowkidar GHS Lal Gami
31	Gul Muhammad	Lal Badshah	Kohat	Chowkidar GPS Inzar Wala
32	Mamun Shah	Qabil Shah	Kohat	L/A GHS Doh Banda
33	Rab Nawaz	Lal Khan	Kohat	Chowkidar GHS Doh Banda
34	Ghan ur Rehman	Gul Mah Khan	Kohat	Chowkidar GPS No 1 Sumari Payan
35	S Hashmat Ali Khan	Muhammad Sulyan	Kohat	Chowkidar GPS No 2 Sumari Bala
36	Jamil Raza	Raza Khan	Kohat	Chowkidar GPS Chamba
37	Shafiq ur Rehman	Hazrat Gul	Kohat	Chowkidar GPS No 2 Kamar Dhand
38	Nawaz Khan	Masemat Khan	Kohat	Chowkidar GPS No 1 Surgul
39	Shah Muhammad	Yar Muhammad	Kohat	N/O GHS Merozai
40	Shameer Khan	Bashir Khan	Kohat	Sweeper GHS Merozai
41	Abdur Rehman	Umar Farooq	Kohat	Chowkidar GPS West Muhammad Za
42	Rashid Gul	Habib Gul	Kohat	Chowkidar GPS No 2 Doctor Banda
43	Hassan Khan	Zahid Khan	Kohat	Chowkidar GPS Talab Banda
44	Qanber Ali	Hassan Ghulam	Kohat	Chowkidar GPS No 1 Asghan Mela
45	Sharaf Ali	Barkat Ali	Kohat	Chowkidar GPS Haji Abad Marai
46	Sabir Abbas	Waqd Ali	Kohat	Sweeper GHS Toira Wan Kachai
47	Muhammad Ihtsham	Fand Khan	Kohat	Chowkidar GPS Khattak Colony
48	Mudassar Shah	Amid Shah	Kohat	Chowkidar GPS No 2 KDA
49	Asir Bargush	Umer Faraz Khan	Kohat	N/O GHS DE-7 (Male) Kohat
50	Muhammad Ahsan Ayaz Khan	Muhammad Aya	Kohat	Chowkidar GHS DEO (Male) Kohat
51	Muhammad Iwas	Mustin Gul	Kohat	L/A GHSS Lachi
52	Tahir Khan	Muhammad Saeed	Kohat	Chowkidar GHSS Lachi
53	Alim Faraz Khan	Umer Faraz	Kohat	Chowkidar GHSS Shakar Dara
54	Abid Amin	Walayat Shah	Kohat	L/A GHSS Mandoon
55	Aoib Zaman	Hayat Muhammad Khan	Kohat	Chowkidar GPS Alwarā Banda Lachi
56	Sanny Waqar	Mushaq Ahmed	Kohat	Chowkidar GHSS No. 1 Kohat
57	Saif Ulliam	Muhammad Islam	Kohat	Chowkidar GHS Kaghaza
58	Manhaj Ull Din	Zain Ul Abideen	Kohat	Chowkidar GPS Khader Khel
59	Aoib Mehmood	Ansar Mehmood	Kohat	N/O GHSS Surgul
60	Muhammad Zubair	Taj Wali Khan	Kohat	L/A GHSS Surgul
61	Muhammad Daud	Munir Badshah	Kohat	L/A GHS Malgin

Note:

- Two candidates of 25% Retired Employees Son Quota contained in DSC Minutes at Sr.No 01 & 07 are deferred due to verification of their documents.
- One Candidate of 02% Disable Quota contained in DSC Minutes at Sr.No 02 is deferred due to verification of his documents
- No TADA etc is allowed

Terms & Conditions

- Charge reports should be submitted to all concerned in duplicate.
- Their seniority will be determined in accordance with the relevant Rules in the filed.
- They should not be handed over charge if they exceed the age of 40 Years or below 18 Years.
- Their services are liable to termination 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.
- They should join their post within 15 days of the issuance of this order, their appointment shall be treated cancelled automatically and no subsequent appeal etc shall be entertained in this behalf.
- Medical & Age certificate should be produce from the Medical Superintendent concerned before taking over charge.
- They will be governed by such Rules & Regulation as may be issued from time to time by the Government.

ATTSTED

Their services shall be terminated at any time, in case their performance is found unsatisfactory during the probation period. In case of misconduct, they shall be proceeded under the Rules framed from time to time. They will be on probation for a period on one year, extendable to another one year.

The DDO concerned may be obtained a certificate from the individual to the effect that during service Retirement on Medical Ground/ Invalidated, if any irregularity/ fake information concealed by the candidate, his appointment order will be dismiss without any notice.

They will provide an undertaking to the effect that another brother/ widow or sister already appointed, which is been concealed, the candidate will be dismiss without any notice. The DDO will record such type certifi cate in his Service Book.

DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst: No. 315-23 Class-IV Appointment

Dated Kohat the 20/01/2021.

Copy forwarded for information and necessary action to the:

1. P.A to Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Kohat.
3. District Accounts Officer Kohat.
4. District Monitoring Officer (EMA) Kohat.
5. SDEO (Male) Kohat & Lachi.
6. All Principals/ Headmasters/DDO/Head Teachers concerned.
7. Official Concerned.
8. M/File

DISTRICT EDUCATION OFFICER
(MALE) KOHAT

ATTESTED

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

CORRIGENDUM

In partial modification in respect of order vide No. 315-23 dated 20/01/2021, please read Mr. Muhammad Daud S/O Munir Badshah Chowkidar at GHSS Surgul Kohat instead of Lab Attendant GHS Malgin Kohat on the recommendation of Committee contained at Sr.No 07.

He is further directed to resume his duty as Chowkidar at GHSS Surgul Kohat against vacant post.

Self
**DISTRICT EDUCATION OFFICER
(MALE) KOHAT**

Endst: No. 580-84

Copy to the:

1. Director E&SE, Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohat.
3. District Account Officer Kohat.
4. Principal/Headmaster concerned.
5. Official concerned.


03/02/21
**DY: DISTRICT EDUCATION OFFICER
(MALE) KOHAT**

ATTSTED


12

OFFICE OF THE PRINCIPAL GHSS SURGUL (KOHAT).
CHARGE REPORT

Certified that Mr. Muhammad Daud on this day i.e. 04 .02.2021(/N) handed over /taken over the charge of the post of Chow at GHSS Surgul (Kohat) vide District Education Officer (M)kohat No. 580-84 dated 03-02-2021 DEO(M)Kohat.


Signature of relieved Govt: servant.
Name: Muhammad Daud
Designation: CHOW

Station: GHSS Surgul (Kohat).


Signature of relieving Govt: servant.
Name:
Designation:


Principal
GHSS Surgul
Kohat

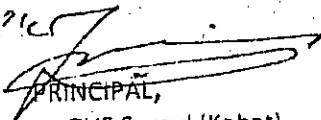
Dated 04/02/2021

Endst: No. 960-

Copy of the above is forwarded to the:-

1. DEO (M) Kohat.
2. CAO Kohat.
3. I/C EMISE E & SE Deptt: Kohat.
4. Distt: Monitoring Officer Kohat
5. Sub: Divi: Education Officer (Male) Kohat.
6. Office copy.


ATTACHED


PRINCIPAL,
GHS Surgul (Kohat).
**Principal
GHSS Surgul
Kohat**

13

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

ORDER

WHEREAS, Mr. Muhammad Daud Chowkidar GHSS Sur Gul Kohat was proceeded under rules 9 of Khyber Pakhtunkhwa Government servants (Efficiency & Disciplinary) Rules 2011 for the charge of wilfully absence from School duty.

AND WHEREAS, Principal GHSS Sur Gul, reported that Mr. Muhammad Daud Chowkidar GHSS Sur Gul Kohat has been absent from school duty wef 01/06/2022 without any prior permission.

AND WHEREAS, He was served absence notice on his home address vide letter No.1124 dated 22/06/2022, No.1128 dated 18/07/2022 and this office No.4659 dated 10/09/2022 for resumption of his duty in accordance with Rules 09 of the Reuls ibid, but he failed to resume his duty.

AND WHEREAS, final absence notice was published in two leading newspapers "Daily Mashriq Peshawar and Daily Aaj Peshawar dated 16/11/2022, but he again failed to report for onward duty within stipulated period.

NOW THEREFORE, in exercise of powers conferred under Rules-4 (b) (iii) of Government of Khyber Pakhtunkhwa (Efficiency and Disciplinary) rules 2011, the Competent authority (District Education Officer (M) Kohat is pleased to impose major penalty of **"REMOVAL FROM SERVICE"** upon Mr. Muhammad Daud Chowkidar GHSS Sur Gul Kohat wef 01/06/2022.

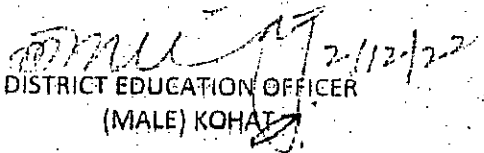
ATTESTED

(MUHAMMAD SHERAZ)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst.No. 7823-26 dated 02 / 12 / 2022

Copy to the:--

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Kohat
3. Principal GHSS Sur Gul Kohat.
4. Mr. Muhammad Daud Ex- Chowkidar GHSS Sur Gul Kohat


DISTRICT EDUCATION OFFICER
(MALE) KOHAT

14
 خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب (مردانہ) کوہاٹ
 عنوان: اپیل برائے بحالی سروس

جناب عالی!

مودبانہ گزارش ہے کہ بحوالہ ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ کے آرڈر نمبر 23-315 کلاس فور تعیناتی بمورخہ 20-01-2021 سیریل نمبر 61، مقام گورنمنٹ ہائی سکول مالکین کوہاٹ شخصیت لیبارٹری اینڈ نٹ کے تعینات کیا گیا۔ بندہ جب مذکورہ سکول چارج لینے گیا تو وہاں کے مقامی افراد نے ڈیوٹی کرنے نہیں دیا اور نہ ہی چارج لینے دیا۔

جس پر بندہ نے ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ سے سارا ماجرہ بیان کیا تو انہوں نے آرڈر نمبر 84-580 بمورخہ 03-02-2021 کو GHSS سورگل کوہاٹ میں شخصیت چوکیدار کے تعینات کیا۔ مگر وہاں بھی مقامی افراد کی وجہ سے وہی صورتحال کا سامنا کرنا پڑا جس پر جب ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ کے سامنے ساری صورتحال بیان کی تو انہوں نے گورنمنٹ شہید سجاد علی ہائی سکول نمبر 2 کوہاٹ میں ڈیوٹی کرنے کا کہا جس کی تعمیل کرتے ہوئے بندہ نے مورخہ 11-02-2021 سے فرائض انجام دینے شروع کئے۔

مگر پھر اچانک ڈسٹرکٹ ایجوکیشن آفیسر (مردانہ) کوہاٹ نے کہا کہ آپ GHSS سورگل کوہاٹ میں اپنے فرائض منجھی سرانجام دو۔ تو بندہ کو چارونا چار GHSS سورگل کوہاٹ میں اپنے فرائض کے ادا ہنگی کے لئے جانا پڑا۔

جناب عالی!

بندہ کا تعلق چھٹہ غنڈہ تحصیل لاجی ضلع کوہاٹ جو کہ میرے ڈیوٹی سٹیشن سے تقریباً 40 کلومیٹر کے فاصلے پر واقع ہے جبکہ دونوں ہاتھوں میں معذوری بھی ہے۔ میں اپنے فرائض درست طریقے سے انجام دے رہا تھا مگر مقام لوگوں کے نامناسب رویے اور بے جا حرکتوں کی وجہ سے آئے روز ڈبئی پریشانی اور جان کا خطرہ بھی بڑھتا جا رہا تھا مگر بھی اپنے فرائض جاری رکھے۔ وہاں (سورگل) کے مقامی افراد کے رویے کے بارے میں جناب پرنسپل صاحب GHSS سورگل کوہاٹ کو تحریر ہی طور پر بھی آگاہ کیا۔ مگر میری کوئی شنوائی نہیں ہوئی۔

مندرجہ بالا حالات اور جان کے خطرے کے ساتھ گھریلو مجبوریوں کی وجہ سے بندہ کے فرائض منجھی متاثر ہوئے اور اپنی ڈیوٹی جاری نہ رکھ سکا اور حکمانہ کارروائی کے بعد آرڈر نمبر 26-7923 بمورخہ 02-12-2022 کے تحت مجھے نوکری سے برخاست کر دیا گیا۔

جناب عالی!

بندہ اپنے فرائض منجھی سے انکاری نہیں تھا مگر حکمدار مقامی لوگوں کے رویے سے میرے لئے ایسے حالات پیدا کئے گئے کہ مجھے مجبوراً اپنے فرائض سے غفلت برتنی پڑی۔ اور نتیجہ آپ کے سامنے ہے۔ سیاسی اثر و رسوخ نہ ہونے کی وجہ سے بھی بندہ کو مات کھانی پڑی۔

بندہ مندرجہ بالا گزارشات کی روشنی میں آپ سے ہمدردانہ اپیل کرتا ہے کہ انسانی ہمدردی کی بنیادوں پر اپنے گھر کے قریب کسی سکول یا پھر گورنمنٹ ہائی سکول نمبر 2 کوہاٹ میں چوکیدار کی خالی آسامی پر تعینات کر کے مشکور فرمائیں۔

بندہ اس امر کے لئے آپ کا تاحیات دعا گو رہیگا۔

العارض

ATT/STEL

آپ کا تاحیات دعا کسی محمد داؤد



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

No. _____ /F.No.P.File/A-20/C-IV/Muhammad Daud/Chow/Kohat
Dated Peshawar the 20-1- /2023
Phone: 091-9225344 Email: ddadmn.es@gmail.com

To:

The District Education Officer
(Male) Kohat.

Subject: **APPLICATION FOR RE-INSTATMENT.**
Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application alongwith its enclosure submitted by Mr. Muhammad Daud Ex-Chowkidar GHSS Surgul District Kohat.

You are therefore ask to submit detail report/comments at an early date.

self
Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. 1228-29

Copy forwarded to the:-

1. Mr. Muhammad Daud Ex-Chowkidar GHSS Surgul District Kohat (0335-9609388).
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

SR 19/11/23
Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

M 17/11/23
ATTSTED



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. _____ /F.No./A-20/C-IV/PF/M.Daud/Chowkidar/Kohat

Dated Peshawar the 20/09 /2023

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

The District Education Officer
(Male) Kohat.

Subject: **DEPARTMENTAL APPEAL FOR RE-INSTATEMENT IN R/O MR. MUHAMMAD DAUD CHOWKIDAR GHSS SUR GUL KOHAT.**

Memo:

I am directed to refer to your letter No 9728 dated 09/02/2023 on the subject cited above and to ask you that the appeal in r/o Muhammad Daud Chowkidar GHSS Sur Gul Kohat has been examined/analyzed by this office Hence inform the appellant concerned that his appeal has been rejected by the appellate authority under Rule (17) of E&D Rules-2011.

Sdf
Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. 2006

Copy forwarded to the: -

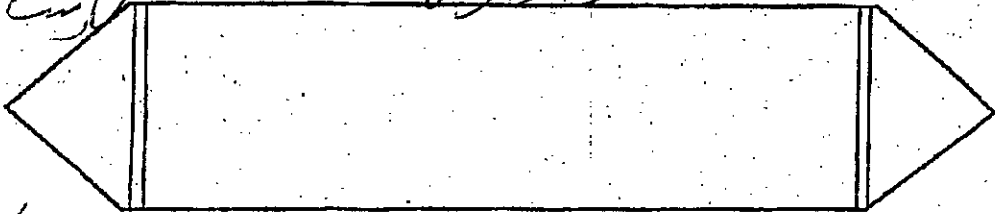
1. Muhammad Daud Chowkidar GHSS Sur Gul Kohat.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

20/9/2023
Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Jas
ATTSTED

بعدالت حیدر خان خواجہ خسرو گل نرہو گل رست اور



Appellant - پنجاب -

بنام گورکھ سنگھ

محمد داؤد

موزخہ

مقدمہ

دعویٰ

جرم

سید اسحاق

9151963-0300

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ایسٹ فور کیلئے حسن۔ یونے۔ سرپرست۔ رستم سنگھ رست اور

وکیل کاروائی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ

پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکور کریں۔ لہذا اولت نامہ لکھ دیا کہ سند ہے۔

الرقوم 24 ماہ 10 2023

بمقام سوسائٹ
محمد داؤد
وہ العی و العی
کے لئے منظور ہے۔