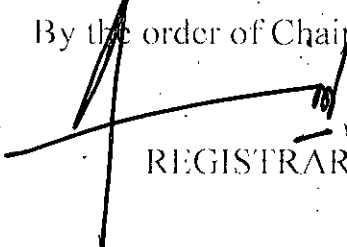


# FORM OF ORDER SHEET

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

Appeal No. 2615/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2.	3.
1-	22/12/2023	<p>The appeal of Mr. Asad Ullah resubmitted today by Mr. Waqar Ali Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Asad Ullah received today i.e on 14.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal be placed on it.
- 3- Departmental appeal is unsigned.
- 4- Page Nos. 6 & 8 of the appeal are illegible be replaced by legible/better one.

No. 3894 /S.T.

Dt. 15/12 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Waqas Ali Shah Adv.  
High Court Peshawar.

- ① objection removed
- ② It is humbly requested that I have no copy of that kindly request to attach it through department
- ③ objection removed
- ④ All the objects has been cleared and the page 6 and 8 are replaced by better one.

W. Ali Shah  
20.12.2023

**BEFORE THE HONORABLE PROVINCIAL SERVICE  
TRIBUNAL KPK PESHAWAR**

Service Appeal No: 2615 2023

Asad Ullah.....(Appellant)

**VERSUS**

Secretary (E&SE) & others.....(Respondents)

**Index**

S.no	Description of documents	Annexure	Pages
1	Service Appeal		1 to 8
2	Copy of CNIC	"A"	9
3	Copy of appointment Order and charge report <i>&amp; Removal order.</i>	"B" & "C". "C-1)	10 to 12
4	Copy of detailed reply dated 16- 02-2023	"D".	13
5	Copy of departmental appeal	"E and E- 1".	14 to 15
6	Copy of the application as	"F".	17
7	Application for Condonation of Delay		18
8	Wakalat Nama		18

*Asad Ullah*  
*Affected*  
*by Counsel.*

*Asad Ullah*  
Waqas Ali Shah  
Advocate High Court  
Cell No: 0222 1544416



**BEFORE THE HONORABLE PROVINCIAL SERVICE  
TRIBUNAL KPK PESHAWAR**

Service Appeal No: 2615 2023

Asad Ullah S/O Inayat UR Rahman

Ex-Drawing Master ( BPS-15)

Post at GMS Sarpah No. 2 Central Kurram District Kurram.

..... (Appellant)

**VERSUS**

1. Secretary (E&SE) Education Department Khyber Pakhtunkhwa Peshawar.
2. The Director (E&SE) Education Department Khyber Pakhtunkhwa Peshawar.
3. The District Education Officer District Kurram  
..... (Respondents)

*Asad Ullah  
Affected by  
Counsel.*

**Appeal Under Section 04 of the Khyber Pakhtunkhwa Service Act, 1974 against the impugned order dated 11-04-2023 whereby the appointment order of the appellant has been cancelled by the respondent and against no action has been taken on the departmental appeal of the appellant within statutory period of ninety days.**

**Respectfully Sheweth:**

1. That the appellant is law abiding citizen of Pakistan and having good reputation in the society.

**(Copy of CNIC is attached as annexure "A")**

(2)

2. That the appellant was appointed as Drawing Master (DM) BPs-15 at GMS Sarpakh No. 2 vide order dated, 16-11-2022. And also taken the charge of DM post on the same date.

**(Copy of appointment Order and charge report are attached as Annexure "B" & "C").**

3. That the appellant was proceeded by respondent No. 3 was willful absence for a period of 15 days only from the duty and accordingly show cause notice No. 307-12 dated, 23-01-2023, and show cause notice No.547-52 dated 08-02-2023 were served upon him to furnish reply. *(copy of Removal order is Annexure, 9)*

4. That the appellant submitted his detailed reply to the show cause notice dated 08-02-2023 by denying/ refuting the allegation willful absence from duty with sound reasoning by stating that:

"That as per the record of local police station the appellant family had gone through a mental trauma and very heart wrenching time. The local of central kurram had the business with the family of appellant's family and their Co-partner sustained substantial financial losses. Resulting in the total cessation of the business. The Co-partner demanded their money/ shares with immediate effect and for the said dispute, a grand Jirga convened with local elders, however, the outcome thereof proved futile so in a result the opposite party open fired on the family of appellant near Arawali and one of the family member of appellant lost his lost his life. So in such alarming situation it is no possible for appellant to perform their duty in the proper way if also his family is not allow the

*Amended  
Attested by  
Counsel*

3

appellant to put another life in todanger again and besides the appellant got severe injuries on his body such leg fractures etc.

**(Copy of detailed reply dated 16-02-2023 is attached as Annexure "D").**

5. That the appellant preferred his departmental appeal dated 05-05-2023 against the impugned order dated 11-04-2023 and on the above said department appeal the respondent No. 2 issued a directive and asking a detailed report/ comments within a week. But, as of now, no results have been provided/ forth coming. **(Copy of departmental appeal is attached as annexure "E and E-1").**

6. That on dated 09-10-2023 the appellant to the respondent No. 2 for the restoration of Job, but the result of that is still in vain. **(Copy of the application as attached as annexure "F").**

7. That appellant being aggrieved from the impugned order referred above, prefers the instant service appeal on the following amongst other grounds for his reinstatements in service and for sitting inside the impugned order dated 11-04-2023 on the following grounds inter alia:

*Case closed  
Attested by  
Counsel*

### **Grounds of appeal:**

A. That the impugned order of the respondent No. 3 is against the law, facts and available material on record, hence no tenable in the eyes of law and also violative of article 04 of the constitution of Pakistan

(4)

B. That no regular inquiry was conducted by the respondents to substantiate the so-called allegation viz-a-viz the willful absence of the appellant for a period of 15 days which is a mandatory requirement of law before imposition of major penalty upon him.

C. That the appellant denied the charge of willful absence by submitting his detailed reply dated 16-02-2023 viz-a-viz the allegation contained the show cause notice dated 08/02/2023 by annexing the relevant documents/ evidence thereon which sufficiently vindicated/ period correct the stance advanced by the appellant but the same was not accepted by the respondents No. 2 & 3, therefore one could not say that the appellant got himself absent willful from the place of duty.

D. That since regular inquiry was dispensed with, therefore, no proper opportunity of proper defence was provided to the appellant to furnish justification with reasoning, hence his defence was materially prejudice, therefore the competent authority as well as the appellate reached to an erroneous conclusion viz-a-viz the charge of willful absence from duty and that too for a period of 15 days.

E. That the impugned order is also violative of the S-24-A of general Clauses Act as the authorities failed to pass a speaking order with reason.

F. That no opportunity of personal hearing was afforded to the appellant which as a flagrant

*Amended  
Attested by  
Counsel*

5

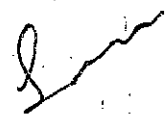
violation of Khyber Pakhtunkhwa Government Servant (E&SE) Rules, 2011, hence the appellant was condemned unheard. That no statement of allegation or charge sheet was served upon the appellant before proving him guilty of the charge which factum is violative of the established principles of natural justice. It is pertinent to mention that the so-called proceedings were carried out at the back of appellant, which is violative of mandatory provisions of Article-10-A of the Constitution of Pakistan.

G. That the additional grounds will be raised at the bar with kind permission of this Honorable Tribunal.

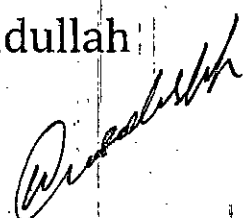
### Prayers:

*It is therefore most humbly prayed, that on the acceptance of this service appeal, the impugned order dated 11-04-2023 may kindly be set aside by restoring/ reinstate the appellant, hence the instead Service appeal.*

*Any other relief to whom the appellant is found entitled during course of hearing may also be granted.*

  
Appellant  
Asadullah

Through

  
Waqas Ali Shah  
Advocate High Court

Dated: 13/12/2023

*Amended by  
Appointed by  
Counsel.*



6

**BEFORE THE WORTHY SERVICES TRIBUNAL KPK,**  
**PESHAWAR**

**Appeal No:** \_\_\_\_\_ **/2023**

Asad Ullah

VS

Secretary (E&SE) & others

**AFFIDIVITE**

I, **Waqas Ali Shah Advocate (Counsel for the Appellant)**, on the instruction of my client I do hereby affirm and declare on oath that the entire contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

*Waqas Ali Shah*

DEPONENT



13.12.2023

Dated: 13-12-2023

*Waqas Ali Shah*  
*Attested by*  
*Counsel.*

7

**BEFORE THE HONORABLE PROVINCIAL SERVICE  
TRIBUNAL KPK PESHAWAR**

Service Appeal No: \_\_\_\_\_ 2023

Asad Ullah S/O Inayat UR Rahman R/O Alezai Manduri  
Bangash Tehsil Lower Kurram Distt Kuram.

..... (Appellant)

**VERSUS**

1. Secretary (E&SE) Education Department Khyber  
Pakhtunkhwa Peshawar and others.

**Certificate:**

It is certified that as per information furnished by my clients  
no such like Service appeal has earlier been moved before this  
august Court, nor is pending in any other court of similar  
jurisdiction.

*Asad Ullah*  
**Advocate**

**Lists of Books:**

1. Constitution of Islamic Republic of Pakistan
2. Any other law Book according to need.

*Asad Ullah*  
**Advocate**

*Asad Ullah*  
*Attended by*  
*Counsel*

8

**BEFORE THE HONORABLE PROVINCIAL SERVICE  
TRIBUNAL KPK PESHAWAR**

Service Appeal No: \_\_\_\_\_ 2023

Asad Ullah S/O Inayat UR Rahman  
Ex Drawing Master  
Post at GMS Sarpah No. 2 Central Kurram District Kurram.  
..... (Appellant)

**VERSUS**

1. Secretary (E&SE) Education Department Khyber  
Pakhtunkhwa Peshawar and others.

*Asad Ullah  
Affected by  
Counsel*

**Certificate:**

It is certified that as per information furnished by my clients  
no such like Service appeal has earlier been moved before this  
august Court, nor is pending in any other court of similar  
jurisdiction.

*Asad Ullah*  
**Advocate**

**Lists of Books:**

1. Constitution of Islamic Republic of Pakistan
2. Any other law Book according to need.

*Asad Ullah*  
**Advocate**

**PAKISTAN** National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Asad Ullah**

Father Name: **Inayat Ur Rehman**

Gender: **M** Country of Stay: **Pakistan**

Identity Number: **21302-5253637-9** Date of Birth: **07.03.1996**

Date of Issue: **10.12.2021** Date of Expiry: **10.12.2031**

12801

Holder's Signature

21302-5253637-9

گمشدہ کارڈ ملنے پر قریبی لیٹر ایکس میں ڈال دیں

510341009861

Registrar General of Pakistan

*Asad Ullah*  
*Affected*  
*By Crime*

Annexure B

10



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(MALE) DISTRICT KURRALI



File No. 0926-10009

Mail Address: K. O. G. Road, K. O. G. P. O., K. O. G. Taluk, K. O. G. District, Karnataka

**APPOINTMENT ORDER**

Consequent upon the recommendation of the Departmental Selection Committee meeting held on 12-09-2022 & Minutes issued vide file No. 10715 dated 16/11/2022, the appointment of the following One (01) candidate is hereby ordered against the post of Drawing Master (DM) Male School Based in BPS-12 (As (22926 1986-833201) 18-33920, (As)) plus non-allowance as permissible under the rules on action for action priority of the Government of Karnataka in teaching cadre on the terms and conditions given here with effect from the date of their taking over charge in the best interest of public service:

Sr.	Roll No.	NAME OF CANDIDATE	FATHER'S NAME	DATE OF BIRTH	EMPNO	NET PAY POSITION	Grade of Salary
01	441345	Abdul K.	Abdul K.	01/01/1977	210000010873	119.50	Gr 15 (1) 17
02	441347	Maheshwari, Jayal	Manjunath Hegde	04/05/85	2100000126715	119.50	Gr 15 (1) 17
03	441348	Amrutesh	Manjunath	30/03/1993	2100000132697	119.50	Gr 15 (1) 17
04	441349	Aravind	Manjunath	01/01/1996	2100000134179	119.50	Gr 15 (1) 17

**TERMS AND CONDITIONS:**

- No TA/DA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely temporary on contract basis initially for one year.
- They should not be paid over charge if they exceed 35 years or below 19 years of age.
- Their services are liable to termination without any notice in case of resignation or if they do not submit their monthly pay & allowances shall be withheld in the Government.
- Health and age certificate should be produced from the Medical Superintendent immediately before taking over charge.
- Appointment is subject to the condition that the candidate's previous records must be verified from the concerned authorities by the District Inspector. Anyone found producing forged or tampered records will be reported to the law enforcement agencies for further action.
- Pay will not be drawn by the DED unless and unless by Release order issued by the Competent Authority.
- They should sign their name within fifteen (15) days of the issuance of the order. In case of failure to sign within 15 days, their appointment will expire unless they sign and their subsequent appointment shall be terminated.
- Before taking over charge they will sign an agreement with the department of the government and where this order will not be valid.
- They will be governed by such rules and regulations as may be issued from time to time by the Government.
- Their services shall be terminated at any time, if they are found to be incompetent or if they are found to be inefficient during their contract period. In case of a second year, they will be proceeded under probation for a period of one year from time to time.
- Their appointment from now onwards, they will be on a contract basis for a period of one year.

*Attested by Counsel*

Sign with Counselor

(Annexure C)

11

**OFFICE OF THE HEAD MASTER GMS SAPAKH NO 2**

**CHARGE REPORT**

1 Mr. Asad Ullah SIO Inayat rehman have taken the charge of DM Post at GMS Sarpakh No  
2 Central Kurram District Kurram With effect from 17-11-2022 fore noon vide District  
Education Officer District Kurram.

Dated: 16-11-2022.

Asad Ullah DM  
GMS Sarpakh No 2

Copy forwarded to:

- 1: DMO (EMA) Kurram.
- 2: District Education Officer Kurram
- 3: Dy: DEO Lower & Central Kurram Sadda.
- 4: SDEO Lower Kurram
- 5: ASDEO Lower Kurram
- 6: Officer Record.

Head Master  
GMS Sarpakh No 2  
**HEAD MASTER**  
GMS Sarpakh No 2  
District Kurram

*Asad Ullah*  
*After tests*  
*By forward.*

(12)

Annexure (C-1)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)  
 KURRAM SADDA  
 Email Address: dyed@kcsadda@gmail.com  
 Phone No. 0926-52067A

Office of the District Education Officer (Male)  
 Kurram Sadda  
 Email Address: dyed@kcsadda@gmail.com  
 Phone No. 0926-52067A

**NOTIFICATION**

1. Whereas, You Mr. Asad Ullah Lab Assistant, GHS Baza, Central Kurram/DM GMS Sarpakh No.2 proceeded against under Khyber Pakhtunkhwa Government Services (Efficiency & Discipline) Rules, 2011. As per report of Headmaster GHS Baza, you were absent since October, 2021 till appointment as DM at GMS Sarpakh No.2 01/12/2022 till 31/03/2023.
2. And whereas, as per EMA report, you were found absent from duty w.e.f 01/12/2022 till 31/03/2023.
3. And whereas, you have been served with show cause notice-I vide this office No 307-17 dated 23/01/2022. But you did not submit your reply to the undersigned.
4. And whereas, you have been served with show cause notice-II vide this office No 547-52 dated 08/02/2023. But no reply received.
5. And whereas, you have been served with show cause notice No-III vide this office No 593-603, dated 25/02/2023. But you didn't submit reply within the stipulated period.
6. And whereas, the undersigned called you for personal hearing vide this office letter No 659 dated 28/02/2023. But you failed to appear before the committee for personnel hearing on 04/03/2023.
7. And whereas, you did not desire to be heard in person as no reply received to this office till date.
8. And whereas, the competent authority (District Education Officer Kurram) after having considered the charges and evidences available on record non-response to the show cause notices and personal hearing is of the considered opinion that the charges against you have been proved.
9. NOW THEREFORE I, Mr. Farooq Ullah Mehsood District Education Officer (M) Kurram, being Competent Authority in exercise of the power conferred under sub Rules 4-b (III) and 9 of Govt. of Khyber Pakhtunkhwa Establishment & Administration Department Rules 2011, imposed upon you the max. penalty of "REMOVAL FROM SERVICE" with immediate effect.

*Removal order  
Affected  
by counsel*

*[Signature]*  
Farooq Ullah Mehsood  
District Education Officer (M)  
Kurram Sadda

Encl. No. \_\_\_\_\_  
Copy to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner District Kurram.
3. District Monitoring Officer Kurram.
4. District Account Officer Kurram.
5. DDEO Male Lower & Central Kurram.
6. Official Concerned.
7. Office record.

*[Signature]*  
District Education Officer (M)  
Kurram Sadda

Better Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)

KURRAM SADDA

Email Address: [dydcolcsadda@gmail.com](mailto:dydcolcsadda@gmail.com)

Phone No. 0926-520674

File No; 1096-1102

Dated: 11/4/2023

**NOTIFICATION**

1. Whereas, You Mr. Asad Ullah Lab Assistant, GHS Baza Central Kurram / DM GMS Sarpakh No. 2 proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011. As per report of Headmaster GHS Baza, you were absent since October, 2021 till appoint as DM at GMS Sarpakh No. 2
2. And whereas, as per EMA report, you were found absent from duty w.e.f 01/12/2022 till 31/03/2023.
3. And whereas, you have been served with show cause notice-I vide this office No. 307-12 dated 23/01/2022. But you did not submit your reply to the undersigned
4. And whereas, you have been served with show cause notice No-II vide this office No. 547-52 dated 08/02/2023. But no reply received.
5. And whereas, you have been served with show cause notice-III vide this office No. 598-603 dated 28.02.2023. But you didn't submit reply within the stipulated period.
6. And whereas, the undersigned called you for personal hearing vide this office letter No. 659 dated 28.02.2023. But you failed to appear before the committee for personal hearing on 04/03/2023.
7. And whereas, you did not desire to be heard in person as no reply received to this office till date.
8. And whereas, the competent authority (District Education Officer Kurram) after having considered the charges and evidences available on record non-response to the show cause notices and personal hearing is of the considered opinion that the charges against you have been proved.
9. NOW THEREFORE I, Mr. Fareed Ullah Mehsood District Education Officer (M) Kurram, being Competent Authority in exercise of the power conferred under sub Rules 4b (III) and 9 of Govt. of Khyber Pakhtunkhwa Establishment & Administration Department Rules 2011, imposed upon you the major penalty of "REMOVAL FROM SERVICE" with immediate effect.

Faridullah Mehsood

District Education Officer (M)

Kurram Sadda

Endst. No. \_\_\_\_\_

**Copy to the:**

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner District Kurram.
3. District Monitoring Office Kurram.
4. District Account Officer, Kurram.
5. DDEO Male Lower & Central Kurram.
6. Official Concerned.
7. Office record.

Attended  
by  
w. u. mehsood



To,

13

(Annexure 0)

THE DISTRICT EDUCATION OFFICER/ ALL CONCERN  
BODIES OF DISTRICT KURRAM PARACHINAR

**Subject: Response of Official Show Cause Issued By District Education Officer, Kurram**

Respected Sir,

Worthy District education officer, I Mr. Asad ullah has been issued with show cause noticed on 08 feb 2023 through official persons/ media plat form and say very sorry for being late in the response because of getting the notice very late. I am very much obliged that the honest education officer has remind me my negligees, why this all happened are explained as under,

Respected sir as per record in local police station, our family had gone through a very dramatic and very heart wrenching time. The local of central Kurram had a business with our family members and that business went into loss wholly soli, the counter party demanded their assist with an immediate effect and we were not even responsible for the loss, so local grand Jirga took place for sometimes, but issue remained undissolved so as a result they open fired on our family near Arawali and one of our family member lost his life. Now in such alarming situation it is even not possible for me to put another life into danger again, that's why our family is not able to allow any of our family member to go over there, but I admit that as a government servant I must put forward my duties although if my department give proper protection and safety. Sir it is also very painful moment to recall my accident, where I got my 2<sup>nd</sup> chance to live, in the bike accident I had very serious injury on my body and leg fracture, all record and medical treatment of concern doctor is attached.

Sir as a member of this society and being scholar with two research publication I can better understand that it is my negligence , but putting myself in danger is also risky way, as a matter of fact that we have disused this issue on higher stages as well and as a result keeping distance is suggested. Sir now it is again very much important that our enemy is still very close to our station and it is very painful for me to go over there, so the overall situation for us is quite alarming.

Now I would request the all concern and authorities to stand by me and help me in such a painful time to allow me on any possible safe station in our locality which is a humble request and my constitutional right of self-defense, if the permission is granted at Began High school, shall be very much thankful to all the concern authorities.

a) Worthy DEO district Kurram, I Mr. Asad Ullah was working as a lab assistant and then I was appointed as DM BPS-15 on 16/11/2023 and with all records we the 4 candidates came to know about our appointment order on 26/11/2023.

b) With all sorry and my apologies I accept that I have halted moral values and my duties all during these 15 days of absenting without any official approval which I accept as my negligence and irresponsible way.

c) Sir I Mr. Asad Ullah is working as Student Brand Ambassador at embassy of United State of America in Peshawar Pakistan for Education, where I had my 5 working days of workshops, so it was very much important for my coming future and for my country.

d) As per record, I had my tests at various departments which includes KPPSC, PAEC and ETEA which were un-avoidable for at any cost.

Respected district education officer district Kurram, as a member of this society and well educated person I understand, what I did is totally unacceptable but with new hope and determination I will do my level best not to repeat such a negligence again, and looking forward for your kind affection if permission at any nearby station is given.

You're sincerely,

Mr. Asad Khan Bangash

M.Phil. scholar chemistry

Mob No 03009793394

Email [Assad.offical@gmail.com](mailto:Assad.offical@gmail.com)

Date: 16/02/2023

Amended  
As per  
by Counsel

Annexure F

20/05/23  
RBSF  
19/05/23

To

The Director Elementary and Secondary Education for  
Newly Merged District Of Khyber Pakhtoonkhwa

Subject: Humble request to restore my services

Respected

It is to mention that I Mr. Asad ullah M.Phil. Scholar has been terminated by the district education officer Mr. Farooq Ullah Wazir male kurram 2 days ago via official notification from education office.

Worthy director, it is to say that I was issued a show cause notice by the competent authority for the absences due to accident and family enmity. in this regard I contacted the official and explained my position in personal hearing and in the written form as well (Copy of explanation is attached for kind information) in the office of deputy district education officer Mr. Maqeen Gul, lower Kurram sadda. In the personal hearing the Dy. DEO acknowledge my presence and accepted my written explanation.

Sir I was visited the same office again and came to know from the concern officer that you are issued the same show cause again, and again I visited the office in person and with the kind suggestion of dy DEO, that post your explanation again on the official address of the office and I did it.

Respected sir, I Mr. Asad Ullah assured the competent authority that I accept my negligence and I would make sure that the same mistake will not be repeated again at any level but anyhow the competent authority terminated my services on the following points keeping in mind.

- a) According to office notice, Mr. Asad Ullah, you were issued a show cause noticed but you did not replied within the given time, but in reality I have explained my position in person and as well in written statement, explanation is attached here.
- b) According to office notice, Mr. Asad ullah you were issued 2<sup>nd</sup> notice but I witness Allah that neither I have received any notice nor any call.
- c) According to office notice, Mr. Asad ullah you were issued 3<sup>rd</sup> notice but I witness Allah that neither I have received any notice nor any call.
- d) According to Office, You were issued a notice through newspaper but there is no publication in newspaper.

Respected sir in light of above points I witness Allah that I have never ever received any official show cause after the 1<sup>st</sup> one and I as a responsible citizen and responsible unit of my family member I will never ever be very careless that not to reply any show cause.

1308

08/05/23

Director of Education  
Newly Merged KPK Peshawar

To

ATTACHED D. E  
better copy F  
Annexure F

(12)

The Director Elementary and Secondary Education for  
Newly Merged District Of Khyber Pakhtoonkhwa

Subject: Humble request to restore my services

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- According to office notice, Mr. Asad ullah you were issued 2<sup>nd</sup> notice but I witness Allah that neither I have received any notice nor any call.
- According to office notice, Mr. Asad ullah you were issued 3<sup>rd</sup> notice but I witness Allah that neither I have received any notice nor any call.
- According to Office, You were issued a notice through newspaper but there is no publication in newspaper.

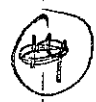
Respected sir in light of above points I witness Allah that I have never ever received any official show cause after the 1<sup>st</sup> one and I as a responsible citizen and responsible unit of my family member I will never ever be very careless that not to reply any show cause.

Respected Director I Mr. Asad ullah working as a DM in the far flung area of district Kurram where sectarian's issue are the daily based issued but still Iam confident and determined to perform my duties at any cost.

Respected Director I Mr. Asad ullah is the only source of my family members who came from very very poor background request you to look into my matter and help me in such critical financial uncertainty to restore my job.

Asad Ullah  
Officer of  
Education

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Sir I promise not to repeat any mistake again so, looking forward for your kindness and affection for restoring my post/ services again in the same way, shall be very much obliged at your kindness.

Your kindness and affection will enlighten our family life and bright future of small brother and sisters.

Thanks

You're sincerely,  
Mr. Asad Khan Bangash  
M.Phil. scholar chemistry  
Mob No 03009793394  
Email [Assad.offical@gmail.com](mailto:Assad.offical@gmail.com)

Dated: 05/05/2023

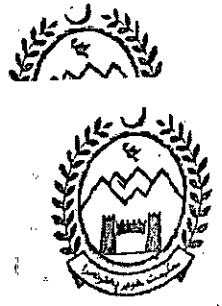
*Asad Khan Bangash*  
*Attested by*  
*Counselor*



(16) (K 7) (8)

~~CONFIDENTIAL~~

Directorate of Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar  
PH No. 091-9330242 Fax 091-9210936



No. 92558-59 EM/II M/Kurram Vol: II Dated 26/05/2023

To  
The District Education Officer (Male)  
Kurram.

Subject: HUMBLE REQUEST TO RESTORE MY SERVICES.  
Memo:

I am directed to refer to the subject cited above and to enclose herewith a copy of self-explanatory Appeal/application in respect Mr. Asad Ullah Khan Ex-DM Govt: Middle School Sarpakh No.02 Central Kurram, and ask you to submit detailed report/comments within a week time positively please.

Assistant Director (Estab:)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Encls: As above

Endost. of even No. & Date:  
Copy forwarded for information to the;

1. PA to Addl: Director Education, (Estab:) Khyber Pakhtunkhwa Peshawar.

Assistant Director (Estab:)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

*Removal  
Affected  
by Counsel.*

(17)

(43)

Annexure F,

The Director Elementary and  
Secondary Education KPK.

Sub: Humble request to restore my Services

R/Sir,

It is to mention that I Mr,  
Asadullah removed from my Services  
w.e.f 7-03-2023 by Dist: Education  
Officer (M) Dist: Kurram.

I had given application for restoration  
but unfortunately the file is seen  
and closed. Which lacks many facts  
for which I draw your attention.  
to look into this matter personally  
shall be thankful to you.

thanks.

yours Sincerely,

M. pail Scholar

Mr. Asadullah

Mob: 0352 9793394

Dated:  
9/10/25

9/10/25

Amatish  
Affected  
by Counsel

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**BEFORE THE HONORABLE PROVINCIAL SERVICE  
TRIBUNAL KPK PESHAWAR**

Service Appeal No: \_\_\_\_\_ 2023

Asad Ullah..... (Appellant)

**VERSUS**

Secretary (E&SE) & others..... (Respondents)

**Service Appeal**

**APPLICATION FOR CONDONATION OF DELAY**

Respectfully Sheweth;

1. That the appellant has filed service appeal before this Hon'ble Court, the contents whereof may kindly be read as an integral part of this application.
2. That the applicant is unable to file the above service appeal in time due to life threats and other unavoidable circumstances, which is already mentioned in para No. 3 of the main appeal, therefore the applicant could not file the instant appeal entire.
3. That the valuable rights of the applicant are involved in the present and if the delay observed is not condoned, applicant would likely to suffer an irreparable loss which cannot be compensated by any means whatsoever.

***It is therefore, most humbly that the acceptance of this application, the application may kindly be accepted and the delay to file the instant appeal graciously be condoned in the interest of justice.***

Appellant,


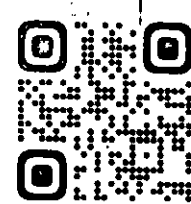
Through

**Waqas Ali Shah**

Advocate High Court

Dated:13-12-2023

*Asad Ullah  
Affected by  
Commitment*

وقت 50	23505	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویٹ: Wages Alised	بار کونسل ایسوسی ایشن نمبر: PC-18-1751	PESHAWAR BAR ASSOCIATION
رابطہ نمبر: 0332-1544416		
		

Before The Honorable Service Tribunal: بعدالت جناب

Appellant: منجانب	Appelant: دعویٰ
Respondent: بنام	علت نمبر:
Secretary (ETSE) & others.	مورخہ:
	جرم:
	تھانہ:

**باعتبار آگے**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام <sup>2</sup> سادر کیلے مقاصد علی شاہ + محمد سلمان جلال کیلے مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال اختیار ہوگا، نیز ذکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور ذکیل یا مختار قانونی ہو جائے ہرگز یا اسے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ برداشتہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائے التوائے مقدمہ کے سب سے ہوگا کوئی تازگی پیشی مقام دورہ یا حد سے باہر ہو تو ذکیل صاحب اپہندانہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم 13/12/2023

سواہ العبد  
 محمد علی شاہ  
 Attorney  
 by Council

اسد اللہ خان صاحب  
 صدر مجلس  
 عدالت  
 خیبر پختونخواہ

تاریخ ایشی وکون اقبال