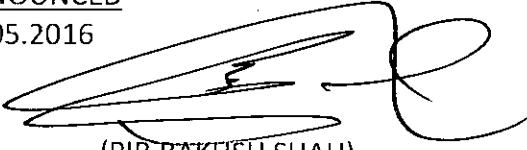

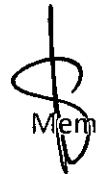


S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	25.05.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</u></p> <p style="text-align: center;"><u>APPEAL NO.1279/2015</u></p> <p style="text-align: center;"><u>(Nisar Khan-vs- The Additional Chief Secretary, FATA, FATA Secretariat, Warsak Road, Peshawar and 9 others).</u></p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p><u>ABDUL LATIF, MEMBER:-</u> Appellant with counsel (Mr. Qaisar Ali, Advocate), M/S Daud Jan, Superintendent and Abdul Malik, AD (litigation) alongwith Mr. Usman Ghani, Senior Government Pleader for respondents present.</p> <p>2. Arguments heard and record perused.</p> <p>3. The record reveals that the appellant is working as SET (BPS-16) and is a Provincial Government employee working in FATA on deputation basis without deputation allowance in terms of presidential order of 1972. The contention of the learned counsel for the appellant that he was liable to serve in FATA is therefore baseless and unfounded as the appellant is not borne on the Agency Cadre. The record further reveals that he has already completed his tenure in FATA as well as in the existence station i.e Government High School Badan, Bajaur Agency. Moreover the impugned order dated 11.08.2015 was not a transfer order rather it was repatriation of the appellant to the Directorate of Elementary and Secondary Education on Administrative grounds. The Tribunal is of the considered view that the appellant has failed to make out a case for its indulgence and therefore being devoid of any merits the appeal in hand is dismissed. Parties are left to bear their own costs. File be consigned to the record.</p> <p><u>ANNOUNCED</u> 25.05.2016</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  (PIR BAKHSH SHAH) MEMBER </div> <div style="text-align: center;">  (ABDUL LATIF) MEMBER </div> </div>

29.02.2016

Appellant in person and Mr. Dawood Jan, Supdt. alongwith Addl: A.G for respondents present. The learned Addl. AG relies on the written statement already submitted by respondents No. 1 to 3 on behalf of respondents No. 4 to 9. The appeal is assigned to D.B for rejoinder and final hearing for 30.3.2016. Status-quo be maintained.


Member

30.03.2016

Appellant with counsel and Mr. Dawood Jan, Supdt. alongwith Mr. Ziaullah, GP for respondents present. Rejoinder submitted. Learned counsel for the appellant requested for adjournment. Adjourned to 27.4.2016 for final hearing before D.B. Status-quo be maintained.


Member
(Executive)


Chairman

27.04.2016

Appellant in person and Mr. Ziaullah, GP for respondents present. Rejoinder submitted. Due to general strike of the Bar learned counsel for the appellant is not in attendance. Adjourned for arguments to 25.05.2016 before D.B. Status-quo be maintained.


Member


Chairman

23.12.2015

Appellant with counsel and Mr. Daud Jan, Supdt. alongwith Addl: AG for respondents present. Counsel for the appellant submitted an application for the release of salary copy whereof is handed over to the learned AAG. Representative of the respondents needs time for submission of written reply. To come up for written reply on main appeal as well as reply/arguments on application on 28.1.2016 before S.B. Status-quo be maintained till the date fixed.


Member

28.1.2016

Appellant with counsel, Mr. Daud Jan, Supdt. alongwith Assistant AG for respondents present. Para-wise comments on behalf of respondents No. 1 to 3 submitted. The learned Assistant AG requested for adjournment on behalf of respondents No. 4 to 9. Last opportunity granted to respondents No. 4 to 9 for submission of written reply/comments for 29.2.2016 before S.B. Status-quo be maintained.


Chairman



25.11.2015

Counsel for the appellant present. Record of the case was requisitioned on application of the learned counsel for the appellant for today and preliminary arguments heard. Learned counsel for the appellant argued that the appellant was serving as SET (BPS-16) at GHS Badan, Bajaur Agency and vide impugned order dated 11.8.2015 he was repatriated and his services placed at the disposal of Provincial Government where against he preferred departmental appeal on 17.8.2015 which was not responded and hence the instant service appeal on 16.11.2015.

That the appointment of the appellant was specifically meant for Agency Cadre and as such the impugned repatriation order is violative of law and, furthermore, no mandatory approval of the Governor in passing such order has been obtained by the authority concerned. That the appellant is also serving as President of the Association which is an approved Association and as such the impugned order is not in consonance and conformity of the relevant law governing the subject. That the appellant has not yet relieved the charge.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.12.2015 before S.B. Notice of application be also issued for the date fixed. Status-quo be maintained.

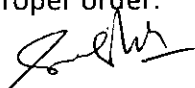


Appellant Deposited
Security & Process Fee


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1279/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16.11.2015	<p>The appeal of Mr. Nisar Khan resubmitted today by Mr. Qaiser Ali Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>24-11-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2	24.11.2015	<p>None present for appellant. The appeal be relisted for preliminary hearing for 23.12.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>


This is an appeal filed by Mr. Nisar Khan today on 06/11/2015 against the impugned orders dated 11.08.2015 against which he preferred/made a departmental appeal on 18.08.2015 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following objections.

- 1- Judgment of Peshawar High Court dated 17.10.2015 mentioned in para-4 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1744/ST,

Dt. 10/11/2015.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Mr. Qaiser Ali Adv. Peshawar.

Respected Sir, pl. refer to the above.

1. The judgement of the Honorable Peshawar High Court is dated 24.10.2008 and has been inadvertently typed as above and copy will be submitted at the time of hearing. However its Annex also complete judgement will be provided at the time of hearing also.

2. As desired Sir more copies of the petition are also submitted before the honorable Khyber Pakhtunkhwa Service Tribunal.

Yours obediently,


13.11.2015
(QAISAR ALI)

Advocate High Court

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT PESHAWAR
JUDICIAL DEPARTMENT

301

Writ Petition NO. 1865 OF 2007

JUDGMENT

Date of hearing 24-10-2008

Petitioner (Mohammed Rastid) By Miss Neelam A. Khan Adv.

Respondents (Goul & others) By M/s Javed Rehman Khan A.S. & Ejaz Adv. Advocate

DOST MUHAMMAD KHAN, .J.- In this petition the

main grievance elaborated in different paras thereof is that the petitioners have served in hardship and unattractive areas away from their home stations. Thus, according to the policy laid down by the Provincial Government, they have prayed for transfer to their respective home stations or to those close thereto and that there should be a consistent rotation so that every employee of the department is given equal treatment in the matter of posting in attractive, unattractive and hardship areas so that no one shall be treated with a special privilege on political or other considerations.

2. There are new incumbents waiting for posting and the learned counsel representing them including the added respondents are of the view that they, being fresh appointees, be granted some concession in the matter of posting at the places nearest to their home stations.

For

be
the
grant
policy
manner
policy in
unavoidable

10

Faint, illegible text covering the majority of the page, possibly bleed-through from the reverse side.

K P
~~Services~~ ~~Intelligence~~
بعد الرمز

غیر مخزن واہ سروس ٹریبونل

موزنہ 25.11.15
مقدمہ شاہد خان بنام ایڈووکیٹ زہیر شاہد بنام ایڈووکیٹ صفیر شاہد
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی و جواب وہی وکل کاروائی متعلقہ
آن مقام Zahir Shahid ka Advocate کے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب وہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیردی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی 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
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

المترقوم Zahir Shahid 25 ماہ نومبر 2015

واہ الع

کے لئے منظور ہے۔

بمقام

RAHIM SHAHID

Advocate

(QAISAR Law Associates)

Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1 1.	2 26.08.2015	<p data-bbox="1016 398 1042 430">3</p> <p data-bbox="628 473 1428 564">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p data-bbox="801 599 1213 642">Service Appeal No. 61/2015</p> <p data-bbox="660 682 1491 766">Ghani-ur-Rahman. Vs. The Addl. Chief Secretary (FATA) FATA Sectt. Peshawar.</p> <p data-bbox="780 808 906 851"><u>ORDER</u></p> <p data-bbox="702 892 1502 934"><u>PIR BAKHSHI SHAIH, MEMBER.</u>- Counsel for the</p> <p data-bbox="639 977 1502 1186">appellant (Mr. Khalid Rahman, Advocate) and Sr. Government Pleader (Mr. Usman Ghani) for the respondents present.</p> <p data-bbox="790 1280 1334 1323">Arguments heard and record perused.</p> <p data-bbox="649 1388 1517 2010">The appellant has already completed his tenure at Government Degree College, Landi Kotal. Further that impugned order dated 30.09.2014 the appellant was not transferred but directed to report to Directorate of Education (FATA) Peshawar for further posting. There is no merit in the appeal, which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record.</p> <p data-bbox="664 2061 890 2094"><u>ANNOUNCED</u></p> <p data-bbox="671 2101 816 2136">26.8.2015</p> <p data-bbox="702 2262 962 2346">(ABDUL LATIF) MEMBER</p> <p data-bbox="1103 2136 1455 2212">(PIR BAKHSHI SHAIH) MEMBER</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Appeal No. 1279/2015

Nisar Khan SET (Science Teacher) GHS Badan, Bajaur

Versus

Additional Chief Secretary FATA and others

PRAY TO ORDER FOR IMPLEMENTATION OF STATUS QUO AND
RELEASE OF PAY / SALARY

Respectfully Sheweth,

1. This Honourable Tribunal on 25/11/2015 very graciously ordered for status quo.
2. That respondents are reluctant to implement the status quo and since 01/11/2015 have not issued pay / salary.

It is, therefore, prayed to implement status quo order dated 25/11/2015 and to release pay / salary of the remaining after 01/11/2015 and onwards.

Through

Appellant

23.12.2015
QAI SAR ALI,

Advocate, High Court Peshawar

of Appellant
1- Affidavit for Status quo order
of this Honble court are enclosed.

Q. M.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Appeal No. 1279/2015


Nisar Khan SET (Science Teacher) GHS Badan, Bajaur

Versus

Additional Chief Secretary FATA and others

AFFIDAVIT

I, Nisar Khan SET (Science Teacher) GHS Badan, Bajaur do hereby solemnly affirm and declare on oath that the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable tribunal.


DEPONENT
23/12/2015



23 DEC 2015



25.11.2015

Counsel for the appellant present. Record of the case was requisitioned on application of the learned counsel for the appellant for today and preliminary arguments heard. Learned counsel for the appellant argued that the appellant was serving as SET (BPS-16) at GHS Badan, Bajaur Agency and vide impugned order dated 11.8.2015 he was repatriated and his services placed at the disposal of Provincial Government where against he preferred departmental appeal on 17.8.2015 which was not responded and hence the instant service appeal on 16.11.2015.

That the appointment of the appellant was specifically meant for Agency Cadre and as such the impugned repatriation order is violative of law and, furthermore, no mandatory approval of the Governor in passing such order has been obtained by the authority concerned. That the appellant is also serving as President of the Association which is an approved Association and as such the impugned order is not in consonance and conformity of the relevant law governing the subject. That the appellant has not yet relieved the charge.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 23.12.2015 before S.B. Notice of application be also issued for the date fixed. Status-quo be maintained.

Certified to be true copy
Khyber Pakhtunkhwa Service Tribunal, Peshawar

Chairman

Date of Presentation of Application 25.11.2015
Number of Petition 800
Copies 6
Pages 1

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No: 1279/2015

Nisar Khan SET GHS Badan Bajaur Agency.....Appellant.

VERSUS

1. The Additional Chief Secretary FATA & Others.....Respondents.

Para-wise comments on behalf of respondent No:1, 2 & 3.

Respectively Sheweth:

Preliminary Objection

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and no departmental appeal is made to the competent authority against the impugned order. Hence not maintainable under Section-4 of Service Tribunal Act.

On Facts:

1. Incorrect. All Government Employees i.e SET/Subject Specialist H/Master in Education Department from BPS-16 and above are working under the control of Khyber Pakhtunkhwa (Provincial Government). All sorts of ^{affairs} are dealt with by the Competent Authority. The appellant was involved in unlawful/undesirable activities as evident from repatriation summary submitted by the Director Education FATA to the Secretary Social Sector Department FATA (Copy attached as Annexure-A).
2. Incorrect. As explained in Para No.1 above.
3. Incorrect. The transfer order has been issued by the Competent Authority in the interest of Public and for the smooth running of the department. According to Section-10 of Khyber Pakhtunkhwa Civil Servant Act-1973 that " every civil servant shall be liable to serve anywhere inside or outside the province". Therefore the appellant has no right to perform his duty according to his wishes.
4. Incorrect. Each & every case has its own merit and circumstances. The transfer order has been issued by the Competent Authority on administration grounds due to misconduct.
5. Incorrect. As per Para's mentioned above.
6. Incorrect. The appellant has been repatriated to his parents Department for further adjustment on administration grounds. The appellant is a provincial employees working in FATA without Deputation allowance as FATA is ex-cadre.
7. Incorrect. All Government employees i.e SET, H/Master/Subject Specialist from BPS-16 and above are working under the control of provincial Government. All sorts of ^{affairs} are dealt with by the said Competent Authority. Therefore, the appellant has been repatriated to Directorate of (E&SE) Khyber Pakhtunkhwa on administration grounds for further adjustment in the interest of public.
8. Incorrect. As per Para mentioned above.
9. Subject to proof.
10. Incorrect. As explained in Para-7 above.
11. Incorrect. As explained in Para-6 above.
12. Incorrect. As per Para's mentioned above..
13. No comments. Subject to proof.

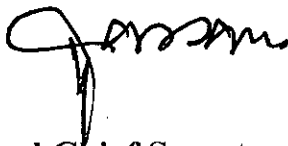
14. Subject to proof.

15. Incorrect. The impugned order is in accordance with law/rules and in accordance with Section-10 of Civil Servant Act.


16. Incorrect. Reply to prayer for interim Relief. All the three ingredients are in favour of respondents, so the appellant is not entitled for the relief claimed for.

In light of the above facts it is humbly prayed that the appeal may very kindly be dismissed having no legal force with cost.

Respondent NO.1

FOT

Additional Chief Secretary FATA

Respondent NO.2


Secretary Administration & Co-ordination
FATA Secretariat Peshawar

Respondent NO.3


Director Education FATA

AFFIDAVIT


We the above respondents do hereby declare and affirm that the above comments are true and correct to the best of our Knowledge and belief that nothing has been concealed from this Honorable Tribunal.

Respondent NO.1

for

Additional Chief Secretary FATA

Respondent NO.2


Secretary Administration & Co-ordination
FATA Secretariat Peshawar

Respondent NO.3


Director Education FATA



Subject: REPATRIATION/CHARGE SHEET

"A"

1. One Mr. Nisar Khan SET GHS Badan Bajour Agency was resorting to mis-conduct during the course of interview for AAEO dated 5-6/08/2015, feigning to be the president of teacher association, though there is strict ban on unionism in FATA vide a Notification already circulated by Secretary AI&C Deptt: FATA Secretariat.
2. This office had called 10 No of SETs of Bajour Agency for selection of one SET for the post of AAEO. Mr. Nisar Khan instigated all the rest of nine SETs, not to appear before interview panel, so that only one could be selected. During the course of this very action of Mr. Nisar Khan SET exchanged hot words with the Director Education FATA using un parliamentary language that is an act unbecoming of a gentle man and a civil servant, as envisaged in Rule -3 (b) of (Efficiency & Disciplinary) Rules 2011, so his services may be surrendered to Director E&SE Khyber Pakhtunkhwa for further posting on settled area and disciplinary action may also be taken against him due to his misconduct and a charge sheet to that effect will be framed after approval.
3. The proposal contained in Para-2/N above is submitted for approval, please.

M. Anwar 6/8/15
Director Education FATA

etc

Secretary SSD FATA

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

APPEAL No.1279/2015

Nisar Khan, Senior English Teacher (SET),
Govt: High School Badan, Bajaur Agency

-----Appellant

VERSUS

1. The Additional Chief Secretary, FATA, FATA Secretariat, Warsak Road, Peshawar
2. The Secretary, Elementary and Secondary Education Department, Govt: of Khyber Pakhtunkhwa, Peshawar
3. The Secretary Administration, Infrastructure and Coordination, FATA Secretariat, Warsak Road, Peshawar
4. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar
5. The Political Agent, Bajaur, Bajaur Agency
6. The Agency Education Officer, Bajaur Agency
7. Agency Account Officer, Bajaur Agency at Khar Bajaur
8. The Headmaster, Govt: High School Badan Bajaur
9. DE FATA

-----Respondents

REJOINDER

**REJOINDER TO PARA-WISE COMMENTS,
SUBMITTED BY THE APPELLANT**

Respectfully Scheweth:

The comments of the Respondents before this Hon'ble Tribunal are totally incomplete, arbitrary, capricious, whimsical, false based on fraud and are vehemently denied in toto. These are based on surmises and conjectures. Para-wise reply in the form of Rejoinder is submitted:

Respectfully Sheweth,

REJOINDER TO PRELIMINARY OBJECTIONS:

1. The Appellant has been condemned and humiliated by illegally dislodging repatriating, which is based on malafide, and a fraud which creates cause of action.

2. The Appellant has come to this Court with very clean hands to pray for SOS, as has been humiliated uprooted and dislodged by the Respondents based on malafide and fraud.
3. Nothing has been concealed. Rather the Respondents are concealing and doing fraud, have submitted cooked and concocted story and documents.
4. Denied. The Appeal is based on material facts against the malafide and malicious act of the Respondents.
5. Denied. The Appellant has made all the concerned as party.
6. Denied. The Appeal is well in time and departmental appeal has been served on the Competent Authority and evidence has already been submitted alongwith the Appeal (Annexure-AL to AQ of Characters Certificates the Appeal).

REJOINDER ON FACTS:

Vehemently Denied. The Appellant was never involved in unlawful/undesirable activities. The fraudulent claim of the Respondents is based on fraud. Best Teacher Award, commendation Certificates, Character Certificates and 100% School Result etc are Annex H to AJ-5 of the Appeal.

- i. That the so called un-served, Charge Sheet of the Respondents (Annex-A of the Para-wise Comments) confirms that Appellant is not on deputation, rather a permanent employee of FATA. The Deputationist cannot be charge sheeted.
- ii. That the so called un-served Charge Sheet has been prepared without appointing any Enquiry Officer [Sub Rule (3) of Rule 5 of E&D Rules] or Statement of Allegations.
- iii. As proved in the Appeal before this Hon'ble Tribunal, the Appellant is admittedly the most outstanding Teacher, Best Teacher Award Holder and President of the Teacher Association. But against the Rules and without any fault, based on malafide the Appellant was illegally shunted out.

Following is the Statutory Provisions of Section 17(SI No.2) regarding transfer of office bearers of Association:

“It has also been decided that the Office bearers of the Association should not ordinarily be transferred for the year they are office bearer as such”

(Authority: S&GAD letter No.SOSIII(S&GAD)1-57/73, dated 18.3.1973)

iv. **In Para 1 of the Repatriation / Charge Sheet (Annex A of the Para-wise Comments)**, it has been falsely mentioned:

“One Mr.Nisar Khan SET, Bajaur Agency was resorting to misconduct during the course of interview for AAEO dated 5-6/08/2015 feigning to be President of Teachers Association, though there is strict ban on the Unionism in FATA vide a Notification already circulated by Secretary AL&C Deptt., FATA Secretariat”

- a. It is mentioned that the Appellant Nisar Khan is not President of Union, he is admitted by President of Association, which is allowed in accordance to the Article 17 of the Constitution of Pakistan and is in the Chapter of Fundamental Rights of the Constitution and all Laws inconsistent with Fundamental Rights in accordance to Article 8 of the Constitution are void. Association is also allowed in Section 17(SI No.2) of the Civil Servants Appointment, Promotion and Transfer Rules as published in the KP Estacode and its Legal, Constitutional and Fundamental Right of the Appellant and is allowed
- b. The allegation is totally false, and malafide based on fraud because Date for the post of AAEO Bajaur was fixed for 5.08.2015 at Peshawar but the Appellant was on duty in Bajaur on this day (Annex-A i.e Page 65 of the Appeal)
- c. Moreover it is also important vide, No.004 dated 1.7.2015 Mr.Saidur Rehman SET, GHS Malangai, Bajaur has already been selected as AAEO; on the basis of Seniority without any interview **(Annex-1)**. The allegations levelled are proved totally false malafide based on fraud to cheat this Hon'ble

Court. The case of Repatriation built on the basis of fraud in falsified and it proves malafide and illegality of the Respondents.

2. Proved as above that the illegal repatriation / transfer from FATA to settled area is based on fraud and malafide.
3. Admitted illegality of the impugned order as **no approval of the Competent authority** i.e Governor was obtained for transfer of the Appellant from FATA to Settled Area. It was total illegality on behalf of the Respondents. Moreover the Appellant was appointed for FATA as he is FATA Domiciled. Section 10 of Civil Servants Act:

“Provided that nothing contained in this Section shall apply to Civil Servant recruited specifically to serve in a particular area or region.”
4. There is no evidence or base for transfer on administrative grounds. The Transfer has been made on the basis of malafide, whimsically and capriciously based on high-handedness and fraud. The Appellant has been punished for his hard work and Excellent Results.
5. As above.
6. The appellant is FATA domiciled, a poor, hardworking and proved outstanding Teacher and has been illegally transferred out from FATA to settled area on the bases of fraud and false allegations.
7. In the Impugned Order, no public interest has been mentioned. The Respondents cannot Transfer / Repatriate the Appellant unilaterally, without the approval of the Governor. No Proper Reply has been given, it is admission. The allegation of administrative grounds has been proved totally false as in Para 1 above.
8. No Proper Reply, it means admission.
9. Proved with valid documentary evidence that the appellant is hardworking, dutiful and admittedly outstanding Teacher giving 100% results which have been tremendously appreciated by the Respondents (**Annexs-H, I, J & K of the Appeal**).

10. No Proper Reply. The Transferring out of FATA of the Appellant has been made without the required approval of the Competent Authority as directed.
11. As above.
12. As above.
13. The Plethora of documentary evidence has been submitted with the Appeal, which now neither can be ignored nor denied by the Respondents (Annexs-H, I, J & K of the Appeal).
14. As above.
15. Denied. The appeal ground in Para 15 is according to Law / Rules. The Appellant is a FATA Domiciled and was appointed for FATA area, in accordance to proviso to Section 10 of the Civil Servants Act 1973 his Repatriation impugned order is illegal and based on malafide.
The Appellant has always delivered excellent results, outstanding performance, Received dozens of Commendations and Appreciation Certificates, Best Teacher Awards and Certificates, 100% Attendance, throughout 100% Results (Annexs-H, I, J & K of the Appeal); but out of malafide the appellant has been illegally shunted out of FATA to settled area, without approval of the Competent Authority. All it is vindictiveness and high handedness of the Respondents.
16. No Proper Reply to the grounds of Appeal of Para 16 has been given.

Sir, a: In nutshell, the Charges mentioned in "Annex-A" of the Para-wise Comments (Repatriation / Charge Sheet) are based on malafide and fraud. The so called interview for the post of AEO was on 5.8.2015 (Annex-2). Moreover vide Agency Education Officer Bajaur No.004 dated 01.07.2015 one Mr.Said Rehman, SET has already been selected for the said post without any interview (Annex-1). Further interesting as mentioned in the Repatriation / Charge Sheet interview was on 5-6/08/2015 and the said so called un-served cooked Charge Sheet is also dated 6.8.2015, which is not possible, in the above contradictions.

b: That all the said 10 candidates for the post of AAEO have given on oath (Annex-3), that Mr.Nisar Khan, the Appellant, has not stopped them from interview.

The Appellant, who is a poor Teacher who is admittedly outstanding, upright and extremely hardworking, obtained many meritorious service rewards of best Teacher, always given 100% results of his School in the Matric, has also been victimized / condemned, based on malafide as he is President of Teachers Association (Not Union) and Associations are allowed under Article 17 of the Constitution and Section 17 (Sl.No.2) of the Civil Servants Appointment, Promotion and Transfer Rules. The Appellant has admittedly been condemned / punished to be Office Bearer of the Association, which is his Fundamental Constitutional and Legal Right, but he has never misbehaved as falsely alleged. It is, therefore Respectfully Prayed:

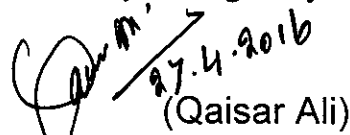
PRAYER: The illegal, arbitrary, whimsical and malafide action in the form of Impugned Repatriation / Transfer Order of the Respondents, against a poor, competent and hardworking school Teacher may be declared as abinitio, illegal and may please be cancelled / Null and void. Any other favourable Remedy in favours of the Appellant which this August Tribunal deems fit may please be granted.



Appellant
(Nisar Khan)

Senior English Teacher (SET)
Govt: High School Badan
Bajaur Agency

Through :



27.4.2016
(Qaisar Ali)

Advocate High Court
Flat No. 7 Tasnim Plaza,
6-Saddar Road, Near Jan's Bakers,
Peshawar Cantt
Phones: 03339122244/091-5272213

AFFIDAVIT

I, Nisar Khan S/o Bashak Khan (CNIC No.21103-8440 474-5), Senior English Teacher (SET, Govt. High School Badan, Bajaur Agency do hereby affirm on oath that the contents of this Appeal and Rejoinder are true and correct as per information and nothing therein is false.

Attested.
Signature
27.04.2016


DEPONENT

8

Annex: 1



**OFFICE OF THE AGENCY EDUCATION
OFFICER BAJAUR AGENCY AT KHAR**

No 004 Dated 01-7-2015

Phone: 220395 Fax: 220395 Email: Rahmatwali30@yahoo.com

To

The Director of Education
FATA Peshawar

Subject: PROPOSAL FOR ADJUSTMENT AS AAEO AGAINST VACANT POST.

Memo:

Kindly refer to the subject cited above and to state that one post of Asstt: Agency Education officer is lying vacant at this office due to the transfer/adjustment of Haji Madayin as I/C Head Master GHS Ghani Adai Bajaur Agency.

So, one Mr. Said ur Rahman SET GHS Malangai Bajaur (Seniority No: 752) already conveyed in the panel is recommended to be adjusted against the said post at this office keeping in view his seniority, efficiency, fitness and know-how of official work please.


Agency Education Officer
Bajaur Agency



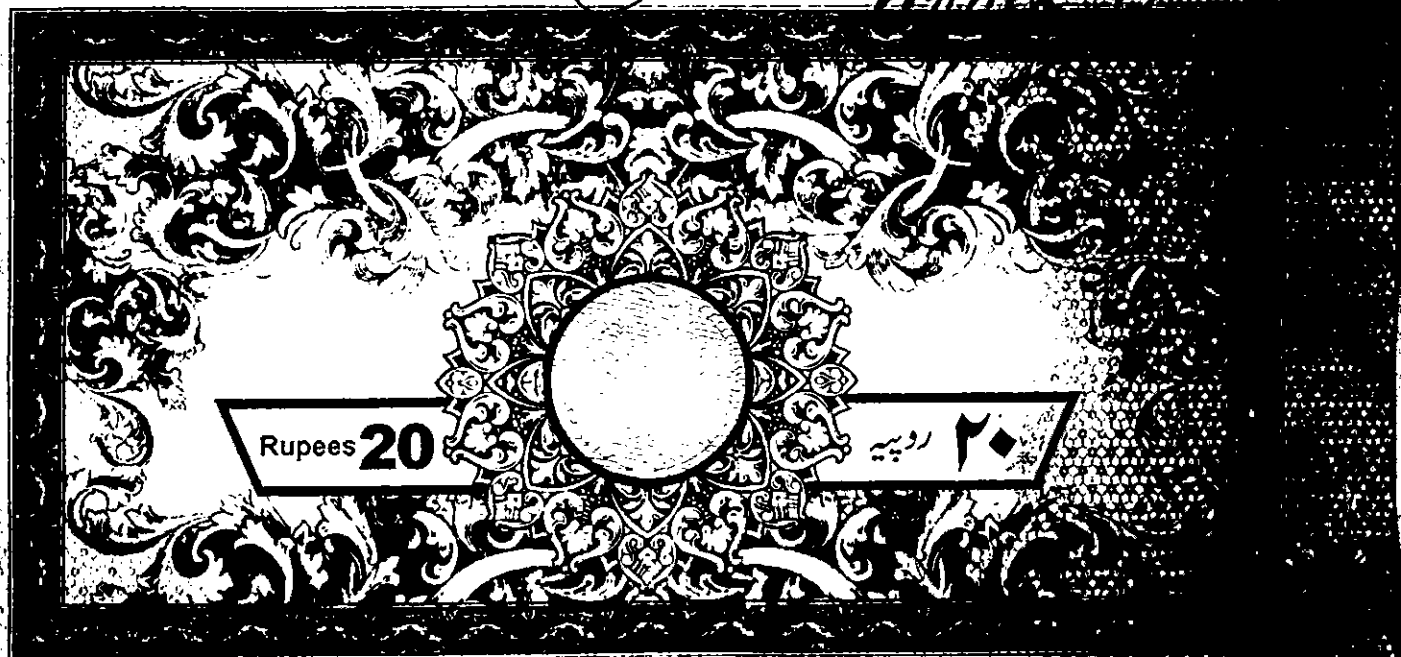
9

Annex: 2
FATA SECRETARIAT
DIRECTORATE OF EDUCATION
WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210166 FAX 091-9210216

NO. _____ / DATED _____

INTERVIEW LIST OF SETS FOR THE POST OF AAEO BAJOUR
TO BE HELD ON 05/08/2015

S/No	Name with school & designation	Tenure/Ist Apptt: as SET	Service record	Remarks
1	Mr. Saecdur Rehman SET GHS Malangai	20/11/94	-do-	
2	Mr. Saeed Ahmed SET GHS Dehrakai	24/11/94	Satisfactory	
3	Mr. Ikhtiar Jan SET GHS Top Mandal	23/05/95	-do-	
4	Mr. Musafar Khan SET GHS Dehrakai	23/05/95	-do-	
5	Mr. Rehmat Gul SET GHS Ghazi Baba	23/05/95	-do-	
6	Mr. Jaffar Shah SET GHS Raghagan	23/05/95	-do-	
7	Mr. Bad Shah Muhammad SET GHS Inayat Killi	23/05/95	-do-	
8	Mr Fazle Subhan SET GHS Bandagai Now I/C H/M GHS Pashat	02/04/96	-do-	
9	Mr. Fazle Rahim SET GHS Ghani Adai	03/04/96	-do-	
10	Muhammad Shah SET GHS Khar	28/03/96	-do-	



جناب چیئرمین صاحب سروس ٹریڈیونل خیبر پختون خواں پشاور۔

بیان (۹) محمد شاہ محمد یوسف -

میں سیماں علی سعید احمد (۱۲) سید الرحمان رحمت علی ریحتم علی دیکھا بادشاہ محمد رحیم مسافر خان جعفر شاہ (۱۵) فضل رحیم

اقرار کر کے لکھ دیتے ہیں کہ جناب ڈائریکٹر صاحب محکم تعلیم (فائنل) پشاور کے ہدایات کے روشنی میں ہم خالی آسامی برائے AAEO باجوڑ ایجنسی کے انٹرویو کیلئے مورخہ 05/08/2015 بلائے گئے تھے۔ چونکہ ہم سب نے متفقہ طور پر یہ مشورہ کیا تھا کہ مذکورہ پوسٹ سینیاریٹی کی بنیاد پر ہیڈ کیا جائے۔ جبکہ نارخان GHS SET بدان نے ہمیں انٹرویو کیلئے حاضر ہونے سے منع نہیں کی ہے۔ اور 06/08/2015 کو انٹرویو نہیں ہو چکا ہے۔

لہذا ہم اپنے بیان میں صادق ہیں۔

5-21106-2258021-5
العبد
مسافر خان SET جی ایچ ایس ڈی سرورنگی باجوڑ

21106-2271074-5
العبد
سعید احمد SET جی ایچ ایس ڈی حونگلی باجوڑ

CNIC No 16405-1036553-1
العبد
جعفر شاہ SET جی ایس رائفٹان باجوڑ

العبد
سید الرحمان SET جی ایچ ایس منٹلی باجوڑ

CNIC 21103-2305228-1
العبد
فضل رحیم SET جی ایچ ایس منٹلی باجوڑ

العبد
اختیار خان SET جی ایچ ایس ٹوپ مائل باجوڑ

21103-5894705
العبد
محمد یوسف SET جی ایچ ایس ٹانڈ خا باجوڑ

العبد
رحمت علی SET جی ایچ ایس غازی بابا (باجوڑ)

العبد
محمد شاہ SET جی ایچ ایس خار باجوڑ
21103-0395531-1

CNIC No 21103-8441329-5
العبد
بادشاہ محمد SET جی ایچ ایس منٹلی باجوڑ

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Court of.....

Case No.....of.....

2

Serial No. of Order of Proceedings	Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2	3
	ORDER 11.02.2010	<p><u>Writ Petition No.2673/2009.</u></p> <p>Present: Mr. Ijaz Anwar, Advocate, for Sirajul Haq etc., petitioners.</p> <p style="text-align: center;">*****</p> <p><u>EJAZ AFZAL KHAN, CJ.</u>-Petitioners through the instant petition have asked for the issuance of an appropriate writ directing the respondents to dispose of their applications in accordance with the posting and transfer policy, formulated by the Provincial Government, and the judgment of this Court rendered in Writ Petition No.1865/2007 on 24.10.2008.</p> <p>2. We have gone through the available record carefully and considered the submissions made by the learned counsel for the petitioners.</p> <p>3. A perusal of the record would reveal that a good number of applications have been filed by the petitioners before the departmental authority, vis-à-vis, their posting and transfer in accordance with the</p>

ATTESTED

EXAMINER
Peshawar High Court

EM

Attached to be
TRUE COPY

policy but none of them has been decided so far despite the lapse of sufficient time. We, thus, direct the respondents to dispose of the applications of the petitioners in accordance with the policy and judgment of this Court within a fortnight. This writ petition is disposed of accordingly.

Announced.
11.02.2010

sdt- Ejaz Afzal Khan - CJ
sdt- Mazhar Alam Khan - J

~~DECLARED TO BE TRUE COPY~~
Notarized Under Section 76 Act of 1956

1-3-10

9693

Date of Presentation of Application 26-2-10
No of Pages 14P
Dropping Fee 21.00
Agent Fee 21.00
Total 21.00
Date of Preparation Copy 1-3-10
Date of Delivery of Copy 1-3-10
Notarized by [Signature]

~~Attested to be True Copy~~

Real: Registrar
18.2.2010
Office
15/2/10

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

APPEAL No.1279/2015

Nisar Khan, Senior English Teacher (SET),
Govt: High School Badan, Bajaur Agency

-----Appellant

VERSUS

1. The Additional Chief Secretary, FATA, FATA Secretariat, Warsak Road, Peshawar
2. The Secretary, Elementary and Secondary Education Department, Govt: of Khyber Pakhtunkhwa, Peshawar
3. The Secretary Administration, Infrastructure and Coordination, FATA Secretariat, Warsak Road, Peshawar
4. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
5. The Political Agent, Bajaur, Bajaur Agency
6. The Agency Education Officer, Bajaur Agency
7. Agency Account Officer, Bajaur Agency at Khar Bajaur
8. The Headmaster, Govt: High School Badan Bajaur
9. DE FATA

-----Respondents

REJOINDER

**REJOINDER TO PARA-WISE COMMENTS,
SUBMITTED BY THE APPELLANT**

Respectfully Sheweth:

The comments of the Respondents before this Hon'ble Tribunal are totally incomplete, arbitrary, capricious, whimsical, false based on fraud and are vehemently denied in toto. These are based on surmises and conjectures. Para-wise reply in the form of Rejoinder is submitted:

Respectfully Sheweth,

REJOINDER TO PRELIMINARY OBJECTIONS:

1. The Appellant has been condemned and humiliated by illegally dislodging repatriating, which is based on malafide, and a fraud which creates cause of action.

2. The Appellant has come to this Court with very clean hands to pray for SOS, as has been humiliated uprooted and dislodged by the Respondents based on malafide and fraud.
3. Nothing has been concealed. Rather the Respondents are concealing and doing fraud, have submitted cooked and concocted story and documents.
4. Denied. The Appeal is based on material facts against the malafide and malicious act of the Respondents.
5. Denied. The Appellant has made all the concerned as party.
6. Denied. The Appeal is well in time and departmental appeal has been served on the Competent Authority and evidence has already been submitted alongwith the Appeal (Annexure-AL to AQ of Characters Certificates the Appeal).

REJOINDER ON FACTS:

Vehemently Denied. The Appellant was never involved in unlawful/undesirable activities. The fraudulent claim of the Respondents is based on fraud. Best Teacher Award, commendation Certificates, Character Certificates and 100% School Result etc are Annex H to AJ-5 of the Appeal.

- i. That the so called un-served, Charge Sheet of the Respondents (Annex-A of the Para-wise Comments) confirms that Appellant is not on deputation, rather a permanent employee of FATA. The Deputationist cannot be charge sheeted.
- ii. That the so called un-served Charge Sheet has been prepared without appointing any Enquiry Officer [Sub Rule (3) of Rule 5 of E&D Rules] or Statement of Allegations.
- iii. As proved in the Appeal before this Hon'ble Tribunal, the Appellant is admittedly the most outstanding Teacher, Best Teacher Award Holder and President of the Teacher Association. But against the Rules and without any fault, based on malafide the Appellant was illegally shunted out.

Following is the Statutory Provisions of Section 17(SI No.2) regarding transfer of office bearers of Association:

“It has also been decided that the Office bearers of the Association should not ordinarily be transferred for the year they are office bearer as such”

(Authority: S&GAD letter No.SOSIII(S&GAD)1-57/73, dated 18.3.1973)

iv. **In Para 1 of the Repatriation / Charge Sheet (Annex A of the Para-wise Comments)**, it has been falsely mentioned:

“One Mr.Nisar Khan SET, Bajaur Agency was resorting to misconduct during the course of interview for AAEO dated 5-6/08/2015 feigning to be President of Teachers Association, though there is strict ban on the Unionism in FATA vide a Notification already circulated by Secretary AL&C Deptt:, FATA Secretariat”

- a. It is mentioned that the Appellant Nisar Khan is not President of Union, he is admitted ~~by~~ ^{by} President of Association, which is allowed in accordance to the Article 17 of the Constitution of Pakistan and is in the Chapter of Fundamental Rights of the Constitution and all Laws inconsistent with Fundamental Rights in accordance to Article 8 of the Constitution are void. Association is also allowed in Section 17(SI No.2) of the Civil Servants Appointment, Promotion and Transfer Rules as published in the KP Estacode and its Legal, Constitutional and Fundamental Right of the Appellant and is allowed
- b. The allegation is totally false, and malafide based on fraud because Date for the post of AAEO Bajaur was fixed for 5.08.2015 at Peshawar but the Appellant was on duty in Bajaur on this day (Annex-A i.e Page 65 of the Appeal)
- c. Moreover it is also important vide, No.004 dated 1.7.2015 Mr.Saidur Rehman SET, GHS Malangai, Bajaur has already been selected as AAEO; on the basis of Seniority without any interview (Annex-1). The allegations levelled are proved totally false malafide based on fraud to cheat this Hon'ble

Court. The case of Repatriation built on the basis of fraud in falsified and it proves malafide and illegality of the Respondents.

2. Proved as above that the illegal repatriation / transfer from FATA to settled area is based on fraud and malafide.
3. Admitted illegality of the impugned order as **no approval of the Competent authority** i.e Governor was obtained for transfer of the Appellant from FATA to Settled Area. It was total illegality on behalf of the Respondents. Moreover the Appellant was appointed for FATA as he is FATA Domiciled. Section 10 of Civil Servants Act:

“Provided that nothing contained in this Section shall apply to Civil Servant recruited specifically to serve in a particular area or region.”

4. There is no evidence or base for transfer on administrative grounds. The Transfer has been made on the basis of malafide, whimsically and capriciously based on high-handedness and fraud. The Appellant has been punished for his hard work and Excellent Results.
5. As above.
6. The appellant is FATA domiciled, a poor, hardworking and proved outstanding Teacher and has been illegally transferred out from FATA to settled area on the bases of fraud and false allegations.
7. In the Impugned Order, no public interest has been mentioned. The Respondents cannot Transfer / Repatriate the Appellant unilaterally, without the approval of the Governor. No Proper Reply has been given, it is admission. The allegation of administrative grounds has been proved totally false as in Para 1 above.
8. No Proper Reply, it means admission.
9. Proved with valid documentary evidence that the appellant is hardworking, dutiful and admittedly outstanding Teacher giving 100% results which have been tremendously appreciated by the Respondents (Annexs-H, I, J & K of the Appeal).

10. No Proper Reply. The Transferring out of FATA of the Appellant has been made without the required approval of the Competent Authority as directed.
11. As above.
12. As above.
13. The Plethora of documentary evidence has been submitted with the Appeal, which now neither can be ignored nor denied by the Respondents (Annexs-H, I, J & K of the Appeal).
14. As above.
15. Denied. The appeal ground in Para 15 is according to Law / Rules. The Appellant is a FATA Domiciled and was appointed for FATA area, in accordance to proviso to Section 10 of the Civil Servants Act 1973 his Repatriation impugned order is illegal and based on malafide.
The Appellant has always delivered excellent results, outstanding performance, Received dozens of Commendations and Appreciation Certificates, Best Teacher Awards and Certificates, 100% Attendance, throughout 100% Results (Annexs-H, I, J & K of the Appeal); but out of malafide the appellant has been illegally shunted out of FATA to settled area, without approval of the Competent Authority. All it is vindictiveness and high handedness of the Respondents.
16. No Proper Reply to the grounds of Appeal of Para 16 has been given.

Sir, a: In nutshell, the Charges mentioned in "Annex-A" of the Para-wise Comments (Repatriation / Charge Sheet) are based on malafide and fraud. The so called interview for the post of AEO was on 5.8.2015 (Annex-2). Moreover vide Agency Education Officer Bajaur No.004 dated 01.07.2015 one Mr.Said Rehman, SET has already been selected for the said post without any interview (Annex-1). Further interesting as mentioned in the Repatriation / Charge Sheet interview was on 5-6/08/2015 and the said so called un-served cooked Charge Sheet is also dated 6.8.2015, which is not possible, in the above contradictions.

b: That all the said 10 candidates for the post of AAEO have given on oath (Annex-3), that Mr.Nisar Khan, the Appellant, has not stopped them from interview.

The Appellant, who is a poor Teacher who is admittedly outstanding, upright and extremely hardworking, obtained many meritorious service rewards of best Teacher, always given 100% results of his School in the Matric, has also been victimized / condemned, based on malafide as he is President of Teachers Association (Not Union) and Associations are allowed under Article 17 of the Constitution and Section 17 (Sl.No.2) of the Civil Servants Appointment, Promotion and Transfer Rules. The Appellant has admittedly been condemned / punished to be Office Bearer of the Association, which is his Fundamental Constitutional and Legal Right, but he has never misbehaved as falsely alleged. It is, therefore Respectfully Prayed:


PRAYER: The illegal, arbitrary, whimsical and malafide action in the form of Impugned Repatriation / Transfer Order of the Respondents, against a poor, competent and hardworking school Teacher may be declared as abinitio, illegal and may please be cancelled / Null and void. Any other favourable Remedy in favours of the Appellant which this August Tribunal deems fit may please be granted.



Appellant
(Nisar Khan)

Senior English Teacher (SET)
Govt: High School Badan
Bajaur Agency

Through :

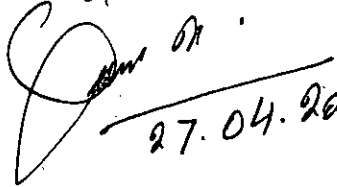


27.4.2016
(Qaisar Ali)

Advocate High Court
Flat No. 7 Tasnim Plaza,
6-Saddar Road, Near Jan's Bakers,
Peshawar Cantt
Phones: 03339122244/091-5272213

AFFIDAVIT

I, Nisar Khan S/o Bashak Khan (CNIC No.21103-8440 474-5), Senior English Teacher (SET, Govt: High School Badan, Bajaur Agency) do hereby affirm on oath that the contents of this Appeal and Rejoinder are true and correct as per information and nothing therein is false.

Attested.

27.04.2016


DEPONANT



8
Annex: 1
OFFICE OF THE AGENCY EDUCATION
OFFICER BAJAUR AGENCY AT KHAR

No. 004 Dated 01-7-20

Phone: 220395 Fax: 220395. Email: Rahmatwali30@yahoo.com

To


The Director of Education
FATA Peshawar

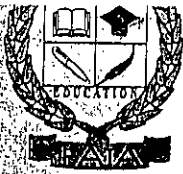
Subject: PROPOSAL FOR ADJUSTMENT AS AAO AGAINST VACANT POST.

Memo:

Kindly refer to the subject cited above and to state that one post of Asstt. Agency Education officer is lying vacant at this office due to the transfer/adjustment of Haji Madayin as I/C Head Master GHS Ghani Adai Bajaur Agency.

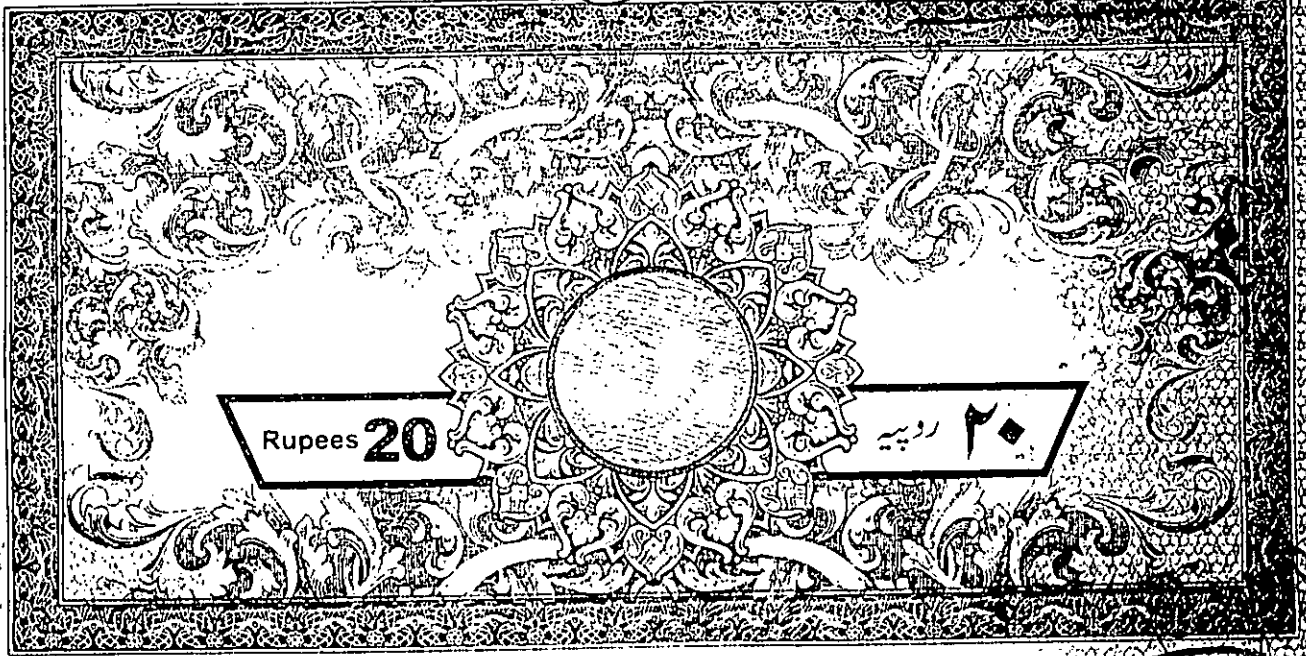
So, one Mr. Said ur Rahman SET GHS Malangai Bajaur (Seniority No: 752) already conveyed in the panel is recommended to be adjusted against the said post at this office keeping in view his seniority, efficiency, fitness and know-how of official work please.


Agency Education Officer
Bajaur Agency



INTERVIEW LIST OF SETS FOR THE POST OF AAEO BAJOUR
TO BE HELD ON 05/08/2015 ✓

S/No	Name with school & designation	Tenure/Ist Apptt: as SET	Service record	Remarks
1	Mr. Saeedur Rehman SET GHS Malangai	20/11/94	-do-	
2	Mr. Saeed Ahmed SET GHS Dehrai	24/11/94	Satisfactory	
3	Mr. Ikhtiar Jan SET GHS Top Mandal	23/05/95	-do-	
4	Mr. Musafar Khan SET GHS Dehrai	23/05/95	-do-	
5	Mr. Rehmat Gul SET GHS Ghazi Baba	23/05/95	-do-	
6	Mr. Jaffar Shah SET GHS Raghagan	23/05/95	-do-	
7	Mr. Bad Shah Muhammad SET GHS Inayat Killi	23/05/95	-do-	
8	Mr. Fazle Subhan SET GHS Bandagai Now I/C H/M GHS Pashat	02/04/96	-do-	
9	Mr. Fazle Rahim SET GHS Ghani Adai	03/04/96	-do-	
10	Muhammad Shah SET GHS Khar	28/03/96	-do-	



جناب چیئر مین صاحب سرورس ٹریڈیونل خیبر پختون خواں پشاور۔

بیان (۹) محمد شاہ محمد یوسف

میں سیماں رک سید احمد علی سید احمد علی اختیار کیا گیا۔ رویت کی ریگ پادشاہ محمد ریو مسافر خانہ جعفر شاہ ری فضل رحیم

اقرار کر کے لکھ دیتے ہیں کہ جناب ڈائریکٹر صاحب محکم تعلیم (فانا) پشاور کے ہدایات کے روشنی میں ہم خالی آسامی برائے AAEO

باجوڑ ایجنسی کے انٹرویو کیلئے مورخہ 05/08/2015 بلائے گئے تھے۔ چونکہ ہم سب نے متفقہ طور پر یہ مشورہ کیا تھا کہ مذکورہ پوسٹ

سیناریو کی بنیاد پر نہ کیا جائے۔ جبکہ ٹارخان GHS SET بدان نے ہمیں انٹرویو لینے حاضر ہونے سے منع نہیں کی

ہے۔ اور 06/08/2015 کو انٹرویو نہیں ہو چکا ہے۔

لہذا ہم اپنے بیان میں صادق ہیں۔

۵۔۔۔ ۱۱۰۶-۲۲۵۸۰۵

العبد
مسافر خانہ SET جی ایچ ایس ڈی عسکری باجوڑ

CNIC No
۱۶۵۵-۱۵۳۶۵۵۳-۱
العبد
جعفر شاہ SET جی ایچ ایس ڈی راجستان باجوڑ

CNIC No 21103-2305228-1
العبد
فضل رحیم SET جی ایچ ایس ڈی غلہ باجوڑ

21103-5894705
العبد
محمد یوسف SET جی ایچ ایس ڈی ٹانڈ خاں باجوڑ

العبد
محمد شاہ SET جی ایچ ایس ڈی فار باجوڑ ایجنسی
21103-0395531-1

۵۔۔۔ ۱۱۱

العبد
سید احمد SET جی ایچ ایس ڈی عسکری باجوڑ

العبد
سید احمد SET جی ایچ ایس ڈی غلہ باجوڑ

21103-1710493
العبد
اختیار جان SET جی ایچ ایس ڈی ٹانڈ خاں باجوڑ

21103-2296169
العبد
رحمت گل SET جی ایچ ایس ڈی غازی باجوڑ

العبد
بادشاہ محمد SET جی ایچ ایس ڈی غلہ باجوڑ
CNIC No 21103-8441329-5

Service Appeal No 1279/2011

To (Nisar Khan SET Bajaur v/s Addl. Chief Secy
+ others)

The Honorable Chairman

Khyber Pakhtunkhwa Service Tribunal

Respectfully Submitted,

It is respectfully prayed that the above mentioned case was fixed before your honor today dt. 11.2015, but due to High Court engagement the undersigned could not appear well in time.

It is prayed that the case may pl be adjourned for tomorrow i.e. 25.11.2015.

Thanking you in anticipation.

Yours obediently.

(Nisar Khan (SET) Bajaur)

Through: (QASAR ALI)
Advocate High Court
Peshawar