

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 539/2023

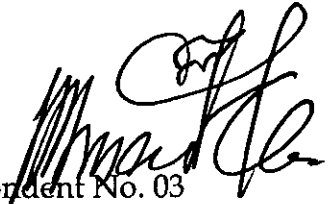
Muhammad Arif

VS

Government of KPK

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Respondent No. 03
Musarat Hussain Baloch
District Education Officer
(Male) Dera Ismail Khan

19-02-2024

(1)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 539/2023

Muhammad Arif

VS

Government of KPK

PARAWISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 to 6.

PRELIMINARY OBJECTIONS

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11145

Dated: 14-02-2024

1. That the appellant has got no cause of action / locus standi. To file instant appeal.
2. That the appellant has not come to the honorable tribunal with clean hands.
3. That the appellant has filed the service appeal on malafide objectives.
4. That the instant appeal is against the prevailing laws and rules.
5. That the appeal is barred by law/limitations.
6. That the instant appeal is illegal and against the facts.
7. That the service appeal is not maintainable in its present form.
8. That the appellant has concealed the material facts from the honorable tribunal.

Respectfully Sheweth, Reply on behalf of Respondents

Respected Sir, The respondents humbly submits as under

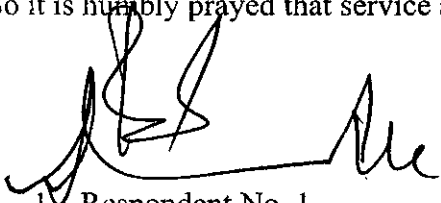
1. Para is correct to the extent that Appellant was given major penalty of compulsory retirement from due to his long and will full absence from duty on 23-06-2021. There were serious reports against the appellant by the education monitoring authority d I Khan. As the appellant was working as a Naib Qasid in GMS Wanda Bolchan D I Khan. The appellant filled the appeal for instatement to the res no.2 the director E&SE KP Peshawar. The appellate authority dismissed the appeal of appellant.
2. As the appellant was appointed as Naib Qasid GMS Wanda Balochan on 14-03-2011. There were Serious allegations against the appellant not to perform his duty. A proper inquiry was initiated against appellant show cause notice was served to appellant, the appellant was given full chance of personal hearing but the appellant failed to prove chares of long absence from duty (Anx-A)
3. Incorrect / not admitted, the appellant has not perform his duty so he was given major penalty of compulsory retirement from service due to his non serious attitude of not performing his duty.
4. In correct / not admitted. The allegations leveled by the respondent No, 6 officer on duty E.M.A D I Khan were correct not based on any political grudges. As the appellant was absent from duty.
5. Incorrect / not admitted. Para is strongly denied, the appellant was not condemned unheard.
6. Incorrect / not admitted. Para is strongly refuted, the respondent No, relied on true reports against appellant. As he was absent from duty and Respondent No, 3 imposed the major penalty of compulsory retirement.
7. Para pertains to the departmental appeal of appellant. Hence no comments.
8. Incorrect / not admitted. Para is strongly rebutted.
9. Incorrect / no admitted. Para is strongly negated.

GROUND


- I. Incorrect / not admitted. The appellant was treated with law a nature principal of justice. There were serious allegation of not performing his duty by the education monitoring authority.
- II. Incorrect / not admitted. para is strongly rebutted.
- III. Incorrect / not admitted. The appellant has not performed his duty.
- IV. Incorrect / not admitted. A proper inquiry was initiated against the appellant.
- V. Incorrect / not admitted. Para is totally false and frivolous.
- VI. Incorrect / not admitted. The appellant was given major penalty of compulsory retirement due to his long absence from duty.
- VII. Incorrect / not admitted. As replied above.
- VIII. Incorrect / not admitted. As discussed above.
- IX. Incorrect / not admitted. The appeal is badly time barred.
- X. Incorrect / not admitted. Para is totally baseless.

Myers.

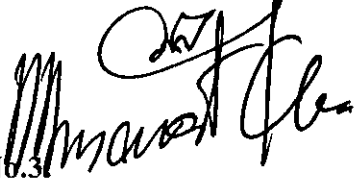
So it is humbly prayed that service appeal of appellant may kindly be dismissed with cost.



1. Respondent No. 1
Abdul Akram
Secretary E&SE KP Peshawar.




2. Respondent No. 2
(~~Samina Aktafi~~)
Director E&SE KP Peshawar.



Respondent No.3
Musarat Hussain Baloch
District Education Officer
(M) D. I. Khan

S.no	Name	Name of School	Designation	Absent Date
1	Muhammad Arif	GMS Wanda Balochan	Naib Qasid	21/05/2019 9:14
2				09/10/2019 13:11
3				23/09/2019 9:44
4				23/09/2020 11:23
5				28/05/2021 10:09
6				01/06/2021 10:51



District Education Officer
(Male) Dera Ismail Khan

www.express.com.pk

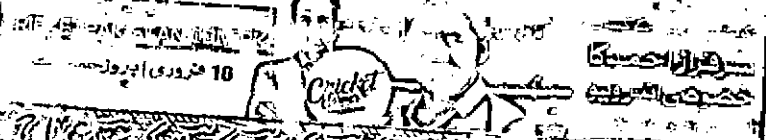
DAILY EXPRESS



THURSDAY, FEBRUARY 19, 2021

CRIC ET

SPECIAL



جونی ایٹار میں پینے کے پانی کی عدم دستیابی اہم عوامی مسئلہ حکومت مل کرنے میں مجبور ہے

جونی ایٹار میں پینے کے پانی کی عدم دستیابی اہم عوامی مسئلہ حکومت مل کرنے میں مجبور ہے۔

پاکستان کے 12 اٹھ سو سال سے ایک وقت میں آئے ہیں اور اس کا سبب

پانی کی کمی سے لڑنے والے پاکستانیوں کی ترقی اور ترقی کے لیے پانی کی کمی

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Left column of news articles and advertisements, including 'PSL' logo at the bottom.

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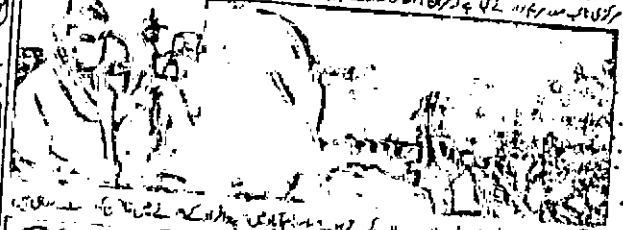
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مہنگے ہونے کے باوجود بیکری کے ڈھیر
انڈیا کی بیکری کا کاروبار بڑھ گیا ہے۔

تلاش تاحصہ بازار میں چھاپے، غیر منصفیاز
بھکرگڑ (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے
شاک لٹوریہ کے فروغی انتہائی لے لادیت
کے خلاف مہنگے بیکری کی تلاش تاحصہ بازار میں چھاپے، غیر منصفیاز
دھولنگا کے خلاف مہنگے بیکری کی تلاش تاحصہ بازار میں چھاپے، غیر منصفیاز
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پشاور (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے
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زیر نگرانی میں ہے۔ وزیر اعلیٰ نے
پشاور (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے

جانم اور ان کے خلاف مہنگے
پشاور (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے
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Sl. No.	Post Title	Qualification	Age
1	Medical Technician (BPS-12)	50 Post each RHC	20/06/2019
2	Aya/Female Ward Servant (BPS-1)	50 Post each BHI	18/10/2019
3	Medical Technician (BPS-12)	50 Post each RHC	18/10/2019
4	Aya/Female Ward Servant (BPS-1)	50 Post each BHI	18/10/2019
5	Medical Technician (BPS-12)	50 Post each RHC	18/10/2019
6	Aya/Female Ward Servant (BPS-1)	50 Post each BHI	18/10/2019
7	Medical Technician (BPS-12)	50 Post each RHC	18/10/2019
8	Aya/Female Ward Servant (BPS-1)	50 Post each BHI	18/10/2019
9	Medical Technician (BPS-12)	50 Post each RHC	18/10/2019
10	Aya/Female Ward Servant (BPS-1)	50 Post each BHI	18/10/2019

پشاور (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے
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**MINISTRY OF HUMAN RIGHTS
DIRECTORATE GENERAL OF SPECIAL EDUCATION
HANNA ROAD, G-8/4 ISLAMABAD**

NOTICE

The Advertisement No. PID (I) 2623/20 dated 20th Nov, 2020, titled "situation vacant, that was published in 'Combined Daily Express', 'Combined Daily Jang' and 'Combined Daily Dawn', for various project posts under Directorate General of Special Education is hereby cancelled/withdrawn.

Director (Admin)

CORRIGENDUM

Reference to the advertisement published in the daily newspapers Daily "Express" Date: 24-01-2021 INF(P) 405/2021. The following amendments in the said advertisement may be read as under:

پشاور (سیکرٹری) عمر کوہ لائیج کے خلاف مہنگے

**DIRECTOR GENERAL OF HEALTH SERVICES
KHYBER**

All Communities Health
Email: dgh
Exch

Project Director "Strengthening of BHUs in 24/7 SBA facilities" and conversion of 60 BHC's into 24/7 RHC's and 738/200045 BHUs in and Newly Merged Districts (pre domicile while Aya who are residing initially filled for one year (Ever performance basis under the said

S. No.	Title of Post	No.
1.	Medical Technician (BPS-12)	50 Post each RHC
2.	Aya/Female Ward Servant (BPS-1)	82 Post each BHI

NOW TO APPLY

1. Eligible candidates can apply to the Director General of Health Department, Islamabad.

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE), DERA ISMAIL KHAN**

Tell: 09669280128- 09669280131
Email: emisdikhan@gmail.com

6735

Dated DIKhan the 08/04/2022

To,

The Director
Elementary & Secondary Education Department
Khyber Pakhtunkhwa, Peshawar.

Subject:

COMMENTS / DETAIL OF CLASS-IV:

Memo:

It is submitted for your kind information that the undersigned has imposed major penalties of the following habitual absent of non-teaching staff under the Efficiency & Deficiency rules 2011. In this connection all the relevant record is being submitted for information please.

S#	Official Name, Designation	Place of Posting	Action Taken	Remarks
1	Mr. Waris Khan, Chowkidar	GPS Wazir Abad	Removal from Service	1. Detail of absent report from IMU. 2. Show cause notices. 3. Minutes of meeting (DSC). 4. Order notification removal from service. 5. Copy of detail comments by SDEO (M) DIKhan.
2	Mr. Zallay Khan, Sweeper	GMS Wanda Balochan	Compulsory retirement	1. Detail of absent report from IMU. 2. Show cause notices. 3. Minutes of meeting (DSC). 4. Order notification compulsory retirement. 5. Copy of detail comments by Headmaster GMS Wanda Balochan DIKhan.
3	Mr. M. Arif, Naib Casid	GMS Wanda Balochan	Compulsory retirement	1. Detail of absent report from IMU. 2. Show cause notices. 3. Minutes of meeting (DSC). 4. Order notification compulsory retirement. 5. Copy of detail comments by Headmaster GMS Wanda Balochan DIKhan.

*Attested
Admnk*

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

MEMORANDUM OF THE DISCIPLINARY ACTION COMMITTEE (DAC)

Office Of The
District Education Officer (M)
DIKhan
(Office Phone# 0966-9280131)

No. 4777/DEO(M)

Dated DIKhan 07/04/2021

AGENDA:

To impose penalties on habitual absent staff reported by Education Monitoring Authority (EMA).

Date & Time:

07th April 2021 at 11:00am

PARTICIPANTS

The Names of the Disciplinary Action Committee as notified vide this office order no. 4645-50 dated 05/04/2020 are as follows:

1. Mr. Musarat Hussain Khan (DEO Male DIKhan) Chairman DAC.
2. Mr. Mehmud Iqbal (Dy DEO Male DIKhan)
3. Mr. Asim Saeed (Principal GHS Himmat)
4. Mr. Muhammad Bilal (ADEO Secondary)
5. Mr. Muhammad Nawaz (Superintendent Primary)
6. Mr. Muhammad Khalid (Superintendent Secondary)
7. All the dealing assistants.

PROCEEDINGS:

The meeting was rescheduled to 1:00 pm due to the arrival of public representative in the office of the DEO Male DIKhan. The meeting was started by DEO (M) DIKhan by giving his opening remarks. All the cases of habitual absent staff that were published in Daily Mashriq dated 1/02/2021 were discussed by the participants. The following decisions were made by the committee as mentioned against each case.

S#	Name of official	School Name	Show Cause Notice	Decision
1	Abrar Moavia (Qari)	GHS Jatta	16429 20/06/2019	Pending till confirmation and case will be discussed with DMO (EMA) DIKhan.
			35066 18/12/2019	
			2993 29/01/2020	
			6668 26/02/2020	
			9469 07/04/2020	
			20310 10/10/2020	
2	Maqbool Ahmad (CT)	GMS Kachi Khesore	16383 19/06/2019	Removal from service.
			26156 03/10/2019	
			31388 05/11/2019	
			32880 20/11/2019	
			2327 23/01/2020	
			6949 27/02/2020	
			9471 07/04/2020	
			20341 10/10/2020	
3	Javed Iqbal (TT)	GMS Kiri Malang	12980 20/05/2019	Compulsory retirement.
			26158 03/10/2019	
			31399 05/11/2019	
			34308 09/12/2019	
			5461 15/02/2020	
4	Shafqat Haroon (SPST)	GPS Sidra Sharif	20276-80 10/10/2020	Compulsory retirement.
			12985 20/05/2019	
			26161 03/10/2019	
			31394 05/11/2019	
			32882 20/11/2019	
			5462 15/02/2020	
5	Sajjad Ahmad (SPST)	GPS Bail Qalo Khan	7405 05/03/2020	Compulsory retirement.
			9470 07/04/2020	
			14257 28/05/2019	
			26164 13/10/2019	
			32881 20/11/2019	

APPROVED
REMOVED

Sl. No.	Name of official	School Name	Show Cause Notice		Decision
			No.	Date	
	Muhammad Arshad (PST)	GPS Kot Essa Khan	7405	05/03/2020	Removal from service.
			9470	07/04/2020	
			20635	17/10/2020	
7	Abdul Majid (Lab Attendant)	GHS Sikandar Janoobi	12996	20/05/2019	Compulsory retirement.
			26175	Mar-19	
			29660	18/10/2019	
			34319	09/12/2019	
			7386	05/03/2020	
8	Zaaly Khan (Sweeper)	GMS Wanda Balochan	19506-10	10/10/2020	Compulsory retirement.
			13000	20/05/2019	
			16105	12/06/2019	
			26168	Mar-19	
			29662	18/10/2019	
9	Muhammad Arif (Naib Qasid)	GMS Wanda Balochan	19496-500	10/10/2020	Compulsory retirement.
			16106	12/06/2019	
			21570	20/08/2019	
			26169	Mar-19	
			29663	18/10/2019	
10	Waris Khan (Chowkidar)	GPS Wazir Abad	19501-05	10/10/2020	Removal from service.
			16117	12/06/2019	
			16147	12/06/2019	
			26172	Mar-19	
			29665	18/10/2019	
11	Fazal-ur-Rehman (Chowkidar)	GPS Wanda Dhawa	13008	20/05/2019	Compulsory retirement.
			16120	12/06/2019	
			26171	Mar-19	
			31384	05/11/2019	
			33561	09/12/2019	
			1619	17/01/2020	
			6946	27/02/2020	
			7391	05/03/2020	
			23310	10/11/2020	
12	Muhammad Naeem (Chowkidar)	GPS Pacca mallana	16134	12/06/2019	Pending till confirmation and case will be discussed with DMO (EMA) DIKhan
			22507	04/09/2019	
			31387	05/11/2019	
			34320	09/12/2019	
			2332	23/01/2020	
			5470	15/02/2020	
			9488	07/04/2020	
			20348	12/10/2020	
15	Aywal Noor (Chowkidar)	GPS Qalo Kalandar	23523	17/09/2019	Compulsory retirement.
			31385	05/11/2019	
			3838	03/02/2020	
			6684	26/02/2020	
			23302	10/11/2020	

By DEO(M) DIKhan

Principal GHS Himmat

ADEO Secondary

Superintendent Primary

Superintendent Secondary

District Education Officer

(Male) DIKhan

Endst: Of Even No and Date.

(10)

GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN

Dated: 12/06/2019

Show-cause Notice for Salary Deduction

I, MUSARRAT HUSSAIN, the District Education Officer (Male) Dera Ismail Khan, as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon you Muhammad Arif Naib Qasid GMS Wanda Balochan DIKhan.

This show cause as follows.

1. That as per IMU monitoring report you were found absent from duty on 21/05/2019 without prior permission of the competent authority.
2. And that as per the material and other connected papers on record under Rule-5 (i) (a) and to dispense with the inquiry in accordance with Rule-7 of the aforementioned rules, I, the competent authority, am satisfied that you have committed acts/omissions specified in Rule-3 (d) i.e. "guilty of habitually absenting himself from duty without prior approval of leave".

Now, therefore, I as the Competent Authority have tentatively decided to deduct one-day salary in accordance with Rule-4 (a) (iii) and the Finance Department Notification No. So (FR)/FD/5-14/2014 dated 16-12-2014.

You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

Note.

If no reply to this show cause is received within 7 days, it shall be presumed that you have no defense to put in and in that case an Ex-Parte decision shall be taken against you.

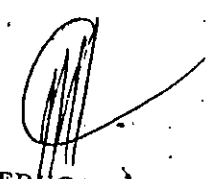
*Attested
Rem K U*

-Sd-
DISTRICT EDUCATION OFFICE
(MALE) DERA ISMAIL KHAN

Encls: Even No. & Date

Copy of the above is forwarded to the:-

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (IMU) DIKhan.
3. Principal/Headmaster/Head Teacher / DDEO/SDEO concerned for necessary action under intimation to this office within 7 days.
4. Official concerned.
5. Master File


DISTRICT EDUCATION OFFICE
(MALE) DERA ISMAIL KHAN

etc

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN**

NOTIFICATION

AS the following officials were proceeded for having committed the acts as noted against him names constitute inefficiency and misconduct under rule 3 sub rules (a), (b) and (d) of the Khyber Pakhtunkhwa Servants (Efficiency & Discipline) rules 2011.

AND WHEREAS they have been found absent from duty as per report of Independent Monitoring Unit (IMU) and Showcause notices generated under Online Action Management System (OAMIS) of Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and these Showcause notice was served to concerned officials through Principal's / Head Masters / SDEO's Concerned as:

S#	Official Name	Design	Name of School	Absent Date
1	Snadat Habib	Naib Qasid	GHSS Choudwan	03/06/2019
2	Essa Khan	Sweeper	GHS Gara Rashid	11/06/2019
3	Muhammad Arif	Naib Qasid	GMS Wanda Balochan	12/06/2019

Now therefore in exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: servant (Efficiency & Discipline) rules, 2011, the Competent Authority is hereby pleased to impose minor penalty of "CENSURE and ONE DAY SALARY DEDUCTION" upon the above accused official in accordance with Rule-4 (a) (iii) of the ibid rules and absent period is converted into leave without pay with immediate effect.

-Sd-
DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN

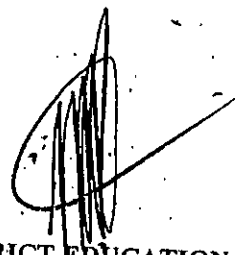
Endst: No. 2260-70 /IMU

Dated 28/8 /2019

Cop. forwarded to the:-

1. Deputy District Education Officer (Male) DIKhan.
2. Principals / Head Masters / SDEO's are concerned with the direction that entry should be made in their service books and also submit his report on monthly basis.
3. DMO (IMU) DIKhan.
4. District Comptroller of Accounts DIKhan
5. Officials concerned.

Attested
MK



DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN

o/c

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GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DERA ISMAIL KHAN.

No: 21570

Dated: 20/8 /2019

Show-Cause Notice for Censure and Salary Deduction

I, MUSARRAT HUSSAIN, the District Education Officer (Male) Dera Ismail Khan, as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 do hereby serve upon you Muhammad Arif GMS Wanda Balochan D.I.Khan. ^{M/R}

This show cause as follows.

1. That as per IMU monitoring report you were found absent for the second time from duty on 12/06/2019 without prior permission of the competent authority.
2. That you had also been reported absent previously on 21/05/2019 for which you had already been penalized.
3. That as per the material and other connected papers on record under Rule-5 (i) (a) and to dispense with the inquiry in accordance with Rule-7 of the aforementioned rules, I, the competent authority, am satisfied that you have committed acts/omissions specified in Rule-3 (d) i.e. "guilty of habitually absenting himself from duty without prior approval of leave".
4. Now, therefore, I as the Competent Authority have tentatively decided to impose upon you the Minor penalty of Censure mentioned in Rule-4 (a) (i) of the ibid rules and deduction of one day salary in accordance with Rule-4 (a) (iii) and the Finance Department Notification No. So (FR)/FD/5-14/2014 dated 16-12-2014.
5. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

Note.

If no reply to this show cause is received within 7 days, it shall be presumed that you have no defense to put in and in that case an Ex-Parte decision shall be taken against you.

Musarrat Hussain
M-U-K

-Sd-
DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

Endst: Even No. & Date

Copy of the above is forwarded to the: -

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (IMU) DIKhan.
3. Principal/Headmaster/DDEO/SDEO concerned for necessary action under intimation to this office within 7 days.
4. Official Concerned.
5. Master File.

Musarrat Hussain
DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN

(131)



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(MALE) DERA ISMAIL KHAN**

Tell: 09669280131
Email: deom.di@kpese.gov.pk

No. 12487

Dated DIKhan the 23/06/2021

WHERE AS you Mr. **MUHAMMAD ARIF** while serving as Naib Qasid at GMS Wanda Balochan DIKhan were proceeded for having committed the following acts which constitutes inefficiency and misconduct under rules 3 sub rules (a),(b) & (d) of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) rules 2011.

- a. That you were appointed against the post of sweeper vide this office Endst No. _____ dated _____ whereas you submitted arrival on _____.
- h. That you remained absent from duties as reported by EMA (Education Monitoring Authority) as mentioned in various show cause notices served upon you.

AND WHERE AS show cause notices were served upon you vide this office No. 16106 dated 12/06/2019, No. 21570 dated 20/08/2019, No. 26169 dated 03/09/2019, No. 29663 dated 18/10/2019 and No. 19501-05 dated 10/10/2020 by the competent authority i.e. District Education Officer (Male) DIKhan.

AND WHERE AS your reply to any of show cause notices was not received.

AND WHERE AS you were called to be heard in person vide 22529-36 dated 02/11/2020 but you were failed to appear on personal hearing.

AND WHERE AS you were intimated to join the duties through public notice in Daily Mashriq dated 18/02/2021 within 15 days but you failed to do so.

NOW THEREFORE the Competent Authority in exercise of the power conferred under Sub Rules 4-b (ii) and 9 of Govt: of Khyber Pakhtoonkhawa, Establishment & Administration Department Rules 2011, I Mr. Musarrat Hussain Khan District Education Officer (Male) DIKhan as competent authority is pleased to impose the Major Penalty of "COMPULSORY RETIREMENT" upon Mr. **MUHAMMAD ARIF** Naib Qaid at GMS Wanda Balochan DIKhan from the date of his first show cause notice i.e. 12.06.2019. Moreover, the absence period will be considered as Extra Ordinary Leave (EOL) without pay.

Attested
M.H.K.

DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

Endst: No. 12482-85 /PF

Dated 23/6/ /2021

Copy for information & necessary action to the:-

- 16. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 17. Deputy Commissioner Dera Ismail Khan.
- 18. District Comptroller of Accounts DIKhan.
- 19. Principal/ Head Master/SDEO concerned.
- 20. Master file...

DISTRICT EDUCATION OFFICER
(MALE) DIKHAN

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 539/2023

Muhammad Arif

VS

Government of KPK

Authority

I District Education Officer (M) D.I.Khan do hereby authorized Muhammad Kamran to attend the honorable Service Tribunal KPK Peshawar on behalf of respondent in connection with submission para wise comments till the decision of service appeal.


Respondent No.3

Musarat Hussain Baloch
District Education Officer
(M) D.I.Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL KPK PESHAWAR

SERVICE APPEAL No. 539/2023

Muhammad Arif

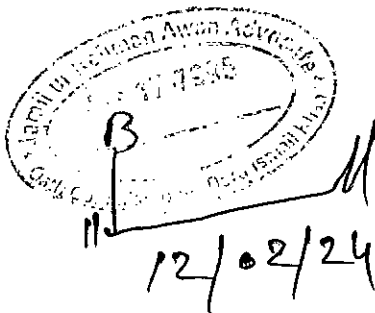
VS

Government of KPK

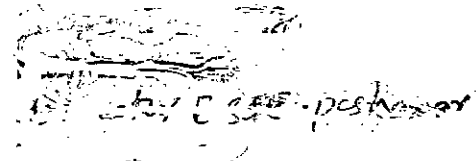
Affidavit

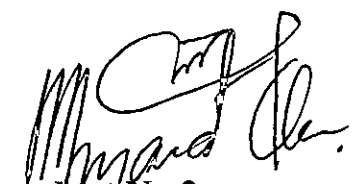
We respondents do solemnly affirm and declare on oath that contents of written reply are correct to the best of my knowledge and nothing has been concealed from this honorable Court. It is further stated that on oath in this appeal the answering respondents have been neither placed ex-parte nor their defense has been struck off. /cost.

Deponents


B
12/02/24

Respondent No. 3
Abdul Akram
Secretary EASE KPK Peshawar




Respondent No.3
Musarat Hussain Baloch
District Education Officer
(M) D.I.Khan