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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

Service Appeal No: 568/2019

Syed Ishaq Hussain.....Appellant

Versus

District Education Officer Kurram & Others .....Respondents.

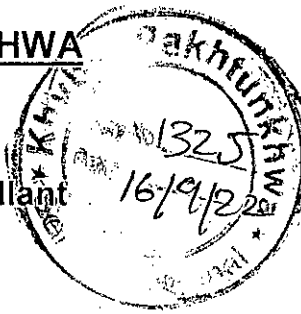
S. No.	Description of Documents.	Annexures	Pages.
1.	Joint parawise comments.		1-2-3,4.
2.	Application for resignation.	A.	5.
3.	Notification of resignation.	B.	6.

*Mudaw*  
District Education officer (M)  
District Kurram  
(Respondent No. 2 & 3)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

Service Appeal No: 568/2019

Syed Ishaq Hussain.....Appellant



**Versus**

District Education Officer Kurram & Others .....Respondents

**Joint Parawise Comments on behalf of Respondent No. 1-3**

**Preliminary objections.**

- That the appellant is not an aggrieved person under Article 212 of the Constitution of 1973.
- That the instant appeal is badly time barred.
- That the Appellant is not entitled for any relief from this Honorable Service Tribunal as he himself tendered resignation from the service and consequently his resignation was accepted w.e.f 01-03-2015. Furthermore the appellant is misleading this Honorable service Tribunal by filling of instant appeal at so belated stage and time barred.
- That the Appellant has got no cause of action, locus standi to file the instant appeal.
- That the Appellant has not come to this Honorable Tribunal with clean hands.
- That the Appellant has concealed material facts from the Honorable Tribunal.
- That the Appeal is not maintainable in the present form being devoid of merits.
- That the conduct of Appellant estopped him to bring the instant appeal before this Honorable Bench.
- That he act of the Respondent Department is legal as per Rules / Policy and is liable to be maintained.

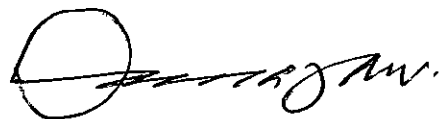
**ON FACTS.**

1. That para-1 pertains to record, hence need no comments.
2. That para-2 pertains to record, hence needs no further comments.
3. That para-3 pertains to record, hence needs no further comments.
4. That para-4 pertains to record, hence needs no further comments.

5. That para-5 pertains to record, hence needs no further comments.
6. That para-6 pertains to record, hence needs no further comment.
7. That para-7 is incorrect and denied on the grounds that the appellant himself tendered resignation from the service and consequently his resignation was accepted w.e.f 01-03-2015, the appellant is misleading this Honorable service Tribunal by filing of instant appeal at so belated stage and time barred (**Resignation of the appellant and Notification dated 6-4-2015 attached as Annex-A & B**).
8. That para-7 is incorrect and denied on the grounds that no Ex-Pakistan Leave / long leave was granted to the appellant and himself tendered resignation which was accordingly accepted and was notified vide dated 6-4-2015.
9. That detail reply has already been submitted under para-7 & 8.
10. That para-10 is incorrect and denied and the act of the Respondent Department is legal and is liable to be maintained.
11. That the case of the appellant is time barred and the act of the respondent by not re-instating is as per rules and policy and is liable to be maintained.
12. That para-12 is legal, the Respondent Department also seek permission of this Honourable Tribunal to advance additional grounds / documents at the time of arguments.

**Prayer:**

In light of the stated factual and legal position, it is humbly prayed that the case of the appellant may be dismissed in favor of the department.



Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa  
(Respondents No. 1)



District Education Officer (Male)  
District Kurram  
(Respondents No. 2 & 3)

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

Service Appeal No: 568/2019

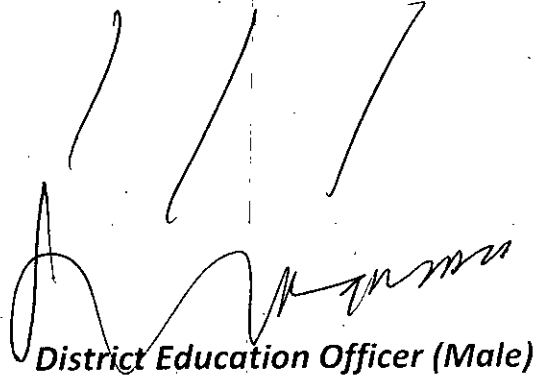
Syed Ishaq Hussain.....Appellant

Versus

District Education Officer Kurram & Others .....Respondents

**AFFIDAVIT**

I Mr. Liaqat Ali, District Education Officer (Male) Kurram do hereby solemnly affirm and declare that the contents of the instant Para wise comments are true & correct to the best of my knowledge & available record.



**District Education Officer (Male)  
District Kurram  
(Respondent No. 2)**



بکثرت رہا۔ اگلے ایکسپریس کے راجہ اہم

درخواست پر اسے استغناء از سرور

1/4  
2015

ضابطہ عالی / صورت میں وزارت میں درخواست کی گئی تھی۔  
فائرنگ گورنمنٹ کے ایک سکول میں سرکار کے راجہ  
رکے راجہ۔ فوری طور پر اسے استغناء از سرور  
اللہ کے نام سے دعا ہے کہ اسے فوری طور پر راجہ  
سے فوری طور پر۔

لہذا عرض کرتا ہوں کہ یہاں استغناء فوری طور پر  
بکثرت رہا۔ اگلے ایکسپریس کے راجہ اہم  
رکے راجہ۔ فوری طور پر اسے استغناء از سرور  
اللہ کے نام سے دعا ہے کہ اسے فوری طور پر راجہ  
سے فوری طور پر۔

1/4  
2015

سر اسحاق حسین  
سر اسحاق حسین  
سر اسحاق حسین

Forwarded to AEO Kursum  
with the remarks that the  
application is based on facts  
& it may be considered as  
favourable pl.

Amir  
01-04-015

Put up for signature  
of Commissioner M. S. Gul  
PA  
Signature to committee

(6)

Annex - B

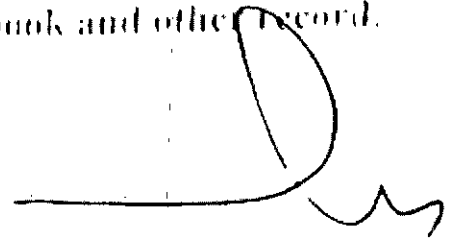
OFFICE OF THE AGENCY EDUCATION OFFICER KURRAM AGENCY PARACHINAR

SIGNATION

Mirjamal

The Resignation tendered by S. Ishaq Hussain Sweeper Govt High School Upper Kurram is hereby accepted with effect from 01-3-2015:-

Necessary entry to this effect should be made in his service book and other record.

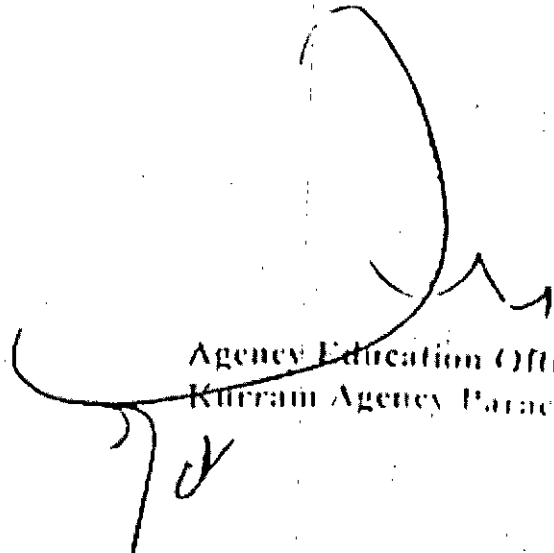


Agency Education Officer  
Kurram Agency Parachinar

1248-50/Edu Dated 6/4/2015 Jd

Copy forwarded to the,

1. Agency Accounts Officer Kurram Agency.
2. Headmaster GHS Mirjamal Upper Kurram
3. Accountant Local Office.
4. Class-IV concerned.
5. Office file.



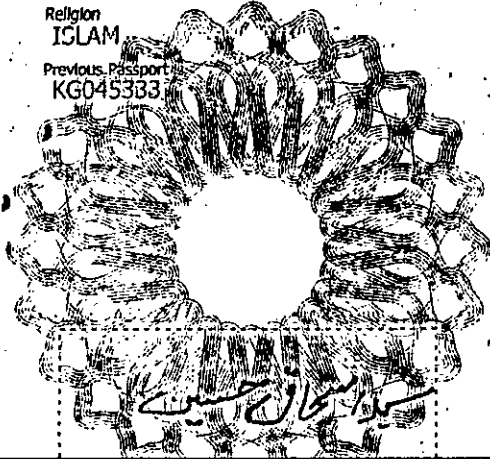
Agency Education Officer  
Kurram Agency Parachinar



ANNOTATIONS

Religion  
ISLAM

Previous Passport  
KG045333



HOLDER'S SIGNATURE OR THUMB IMPRESSION

حامل ہذا کا دستخط یا نشان انگوٹھا۔

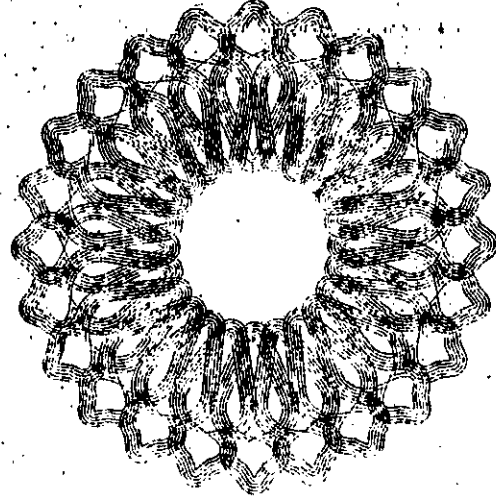
NOT VALID WITHOUT SIGNATURE OR THUMB IMPRESSION

یہ پاسپورٹ بغیر دستخط یا نشان انگوٹھا ناما قابل استعمال ہے۔



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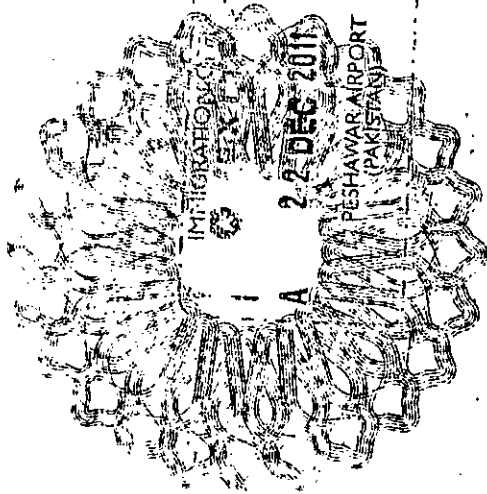
یہ پاسپورٹ سوائے اسرائیل کے دنیا کے تمام ممالک کے لئے کارآمد ہے  
THIS PASSPORT IS VALID FOR ALL COUNTRIES OF  
THE WORLD EXCEPT ISRAEL





2044123

VISAS/123



2214402

VISAS/123

### Government of Pakistan

Certified that the holder has been regt under Emigration Ordinance 1979 and Rules made thereunder for employment

in USA as Driver

vide No. PE(Direct)PWR 97307

dated 22-12-11 to work with

is Jamil Mirza

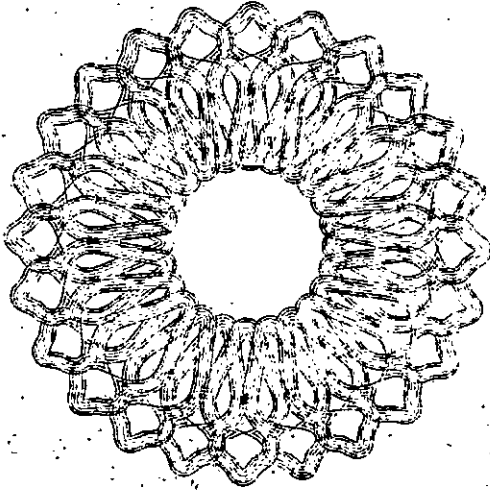
Green M. Mirza

Protector Of Emigrants  
Direct Employment  
Peshawar



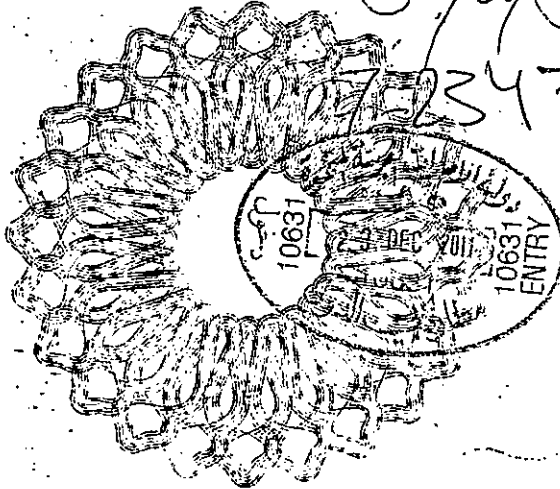
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VISAS / 1/2



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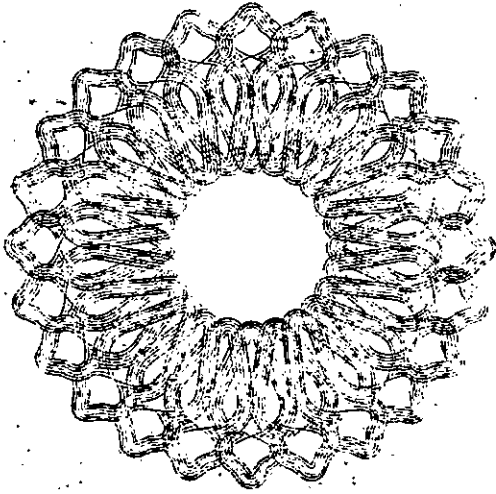
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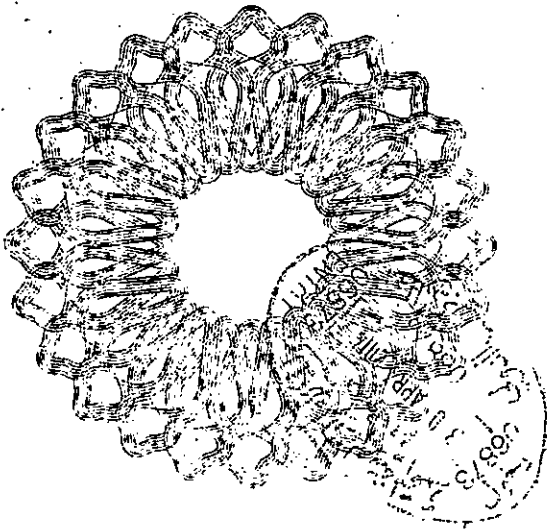
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VISAS / 1/23



دولة الامارات العربية المتحدة  
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30 APR 2013  
06284  
مطار دبي الدولي

06284  
069690  
30 APR 2013  
069690  
06284

2009 JAN 2015  
IMMIGRATION OFFICE  
30 APR 2013



دولة الامارات العربية المتحدة  
UNITED ARAB EMIRATES



إقامة  
RESIDENCE

استوفيت الرسوم

تجديد



جهة الاصدار دبي  
DUBAI  
Place of Issue

110550683

الرقم الموحد  
U.I.D. No

2017/2011/7234711

الملف  
File

**CANCELLED**

2017/2011/7234711  
EE1845511

رقم الجواز  
Passport No

سيد اسحاق حسين سيد مير شاه حسين  
SAYED ISHAQ HUSSAIN SAYED MIR SHAH HUSSAIN

الاسم  
Name

سائق  
DRIVER

المهنة  
Profession

**CANCELLED**  
NASSER SALEH AL RAHMAN  
2016/01/21

الكفيل  
Sponsor

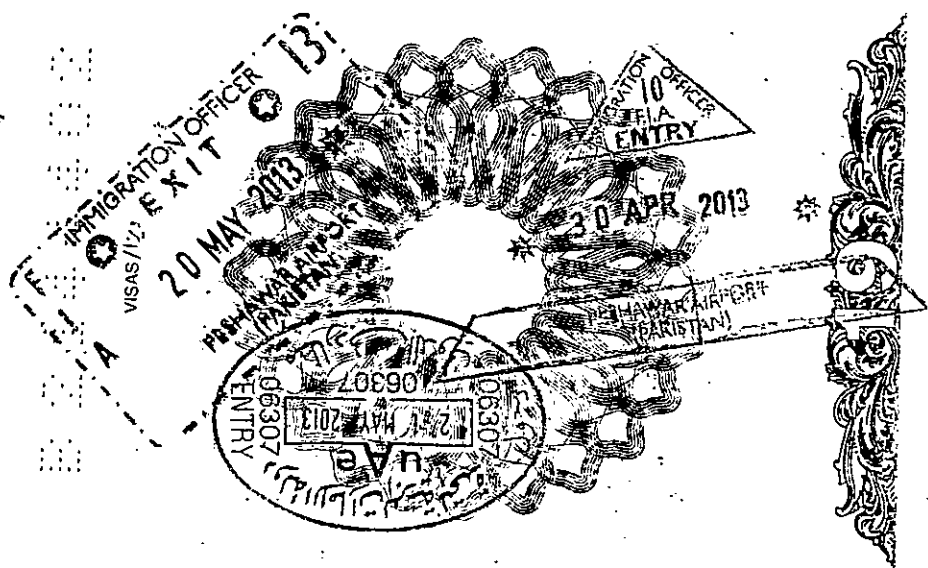
2014/01/22

تاريخ الاصدار  
Issue Date



التوقيع  
Sign.

تعتبر الإقامة لاغية إذا تجاوز حاملها الإقامة خارج دولة الامارات مدة ستة اشهر  
Residence Permit becomes invalid if bearer resides out of the U.A.E. for more than six months.



دولة الامارات العربية المتحدة  
UNITED ARAB EMIRATES

استوفيت الرسوم



إقامة  
RESIDENCE

جديد



دبي  
DUBAI

جهة الاصدار  
Place of Issue

110550683  
201/2011/7234711

الرقم الموحد  
U.I.D. No

البيانات  
File

عده المرافقين  
Accompanied by

EE1846511

رقم الجواز  
Passport No

SAYED ISMAAC HUSSAIN SAYED MIR SHAH  
سيد اسحاق حسين سيد مير شاه

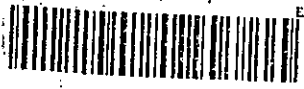
الاسم  
Name

DRIVER  
جميل ناصر سالم  
JAMIL NASSER SALEM AL-FARMA  
2014/01/21  
تاريخ الانتهاء  
Expiry Date

المهنة  
Profession

الضفييل  
Sponsor

تاريخ اصدار  
Issue Date

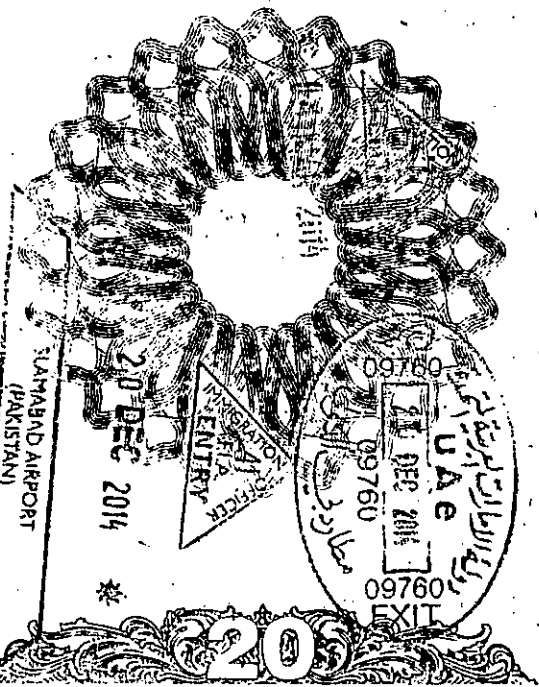


التوقيع  
Sign.

تمتبر الإقامة لاجبة اذا تجاوز حاملها الإقامة خارج دولة الامارات مدة ستة اشهر  
Residence Permit becomes invalid if bearer resides out of the U.A.E. for more than six months.

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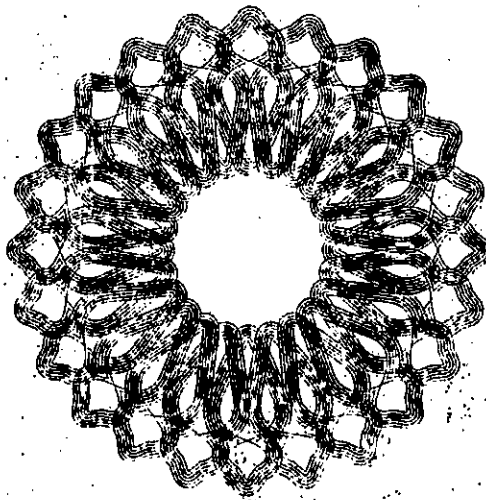
SUIFABAND AIRPORT  
(PAKISTAN)

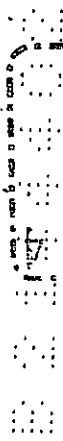
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VISAS / 1/2

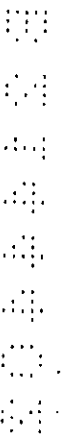
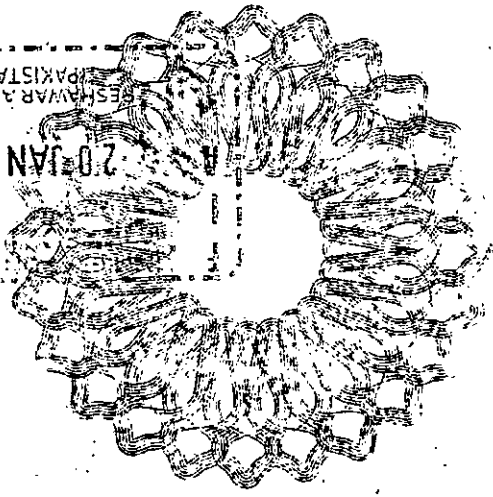




VISAS/123

20 JAN 2015

HESHAWAR AIRPORT  
(PAKISTAN)



VISAS/123

