

**BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL**  
**PESHAWAR .**

CM. No 2024  
IN  
Appeal No. 766/2018

Mudassar Saeed

Appellant

**VERSUS**

The Secretary Education (E&SE) etc.

...RESPONDENTS

**SERVICE APPEAL**

**APPLICATION FOR PLACING OF DOCUMENTS**

**INDEX**

Sr.#	Description	Annexure	Page
1.	Application		1
2.	Copy of Charge Report	"A-1"	2
3.	Copy of Attendance Register	"A-2"	3
4.	Copy of application dated 21.08.2017	"A-3"	4
5.	Copy of letter dated 05.10.2017	"A-4"	5
6.	Copy of letter dated 28.08.2017	"A-5"	6
7.	Copy of letter dated 24.10.2017	"A-6"	7

... APPELLANT

Through:

*(Signature)*  
(Muhammad Liaqat)

Advocate High Court, Abbottabad

By PAST

①

**BEFORE THE HONOURABLE KPK SERVICE TRIBUNAL CAMP**  
**COURT ABBOTTABAD.**

CM NO. 12024

IN

Appeal No. 766 of 2018

Mudassar Saeed

**Vs**

The Secretary Education (E&SE) etc

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11828

Dated 19/03/2024

**Subject: APPLICATION FOR PLACING OF CHARGE REPORT, ATTANDANCE REGISTER, AND APPLICATION DATED 21.08.2017 AND LATTER NO. 10778EB-I/FILE/APPTT:2017 OF DEO ABBOTTABAD DATED 05.10.2017, LETTER DATED 28.08.2017 AND LETTER NO. 5221/F.NO.113/SST (M) DATED 24.10.2017 AND CONSIDERING AT THE TIME OF ARGUMENTS AND ORDER.**

***Respectfully Sheweth:***

1. That the titled appeal No.640 is pending disposal before this Honourable Tribunal and fixed for today i.e 24.01.2024.
2. that charge report, attendance register, application of appellant for re-instatement, letter dated 05.10.2017 and letter dated 28.08.2017 and letter dated 24.10.2017 prayer to impugned order were not place on file at the time of filing instant appeal which are very necessary for just decision of the instant appeal. (Copies are attached as Annexure "A1" to Annexure "A6")

It is therefore humbly prayed that above mention document may please be place on file and considering at the time of arguments and order upon instant appeal.

Dated:- 24/01/2024

Mudassar Saeed (Appellant)

***Through Counsel:***

  
**MUHAMMAD LIAQAT**  
Advocate High Court Abbottabad

(2)

Annex "A-1"

OFFICE OF THE HEAD MASTER GHS HADORA BANDI

ABBOTTABAD (DDO AD 6097)

Annex - A-1

Charge Report

Mr. Mudasar Saeed has taken over the charge at this School before noon dated 03/05/2017.

According to the office order No. 4272-78/FileNo.2/A-14

/SST/Adhoc/Apptt: Dated Peshawar the 25/04/2017.

Name and Signature of relieving

Governement Servant Mudasar Saeed

Deisgnation: SST (S)

Endst No 240-3 Dated 03/05/2017.

1. District Education Office(M) Abbottabad
2. District Account Office Abbottabad.
3. Office file.

*M. Saeed*  
Head Master  
Govt. High School  
Hadora Bandi District Ad  
Abbottabad



4

Annex "A-3" <sup>FILE</sup> U  
2-27/1

Secretary  
Elementary & Secondary Education KPK  
Peshawar

Annex A-III

Subject: Application for re-instatement of job SST Bio/Chem GHS Hadorabandi Abbottabad.

Sir,

It is stated that I have been selected as SST. Bio/Chem at G.H.S. Hadorabandi, Abbottabad in current orders. Because of some severe domestic issues & problems I was not able to join the job, which post is still vacant & there is no other person behind me in the list or at waiting option, so it is therefore requested you to kindly reinstate my job. The copy of order is attached with this application. I have sent many applications before but they doesn't effected a single spot, so please it is requested to kindly do some favour for me.

I will be ever grateful to you.

Thanks,

Yours Obedient

*Mudasar Sae*  
Mudasar Sae

H.No. 49/1, near green Valley Scho

Kakool Ro:

Abbottab:

Cell No. 030053308

SS R  
21/8  
DB/ABD

Copy to,

- 1. Minister Elementary & secondary education kpk.
- 2. Secretary Elementary & secondary education kpk.
- 3. Director Elementary & secondary education kpk.



Spi Secretary, Peshawar  
Dairy No. 2700  
Dated 21/8

SCP  
22/8/17

5

Annex "A-4"

**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)**  
**ABBOTTABAD.**

No. 16778 /EB-I/File/ Apptt:2017

Dated Abbottabad the 5/10/2017

To,

The Director ,  
Elementary and Secondary Education,  
Khyber Pakhtunkhwa Peshawar .

Annex - A-IV

Subject:

**ABSENT REPORT.**

Memo:

Reference is invited to your Office Memo.No.6377/F.No.113/  
SST(M) Compl/A/Abad dated 29-08-2017 on the subject noted above and  
submit that absent notice was served upon Mr.Mudasar Saeed S/O Saeed Gul  
SST (Bio:Chemistry) GHS Hadora Bandi Abbottabad vide this Office Memo.No.  
9805-6 dated 11-09-2017 (Copy attached). He has submitted his reply and the  
same is enclosed for further necessary action please.

**DISTRICT EDUCATION OFFICER (M)**  
**ABBOTTABAD** 9/10

6

Annex "A-5" 43



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
SO(PE)/E&SE/2-2/APPTT/2013  
Dated Peshawar the 28-08-2017

ADDE  
30/8  
mm

To

Annex - A-V

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

Subject: -

APPLICATION FOR RE-INSTATEMENT OF JOB SST BIO/CHEM GHS  
HADORA BANDI ABBOTTABAD

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of application alongwith relevant documents, in respect of Mr. Mudassar Saeed, District Abbottabad, which is self-explanatory, for appropriate necessary action as per rules/policy, please.

Yours faithfully,

Encl: as above.

(NAIK MUHAMMAD)  
SECTION OFFICER (PRIMARY)

103/27  
05/9/17

765  
31/8/17

1266  
31/8

1099  
3/8

DD/m/17  
h  
2/8

(7) Annex "A-6"

Directorate of Elementary & Secy: Education  
Khyber Pakhtunkhwa, Peshawar  
No. 5221 /F.No. 113/SST (M) Complaint/A/Abad.  
Dated Peshawar the 24/10 2017

To

The District Education Officer,  
(Male) Abbottabad.

Annex - A-VI

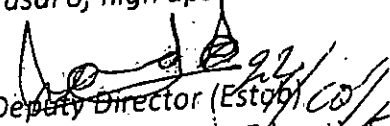
Subject: -

APPLICATION FOR RE-INSTATEMENT OF JOB SST BIO/ CHEN  
GHS, HADORA BANDI ABBOTTABAD.

Memo:

I am directed to refer to your letter No.10778 dated 05-10-2017 and to enclose here with a copy of letter no. SO (PE)/E&SED/22/Apptt/2013 dated 28-08-2017 along with its enclosures in respect of Mr. Mudassar Saeed District Abbottabad on the subject cited above for your perusal and comments.

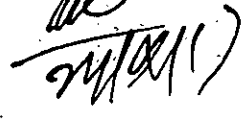
In this regard, I am further directed to ask you to submit your comments to this office immediately for the perusal of high ups.

  
Deputy Director (Estab)  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa.

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

Copy of the above is to:-

1. Section Officer Primary E&SE Department w/r to the letter no. cited above.
2. PA to Director (E&SE) Local Directorate.

  
Deputy Director (Estab)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa