


FORM OF ORDER SHEET

Court of _____

Appeal No. 2551/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge.
1	2	3
1-	11/12/2023	<p>The appeal of Mr. Inayat ur Rehman resubmitted today by him. It is fixed for preliminary hearing before touring Single Bench at Swat on _____.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

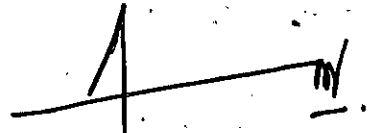
The appeal of Mr. Inayat ul Rehman received today i.e. on 29.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of the appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Annexures of the appeal are unattested.
- 3- Annexures-B & C of the appeal are illegible which may be replaced by legible/better one.
- 4- Departmental appeal is unsigned.
- 5- 18 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3735 /S.T.

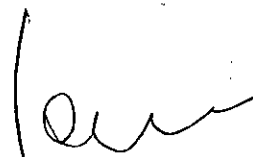
DL 30/11 /2023.

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REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Imran Adv.
High Court Swat.

Resubmitter. after completion
(1) and (2) and (5) is
also corrected


11/12

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 2051 / 2023

Inayat Ur Rahman.

... Appellant

- VERSUS -

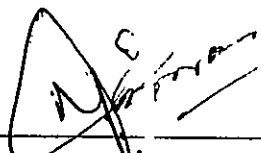
Govt: of KP and others.

... Respondents

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APPELLANT
THROUGH COUNSEL


Muhammad Irfan
Advocate High Court
Office: Legal Floor, Sultan Tower, Makanbagh,
Mingora, Swat.
Cell No. 0333-9508552
Dated: -11-2023

Appellant:


Inayat Ur Rahman

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

Service Appeal No. 2851 / 2023

Inayat Ur Rahman S/o Bahre Karam R/o Aligrama, Tehsil Kabal,
District Swat. *EX-CHARGE AT GOVT PRIMARY SCHOOL NO. 2
KOZA BANDAI - SWAT*

... Appellant

- VERSUS -

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department at Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
3. Muhammad Riaz, District Education Officer (Male), District Swat at Gulkada, Saidu Sharif, Swat.
4. Azam Khan, SDEO (M) Kabal, District Swat.
5. Niaz Ahmad, Headmaster Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
6. Shamsheer Ali, Senior Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
7. Mian Ali Said, Senior Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
8. Bakht Akbar, Senior Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
9. Raham Ghani, Senior Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
10. Amjad Ali, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
11. Amjad Ali, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
12. Hamid Alam, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
13. Imran, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.

- 2
14. Usman, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
 15. Ali Sher, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
 16. Rahmat Zada, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.

... Respondents

Appeal Under Section 4 of the Service Tribunal Act, 1974, against order No. 4901/F.No/A-20/C-IV/Inayat Ur Rahman/PF/Swat dated 06-11-2023, passed by respondent No. 2, vide which departmental appeal of the appellant has been dismissed and against the order bearing Endst No. 7511-17/P.F/531/InayatUrRahman/Chow/DEO/M dated 31-08-2023, passed by respondent No. 3, whereby the appellant has been removed from service.

Prayer:

On acceptance of this appeal, the impugned orders No. No. 4901/F.No/A-20/C-IV/Inayat Ur Rahman/PF/Swat dated 06-11-2023, passed by respondent No. 2, and order bearing Endst No. 7511-17/P.F/531/InayatUrRahman/Chow/DEO/M dated 31-08-2023, passed by respondent No. 3, may please be set aside and the appellant may kindly be reinstated against the post of Chowkidar with all back benefits.

Any other relief not specifically prayed for, but this Hon'ble Tribunal deems proper may also be granted.

Respectfully Sheweth;

1. That appellant was serving against the post of Chowkidar at Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.

2. That appellant has fulfilled all his responsibilities with zeal, devotion and upto the entire satisfaction of his high ups and no single complaint during his services has been lodged against the appellant.
3. That upon a baseless complaint, an inquiry was carried out through inquiry officer i.e. Principal Government High Secondary School Aboha, Swat along with respondent No. 4, whereby report was submitted on 27-06-2023, wherein it was recommended by the inquiry committee that the appellant be removed from service. Thereafter, show cause notice dated 04-07-2023, was issued to the appellant, wherein serious and severe groundless allegations were leveled against the appellant. The appellant for defense of his rights, timely and properly submitted his written reply, wherein the allegations were categorically denied by the appellant (Copies of show cause notice and reply are annexure **A**).
4. That during hearing of the appellant, all the allegations were denied, but even then the respondent No. 3 vide order bearing EndstNo.7511-17/P.F/531/InayatUr Rahman /Chow/DEO/M dated 31-08-2023, imposed major penalty of removal from service on the appellant (Copy of impugned order is annexure **B**).
5. That departmental appeal was filed by appellant against the impugned order of removal from service before respondent No. 2, which was dismissed vide impugned order No. 4901/F.No/A-20/C-IV/Inayat Ur Rahman/PF/Swat dated 06-11-2023 (Copies of memo of appeal and impugned order dated 06-11-2023 are annexure **C**).
6. That being aggrieved from the impugned orders dated 06-11-2023 of respondent No. 2 and removal from

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service order dated 31-08-2023, of respondent No. 3, the appellant having no other adequate and efficacious remedy, thus approaches this Hon'ble Tribunal inter alia on the following grounds.

GROUND:

- i. That the impugned orders of respondents No. 2 & 3 as well as refusal of respondents to reinstate the appellant against the post of Chowkidar, are illegal and unlawful.
- ii. That appellant belongs to a respectable family of the locality and could not even think about such allegations leveled against him, thus is eligible to be re-instated against the said post with all back benefits.
- iii. That even the allegations leveled against the appellant are oral and there is no documentary or any other proof whatsoever, which could legally be considered as strong ground for removal of service.
- iv. That the allegations against the appellant, has not only affected the livelihood of appellant, but the good reputation of the appellant has been lowered in the eyes of public at large.
- v. That though the appellant has never committed such crime nor could think about it, however, the said allegations has deprived the appellant from his only source of earning bread and butter for his family, because the appellant is the only person of earning in his family and some of the disabled members of the family, are only depending upon the appellant and his sources.
- vi. That appellant has not properly been heard and the respondents have given undue weight to the weak

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and oral stances of some unknown locals / students, whose statements are neither supported by any documentary proof nor it have been proved against the appellant.

- vii. That the case of appellant needs to be thoroughly inquired before giving such a harsh punishment of dismissal from services, because the financial position of the family of appellant is poor and in such like worst economic situation, depriving the appellant from his accrued right of services, is the economic murder of the appellant, as it will not only cause irreparable loss to the appellant but the family of the appellant would also suffer a huge loss.
- viii. That the appellant has always remained punctual, devoted and dutiful to his services and no complaint whatsoever has been lodged against the appellant.
- ix. That appellant is entitled to be equally treated with the similarly placed persons and respondents are not authorized to make any discrimination with the appellant.
- x. That there is no embargo in acceptance of the present appeal.
- xi. Any other grounds not specifically raised will be argued with prior permission of this august court.

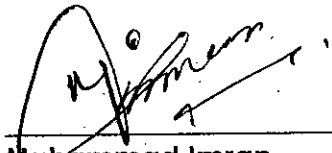
It is therefore very humbly prayed that, on acceptance of this appeal, the impugned orders No. No. 4901/F.No/A-20/C-IV/Inayat Ur Rahman/PF/Swat dated 06-11-2023, passed by respondent No. 2, and order bearing Endst No. 7511-17/P.F/531/InayatUrRahman/Chow/DEO/M

dated 31-08-2023, passed by respondent No. 3, may please be set aside and the appellant may kindly be reinstated against the post of Chowkidar with all back benefits.

Any other relief which is otherwise deemed proper, lawful, efficacious may also be granted in favour of appellant.

Appellant: AI
Inayat Ur Rahman

Counsel:



Muhammad Imran
Advocate High Court

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

Service Appeal No. _____ / 2023

Inayat Ur Rahman.

... Appellant

- VERSUS -


Govt: of KP and others.

... Respondents

Certificate

It is certified that no such like other service appeal has earlier been filed before this Hon'ble Court.

Appellant



**Inayat Ur Rahman
(In Person)**

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

Service Appeal No. _____ / 2023

Inayat Ur Rahman.

... Appellant

- VERSUS -

Govt: of KP and others.

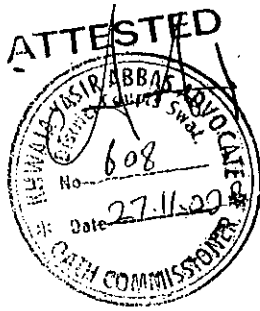
... Respondents

Affidavit

I, do hereby solemnly affirm and declares that, all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed therein from this august court.

Deponent:

AI
Inayat Ur Rahman
(Appellant)



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

Service Appeal No. _____ / 2023

Inayat Ur Rahman.

... Appellant

- VERSUS -

Govt: of KP and others.

... Respondents

Address of Appellant:

Inayat Ur Rahman S/o Bahre Karam R/o Aligrama, Tehsil Kabal,
District Swat.

CNIC No. 15602-5131975-9

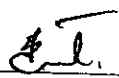
Cell No. 0345-9451391

Addresses of Respondents:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department at Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
3. Muhammad Riaz, District Education Officer (Male), District Swat at Gulkadda, Saidu Sharif, Swat.
4. Azam Khan, SDEO (M) Kabal, District Swat.
5. Niaz Ahmad, Headmaster Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
6. Shamsheer Ali, Senior Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.
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16. Rahmat Zada, Primary School Teacher, Government Primary School No. 2, Koza Bandai, Tehsil Kabal, District Swat.

Appellant



Inayat Ur Rahman
(In Person)

Annex 11 A



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DISTRICT SWAT

#: (0946) 9240228
Email: deomswat@ed.gov.pk

#: (0946) 9240228
Web: www.ed.edu.pk

SHOW CAUSE NOTICE

I Muhammad Riaz District Swat Education officer (M) Swat, Competent Authority under the Khyber Pakhtunkhwa Government Servant (Efficiency & Disciplinary) , Rules 2011, do hereby serve upon you, Mr. Inayat Ur Rahman Chowkidar GPS: No-02 Koza Bandal Kabal District Swat, this show cause notice as follows:-

1. That as reported by the SDEO (M) Kabal District Swat Vide No. 1384 Dated 16/6/2023.
2. That you are involved in teasing and sexually harassing female students in the school.
3. That you are kissing the female students and do immoral activities during school times.
4. That you also wash dishes, prepare tea for teachers, broom the school and do other sanitary works on female students.
5. That you are addicted to charrs and are using during the school hours.
6. That you are using abusive and un-parliamentary language.
7. That you have proved to be non-professional in your duty.
8. That this Office constituted an Inquiry committee against you Vide this Office Endst No-4466-67 Dated 19/06/2023.
9. That the enquiry Committee conducted a detailed enquiry & the allegations leveled against you were proved and recommended you under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, for removal from service under 4 (b) (iii) of the Ibid Rules.
10. As a result thereof, I Muhammad Riaz as the Competent Authority have tentatively decided to proceed against you under the above mentioned rule 2011.
11. You are, therefore, required to show cause as to why major penalty provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.
12. If no reply to this office is received within 10 days of delivery of this show cause, it shall be presumed that you have no defense and the department will take ex-parte decision against you under the relevant rules.

(Muhammad Riaz)
DISTRICT EDUCATION OFFICER (M)
SWAT

Enst. No. 35 /P/File/C-IV Dated 4/7 /2023.

Copy forwarded to:-

- 1- The Director of Elementary and Secondary Education Khyber Pukhtunkhwa, Peshawar.
- 2- The SDEO (M) Kabal District Swat.
- 3- The Officer Concerned.
- 4- The District Education Officer (M) Swat local Office.

DISTRICT EDUCATION OFFICER (M)
SWAT

Mr. Inayat Ur Rahman Chowkidar GPS No-02 Koza Bandal Kabal District Swat

محرمت جناب محترم محمد سعید صاحب پرنسپل انٹوائٹری افسر ایف ڈی اے
ایجوکیشن

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جناب عالی!
السلام علیکم!

محترم انٹوائٹری افسر جناب محمد سعید صاحب محترم DEO صاحب
صاحب مردانہ طرح مسوات نے آپ کو میرا انٹوائٹری افسر
مقرر کیا ہے۔ آپ نے جو سوالنامہ دیا تھا۔ اس کے جوابات ذیل
عنوانات:- انٹوائٹری افسر کے سوالنامے کے جوابات

- ① میرا پورا نام عنایت الرحمان ولدیت محترم سلوٹ علیگراہ ہے
- (2) میرا تاریخ پیدائش 11-11-1988 ہے
- (3) میری محکمہ تعلیم میں ترقی تاریخ 2019-08-29 ہے
- (4) میں نے محکمہ تعلیم سے پہلے کسی دوسرے محکمہ میں
سروس میں نہیں کی۔
- (5) میں میں نے خیراً کسی پر صفائی دیکھ نہیں کی ہے۔ اور خود
صفائی کرتا ہوں۔
- (6) میں یہ مجھ پر سراسر الزام ہے۔

(7) یہ الزام غلط ہے۔ میں ایک فخرزادہ شہر گانے میں
تعلق رکھتا ہوں اور میں نے ایسا کوئی کام نہیں کیا ہے۔

نام عنایت الرحمان دار محترم دستخط اس کے
نشانی گانہ 15602-61319759 انٹوائٹری
0545 9451371
مکمل نام
دستخط



خدمت جناب مہترم DEO صاحب بیگے دوسرے دست سوات

جناب عالی،

اسلام علیکم :-

مہترم DEO صاحب آپ نے مجھے ایک شوکانہ نوٹس بھیجا ہے جس کا جواب درج ذیل ہے۔

عنوان شوکانہ نوٹس کا جواب نام :-

1) مہترم DEO صاحب سے میری تقری ہوئی ہے۔ اسی دن سے مجھ پر قسم قسم کے جرمے استعمال ہو رہے ہیں۔ اس پوئین وٹل میں مجھے کوئی برداشت نہیں کرتا۔

(2) یہ میرے خلاف سازش ہے۔ اور سسر اسر جھوٹ ہے۔

(3) یہ غلط ہے اور میں نے کوئی غیر اخلاقی کام نہیں کیا

(4) یہ غلط ہے اور میں نے کسی پر کوئی کام نہیں کیا۔

(5) یہ غلط ہے۔ اور میں نے سکول میں ایسا کوئی کام نہیں کیا ہے۔

(6) یہ جھوٹ ہے۔ اور میں نے اس طرح کی زبان استعمال نہیں کی

(7) یہ غلط ہے۔ اور میں ایسا آزادی سے اپنی ڈپوٹی کرتا ہوں

(8) انکوائری کمٹی نے میرے خلاف جو رپورٹ دیا ہے اور

جس قانون کے مطابق مجھے نوٹس سے بٹانے کا کہا ہے یہ

سسر نا انصافی ہے۔

(9) یہ میرے خلاف سازش ہے اور مجھے سلو نوٹس سے

بٹانے کا حربہ ہے۔

اگر آپ صاحبان میرا فی فرما کر مجھے ایک

موقع دیں تو بندہ تا میات شکر گزار رہے گا۔

آپ کا فرما بردار

مناہیت امر گل

SD

تاریخ: 13-7-2023

HTNRDA
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Better copy of the page No.

OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
DISTRICT SWAT

NOTIFICATION.

1. Whereas, Mr. Inayat Ur Rahman S/O Bahre Karam was appointed as Chowkidar at GPS No.2 Koza Dandal vide this office Endst: No.9213-29/Class IV Appointment dated 29-08-2019.
2. Whereas, Sub Divisional Education Officer (M) Kabal Swat sent a letter and requested for his compulsory retirement due to involvement in harassing the female students in the school.
3. Whereas, this office conducted Inquiry through Principal GHSS Aboha Swat and SDEO (M) Kabal vide this Office memo No.4466-67 dated 19-06-2023.
4. Whereas, Inquiry Committee submitted Inquiry report vide No Nil Dated 27/06/2023 in which it was recommended by the Inquiry committee that Mr. Inayat Ur Rahman an Chowkidar GPS No. 2 Koza Bandal Swat may kindly be removed from service.
5. Whereas, this office issued show notice vide this office Endst No-5031-35 Dated 04/07/2023 In the light of Inquiry report, but his reply was unsatisfactory which was received to this office on 13/7/2023 G. Whereas, this office provided one more chance to defend himself regarding all the allegations reflected in the show chase notice on the bases of enquiry report, and this office nominated Mr. Hazrat Rahman Principal GHSS Balogram Swat as Personal hearing Officer vide this office Endst. No-6478 28 Dated 12/08/2023.
7. Whereas, he could not present any concrete proofs in terms of witness videos etc, to wash out the allegations leveled against him supported by more than ten (10) officials, parents and even the effected girls students statements attested by Head Teacher and Head Teacher self-statement.
8. Whereas, the Personal hearing Officer is of the view that under section 366(A) of penal code read with section 2(H) of the protection harassment of women Act 2010 of Pakistan, the penalty proposed by the Inquiry committee may be retained.
9. Whereas, the District Education Officer (M) Swat being the competent authority after having considered the charges and evidences on record against you Mr. Inayat Ur Rahman Chowkidar GPS No 02 Koza Bandal and found as proved.
10. Now, Therefore, 1 Muhammad Riaz, District Education Officer (M) Swat being the competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 do hereby impose upon you" the major penalty of "REMOVAL FROM SERVICE" under 4 (b) (iii) service. of the Ibid Rules with immediate effect in the interest of public service.

(MUHAMMAD RIAZ)

DISTRICT EDUCATION OFFICER (M) SWAT

Endst No: 7511-17 /P.F/531/ InayatUrRahman/Chow/DEO/M. Dated 31-08-2023

Copy forwarded to:

1. The Director Elementary & Secondary Education KPK Peshawar.
2. The District comptrollers of Account Swat at Sadhu Sharif.
3. The SDEO (M) Kabal Swat.
4. The District Monitoring Officer EMA District Swat.
5. The EMIS Cell DEO (M) Swat local Office.
6. P.A to District Education Officer (M) Swat the local office.
7. Mr. Inayat Ur Rahman s/o Bahre Karam i/o Ali Grama Tehsil Kabal Swat (Registered).

Sd/
(DISTRICT EDUCATION OFFICER (M)
SWAT

Better Copy:

بخدمت جناب ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ پشاور

عنایت الرحمن ولدہ بحر کرم سکنتہ علیگرا مہ تحصیل کبل ضلع سوات۔۔۔۔۔ سائل

محکمانہ اپیل

جناب عالی! سائل حسب ذیل عرض رساں ہے۔

- ۱۔ یہ کہ سائل دیہہ بالا کا مستقل رہائشی و پیدائشی باشندہ ہے۔
- ۲۔ یہ کہ سائل محکمہ ایجوکیشن/تعلیم میں سال 29-08-2019 کو بحیثیت چوکیدار گورنمنٹ پرائمری سکول نمبر 2 کوزہ بانڈ کی ضلع سوات تعینات ہوا۔
- ۳۔ یہ کہ سائل 16 جون 2023 تک متذکرہ سکول میں بحیثیت چوکیدار اپنی فرائض منصبی احسن طریقے سے سرانجام دیتا رہا۔
- ۴۔ یہ کہ 16 جون 2023ء SDEO سکول متذکرہ آ کر سائل کو اپنے ساتھ سرکل کبل آفس لے گیا اور سائل کو مزید ڈیوٹی کبل آفس میں رپورٹ کرنے کو کہا گیا۔
- ۵۔ یہ کہ چند دن پہلے سائل کو SDEO سرکل کبل نے اطلاع دی کہ آپ کے خلاف محکمانہ انکوائری شروع ہو چکی ہے۔
- ۶۔ یہ کہ سائل نے متذکرہ بالا انکوائری کے بارے میں معلومات و پتہ براری کی اور معلوم ہوا کہ سائل کے خلاف ایک بے بنیاد من گھڑت اور خود ساختہ اور مبنی بر جھوٹ انکوائری شروع کی گئی ہے۔
- ۷۔ یہ کہ بعدہ سائل کو ایک نوٹیفیکیشن محررہ 31-08-2023 جاری ہو کر سائل کو نوکری سے برخاست کر دیا گیا ہے۔ (نقل نوٹیفیکیشن محررہ 31-08-2023 لف اپیل ہذا ہے)۔
- ۸۔ یہ کہ سائل اپنے فرائض منصبی سے کبھی بھی غافل نہیں ہوا ہے۔ اور نہ ہی مجاز آفیسروں کو کوئی شکایت کا موقع دیا ہے۔

۸- یہ کہ سائل کے خلاف ایک من گھڑت کہانی رچا کر سائل کو نوکری سے برخاست کیا گیا اور سائل کے

ضعیف العمر والدین اور ہمیشہ گان (خصوصی افراد) کو مشکلات سے دوچار کئے گئے ہیں۔

۹- یہ کہ سائل ایک محبت وطن اور معزز پاکستانی شہری ہے اور کبھی بھی کسی قسم کی غیر قانونی و غیر اخلاقی امر کا سوچ بھی نہیں سکتا۔

۱۰- یہ کہ سائل کے خلاف جاری شدہ نوٹیفکیشن محررہ 31-08-2023 واپس لیا جا کر سائل کو دوبارہ اپنے آسامی پر بحال کرنے کا حکم صادر فرمایا جائے۔

لہذا استدعا ہے کہ منظورہ محکمانہ اپیل ہذا سائل کے خلاف جاری شدہ

نوٹیفکیشن محررہ 31-08-2023 کو واپس لیا جا کر سائل کو دوبارہ اپنے

پوسٹ پر تعینات کرنے کا حکم صادر فرمایا جائے۔

المرقوم: 04-09-2023

محمد

حرف

عنایت الرحمن ولد بھکر کرم

(چوکیدار 3-BPS)

Attested Advo



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 4901 /F.No./A-20/C-IV/Inayat Ur Rehman/PE/Swat

Dated Peshawar the 6/11/2023

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

The District Education Officer
(Male) Swat.

Subject: DEPARTMENTAL APPEAL IN R/O INAYAT UR REHMAN CHOWKIDAR
GPS NO.2 KOZA BANDAI SWAT.

Memo:

I am directed to refer to your letter No 9191 dated 4-10-2023 on the subject cited above and to ask you that the appeal in r/o Inayat Ur Rehman Chowkidar GPS No.2 Koza Bandai Swat has been examined/analyzed by this office hence inform the appellant concerned that his appeal has been rejected by the appellate authority.

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

Endst; No. _____

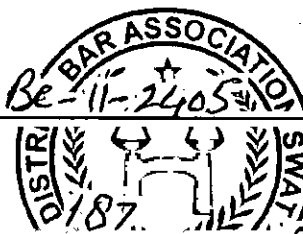

Copy forwarded to the: -

1. Mr. Inayat Ur Rehman Chowkidar GPS No.2 Koza Bandai Swat.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.


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

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یہ کہ سائل کے خلاف ایک من گھڑت کہانی رچا کر سائل کو نوٹ کری سے درخواست کیا گیا اور سائل کے

 <p>بار کونسل نمبر: Be-11-2405</p> <p>بار ایسوسی ایشن نمبر: 087</p> <p>رابطہ نمبر: 0333-950 8552</p>	 <p>74872</p> <p>سرویس نمبر:</p>
<p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>	

بعدالت جناب: سروس ٹریبونل بمقام ضعیف پنشنوخوا پشاور

<p>منجانب: اپیلانٹ</p>  <p>عنایت الہ خان بنام ضعیف پنشنوخوا وغیرہ</p>	<p>دعویٰ اور خواہش: سروس ٹریبونل</p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
<p>بابت تحریر آگے</p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام پشاور کیلئے محمد عمران خود میدان ضعیف ایڈووکیٹ مقرر کر کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث کرنے، دعویٰ، جواب دعویٰ، اقبال دعویٰ، اور درخواست برائے سرسبزی مقدمہ، منسوخی ڈگری یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا، نیز دائر کرنے اپیل نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداخت منظور قبول ہوگا، بدوران مقدمہ جو خرچہ و ہر جانہ کسی بھی نسبت سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا وکالت نامہ لکھ دیا کہ سندر ہے

عنایت الہ خان
(اپیلانٹ)

Accepted on

ایڈووکیٹ ادخطا:

27/11/2023

الرقوم: