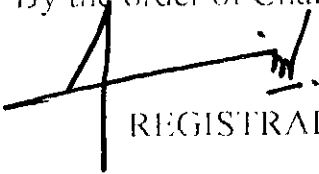


FORM OF ORDER SHEET

Court of _____

Appeal No. 125/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	12/01/2024	<p>The appeal of Mr. Muhammad Anwar presented today by Mr. Kamran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on . Parcha Peshi is given to counsel for the appellant.</p>

By the order of Chairman

REGISTRAR

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL No. 125 /2024

MUHAMMAD ANWAR KHAN VS EDUCATION DETP:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with <i>Application</i>	<i>1-04</i>
2.	Order dated 30.09.2023	A	<i>5.</i>
3.	Reliving chit and attendance register	B	<i>6-7</i>
4.	Change alert	C	<i>8-9</i>
5.	FIR	D	<i>10.</i>
6.	Medical record	E	<i>11-20</i>
7.	Notification dated 01.11.2023	F	<i>21-</i>
8.	Departmental appeal	G	<i>22-24</i>
9.	VAKALATNAMA	--	<i>25</i>

APPELLANT

THROUGH:

[Signature]
**KAMRAN KHAN
ADVOCATES**

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 125 /2024

Mr. Muhammad Anwar Khan, SPET (BPS-16),
GHS Zaffar Mama Khel, District Lakki Marwat, now at the disposal
of Director (E&S) Education, Khyber Pakhtunkhwa, Peshawar.

.....**APPELLANT**

VERSUS

- 1- The Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Lakki Marwat.
- 3- The District Account Officer, District Lakki Marwat.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 30.09.2023 WHEREBY THE APPELLANT HAS BEEN RELIVED FROM DISTRICT LAKKI MARWAT TO DIRECTORATE OF E&SE KHYBER PAKHTUNKHWA, AGAINST THE ILLEGAL STOPPAGE OF SALARY W-E-F 01.09.2023 AND AGAINST THE INACTION BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD ON NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned order dated 30.09.2023 may kindly be set aside and the appellant be posted/ retained at GHS Zaffar Mama Khel District Lakki Marwat as well as the monthly salary/pay of the appellant may also be released. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant is an employee of the respondent department and was performing his duty as SPET (BPS-16) in GHS Zaffar Mama Khel, District Lakki Marwat.
- 2- That while performing his duty with zeal and zest and up to the entire satisfaction of his superior the appellant was astonished to receive the impugned letter/ order dated 30.09.2023 whereby he was relived from his duty and his service was placed at the disposal of the respondent No. 1 without any explanation/ show

cause notice. Copy of the order dated 30.09.2023 is attached as annexure **A.**

3- That in response to the order mentioned above the appellant was relieved by the Headmaster of the school concerned on 04.10.2023. Copies of the reliving chit and attendance register are attached as annexure **B.**

4- That it is pertinent to mention here that the reliving was ordered on 30.09.2023 but the monthly salary of the appellant was stopped w-e-f 01.09.2023 which shows the mala fide of the respondent No. 2 with the appellant. Copy of the change alert is attached as annexure **C.**

5- That in the meanwhile the appellant got a road side accident and was hospitalized for considerable time till 26.12.2023. Copies of the FIR along with the medical record are attached as annexure **D&E.**

6- That vide notification dated 01.11.2023 a fact finding inquiry was also ordered with the direction to submit its report and recommendation within a week but till date nothing has been done. Copy of the notification dated 01.11.2023 is attached as annexure **F.**

7- That appellant feeling aggrieved from the impugned order dated 30.09.2023 and stoppage of monthly salary preferred departmental appeal but the same was not decided within the statutory period of ninety days. Copy of the departmental appeal is attached as annexure **G.**

8- That appellant having no other remedy but to file the instant appeal on the following grounds inter alia.

GROUND:

A- That the impugned order dated 30.09.2023 whereby the appellant has been relived without any explanation and show cause notice and stoppage of monthly salary are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.



B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That the respondent department acted in arbitrary and mala fide manner while issuing the impugned order dated 30.09.2023 and stoppage of monthly salary.

- D- That impugned order dated 30.09.2023 was issued by the respondent No. 2 with mala fide intention and with bad faith and monthly salary was stopped w-e-f 01.09.2023 i.e. before the order dated 30.09.2023 which shows the mala fide of the respondent No. 2.
- E- That the stoppage of monthly salary of the appellant is in violation of Article 11 of the constitution of the Islamic republic of Pakistan, 1973.
- F- That the impugned order dated 30.09.2023 and stoppage of monthly salary is against the principle of natural justice for the reason that before the issuance of the impugned order no explanation or show cause notice has been served upon the appellant.
- G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

Dated: 10.01.2024


APPELLANT
MUHAMMAD ANWAR KHAN

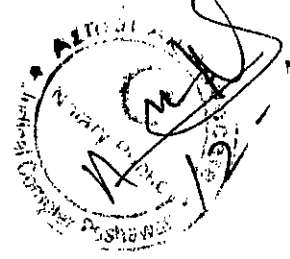
THROUGH: 
KAMRA KHAN
 & 
WALEED ADNAN
ADVOCATES

AFFIDAVIT

I do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing have been concealed from this Honorable tribunal.


DEPONENT

ATTESTED



(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. _____/2024

MUHAMMAD ANWAR KHAN VS EDUCATION DETP:

APPLICATION FOR SUSPENSION OF THE OPERATION OF
THE IMPUGNED ORDER DATED 30.09.2023 AND
DIRECTION FOR THE RELEASE OF MONTHLY PAY TILL
THE DISPOSAL OF THE ABOVE-MENTIONED APPEAL

R/SHEWETH:

- 1- That the above-mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above-mentioned appeal against the illegal and unlawful order dated 30.09.2023 and against the stoppage of monthly salary/ pay.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned order dated 30.09.2023 may very kindly be suspended till the disposal of the main appeal or the respondents may please be directed to release the monthly salary/ pay of the appellant till the final adjudication of the appeal.

Dated: 10.01.2024

THROUGH:

APPLICANT


KAMRAN KHAN
ADVOCATE



**Office of The District Education Officer
Male Lakki Marwat**

Phone & Fax: (0969)538291, Email: emslakki@yahoo.com
www.facebook.com/deomale Lakki, www.twitter.com/deo_m_lakki

(S) (A)

No. 766 /Misc Date: 30/09/2023

To


The Director
E&SE Khyber Pakhtunkhwa
Peshawar

Subject:

Services of Muhammad Anwar SPET GHS Zaffar Mama Khel
District Lakki Marwat placed at Directorate of E&SE Khyber
Pakhtunkhwa

On 30th September 2023, the undersigned paid a surprise inspection visit to Government High School Zaffar Mama Khel District Lakki Marwat to check implementation of performance indicators. When the undersigned entered the school premises, Mr Muhammad Anwar SPET was leaving the school to attend his guests at home. The above quoted teacher used inappropriate attitude when he was asked for reasons of leaving the school before closing time. The teacher also said, the undersigned is not authorized to question him for his duty or leaving the school before closing time.

In above light, this office is not in need of the services of Mr Muhammad Anwar SPET GHS Zaffar Mama Khel and he is hereby relieved of duty with the request to transfer him out of district.



District Education Officer
(Male) Lakki Marwat

Even No.& Date

Copy to the;

1. Deputy Commissioner Lakki Marwat
2. District Monitoring Officer EMA Lakki Marwat
3. Headmaster GHS Zaffar Mama Khel to stop salary of Mr Muhammad Anwar SPET and relieve him immediately to report to Directorate of E&SE Khyber Pakhtunkhwa Peshawar for further posting.

District Education Officer
(Male) Lakki Marwat

Attested


Headmaster
GHS Zaffar Mama Khel
Distt. Lakki Marwat

1061


⑥ "B"

Relieving chit

According to the office of the
DEO (Male) Larkana Marnai NO 7606
Dated 30-09-2023 Mr Muhammad Anwar ^{S.P.B?}
has been relieved of his duties and
his services have been placed at
Directorate of E & St KPK (Peshawar)

You should report to the
Directorate E & St ^{UPA} Peshawar for
adjusting your services as soon as possible

Order Copy of DEO (Male) attached


Head Master 09/10/23
GHS Zaffar Marnai

Head Master
GHS Zaffar Marnai
Dist. Larkana

Larkana Marnai

شرحاً حاضری مدرسین در حیطه کلاس (بابت ماه اکتوبر سال 2023)

(7)

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10:52 AM

↑ 4G LTE 72%



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CHANGE ALERT - 28.09.2023 (00312391 - MUHAMMAD AN ☆)

Inbox



Employee... 10/2/2023



to me ^

From Employee Services • SERVICES@pifra.gov .pk

To MAKM.DPE.2221970@gmail.com

Date Oct 2, 2023, 7:03 PM

🔒 Standard encryption (TLS).

[View security details](#)



Translate to English

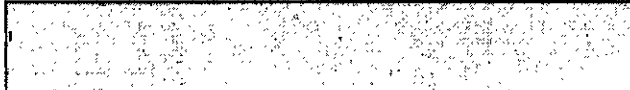


00312391

MUHAMMAD ANWAR KHAN

LK6030

Action Performed



LEAVING ACTION PERFORMED
(SALARY STOPPED) with effect from
01.09.2023



9

10:52 AM

4G 72



CHANGE ALERT - 28.09.2023

(00312391 - MUHAMMAD AN ☆

Inbox



Employee... 10/2/2023



to me v



Translate to English

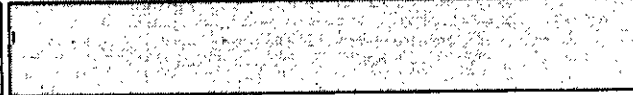


00312391

MUHAMMAD ANWAR KHAN

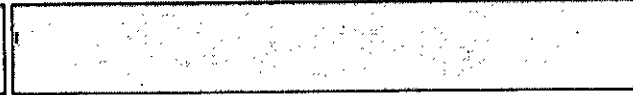
LK6030

Action Performed



LEAVING ACTION PERFORMED
(SALARY STOPPED) with effect from
01.09.2023

Office Details



DESIGNATION CHANGED to
99999999 - TEHSILDAR

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد
ٹی ڈی او کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے۔
اگر اس ای-میل میں شامل ملازمین کی چینجز میں کوئی غلطی
پائی جا رہی ہو، تو جلد از جلد اپنے متعلقہ اکاؤنٹ آفس سے رابطہ

11:00 < >



ابتدائی اطلاعی رپورٹ

کوٹر 'D'

(فائل) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دلہ ۱۵۴ مجموعہ ضابطہ فوجداری

نمبر	فونڈ	تاریخ وقت وقوع و وقت	محل وقوع
15	809	08:33	محل وقوع
1	تاریخ وقت رپورٹ	09:10	وقت 9:10
2	نام و کنونت اطلاع دہندہ	محمد ابرار خان	خان سکنہ ظفر محمد خلیل لہور 33 سال
3	مختصر کیفیت مجرم (موجودہ) حال اگر کچھ لیا گیا ہو	PPC 279, 337C, 427	
4	جائے وقوعہ فاصلہ قاعدہ سے اور سمت	شہر درونک تحصیل قصبہ خانہ	صوبہ لغمان قصبہ قریب چاکا کوسہ رارکھانہ
5	نام و کنونت ظم	رضیہ علیہ	محل وقوع خانہ سکنہ ظفر محمد خلیل لہور 33 سال
6	کارروائی جو پیش کے مطلق کی گئی اگر اطلاع درج کرنے کے وقت ہوا تو بیان کر دو	سرسید سروس سروس سروس سروس	
7	قاعدہ سے روائی کی تاریخ وقت		مذکورہ ڈاکٹر

ابتدائی اطلاع نئے درج کر کے

گل برس 417 اصولوں پر کچھ ڈھل چکا۔ رپورٹ محمد ابرار خان خان سکنہ ظفر محمد خلیل لہور 33 سال
 NIC=11201-9101451-9 قریب شہر لہور، 5993699-0300 محالہ قصبہ قریب اور وقت 9:10 اور وقت 9:30
 رقم ضمنی رقم THQ تحصیل لہورنگ میں رپورٹ کرنا ہے کہ اور وہ وہاں میں خانہ خود سے خود لیا گیا ہے اور
 ہو کر گسٹری حویلی (پیشاور روڈ ڈیپارٹمنٹ کی طرف) لگائی گئی ہے اور تیرا ڈائریکشن میں جنوبی طرف قصبہ قریب
 دلنگ ایجا کہ قبل وقت 08:33 کے عین سے وہاں حویلی کاروائی۔ اور یہاں عملت ہے اور یہاں سے بہتر
 وفتاری آئے عالم نہیں ہے اور یہاں سہا سہا کو ٹیکس مار کر کے گسٹری لگائی اور زخم لگایا اور ڈاکٹر کارٹر 767-767
 (مذکورہ) ڈاکٹر سید حسد حسین رضیہ علیہ خان خان سکنہ ظفر محمد خلیل لہور 33 سال رپورٹ کرنا ہے اور
 گسٹری نے زخمی حالت تھمہ THQ تحصیل لہورنگ لے کر لیا، میں اس حویلی سے مذکورہ ڈاکٹر سید حسد حسین رضیہ علیہ خان
 سے مشکل کی نقصان رسائی اور عملت ہے اور یہاں رپورٹ کرنا ہے اور یہاں سے خود بخود کے سبب
 ہی ہے۔ برصغرت ڈاکٹر سید حسد حسین رضیہ علیہ خان خان سکنہ ظفر محمد خلیل لہور 33 سال رپورٹ کرنا ہے اور
 سنا کہ حویلی کی رپورٹ کرنا ہے اور یہاں سے خود بخود کے سبب ہی ہے اور یہاں سے خود بخود کے سبب ہی ہے اور
 نیم کمرے ہوش ہوش وہاں سے اپنے اپنے اپنی رپورٹ کرنا ہے اور یہاں سے خود بخود کے سبب ہی ہے اور یہاں سے
 حویلی رپورٹ سے صورت ہم 279, 337C کی پائی گئی ہے۔ مفروضہ کا لٹنہ طرز علیہ وقت کرن نہر قاعدہ
 کسٹری سید حسد حسین رضیہ علیہ خان خان سکنہ ظفر محمد خلیل لہور 33 سال رپورٹ کرنا ہے اور یہاں سے
 حقیقہ بلدیہ کسٹری کی رپورٹ 417 قاعدہ لہورنگی خانہ ہے۔ حقیقہ درج رہا کہ قصبہ سہا سہا سہا سہا سہا
 سماجی ہے۔ حقیقہ کارروائی لہورنگی خانہ سکنہ ظفر محمد خلیل لہور 33 سال رپورٹ کرنا ہے اور یہاں سے
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8/11/72

by 1 meter
by 1 meter
1084

8/11/72

PTA



END 1963

E

(11)



THQ Hospital Serai Naurang

(12)

OUT DOOR PATIENT TICKET (Lakki Marwat)

Date 9/10/23

Name 06/31 R OPD No _____

Contact No _____ CNIC No _____

Father's/Husband's Name M Age 72 Sex M

Address _____

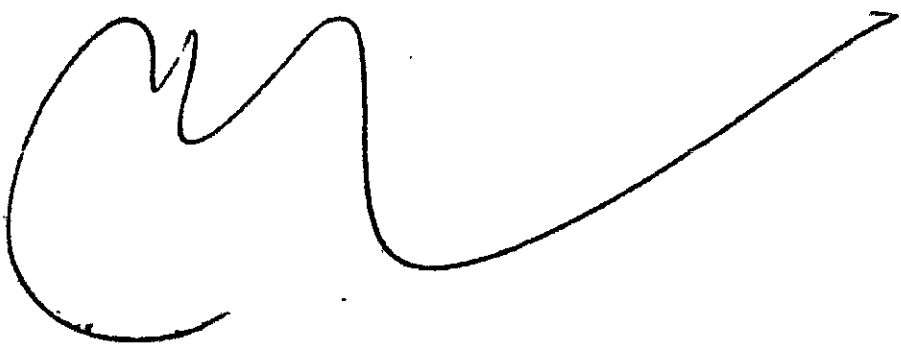
Dovisinal Diagnosis R/A

Investigation

RT Heart R
Re ✓
 Cholesterol
LA Cl
 C/O
 1: BP 170/90
 2: RF L.F. Buid
 3: OTM wind
RA Hypertension
5/10 240
R/S

2/ Dept of
2/ Tra
up R/C
Adv: also
for 02
was

Dr. Signature
 Medical Superintendent
 THQ Hospital Serai Naurang
 Distt Lakki Marwat



was Lt Lt 1

Cap. ~~Worship~~

such Lt 1

cap. ~~Worship~~

Cap.

was Lt 1

57144

Cap.

Cap.

Cap.



THQ Hospital Serai Naurang

15

OUT DOOR PATIENT TICKET (Lakki Marwat)

Handwritten scribbles

Date 23.10.23

Name _____ OPD No 2857

Contact No _____ CNIC No _____

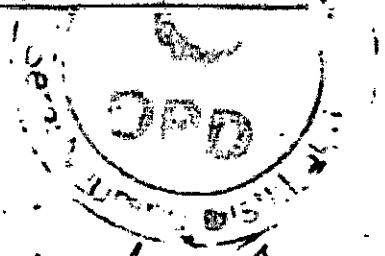
Father's/Husband's Name _____ Age 50 Sex M

Address _____

Dovisinal Diagnosis RTA - Right Fracture

Investigation

Rx



2TA

for 2, 3
cloxacillin

Fracture 2

2TA

3. Hand
Truss
Binding

- Already taken

medication for PSH
osteoporosis

One month
Complete Rest
Rest

Dr. Signature

Medical Officer
THQ Hospital Serai Naurang



THQ Hospital Serai Naurang

OUT DOOR PATIENT TICKET (Lakki Marwat)

Date 23.11.23

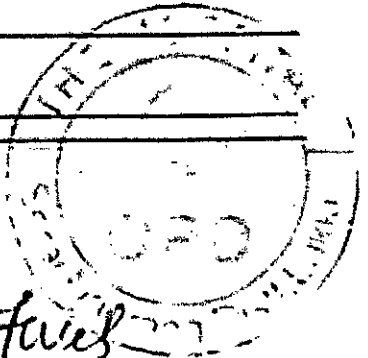
Name _____ OPD No 8183

Contact No 06191 CNIC No _____

Father's/Husband's Name _____ Age _____ Sex _____

Address _____

Dovisional Diagnosis _____



Investigation

Rx

A Typhoid fever

- TB
- fever ↑
- Bodyache
- Nausea
- C/O Abdomin pain
- 1: Generalize
- 2: Bodyache
- 3: —
- C/S

Tab Ciproxin 500mg
b.i.d — (1+1)

Tab Ousagesic - P
1+1+1

Tab Nospa - R
1+1

Tab Famotidine
1/1, 1/1, 1/1

Adv: Bed rest for
02 weeks

Medical Superintendent
THQ Hospital Serai Naurang
Dist: Lakki Marwat

Dr. Signature

SENIOR MEDICAL OFFICER 23.11.23
T.H.Q. Hospital Serai Naurang

(17)

P. NAME الوارطان AGE & SEX M DATE 23-11-23

REF. BY _____ SPECIMEN TPO

HEMATOLOGY

BIOCHEMISTRY

TEST	RESULT	NORMAL	TEST	RESULT	NORMAL
Haemoglobin	gm/dl	M-14-17 F-12-15	Glucose Fasting	mg/dl	70-110 mg/dl
Total White Cell	/cmm	4000-11000/cmm	Glucose Random	mg/dl	80-180 mg/dl
Differential Count			Bilirubin Total	mg/dl	0.2-1.2 mg/dl
Polymorpha	%	40-75	Bilirubin Direct	mg/dl	0.1-1.0 mg/dl
Lymphocytes	%	20-45	Bilirubin Indirect	mg/dl	0.0-2 mg/dl
Monocytes	%	02-10%	SGPT (ALT)	U/l	M-0-43 F-0-38 U/l
Eosinophils	%	01-06%	Alkaline Phosphatase	U/l	F-63-240 U/l M-83-278 U/l CNL < 154 < 643
Basophils	%	0-0.1%	Urea	mg/dl	18-50 mg/dl
E.S.R Westergren	mm/1st hr	M-0-10 F-0-20	Creatinine	mg/dl	0.6-1.3 mg/dl
Platelet Count	/mm ³	150-400 X 10 ³	Uric Acid Level	mg/dl	M-2.4-8.0 F-2.4-6.0 mg/dl
Bleeding Time	Min	1-9min	Total Cholesterol	mg/dl	100-200 mg/dl
Clotting Time	Min	5-11min	Triglycerides	mg/dl	100-200 mg/dl
Prothrombin Time	Sec	11-15	HDL	mg/dl	35-55 mg/dl
Prothrombin Control	Sec		LDL	mg/dl	Desirable < 130mg/dl
LDH		230 - 470	Calcium	mg/dl	8.1 - 10.4
INR			Sodium	mmol/l	135-150
M.P			Potassium	mmol/l	3.8-5.2
			Amylase	U/l	
			HbA1c	%	4.5-7.0

SEROLOGY

Widal Test	Blood Group (ABO)
To AH	Rh Factor
TH BH	Bruceella Abortus
Rheumatoid Factor	Bruceella Melitensis
ASO Titre Normal upto 200 u/ml	H Pylori Anti Bodies
VDRL	Mycodot Test (T.B) .IgM.....IgG.....
T.P.H.A	HBs Ag
Pregnancy Test	HCV Antibodies
Toxoplasma IgM.....IgG.....	HIV (Screening)
Typhidot IgM. <u>POSITIVE</u> IgG. <u>NEGATIVE</u>	Scraping Fungus
LD Bodies	Anti DNA
Montoux Test	CRP.....
Trop T.....	

Remarks _____

Signature _____

0336-9342270 # خٹک میڈیکل لیبارٹری بالقابل تحصیل ہیڈ کوارٹر ہسپتال سرائے نورنگ



THQ Hospital Serai Naurang

OUT DOOR PATIENT TICKET (Lakki Marwat)

(18)

Date 8/12/2023

Name الفرقان OPD No 3450

Contact No _____ CNIC No _____

Father's/Husband's Name _____ Age _____ Sex _____

Address _____

Dovisional Diagnosis _____

Investigation

Rx

O/E

Hx of Typhoid fever

Generalized bodyache
- weakness
C/O Abdomen pain

Cap Rizele 4000

U/L - normal

Tab Panadol-E

1 + 4 /

Tab Dragesic - 8

- 17 /

1:

2:

3:

ADV:- Bed rest for 02 weeks

Medical Superintendent
THQ Hospital Serai Naurang
Distt: Lakki Marwat

Dr. Signature
SENIOR MEDICAL OFFICER
T.H.Q. Hospital Serai Naurang
Distt: Lakki Marwat

19

P. NAME الوارفان AGE & SEX M DATE 8/12/23

REF. BY: _____ SPECIMEN Tp
HEMATOLOGY **BIOCHEMISTRY**

TEST	RESULT	NORMAL	TEST	RESULT	NORMAL
Haemoglobin	gm/dl	M-14-17 F-12-15	Glucose Fasting	mg/dl	70-110 mg/dl
Total White Cell	/cmm	4000-11000/cmm	Glucose Random	mg/dl	80-180 mg/dl
Differential Count			Bilirubin Total	mg/dl	0.2-1.2 mg/dl
Polymorphs	%	40-75	Bilirubin Direct	mg/dl	0.1-1.0 mg/dl
Lymphocytes	%	20-45	Bilirubin Indirect	mg/dl	0.0-2 mg/dl
Monocytes	%	02-10%	SGPT (ALT)	U/l	M-0-43 F-0-34 U/l
Eosinophils	%	01-06%	Alkaline Phosphatase	U/l	F-65-349 U/l M-88-178 U/l CNL ≤ 156 ≤ 543
Basophils	%	0-0.1%	Urea	mg/dl	10-50 mg/dl
E.S.R Westergren	mm/1st hr	M-0-10 F-0-20	Creatinine	mg/dl	0.9-1.3 mg/dl
Platelet Count	/mm ³	150-400 X 10 ⁹	Uric Acid Level	mg/dl	M-3.4-8.0 F-2.4-6.00 mg/dl
Bleeding Time	Min	1-9min	Total Cholesterol	mg/dl	100-200 mg/dl
Clotting Time	Min	5-11min	Triglycerides	mg/dl	100-200 mg/dl
Prothrombin Time	Sec	11-15	HDL	mg/dl	35-55 mg/dl
Prothrombin Control	Sec		LDL	mg/dl	Desirable ≤ 130mg/dl
LDH		230 - 470	Calcium	mg/dl	8.1 - 10.4
INR			Sodium	Mmol/l	135 - 150
M.P			Potassium	Mmol/l	3.8 - 5.2
			Amylase	U/l	
			HbA1c	%	4.5 - 7.0

SEROLOGY

Widal Test	Blood Group (ABO)
To AH	Rh Factor
TH BH	Brucella Abortus
Rheumatoid Factor	Brucella Melitensis
ASO Titre Normal upto 200 u/ml	H Pylori Anti Bodies
VDRL	Mycodot Test (T.B) .IgM..... IgG.....
T.P.H.A	HBs Ag
Pregnancy Test	HCV Antibodies
Toxoplasma IgM..... IgG.....	HIV (Screening)
Typhidot IgM..... IgG.....	Scraping Fungus
LD Bodies	Anti DNA
Montoux Test	CRP.....
Trop T.....	

Remarks _____

Signature _____

0336-9342270 # خٹک میڈیکل لیبارٹری ہاتھ بل تحصیل ہیڈ کوارٹر ہسپتال سرانے نورنگ



**OFFICE OF THE MEDICAL SUPERINTENDENT THQ
HOSPITAL SERAI NAURANG**

20

MEDICAL FITNESS CERTIFICATE

Certified that Mr. Muhammad Anwar Khan S/O Muhammad Abbas Khan
Residence of Zaffar Mama Khel Tehsil Serai Naurang District Lakki Marwat
via OPD No. 9262 Dated 26-12-2023 is examined by me and found him/her
physically and mentally fit to resume his duty.

MEDICAL SUPERINTENDENT
THQ Hospital Serai Naurang
SENIOR MEDICAL OFFICER
T.H.Q. Hospital Serai Naurang
Distt. Lakki Marwat



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR

(21)

"F"

NOTIFICATION

The competent authority has been pleased to nominate Mr. Sheraz Ahmad DEO Male (Awaiting posting), as Inquiry Officer to probe into the conduct of the DEO (M) Lakki Marwat bearing No. 7606 dated 10/11/2023 by taking all stakeholders on board, and submit clear-cut recommendation thereon within a week positively.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa Province

Endst No. 3714-15 /A-25/Appeals/SPETs/PETs/DPEs dated. Peshawar 12/11/23
Copy forwarded to: -

1. Mr. Sheraz Ahmad DEO Male (Awaiting posting).
2. District Education Officer (M) Lakki Marwat
3. Head Master GHS Zaffar Mama Khel Lakki Marwat.
4. Muhammad Anwar SPET GHS Zaffar Mama Khel Lakki Marwat
5. PA to Director E&SE local office.

Deputy Director (F) /
Elementary & Secondary Education
Khyber Pakhtunkhwa Province

To

22
"G"

THE DIRECTOR (E&SE),
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE RELIEVING
ORDER DATED 30-09-2023 AND STOPPAGE OF
SALARIES

R/Sir,

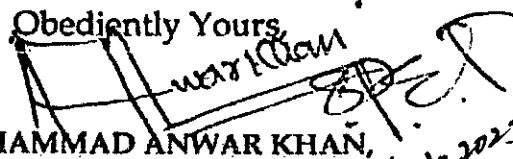
Respectfully submits as under that:

1. I am working as Senior Physical Education Teacher (BPS-16) in Government High School Zafar Mama Khel District Lakki Marwat with full zeal & zest.
2. On 30-09-2023 someone was continuously blowing the horn from at the main gate of the school, I was on the routine round of the school realized that the horn is blowing in front of the main gate of the school.
3. As I left the office of Headmaster at the door of the office the DEO reached and asked me that way you didn't open the main gate, I told him that its not my job and furthermore I didn't know you because before this I didn't meet you.
4. As and when he entered the school told me and the staff that I am District Education Officer of this Area and am on surprise visit to this school.
5. After the so called surprise visit, the DEO in it personal grudges that I have not opened the gate for DEO issued the impugned order dated 30-09-2023 whereby I have illegally been relieved without any cogent or plausible reason mention.
6. The impugned order dated 30-09-2023 has not been passed while fulfilling the codal formalities.
7. The impugned order dated 30-09-2023 has not been passed in the exigencies of service by the DEO.
8. The impugned order dated 30-09-2023 is the result of personal grudges and to show superiority over the sub-ordinate staff.

9. Vide the impugned order dated 30-09-2023 the order for stoppage of the salary has also been issued which is against the Law & prevailing rules.

It is, therefore, requested that the impugned order dated 30-09-2023 is void ab initio may kindly be cancelled in the best of public service.

Obediently Yours,


MUHAMMAD ANWAR KHAN,
SPET, GHS Zafar Mama Khel,
Lakki Marwat

4-10-2023

24

No. 293

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the

Rs. Ps.

RGL82099917 r on which no

acknowledgement is due.

60/-

Received a registered*
addressed to

Date-Stamp

Initials of Receiving Officer

*Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

If insured.

Insurance fee Rs.

Weight

Kilo

Grams

Name and
address
of sender

Rs. 1/- (in words)
Zafar Khan
10, 11/1
0300-399999

بعد اکت پیروں کے لئے



Appellant 2 جناب
بنام ایک کورٹ

محمد انور خان

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام کیلئے کہ حیران خانی ایڈووکیٹس و لبریری کے نام سے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی 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 پر داختم منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائز 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 وکالت نامہ لکھ دیا کہ سند ہے۔

2024

ماہ جنوری

10

الرقوم

العہدہ العہدہ العہدہ
مقام کے لئے منظور ہے۔

Attested & Accepted

محمد انور خان

Appellant

Attested & Accepted
محمد انور خان