

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Service Appeal No. 1267/2023

**BEFORE:** RASHIDA BANO --- MEMBER (J)  
MUHAMMAD AKBAR KHAN --- MEMBER (E)

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel Tehsil  
Takhtbhai District Mardan..... (*Appellant*)

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Department Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Mardan.
4. Sub Divisional Education Officer (Male) Takhtbhai.
5. District Accounts Officer, (Mardan)..... (*Respondents*)

**Present:-**

MUHAMMAD IRSHAD MOHMAND,  
Advocate --- For Appellant

MUHAMMAD JAN,  
District Attorney --- For respondents.

Date of Institution.....02.06.2023  
Date of Hearing..... 26.02.2024  
Date of Decision.....26.02.2024

**JUDGMENT.**

**MUHAMMAD AKBAR KHAN, MEMBER(E):-** The instant service appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as under;

*“On acceptance of this appeal, the impugned office order  
Endst. No. 8474-75 dated 12.10.2022 passed by respondent No.  
3/DEO (Male) Mardn as well as rejection order passed on the  
Departmental appeal of the appellant by the respondent No.*

*2/Director E&SE Department Khyber Pakhtunkhwa Peshawar, may kindly be set aside, and the appellant be reinstated into his service with all back benefits. Any other remedy, which this Honorable Tribunal deems appropriate, may also be granted to the appellant.”*

02. Brief facts of the case are that appellant was serving as Primary School Head Teacher (PSHT); that in the meanwhile, without any codal formalities i.e. charge sheet/statement of allegations or inquiry, major penalty of compulsory retirement from service was imposed upon appellant vide order dated 12.10.2022. Feeling aggrieved from the impugned order dated 12.10.2022, the appellant filed departmental appeal which was not responded, therefore, he filed another application to the Secretary Education (respondent No. 1) and in the light of directions of the Director Education (respondent No. 2), his appeal was considered and accordingly rejected vide order dated 07.04.2023 by the District Education Officer (Male) Mardan (respondent No. 3), hence preferred the instant service appeal on 02.06.2023.

03. Notices were issued to the respondents, who submit their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant and learned District Attorney and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant contended that the impugned order was illegal, unlawful and without jurisdiction. He submitted that the appellant was regularly performing his duty to the entire satisfaction of his high-ups and

was punctual in the duty; that without issuance of any charge sheet/statement of allegations and without conducting of inquiry, the impugned order had been issued; that the appellant had not been given any opportunity of defense under the law which was the violation of his constitutional rights guaranteed under the Constitution of Islamic Republic of Pakistan, 1973; that the appellant had compulsorily retired from service which act of the respondents was against the law and was not sustainable under the law. Lastly, he submitted that the appellant had at his credit more than 25 year service and his retirement was due in the year 2033, however, was compulsorily retired which was harsh punishment on the basis of unauthentic and baseless allegations, therefore, he requested for acceptance of the instant service appeal.

05. As against that, learned District Attorney argued that the respondent department had properly issued Show Cause Notice on 16.09.2022. He submitted that after observance of all codal formalities, the impugned order of compulsory retirement from service was issued; that there were many complaints against the appellant on the basis of which he was awarded the impugned penalty; that as the order of compulsory retirement was legal, therefore, was not liable to be set aside. Lastly, he submitted that no constitutional right of the appellant had been infringed and had been treated in accordance with law and rules, therefore, he requested for dismissal of the instant service appeal.


06. It is evident from record available on the case file that the appellant was proceeded against on the basis of complaints from the community people. The nature of the miscellaneous complaints were generic that required detail



probe/inquiry to substantiate and bring material evidence on record. Instead the respondent No. 3 in his capacity as competent authority served a direct Show Cause Notice upon the appellant and imposed major penalty of compulsory retirement from service upon him. Serving a direct Show Cause Notice without observing the legal procedure is in contravention to the provisions of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. Rule 5 of the said rules provide the following procedure for initiation of disciplinary proceedings against government servants.

**5. Initiation of proceedings.**—(1) *If on the basis of its own knowledge or information placed before it, the competent authority is of the opinion that there are sufficient grounds for initiating proceedings against a Government servant under these rules it shall either:-*

*(a) proceed itself against the accused by issuing a show cause notice under rule 7 and, for reasons to be recorded in writing, dispense with inquiry: Provided that no opportunity of showing cause or personal hearing shall be given where-*

- 
- (i) the competent authority is satisfied that in the interest of security of Pakistan or any part thereof, it is not expedient to give such an opportunity; or*
  - (ii) a Government servant has entered into plea bargain under any law for the time being in force or has been convicted on the charges of corruption which have led to a sentence of fine or imprisonment; or*
  - (iii) a Government servant is involved in subversive activities; or*
  - (iv) it is not reasonably practicable to give such an opportunity to the accused; or*

*(b) get an inquiry conducted into the charge or charges against the accused, by appointing an inquiry officer or an inquiry committee, as the case may be, under rule 11:*

*Provided that the competent authority shall dispense with the inquiry where-*

(i) *a Government servant has been convicted of any offence other than corruption by a court of law under any law for the time being in force; or*

(ii) *a Government servant is or has been absent from duty without prior approval of leave:*

*Provided that the competent authority may dispense with the inquiry where it is in possession of sufficient documentary evidence against the accused or, for reasons to be recorded in writing, it is satisfied that there is no need to hold an inquiry. The charge sheet or statement of allegations or the show cause notice, as the case may be, shall be signed by the competent authority.*

07. We found nothing on record any specific order of the competent authority in writing giving reasons for dispensing with the regular inquiry as provided under the provision of above quoted Rule. We observe that the competent authority should have conducted at least fact finding inquiry to verify the complaints so as to satisfy himself to dispense with the inquiry proceedings and going for direct Show Cause Notice and then imposition of major penalty against the appellant who had served the respondent department for 25 years. Imposition of major penalty on certain oral complaints without issuing charge sheet, statement of allegations, conduct of proper inquiry, affording opportunity of defense to the accused is against fundamental rights and universal principle of natural justice.

08. Foregoing in view we are constrained to set aside the impugned order dated 12.10.2022 and the appellate order 07.04.2023 and reinstate the appellant into service with effect from the date of issuance of impugned order i.e. 12.10.2022. Since the appellant has died during pendency of his service

appeal in the Tribunal, he shall be treated to have died during service. Costs shall follow the event. Consign.

09. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 26<sup>th</sup> day of February, 2024.*



(Rashida Bano)  
Member (J)



(Muhammad Akbar Khan)  
Member (E)

\*Kamranullah\*

SCANNED  
KPST  
Peshawar

IN S A 1267/2018

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 786/2018

Date of Institution 08.06.2018

Date of Decision 09.06.2021

Noor Salam Khan S/O Mir Salam Khan Constable No.295 Police  
Line, Bannu.

(Appellant)

**VERSUS**

Inspector General of Police near Civil Secretariat, Khyber  
Pakhtunkhwa, Peshawar and two others.

(Respondents)

Arbab Saiful Kamal,  
Advocate

For appellant.

Kabir Ullah Khattak,  
Additional Advocate General

For respondents.

AHMAD SULTAN TAREEN  
ROZINA REHMAN

CHAIRMAN  
MEMBER (J)

**JUDGMENT**

ROZINA REHMAN, MEMBER : Appellant was a Constable. He was dismissed from service vide order dated 27.02.2018. It is the legality and validity of this order which has been challenged by him in the present service appeal filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

09/1/21

2: The relevant facts in the background are that the appellant was appointed as a Constable in the year 1995. During service, he was awarded cash prizes by superiors in view of his best performance. He was also assigned important task to provide spy information about terrorist activities and due to his information, network of terrorists was traced out. As a result, some of his colleagues were annoyed and they started conspiracy against the appellant by making verbal complaints to the respondents. He was charge sheeted and was departmentally proceeded against and lastly, was dismissed from service which was challenged before the respondent No.1. His appeal was partially accepted and his order of dismissal was converted into compulsory retirement vide order dated 22.12.2015. Feeling aggrieved from the said order, he filed Service Appeal No.04/2016 which was allowed with direction to the respondents to hold de-novo inquiry. In view of the direction of Service Tribunal, he was reinstated in service and de-novo inquiry was ordered to be initiated against him. He was again charge sheeted and inquiry was also conducted. Final show cause notice was issued to appellant which was replied and lastly, he was dismissed from service. He filed departmental appeal which was also dismissed. He then filed appeal under Rule 11-A of the Khyber Pakhtunkhwa Police Rules, 1975 but the same was not responded to, hence, the present service appeal. During pendency of appeal, departmental appeal was partially accepted and his major penalty of dismissal from service was converted into major penalty of

  
6/9/18



compulsory retirement from service vide order dated 31.07.2018, therefore, amended appeal was filed.

3. Learned counsel for the appellant argued that main point under discussion is the survival of the right to sue following the death of a civil servant. In the instant case, admittedly the appellant Noor Salam Khan died during pendency of his appeal and now, the matter in issue relates to the survival of the right to sue following his death. It was argued that appeal of decedent on a matter relating to some terms and conditions of service was undoubtedly pending before this Tribunal at the time of his death and now his legal heirs have filed the petition for bringing on record legal heirs of the appellant in the instant service appeal. The learned counsel further submitted that the orders dated 31.07.2018, 16.05.2018 and 27.02.2018 are against law and facts and that allegations of general nature were leveled against the appellant and the findings of the respondents are based on assumptions and presumptions. He contended that the appellant was not provided an opportunity of being heard and he was condemned unheard. He submitted that inquiry was conducted against the appellant in shape of questions answers which mode of inquiry is against law and procedure and on the strength of this mode of inquiry, appellant could not be given major penalty. Reliance was placed on 2013 SCMR 752 and 2015 PLC (C.S) 1442.

4. Conversely, learned A.A.G argued that appellant was appointed as Constable, whose services were found unsatisfactory. He was found involved in extracting money from Police Officers threatening

16/9/2018

TO GOVERNMENT  
OFFICE  
MIRPUR  
16/9/2018

them of negative reports to high-ups against them and was band in gloves with anti social elements and immoral activities. He submitted that different complaints were made by Police Officers to the superior officers against his wrong reporting, therefore, he was charge sheeted and proper inquiry was conducted after observing all the codal formalities

First question relates to the survival of the right to sue following the death of the appellant (civil servant). Undoubtedly, matter relating to the terms and conditions of service of appellant was pending before this Tribunal at the time of his death. In the instant case the abatement of proceedings on the death of appellant (civil servant) in a case, where the cause of action carries a survivable interest will deprive the decedent civil servant as well as his legal heirs of their constitutional rights. It was held by the Hon'ble Supreme Court of Pakistan in the case of Regional Operation Chief National Bank of Pakistan, Human Resource Department, Regional Office, Sargodha, etc Vs Mst Nusrat Parveen, etc. in C.P.2717-L of 2015 that;

"Other than pecuniary and pensionary benefits that inure to the benefit of the legal heirs, the right to restore one's reputation is also a survivable right and flows down to the legal heirs to pursue and take to its logical conclusion. Any slur on the reputation of a civil servant impinges on his human dignity and weighs equally on the dignity and honour of his family."

  
09/16/21

6. In view of the above discussion, petition for impleadment of legal heirs of appellant (civil servant) is accepted.

7. From the record, it is evident that appellant was deputed on intelligence duties as Incharge of the District Special Branch. He had been awarded cash and Commendation Certificate for 23 times by his seniors. The appellant had been dismissed from service vide order dated 18.08.2015 which order was challenged by him and his appeal was placed before the Review Petition Board meeting held on 26.11.2015 wherein appellant was heard in person. It was observed by the Board that no solid evidence had been collected in support of the charges leveled against the appellant. Hence, his departmental appeal was allowed vide order dated 22.12.2015 and his major penalty of dismissal was converted into that of compulsory retirement from service. He then knocked at the door of this Tribunal in shape of Appeal No.04/2016 which was allowed as there was no solid proof against appellant which fact was also admitted by the appellate authority. Upon reinstatement in service, again he was served with charge sheet and statement of allegations containing almost all the charges leveled against the appellant in the previous round of allegations. D.S.P Headquarters Bannu was appointed as inquiry officer who submitted his inquiry report with the conclusion that the allegations have partially proved despite the fact that all the three witnesses examined against the appellant uttered not a single word against the appellant. The appellant had also filed departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police

09/12/21

which was decided vide order dated 31.07.2018, whereby, major penalty of dismissal from service was converted into major penalty of compulsory retirement because there was no solid evidence regarding his involvement in anti-social activities and corruption. It was also held by the Appellate Board that he was a Constable, therefore, his involvement in corruption and corrupt practices without support of the supervisory officer, does not appeal to prudent mind. From the records it appears crystal clear that respondents failed to collect solid and direct evidence against the appellant but even then, he was not awarded any penalty. The appellant was having long service of 22 years and 22 days at his credit, he was awarded cash prize and Commendation Certificates but nothing was taken into consideration by the respondents while awarding major punishment.

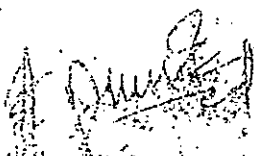
The inquiry report in shape of questions answers is available on file which shows that the allegations of dealing in stolen vehicles was false and no such allegation had ever come forward against the appellant during his 22 years service. He was having no personal vehicle as nothing was brought on record in black and white. It was also observed by the inquiry officer that the appellant had not done any corruption during his service of 22 years and he never violated discipline. Both the witnesses did not depose against the appellant.

*[Handwritten signature]*  
27/6/21

8. For what has been discussed above, we consider that the appeal in hand merits acceptance. It is, therefore, accordingly allowed as prayed for.

9. Before parting, we deem it necessary to expound for removal of difficulties in giving effect to operative part of the judgment that due to death of the appellant during pendency of appeal, his posthumous reinstatement into service will be ordered and he will be treated to have died during service. Parties are left to bear their own costs. This has been assigned to the record room.

APND/014/13  
09.06.2013

  
(Anwaruddin Pausen)  
J.D. No. 13/13

  
(Rojha Rehman)  
Member (2)

ORDER

26.02.2024 1. Learned counsel for the appellant present. Mr. Asif Masood

Ali Shah, Deputy District Attorney for the respondents present.

Arguments heard and record perused.

2. Vide our detailed judgment of today separately placed on

file, we are constrained to set aside the impugned order dated

12.10.2022 and the appellate order 07.04.2023 and reinstate the

appellant into service with effect from the date of issuance of

impugned order i.e. 12.10.2022. Since the appellant has died during

pendency of his service appeal in the Tribunal, he shall be treated to

have died during service. Costs shall follow the event. Consign.

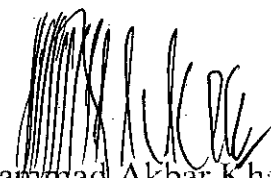
3. *Pronounced in open court at Peshawar and given under our*

*hands and seal of the Tribunal on this 26<sup>th</sup> day of February, 2024.*

SCANNED  
KPST  
Peshawar



(Rashida Bano)  
Member (J)



(Muhammad Akbar Khan)  
Member (E)

\*Kamranullah\*


SA 1267/23.

25<sup>th</sup> Sept. 2023

01. Counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. AG for the respondents present.

02. Reply/comments on behalf of the respondents submitted, a copy whereof handed over to learned counsel for the appellant. To come up for rejoinder, if any, and arguments on 11.01.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

  
(FAREEHA PAUL)  
Member (E)


*\*Fazle Subhan, P.S\**

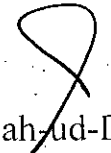
11.01.2024

Learned counsel for the appellant present. Mr. Abdul Jameel, Assistant alongwith Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks some time for preparation of arguments. Adjourned. To come up for arguments on 26.02.2024 before the D.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

*\*Naeem Amin\**

17.07.2023

Learned counsel for the appellant present. Mr. Asad Ali Khan,  
Assistant Advocate General for the respondents present.

Learned counsel for the appellant stated at the bar that the  
appellant has died, therefore, time may be granted to him to submit list  
of legal heirs of the deceased appellant as well as Wakalatnama on  
their behalf. In this regard he also submitted Death Registration  
Certificate which is placed on file. To come up for submission of  
Wakalatnama as well as reply/comments on 28.08.2023 before S.B.  
P.P given to the parties.

SCANNED  
KPST  
Peshawar

\*Kamranullah\*

(Muhammad Akbar Khan)  
Member (I)

28<sup>th</sup> Aug, 2023

1. Learned counsel for the appellant present. Mr.  
Muhammad Jan, District Attorney alongwith Mr. Abdul Jamil,  
ADEO for the respondents present.

2. Learned counsel for the appellant has submitted list of  
legal heirs of the deceased appellant which is found placed on  
file. Representative of the respondents seeks some time to submit  
written reply/comments. Last chance is given to the respondents  
for filing of written reply/comments. To come up for written  
reply/comments on 25.09.2023 before S.B. P.P given to the  
learned counsel for the appellant.

SCANNED  
KPST  
Peshawar

\*Adnan Shah\*



(Kalim Arshad Khan)  
Chairman



# FORM OF ORDER SHEET

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

**Appeal No. 1267/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/06/2023	<p>The appeal of Mr. Aurangzeb presented today by Mr. Muhammad Irshad Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <b>06-06-2023</b>.</p> <p style="text-align: right;">By the order of Chairman                        REGISTRAR</p> <p>06<sup>th</sup> June, 2023</p> <p>01. Counsel for the appellant present. Preliminary arguments heard and record perused.</p> <p>02. Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security within 10 days. Thereafter, local respondents be served through ordinary mode while out-district respondents be served through TCS, the expenses of which shall be deposited by the appellant. To come up for written reply/comments on 17.07.2023 before the S.B. Parcha-Peshi given to learned counsel for the appellant.</p> <p style="text-align: right;">                       (Fareeha Paul)                      Member(E)                 </p>

**SCANNED  
KPST  
Peshawar**

**SCANNED  
KPST  
Peshawar**

# KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

اورینجی

**Versus**

جی جی کورٹ

.....Appellant

.....Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>اورینجی</u> Advocate <u>جی جی کورٹ</u> Court	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- اورینجی

Signature:- Mirza Asif

Dated:- 02-06-23



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR**

Service Appeal No: 1267 /2023


Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan  
(Appellant) P.S.T  
Peshawar

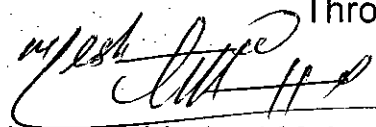
**VERSUS**

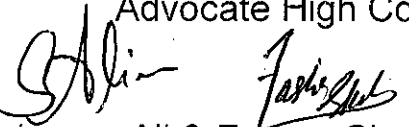
Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar & others  
(Respondents)

**INDEX**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Application for condonation of delay		8-10
4.	Address of parties		11
5.	Copy of orders	"A"	12-17
6.	Copy of impugned Office Order Endst No 8474-75 dated 12-10-2022	"B"	18
7.	Copy of Departmental Appeal	"C"	19-20
8.	Copy of application / complaint along with letter dated 17-05-2023 & letter No 3905 dated 07-04-2022 regarding rejection of Departmental appeal.	"D"	21-23
9.	Other Documents	"E"	24-25
10.	Wakalat Nama		26

  
**Appellant:-Aurangzeb**  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court

  
Suleman Ali & Fathan Sheikh  
Advocate

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No: 1267 /2023

Diary No. 5791

Dated 2/6/2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department KPK Peshawar
2. Director Education Elementary & Secondary Education Department KPK Peshawar
3. District Education Officer (Male) Mardan,
4. Sub Divisional Education Officer (Male) Takhtbhai
5. District Account Officer Mardan (Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER ENDST NO 8474-75 DATED 12-10-2022 PASSED BY RESPONDENT NO 3 / DEO (Male) MARDAN, WHEREBY MAJOR PENALTY OF COMPULSORY RETIREMENT FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT, WHICH IS ILLEGAL, UNLAWFUL AND IN DISREGARD OF LAW & FACT AS WELL AS AGAINST REJECTION ORDER PASSED ON THE DEPARTMENTAL APPEAL OF THE APPELLANT BY THE RESPONDENT NO 2 / DIRECTOR E & SE DEPARTMENT KPK PESHAWAR BUT THE REJECTION ORDER OF DEPARTMENTAL APPEAL HAS NOT BEEN CONVEYED TO THE APPELLANT AND THE APPELLANT GOT THE KNOWLEDGE OF REJECTION OF DEPARTMENTAL APPEAL ON 24-05-2023.

Filed to day

02/06/23

**PRAYER:-**

On acceptance of this Appeal, the impugned Office Order Endst No 8474-75 dated 12-10-2022 passed by Respondent No 3 / DEO (Male) Mardan as well as Rejection Order passed on the Departmental Appeal of the appellant by Respondent No 2 / Director E & SE Department KPK Peshawar may kindly be set aside, and the appellant be reinstated into his service with all back benefits.

*Any other remedy, which this Honorable Tribunal deems appropriate, may also be granted to the appellant*

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**Respectfully Sheweth: -**

The brief facts leading up to the filing of this appeal are as under:

1. That the appellant was initially appointed as Primary School Teacher on 12-03-1995 and with the passage of time the appellant was promoted as Senior Primary School Teacher 26-03-2013 and thereafter as Primary School Head Teacher (PSHT) in the year 2019. **(Copy of orders are attach as Annex "A")**
2. That the Appellant has performed his duty with great zeal & zest in the department for more than 25 years with honestly to the entire satisfaction of his high ups and no complaint whatsoever has been made against the appellant.
3. That the Respondent No.3 / DEO (Male) Mardan without issuance of charge sheet & statement of allegation and without conducting any departmental inquiry straightaway issued the impugned Office Order Endst No 8474-75 dated 12-10-2022 whereby major penalty of compulsory retirement has been imposed on the appellant **(Copy of impugned Office Order Endst No 8474-75 dated 12-10-2022 is attach as Annex "B")**

3

4. That the appellant then filed departmental appeal against the impugned Office Order Endst No 8474-75 dated 12-10-2022, before the Respondent No 2 / Director E & SE Department KPK Peshawar which was kept pending without taking any action on the representation of appellant by Respondent No 2 and the appellant was kept busy on one pretext & other **(Copy of Departmental Appeal is attach as Annex "C")**
  
5. That thereafter the appellant was constrained to file application / complaint to the Respondent No 1 / Secretary Elementary & Secondary Education Department KPK Peshawar and on the application of appellant, the Respondent No 1 issued letter dated 17-05-2023 to the Respondent No 2 / Director E & SE Department KPK Peshawar with certain direction and thereafter when the appellant inquired about the complaint & ibid letter dated 17-05-2023, the appellant was informed on 24-05-2023 by the Respondent No 2 / Director E & SE Department Peshawar that the departmental appeal of the appellant has been rejected vide letter No 3905 dated 07-04-2023 issued to DEO Mardan, but the same has not been conveyed to the appellant till date and the appellant has got the knowledge of rejection of departmental on 24-05-2023 **(Copy of application / complaint along with letter dated 17-05-2023 & letter No 3905 dated 07-04-2023 are attach as Annex "D")**
  
6. That the appellant being aggrieved from the impugned Office Order Endst No 8474-75 dated 12-10-2022 & against the rejection order passed on departmental appeal, prefer the instant service appeal before this Honorable Tribunal on the following Grounds: -

**GROUNDS:-**

- A. That the impugned Office Order Endst No 8474-75 dated 12-10-2022 of Respondent No.3 as well as rejection order passed on departmental appeal of the appellant by the Respondent No 2 are manifestly illegal, unlawful, without lawful authority, void ab-initio, without jurisdiction and ineffective upon the valuable rights of the appellant, hence not tenable and liable to be set aside by reinstating the appellant into his service.
- B. That the appellant has regularly performed his duty to the entire satisfaction of his high ups and always remain punctual in the duty, but without issuing any charge sheet & statement of allegation and what to speak of charge sheet & statement of allegation, no inquiry proceeding has been conducted, even the appellant was not put under suspension as provided in Rule 6 of E & D Rule 2011, if there was any alleged inquiry against the appellant, therefore without conducting any departmental inquiry in the matter & in disregard of law with one stroke of pen major penalty of compulsory retirement from service has been imposed on the appellant which is against the law & natural justice.
- C. That the august Supreme Court as well as this Honorable Tribunal in various judgment have held that the major penalty of removal from service should not be imposed without conducting detail inquiry
- D. That no inquiry has been conducted nor any opportunity of defense has been provided under the law and all the proceeding have been conducted on the back of the appellant, therefore the impugned order of compulsory retirement from service is not only illegal but also against the constitutional right guaranteed under the Constitution of Islamic Republic of Pakistan, 1973.
- E. That the appellant has been compulsory retired from service on the alleged anonymous complaint without any solid or



5

authentic evidence regarding the alleged allegation, which is totally illegal, baseless and not supported by any evidence, therefore the impugned order of compulsory retirement of appellant is against the law and not sustainable under the law.

- F. That the appellant has more than 25 years' service on his credit and the appellant retirement is due in the year 2033 but at this stage a very harsh punishment of compulsory retirement has been imposed on the appellant without any authentic evidence & on baseless allegation, which has no legal foundation, therefore the impugned order of compulsory retirement is illegal & unjustified and liable to be set aside.
- G. That before issuing the impugned order no reasons & grounds have been supplied to the appellant nor the appellate authority has provided any opportunity of hearing to the appellant, which amount to condemned unheard & against natural justice as well as fair play and in violation of Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973.
- H. That the Respondents while issuing the impugned order has not only violated the law but also infringed the constitutional rights provided under Article 4, & 25 of the Constitution of Islamic Republic of Pakistan 1973.
- I. That the Appellant is will qualified person and had obtained service through proper procedure, therefore without adopting the proper procedure of inquiry in the matter as provided under the law, therefore imposing major penalty of compulsory retirement on the appellant from service is illegal & unjustified.
- J. That as per the reported judgment of the Apex Supreme Court of Pakistan as well as delivered by this Honorable Service Tribunal, that no person / official should be condemned / penalized without solid reasons, proof of allegation, as the same is against the spirit of services law

6


and the punishment could only be awarded to the official, if there is solid proof & evidence towards the allegation, but the appellant has been compulsory retired from service illegally on general allegations without any proof, it is also pertinent to mention here that there are no adverse remarks of monthly monitoring office which is clear from attendance sheet of the appellant, therefore the impugned order is not sustainable under the law and is liable to be set aside.

- K. That the appellant has not been treated in accordance with law nor extended equal protection of law which is inalienable right of the appellant.
- L. That any other ground will be raised at the time of final arguments with the permission of this Honorable Tribunal.

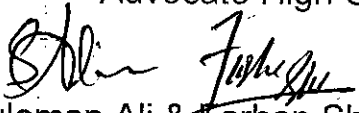
**Prayer:-**

It is therefore most humbly prayed, that on acceptance of this Service Appeal, the impugned Office Order Endst No 8474-75 dated 12-10-2022 passed by Respondent No 3 / DEO (Male) Mardan as well as rejection order passed on departmental appeal of the appellant by Respondent No 2 / Director E & SE KPK Peshawar may kindly be set aside, and the appellant be reinstated into his service with all back benefits.

*Any other remedy which this august tribunal deems appropriate may also be granted to the appellant.*

  
Appellant:-Aurangzeb  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court

  
Suleman Ali & Farhan Sheikh  
Advocate

7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR**

Service Appeal No:

/2023

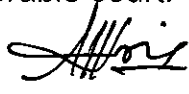
Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar & others  
(Respondents)


**AFFIDAVIT**

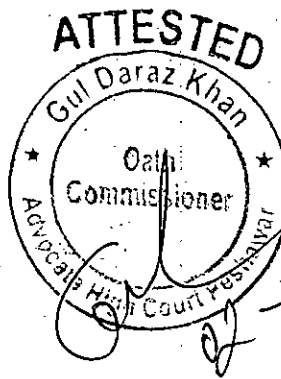
I Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan, do hereby solemnly affirm and  
declare that all the contents of the accompanied writ petition are true  
and correct to the best of my knowledge and belief and nothing has  
been concealed or withheld from this Honorable court.

  
DEPONENT

0346-9466118

Identified by

  
Muhammad Irshad Mohmand  
Advocate  
High Court Peshawar



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR**

CM No /2023

In Service Appeal No: /2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar & others  
(Respondents)

**APPLICATION FOR CONDONATION OF**  
**DELAY, IF ANY IN FILLING OF ABOVE**  
**NOTED APPEAL**

**Respectfully sheweth:-**

The applicant / appellant submits as under:-

1. That the applicant / appellant is filling the instant application for condonation of delay, if any in the above mentioned appeal, though the appeal of the appellant is well within time as the impugned appellate order has not been conveyed to the appellant.
2. That furthermore the impugned Office Order Endst No 8474-75 dated 12-10-2022 whereby major penalty of compulsory retirement from Service has been imposed on the appellant is totally illegal, unwarranted, void ab-initio and against the set procedure of law as no charge sheet & statement of allegation has been issued to the appellant, even no inquiry has been conducted in the matter, therefore being void order is liable to be set aside and under the law no limitation is run against the void order.

3. That after the impugned Office Order Endst No 8474-75 dated 12-10-2022, the appellant filed departmental appeal before the Respondent No.2 / Director E & SE Department Kpk Peshawar within time but the same was kept pending without taking any action on the departmental appeal of the appellant, thereafter the appellant was constrained to made complaint to Respondent No 1 / Secretary Elementary & Secondary Education Department KPK Peshawar and on the application of appellant, the Respondent No 1 issued letter dated 17-05-2023 to the Respondent No 2 and when the applicant / appellant inquired about the application / complaint & ibid letter, the appellant was informed on 24-05-2023 by the Respondent No 2 / Director E & SE KPK Peshawar that the departmental appeal of the appellant has been rejected vide letter No 3905 dated 07-04-2023 but the same has not been conveyed to the appellant and the appellant has got the knowledge of rejection of departmental appeal on 24-05-2023, therefore the instant service appeal is well within time.
4. That if there is any delay in filling of instant service appeal, the same is not intentional but due to above mentioned reason, as the appellant has filed the departmental appeal within time but the appellant was kept busy on one pretext and others, and the matter has been delay by the Respondent No 2.
5. That furthermore the applicant / appellant has not committed any miss-conduct during his entire service and the appellant has been penalized just for nothing, therefore the impugned order of compulsory retirement from service is illegal and liable to be set aside.

- 6. That while issuing the impugned office order of appellant, no opportunity of hearing & defense was provided to the applicant / appellant, which is against natural justice.
- 7. That the departmental appeal as well as present service appeal of the appellant is well within time, but due to precautionary measure the appellant is filling the instant application for condonation of delay if any.
- 8. That there is no legal bar on the power of this Honorable Tribunal to condone the delay for the end of justice.

**Prayer:-**

It is therefore most humbly requested, that on acceptance of this application, if there is any delay the same may kindly be condoned in the larger interest of justice.

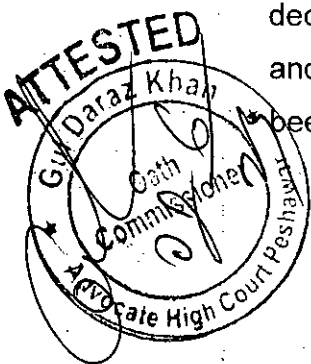
*Aurangzeb*  
Applicant / Appellant: -Aurangzeb  
Through

*Muhammad Irshad Mohmand*  
Muhammad Irshad Mohmand  
Advocate High Court

*Suleman Ali & Farhan Sheikh*  
Suleman Ali & Farhan Sheikh  
Advocate

**AFFIDAVIT**

I Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel Tehsil Takhtbhai District Mardan, do hereby solemnly affirm and declare that all the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.



*Aurangzeb*  
**DEPONENT**

0346-9466118

(11)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**AT PESHAWAR**

Service Appeal No:

/2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

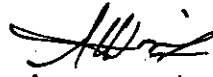
Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar & others  
(Respondents)

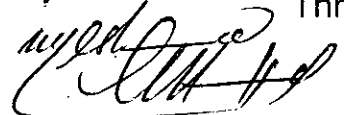
**ADDRESSES OF PARTIES**

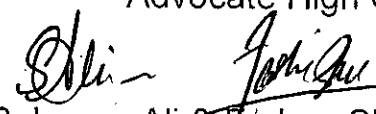
Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar
2. Director Education Elementary & Secondary Education Department  
KPK Peshawar
3. District Education Officer (Male) Mardan
4. Sub Divisional Education Officer (Male) Takhtbhai
5. District Account Officer Mardan (Respondents)

  
Appellant: -Aurangzeb  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court

  
Suleman Ali & Farhan Sheikh  
Advocate

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PRIMARY MARDAN.AFFOINTMENT.

Consequent upon the advertisement published in the Daily Mashriq Peshawar dated 25/09/1994 interview held on 11, 12, 13/10/1994 by the Departmental selection committee Mardan District and Merit list prepared according to Govt:rules the following PTC trained candidates (AIOU Islam Abad) are hereby appointed as PTC trained Teacher in BPS(07)(1480-81-2695) plus usual allowances as admissible under the rules w.e.f. the date of taking over charge in the school noted against each in the interest of public service on the following terms and conditions:-

<u>S.No.</u>	<u>Name of Candidate/Home Address/Qualification.</u>	<u>PTC Marks.</u>	<u>School where posted.</u>	<u>Remarks:</u>
<u>PF-18 Mardan-1.</u>				
1.	Mi Sher Zada S/O Amir Zada R/O PSM Colony Mardan.	64 %	GMFS, Mayee Khel.	AY: Post:
2.	S: Khalid Shah S/O Rahman Gul R/O Bacha Garhi (Mardan).	63 %	GMFS, Nana Khel G/Garhi.	-do-
<u>PF-19 Mardan-2.</u>				
3.	Abdul Wadood S/O Abdul Halim R/O Mohib Banda.	67 %	GMFS, Siraj	-do-
4.	Waliullah S/O Sher Ullah R/O G.D. Zai	60 %	GMFS, Nakhtar Banda.	-do-
5.	Mohammad Sajjid S/O Fida Mohd: R/O Toru.	59 %	GFS, Subbat Abad	-do-
6.	Rashidur Rahman S/O Abdur Rahman R/O Zando Dheri.	58 %	GMFS, Durani Kaka	-do-
7.	S: Ahmed Hussain Shah S/O S: Qamer R/O Mohib Banda.	55 %	GFS, Dhakki	-do-
8.	Mohammad Fayaz S/O Bashir Ahmed R/O Toru.	50 %	GFS, Qasim(T)	-do-
<u>PF-20 Mardan-3.</u>				
9.	Mir Nawaz S/O Haya Khan R/O Gujarat.	69 %	GFS, Aman Kot	-do-
10.	Mohammad Ishaq S/O Mir Dad Khan R/O Gul Bahar Gujarat.	62 %	GFS, Shah Tori	-do-
11.	Zulfiqar Ali S/O Mohd: Baz R/O Cham Dheri.	61 %	GFS, No. 2 Jalil.	-do-
12.	Said Jamal S/O Abdul Jamal R/O Jaffer Abad.	60 %	GMFS, Bagi Banda.	-do-
13.	Mohammad Tahir S/O Sarfaraz R/O Char Guli.	59 %	GMFS, Tango.	-do-
14.	Ghulam Azim S/O Ghulam Rahman R/O Gujarat.	59 %	GFS, Shin Khal(SAP)	-do-
15.	Nasir Ahmad S/O Mohammad Rafiq R/O Gujarat.	56 %	GMFS, Akhun Baha.	-do-
16.	Bacha Said S/O Saeed Ullah R/O Garyala.	55 %	GFS, Surkh Dheri.	-do-
17.	Mohammad Khalid S/O Wali Said R/O Sher Abad.	52 %	GMFS, Tahir Abad.	-do-
18.	Gul Wahab S/O Niaz Mohammad R/O Landai.	52 %	GMFS, Shaheedan	-do-

ATTESTED



19.	Nisar Ahmad S/O Imran Khan R/O Dheri Lak Fani.	62 %	GPS, Taro Banda -do-
(13)			
FF-22 Mardan-5.			
20.	M: Noor Khan S/O Baz Gul R/O Sheikh Yousaf.	58 %	GMPS, Mingawar Kili -do-
21.	Abdul Shakoor S/O Niaz Gul R/O Jandai.	56 %	GMPS, Sari Bahlol. -do-
22.	Faqir Taj S/O Khair Gul R/O Said Abad.	55 %	GMPS, Mir Hassan Kili. -do-
FF-23 Mardan-6.			
23.	Furhad Ali S/O Anwar Shah R/O Hussai.	65 %	GMPS, Momin Khan Kili -do-
24.	Mohammad Azam S/O Murtaza Khan R/O Chiragh Din Kili.	58 %	GMPS, Dilroz Khan Kili. -do-
25.	Zaman Khan S/O Khalid Khan R/O Pati Kalan.	58 %	GMPS, Sakhtair Kili. -do-
26.	Fervaiz Khan S/O Shah Zad Gul R/O Zarghar Koroona.	54 %	GMPS, Dilawar Khan Kili. -do-
<b>GENERAL MERIT LIST.</b>			
27.	S: Mohd: Iftikhar Hussain S/O Noor Hassan R/O Noor Mankhel.	63 %	GPS, Far Hoti (MDN) -do-
28.	Hayatullah S/O Ajab Khan R/O Moh: Allah Dad Khel.	62 %	GPS, Mirza Kai (R) -do-
29.	Imran Ali S/O Farman Ali R/O Muslim Abad Mardan.	62 %	GMPS, Jamdad -do-
30.	Irshid Akbar S/O Mohammad Akbar R/O Noor Man Khel.	60 %	GMPS, Mura Banda. -do-
31.	Mohammad Islam S/O Zardad Khan R/O New Muslim Abad.	60 %	GPS, Nodah (R) -do-
32.	Zawar Mohammad S/O Ghulam Nabi R/O Landakai Hoti Mardan.	60 %	GPS, Bahader Shah Banda. -do-
33.	Zakir Hussain S/O Mohammed Hussain R/O Fazi Colony.	59 %	GPS, Nadar Khan Banda (SAF) -do-
34.	Khan Baz S/O Wali Dad R/O Qasmi.	59 %	GMPS, Anwar Khan Kili. -do-
35.	Ajmal Shah S/O Afzal Shah R/O Haji Koroona.	59 %	GMPS, Akbar Abad. -do-
36.	Khalid S/O Mohammad Akbar R/O Noor Man Khel Hoti Mardan.	58 %	GMPS, Umer Khan Kili. -do-
37.	Aurang Zeb S/O Zehra ud Din R/O Fohan Colony Mardan.	58 %	GMPS, Amir Abad Rustam -do-
38.	Maqbool Ahmad S/O Ali Akbar R/O Kurya Qadeem	57 %	GPS, Kass Kili -do-
39.	Abdul Hakim S/O Abdul Manan R/O Bicket Gunj	56 %	GMPS, Farman Banda. -do-
40.	Fazal Dad Shah S/O Rahim Dad Shah R/O Umer Khan Khel.	55 %	GMPS, Afzal Abad -do-
41.	Islam Gul S/O Hamid Gul R/O Katlang.	55 %	GMPS, Chimbar. -do-
42.	Zainul Abideen S/O Noor Alahi Qureshi R/O Baricham.	53 %	GPS, Surkh Dheri. -do-
43.	Mohammad Asif S/O Abdullah R/O Kass Koroona.	52 %	GMPS, Bagh Koroona -do-
44.	Mohammad Nazeer S/O Shamroz R/O Guli Bagh.	52 %	GPS, Jungara. -do-
45.	Mohd: Ijaz Hussain S/O Noor Hassan R/O Noor Man Khel.	52 %	GMPS, Jawan Kili -do-

**ATTESTED**

46.	Muslim Khan S/O Said Karim R/O Chail Banda.	50 %	GMPS, Hayat Abad Takht Bhai.	-do-
47.	Nisar Mohammad S/O Fatah Mohd: R/O Sarfaraz Gunj.	49 %	GMPS, Firano Kili Takht Bhai.	-do-
48.	Liaqat Ali S/O Safoor R/O Moh: Mohammad Ali Khan Hoti.	46 %	GFS, Maho Naray Takht Bhai.	-do-
49.	Mohammad Ghawas S/O Amir Ghawas R/O Guli Bugh S: Dher	45 %	GMPS, Umer Khan Kili.	-do-

TERMS AND CONDITION.

- 1). Their appointment are made purely on Temp: basis in liable to termination at any time assigning any reason or notice.
- 2). In case of resignation they will have to submit one months prior notice to the Deptt: or forfeit one months pay in lieu thereof to the Govt.
- 3). They are required to produce Health and age certificate from the M/S DHQ Hospital, Mardan before taking over charge.
- 4). Their original certificate should be checked before handing over charge.
- 5). They shall governed by such services discipline and conduct rules as are in force or may be prescribed thereafter by the Govt; WFF.
- 6). They should not be allowed to take over charge in a case their age is less than 18 years and above then 30 years.
- 7). If they fail to take over charge of the post within 15 days on the issued of this order their appointment order will be cancelled.
- 8). No.TA/DA etc is allowed to any one.

NOTE:-

Mr. Khaleefatul Muslameen S/O Amir Ayaz R/O Takker, H-23, will be appointed on receipt obtaining sanction of upper age limit from the authority concerned as he is over age.

(MR. KARIM ULLAH KHAN)  
DISTRICT EDUCATION OFFICER,  
(MALE) PRIMARY M A R D A N

Undst; No. 859-922 / F.No. 25/ Apptt: ITC/Vol: III/I-AE/ dt: 12-03-95.

Copy to the:-

1. The Director Primary Education WFF, Hayat Abad Peshawar.
2. The Sub-Div: Education Officer (Male) Mardan / Takht Bhai.
3. The Registrar Peshawar High Court for information please.
4. The District Accounts Officer Mardan.
- 5-52. Candidates concerned.
53. Manager Employment Exchange Mardan for information please.

**ATTESTED**

DISTRICT EDUCATION OFFICER  
(MALE) PRIMARY M A R D A N

an Ullah

Office of the District Education Officer (Male) Mardan

(15)



ADJUSTMENT ORDER

Consequent upon the promotion/upgradation of PSTs B-12 to SPST B-14 and SPSTs B-14 to PSHT B-15 vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education notification No. SO(B&A)/1-18/E & SE/2012 dated 11-07-2012 & No. SO (PE) 4-5/SSRC/meeting/2012 teaching cader dated 13-11-2012, the following transfer/adjustment of PSTs, SPSTs & PSHTs are hereby ordered on their own pay and BPS to the schools as noted against each in the interest of public service

S.No	Post	BPS	Name	Present School	Proposed School	Remarks
1	PSHT	15	Kaza khan	GPS Kaudari	GPS Kaudari	
2	PST	12	Suleman	GPS Kaudari bala	GPS Kaudari	
3	PSHT	15	Khurshaid ahmad	GPS, Spalano Dheri	GPS, Spalano Dheri	
4	PSHT	15	Ihsan Ullah	GPS, Jamal Abad	GPS, Jamal Abad	
5	PSHT	15	Zahid Anwar	GPS, Gul Abad	GPS, Gul Abad	
6	PSHT	15	Shamshad khan	Spalano Dheri	Fazli Akbar koroona	
7	PSHT	15	Missal khan	Kaudari	Kaudari Data	
8	PSHT	15	Mumtaz Mohd	Gul Pur kalay	Gul Pur kalay	
9	PSHT	15	Nascer Ahmad	No-1 Shahdand	No-1 Shahdand	
10	PSHT	15	Rahmat Ullah	Gul Roz banda	Gul Roz banda	
11	PSHT	15	Moham Gul	Izzat Khan kalay	Izzat Khan kalay	
12	PSHT	15	M. Shoaib	Baba kalay	Baba kalay	
13	PSHT	15	Khalid hussain	Spalano Dheri	GPS, Jeweer	
14	PST	12	Riaz	Jalil Abad	Habib Noor Kili	
15	PSHT	15	Fazli Akbar	Gul Roz Banda	GPS, Shah Dhand	
16	PSHT	15	Ihsan-ul-Haq	GPS, Kamala	GPS, Kamala	
17	PSHT	15	Ihsan Ullah	GPS, Miskeen Abad	GPS, Miskeen Abad	
18	PSHT	15	Abdul Latif	GPS, Dad Mohd kalay	GPS, Dad Mohd kalay	
19	PSHT	15	Mohib Gul	Tariq Abad	Tariq Abad	
20	PSHT	15	Mohammad Ghani	Hathian	Hathian	
21	PSHT	15	Said kamal	Essa khari kalay	Essa khan kalay	
22	PSHT	15	Javed	Akbar Abad	Akbar Abad	
23	PSHT	15	Mohammad Ishaq	GPS, Hathian	Lebas khan kalay	
24	PST	12	Fazal Haq	GPS, Libas Khan Kili	GPS, Hathian	
25	PSHT	15	Mohammad Kamal	Hashinagaro kalay	Hashinagaro kalay	
26	PSHT	15	Qaisar khan	Lala Jan kalay	Lala Jan kalay	
27	PSHT	15	Murad Ali	Hathian	Safi Abad	
28	PSHT	15	Mohammad ishaq	GPS, Akbar Abad	GPS, Kalim Abad	
29	PST	12	Aziz ur Rahman	GPS, Sharif Malak Kili	GPS, Kalim Abad	
30	PSHT	15	Ghaffoor-ur-Rehman	GPS, Shahid Abad	GPS, Shahid Abad	
31	PSHT	15	Amia Ullah	GPS, No-2 Sher garh	GPS, Mela Masjid	
32	PST	12	Habib Shah	GPS, Mela Masjid	GPS, No.2, Sher Garh.	
33	PSHT	15	Sikandar khan	GPS, No-1 Sher garh	GPS, No-1 Sher garh	
34	PSHT	15	Mohammad Hani	GPS, Khan Mohammad	GPS, Nadir She kalay	
35	PST	12	Iftikhar Ahmad	GPS, Nahir Sher Kili	GPS, Khan Mul Ahmad Kili	

**ATTESTED**

No	Post	BPS	Name	Present School	Proposed School	Remarks
241	PST	12	Raj Wali	GPS. Qamar Abad	GPS. Habibnoor Kili	
242	PSHT	15	Mukamil Khan	GPS. Peshia	GPS Usman Banda	
243	PSHT	15	Mukaram Khan	GPS. Habibnoor Kili	GPS. Habibnoor Kili	
244	PSHT	15	Muhammad Israr	GPS. Karim Kili	GPS. Karim Kili	
245	PSHT	15	Gul Hassan	Khadi Kili	Khadi Kili	
246	PSHT	15	Noor ul Haq	M/Garo Shah	M/Garo Shah	
247	PSHT	15	Riaz Ahmad	Sadiq Abad	Sadiq Abad	
248	PSHT	15	Javed Iqbal	Nawab Deri	Nawab Deri	
249	PSHT	15	Mohd Irshad	M/Garo Shah	Akbar Khan Kili	
250	PST	12	M.FAROOQ	Sada Bahar	M/Garo Shah	
251	PSHT	15	Wajid Ali	Kalu Shah	Sada Bahar	
252	PST	12	Jamshed	Akbar Khan	Kalu Shah	
253	PSHT	15	Mushtaq Ali	Kalu Shah	Kalu Shah	
254	PSHT	15	Khushdil Khan	No1 Fazal Abad	No1 Fazal Abad	
255	PSHT	15	Ayub Khan	Garo Shah	Garoshah	
256	PSHT	15	Rasool Khan	Shekhano Banda	Shekhano Banda	
257	PSHT	15	Latif Khan	Mehtar Ghundi	Mehtar Ghundi	
258	PSHT	15	Sameeul Haq	Shah Noor Killi	ShahNoor Kili	
259	PSHT	15	Mohd. Bostan	Patikhurd	Patikhurd	
260	PSHT	15	Mahboob Khan	Chail Banda	No2 Takkar	
261	SPST	14	Ajmir Khan	Bakhtiar Kili	GPS. Chail Banda	
262	PSHT	15	Bostan	Yeh Kohi	Bakhtiar Kili	
263	PST	12	Shaukat Ali	Ahmad Abad Garo	Yeh Kohi	
264	PSHT	15	Muhammad Akbar	No1 Chiragh Din	Ahmad Abad Garo	
265	PST	12	Zahid Shah	Mohammad Din Kili	GPS, Cheraghdin - I	
266	PSHT	15	Dervesh	Kanda Ghar	Mohammad Din Kili	
267	PST	12	Muhammad Zia ul Haq	GPS, No.1. Cheraghdin	GPS, Kanda Ghar	
268	PSHT	15	Afsar Ali	Kanda Ghar	GES Ghazi Shah	
269	PST	12	Alam Khan	GES Ghazi Shah	M/ Roze Kili	
270	PSHT	15	Hadi Mohd	M/ Roze Kili	GPS, Akram Abad	
271	SPST	14	Amir Sultan	GPS, Akram Abad	No1 Chiragh Din	
272	PST	12	Muhammad Farooq	GPS, Cheraghdin - I	GPS, Amir Zada Kili	
273	SPST	14	Gauhar Zaman	Ameer Zada Kili	Kanda Ghar	
274	PSHT	15	Farid Khan	Amirzada Kili	No2 Mley Baba	
275	SPST	14	Aurang Zeb ✓	Ghaffar Serai ✓	M/ Roze Kili ✓	
276	PSHT	15	Tahseen Ullah	No2 Fazal Abad	Ghaffar Serai	
277	SPST	14	Zubairul Haq	Feroz Banda	No2 Fazal Abad	
278	PSHT	15	Akbar Ali	No1 Takkar	Feroz Banda	
279	PST	12	Riaz Ahmad	Mir Bad Shah Banda	No1 Takkar	
280	PSHT	15	Sartaj Ali	No1 Fazal Abad	Mir Bad Shah Banda	
281	SPST	14	M. Tariq	Dandaw	No1 Fazal Abad	

**ATTESTED**

S.No	Post	BPS	Name	Present School	Proposed School	Remarks
721	SPST	11	Saeed ur rehman B14	Akhtar abad		
722	PST	12	Mohib Ur Rehman B12	Kagan	Khani koti	
723	PST	12	Muhammad ayaz B12	Garyala.2	Mohib Banda 2	
724	PST	12	Habib Ur Rehman B12	Krum gumbat	Garyaka khas	
725	SPST	14	Qamresh B14	shago wand	Anar baig.1	
726	SPST	14	Aman khan B14	Garyala khas	Wahid abad	
727	SPST	14	Irshad ul haq B14	Wahid abad	Baroo.1	
728	PST	12	Muhammad yasir B12	Kodinaka	Mohib banda.1	
729	PST	12	Aqil muhammad B12	Choora	GIZai.2	
730	PST	12	Mohsin N12	Javed abad	Bhai Khan	
731	PST	12	Kishwar said B12	Said rasan banda	GDZai.2	
732	PST	12	Akhtar ali B12	GIZai.3	Bhai Khan	
733	PST	12	Muhammad Nadeem B12	Asara dheji	GIZai.1	
734	PST	12	Noorul Basar B12	Chembar	Hussai	
735	SPST	14	Alam zeb B14	Garkul	GDZai.2	
736	SPST	14	Navab ali B14	Shamas korooni	But seri.1	
737	SPST	14	Fasih ur rehman B14	Mohib banda.4	Mohib Banda.3	
738	SPST	14	Hussain ahmed B14	Garyala.2	Mohib Banda No.3	
739	PST	12	Saeed Akbar B12	Wahid abad	But seri.1	
740	PST	12	Asad ali B12	GIZai.2	Madeena gumbat	
					Pani allahdad khel.1	

Note

- 1- No TADA is allowed
- 2- Charge Report should be submitted to all concerned.
- 3- The terms and conditions will be the same as mentioned in the promotion order
- 4- They will take over charge on their new station within 15 days.
- 5- Any kind of discrepancy found at any stage against the promotees teachers , the promotion/transfer will stand cancelled automatically.

(BAHADAR KHAN MARWAT)  
 DISTRICT EDUCATION OFFICER  
 (MALE) MARDAN

Endst No. 3062-G Transfer/Adjustment file

dated. 26-3 /2013

Copy forwarded to the:

- 1- PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2- DAO Mardan
- 3- SDEOs (male) Piry Mardan & T.Bhai
- 4- ASDEOs Circle concerned
- 5- Official concerned
- 6- MIS branch Local office
- 7- Personal file

**ATTESTED**

*[Signature]*  
 DISTRICT EDUCATION OFFICER  
 (MALE) MARDAN

26/3/13

Annex "B"

18

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MARDAN**

**OFFICE ORDER**

WHEREAS, Mr. Aurangzeb PSHT GPS Wana Khel was reported by SDEO(M) concerned that he is habitual late comer irregular in duties and non cooperative.

AND WHEREAS, a show cause notice has been issued to him vide this office order No:6813 dated 01-09-2022.

AND WHEREAS, the concerned teacher has submitted reply of show cause notice through SDEO concerned vide letter No:1438 dated 08-09-2022.

AND WHEREAS, several other complaints have been filed by community members against head teacher concerned for taking labour work from students.

AND WHEREAS, he was called for personal hearing vide letter No:7808 dated 01-10-2022.

AND WHEREAS the Competent Authority is not satisfied from his written statement at the time of personal hearing.

And Where As he found guilty of gross misconduct, under the KPK Govt servant E&D rules 2011.

Therefore, in exercise of the power conferred under Khyber Pakhtunkhwa Govt servants E&D rules 2011 (4b-ii), and on the basis of evidence on the record, the undersigned being Competent Authority is pleased to impose the penalty of Compulsory Retirement upon, Mr. Aurangzeb PSHT GPS Wana Khel with immediate effect.

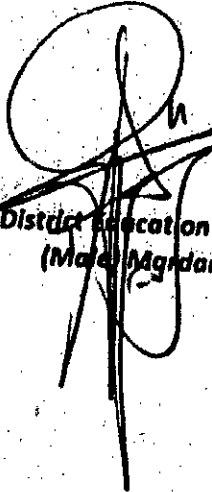
(Zulfiqar ul Mulk)  
District Education Officer  
(Male) Mardan

Endst No. 8474-75 /com T.Bh/ Dated: 12-10 /2022

copy forwarded for information and necessary action to the:-

1. Director E&SE Education KPK, Peshawar.
2. DAO Mardan
3. SDEO(M) Takht Bhal.
4. Official concerned.

DA B & A/c/assistant  
A endorse &  
19/10/2022  
st of pay

  
District Education Officer  
(Male) Mardan

ATTESTED

بجضور جناب ڈائریکٹر صاحب محکمہ تعلیم KPK پشاور

عنوان: وضاحت Compulsory Retirement شوکا زٹوس

جناب عالی:

Endst نمبر 8424/75 مورثہ 12/10/2022 Come to SDO (میل) تخت بھائی

مودبانہ گزارش عرض ہے۔

- ۱۔ یہ کہ آپ صاحبان ایمان اور صحت کے بہترین حالت میں ہوئے انشاء اللہ۔
- ۲۔ یہ کہ اورنگزیب PSHT، جو کہ GPS و ناخیل سرکل تخت بھائی، تحصیل تخت بھائی ضلع مردان میں ڈپوٹی سرانجام دے رہا ہے۔
- ۳۔ یہ کہ مسائل کے خلاف SDO تخت بھائی (میل) نے الزام عائد کی ہے جو کہ مندرجہ ذیل ہیں۔

i۔ یہ کہ مسی اورنگزیب PSHT، GPS و ناخیل Habitual Late Comer اینڈ

Irregular Come to School اینڈ Non Cooperotive ہے۔

وضاحت پیش کی جاتی ہے کہ آپ صاحبان کو اطلاعاً عرض ہے کہ مذکورہ ہیڈ ٹیچر سکول کو AM7:30 حاضر ہو جاتے ہیں۔ جبکہ سکول حاضری AM8:30 ہے۔

ii۔ یہ کہ SDO (میل) تخت بھائی نے الزام عائد کی ہے کہ کیوٹیٹی کے لوگوں نے اسے رپورٹ کیا ہے۔ وضاحت پیش کی جاتی ہے۔ کہ مسائل کے خلاف کوئی ایسے الزام نہیں۔ جو کہ کیوٹیٹی کے لوگ مجھ پر عائد کرے۔

iii۔ یہ کہ SDO (میل) تخت بھائی نے مذکورہ ہیڈ ٹیچر کو KPK گورنمنٹ Servant & Rules

2011ء کے مطابق Compulsory ریٹائرمنٹ کے احکامات جاری کرنے کے لئے سفارش کی گئی ہے۔ جو کہ DEO (میل) مردان کی طرف سے جاری کردہ ہے۔

وضاحت پیش کی جاتی ہے۔ کہ سپریم کورٹ آف پاکستان نے اپنے حالیہ فیصلے میں قرار دیا ہے۔

”کہ چاہے ملازم انکوائری Join نہ بھی کرے پھر بھی محکمہ کے ذمے ہے کہ ملازم پر لگائے گئے

الزامات کو شہود ادا کھٹے کر کے ثابت کرنے کہ اگر ٹھوس شہود موجود نہ ہوں۔ تو محض انکوائری رپورٹ

ملازم کے خلاف آنے پر اسے نوکری سے نہیں نکالا جاسکتا“ بحوالہ نمبر

1291(C-S)2020 PLS غیر حاضری کی صورت میں ملازم کو صرف اس صورت میں

نوکری سے برحاست کیا جائیگا۔ اگر غیر حاضری کا دورانیہ ایک سال سے زائد ہوگا۔

(رڈ 16) (07) 00 سپریم کورٹ آف پاکستان۔

ATTESTED

20

مندرجہ بالا بیان آپ صاحبان کو عرض ہے کہ مندرجہ بالا بیان کی وضاحت کو مقبول جان کر جو کچھ ہم نے درج کیا ہے سچ لکھا ہے سچ کے سوا کچھ نہیں۔

۱۔ سکول حاضری مدرسین کی دستخط والی کاپی درخواست کے ساتھ منسلک ہے۔  
۲۔ لاک بک کی ریبارکس درخواست کے ساتھ منسلک ہے۔ جو کہ آفسران بالا کی طرف سے کوئی غیر حاضری درج کی گئی ہے اور نہ EMA والوں کی طرف سے کوئی غیر حاضری درج ہے۔

لہذا آپ صاحبان اور نگرزب PSHT و ناخیل کی طرف سے مندرجہ بالا وضاحت کی روشنی میں مذکورہ آرڈر ڈیو DEO میں مردان کو واپس کرنے کی احکامات صادر فرما کر عنایت و مشکور فرمائیں۔

العارضہ

مورخہ: 12/10/2022

فقد زیادہ آداب

عین نوازش ہوگی

نوٹ: PTC کونسل اور نائب مدرسین کی ریبارکس بھی درخواست کے ساتھ منسلک ہے۔

اور نگرزب GPS PSHT و ناخیل سرکل تحت بھائی تحصیل تحت بھائی ضلع مردان ساہل

دستخط ایڈیشنر

ATTESTED



اکبر مت خان، سیکرٹری ایجوکیشن، ایف ڈی سی، ایف ڈی سی، ایف ڈی سی، ایف ڈی سی، ایف ڈی سی

(21)

درخواست نمبر (Re-statement order)

SO (PE) M  
Please look into the matter and forward to proper person for proper reply.

1۔ زارش و عرض یہ کہ امید ہے کہ آپ مہربانی ایمان اور اہمیت کے پیش نظر حالت میں نوٹنگ 1۔ کیس میں من مسمیٰ آوزنگزیب (PSHT) جی ایس این فاضل تحصیل تخت بھائی سرکل تخت بھائی، ضلع مردان، ڈیوٹی انجام دے دیں ہوں۔

2۔ یہ کہ آپ مہربانی کے علم میں مندرجہ ذیل گزارشات پیش کرنا چاہتا ہوں

3۔ یہ کہ میں من مسمیٰ آوزنگزیب جو کہ پیدائشی جی ایس این فاضل ڈیوٹی انجام دے رہا تھا۔ دوران ڈیوٹی جو کہ دار کو حاضر ہونے کیلئے کہا گیا تھا۔

4۔ یہ کہ جو کہ دار حاضر ہونے کی بجائے میرے ساتھ لڑکھائے، اور کہا کہ وہ آپ کو لے جے؟ جو کہ ڈیوٹی کرنے والہ ہے، لہذا آپ اس سکول سے جے جائیں گے۔

بعد آزان انٹوز نے میرے خلاف گاڈن والوں کو جمع کیا۔ اور میرے خلاف DE-O میل مردان - کوشکیات کا ڈھیر لگایا۔ اور جو جے جائے گی ان کے ساتھ ساتھ (D-E-O) میل مردان میں جمع کرائی۔ اور میرے خلاف لوگوں کو اکسایا۔ کیونکہ مذکورہ فولڈر عدالت کا بار سوخ شخص ہے۔ اسلئے میرے خلاف کارروائی کر کے، مجھے (Compulsory retirement) کا آرڈر جاری کیا گیا۔

5۔ 12-10-2022 کو فارغیت نامہ دینے جبری ریٹائرمنٹ کی کارروائی جاری کی گئی ہے۔ بعد آزان میں نہ ڈائریکٹر ایجوکیشن و مشاورت میں دائر کر کے اپیل کر دی گئی۔ لیکن 12/10/2022 سے لے کر یہاں کوئی کارروائی عمل میں نہیں لائی گئی۔ لہذا آپ مہربانی فرما کر ڈائریکٹر ایجوکیشن کو بددیانت نامہ جاری کرنے کی احکامات مہاور فرما کر مشکور فرماویں۔

القاصد  
سین زارش ہوگا! خفا زیادہ آدرا  
12/10/2023

ATTESTED

سیکرٹری (PSHT) آوزنگزیب جی ایس این فاضل



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
CIVIL SECRETARIAT PESHAWAR  
(Phone No.091-9223587)

22

No. SO(Primary-M)E&SED/5-19/Reinstatement/Aurangzeb/PSHT/Takht Bai/2023  
Dated Peshawar the May 17<sup>th</sup>, 2023

To

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

**SUBJECT: - APPEAL FOR RE-INSTATEMENT ORDER INTO SERVICE.**

I am directed to refer to the subject noted above and to enclose herewith a copy of an application which is self-explanatory received from Mr Aurangzeb PSHT Tehsil Takht Bai District Mardan to look into the matter for further necessary action as per rules, please.

Encl: AA

(MUHAMMAD ISHAQ)

SECTION OFFICER (PRIMARY MALE)

Copy forwarded to the:

1. District Education Officer (M), Mardan.
2. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PRIMARY MALE)

17/5/23

DDP-I

*[Handwritten signature]*

20/5/23

702  
24/5/23

**ATTESTED**



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 3905 /F.No./19/Appeal for Re-instatement/Estab(M-1)  
Dated Peshawar the 07-04-2023.

43

23

To

The District Education Officer  
(Male) Mardan.

Subject: **APPEAL FOR RE-INSTATEMENT INTO SERVICE**

Memo:

I am directed to refer to the subject cited above and to ask you that appeal in r/o Mr. Aurangzeb PSHT GPS Wana Khel Takht Bhai District Mardan has been rejected.

I am further directed to ask to inform the teacher concerned accordingly, please.

  
**Assistant Director (Estab-1)**

Directorate of Elementary & Secondary Edu:  
Khyber Pakhtunkhwa, Peshawar.

ok gdf

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

Copy forwarded to the: -

1. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

  
**Assistant Director (Estab-1)**

Directorate of Elementary & Secondary Edu:  
Khyber Pakhtunkhwa, Peshawar.

ok gdf

**ATTESTED**

Annex "E"

24

ELEMENTARY & SECONDARY EDUCATION DEPARTMENT GOVT. OF KHYBER PAKHTUNKHWA



**OFFICE OF THE HEAD MASTER GHS  
JEHANGIR ABAD TAKHTBHAI MARDAN**

**VISITING COMMITTEE OF GHS JEHANGIR ABAD**

As per the directives of the honourable DEO (M) Mardan, I paid a visit to **GPS Wanna Khel (Jehangir Abad)** along with my team and checked the following points comprehensively.

1. The free books are distributed properly among the students.
2. All staff are present i.e 06/06, The students attendance is 178/202.
3. Basic facilities like water system electricity and wash rooms for students and teachers are available.
4. The furniture is less than no; of students.
5. The school is clean and green.
6. The fresh enrollment is 44.

**ATTESTED**

*Zameer*  
*30/11/2022*  
**HEAD MASTER**

**GHS JEHANGIR ABAD**




**MARDAN**

رجوعی مدرسین - PS - دہلی - ایستہ - سال 2023

00745629

عند التخصيم - 14			مدرسین - 13			مدرسین - 15		
KPT - PPS = 14			PST - PPS = 13			PST - PPS = 15		
16102-0624048-7			16102-0491987-9			16101-7537367-7		
0302-8190033			0344-8616125			0344-8616118		
روز	وقت	مقرر	روز	وقت	مقرر	روز	وقت	مقرر
P.T. J.A.								
SUNDAY								
1								
2								
3	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
4	8:30	11:35	8:30	11:35	8:30	C/Leave = (15)		8:30
5	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
6	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
7	8:30	11:35	8:30	11:35	8:30	C/Leave = (19)		8:30
8	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
SUNDAY								
9								
10	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
11	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
12	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
13	8:30	11:35	8:30	11:35	8:30	C/Leave = (7)		8:30
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SUNDAY								
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17	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
18	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
19	8:30	11:35	8:30	11:35	8:30	8:30	11:35	8:30
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مقرر	روز	وقت	مقرر	روز	وقت	مقرر	روز	وقت
05			06			17		

ATTESTED

50 روپے	77452			
ایڈویکٹ: <i>Mirza</i>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ Peshawar Bar Association		
بار کونسل ایسوسی ایشن نمبر: bc-12-3483				
رابطہ نمبر: 5917744-0300				
سر جسٹس ایف بی ایف				

منجانب: <i>اسلامیٹ</i>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
<b>باعث تحریر آنکہ</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام *لکھنؤ* کیلئے *محمد ارشد و محمد سلمان* کے درمیان *فروغیہ* کیس 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 تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مفوضی، نیز  
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا بناختہ پر داخیت منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: *محمد ارشد*  
 PESHAWAR BAR ASSOCIATION  
 KHYBER PAKHTUNKHWA  
 واہ شاہ

مقام: *لکھنؤ*  
 نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔  
 5917744-0300

اورڈر نمبر 8119946-9450

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

SCANNED  
KPST  
Peshawar

CM No /2023

Khyber Pakhtunkhwa  
Service Tribunal

In Service Appeal No 1267-/2023

Diary No. 7176

Dated 28/8/2023

Aurangzeb (Ex-Primary School Head Teacher) GPS Wanna Khel  
Tehsil Takhtbhai District Mardan (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary  
& Secondary Education Department KPK Peshawar & others

(Respondents)

**APPLICATION FOR PLACING ON FILE THE LIST  
OF LEGAL HEIRS BEING NECESSARY.**

**Respectfully Sheweth:**

That the applicant / appellant through legal heirs submit as  
under:-

1. That the above noted appeal is pending / subjudice before this honorable tribunal and is fixed for today.
2. That the above title service appeal has been admitted by this Honorable tribunal wherein notice has been issued to the Respondents.
3. That during pendency of the appeal, the appellant has been died.

2

4. That in the above circumstances, the list of legal heirs be placed on file.

- i. **Mst Naheed Bibi (widow)**
  - ii. **Amir Zeb (Minor son through Mother)**
  - iii. **Alishba Zeb (Daughter)**
  - iv. **Zaleesh Bibi (Through Mother)**
- (Copy of FRC is attached as Annex "A")

5. That there is no legal bar to place on file the list of legal heirs for the end of justice.

**Prayer**

It is therefore requested that on acceptance of this application the list of legal heirs may kindly be placed on file for further proceeding.

**Applicant: Mst Naheed Bibi & others**  
Through



Muhammad Irshad Mohmand

Advocate High Court

Dated 28-08-2023





**FAMILY REGISTRATION CERTIFICATE**

Applicant Name: Naheed Bibi  
Citizen Number: 1610258973824  
Document Number: EA23695546

Family Members: 5

To certify that the family comprising of the following members is registered in NADRA with the particulars mentioned below as per the registration provided.



Name: Aurang Zeb  
Identity No: 16101-7537367-7  
Date of Birth: 16/06/1973  
Father Name: Zaheer Uddin  
Mother Name: Haleema Begum  
Relation With Applicant: Husband

پورانام: اورنگ زیب  
والد کا نام: ظہیر الدین  
والدہ کا نام:



Name: Naheed Bibi  
Identity No: 16102-5897382-4  
Date of Birth: 17/08/1989  
Father Name: Ghulam Qadar  
Mother Name: Aqal Meena  
Relation With Applicant: Self

پورانام: ناہید بی بی  
والد کا نام: غلام قادر  
والدہ کا نام: عقیل میمنہ



Name: Alishba Zeb  
Identity No: 16102-3290412-8  
Date of Birth: 01/03/2005  
Father Name: Aurang Zeb  
Mother Name: Naheed Bibi  
Relation With Applicant: Daughter

پورانام: ایشبا زب  
والد کا نام: اورنگ زیب  
والدہ کا نام: ناہید بی بی



Name: Amir Zeb  
Identity No: 16102-1490790-5  
Date of Birth: 23/03/2010  
Father Name: Aurang Zeb  
Mother Name: Naheed Bibi  
Relation With Applicant: Son

پورانام: امیر زب  
والد کا نام: اورنگ زیب  
والدہ کا نام: ناہید بی بی



Name: Zaleesh Bibi  
Identity No: 16102-6224974-6  
Date of Birth: 03/09/2014  
Father Name: Aurang Zeb  
Mother Name: Naheed Bibi  
Relation With Applicant: Daughter

پورانام: زلیش بی بی  
والد کا نام: اورنگ زیب  
والدہ کا نام: ناہید بی بی

Note:

Family members are linked in NADRA database  
Family members that may be registered but not linked to this family in NADRA database



https://id.nadra.gov.pk/e-id

*Ahmad Raza*

REGISTRAR GENERAL OF PAKISTAN

Date of Issue: 05/07/2023



\*1610258973824\*

(4)

SCANNED  
KPST  
Peshawar

بعدالت جناب جسٹس گلزار حسین سپریم کورٹ پشاور

تاریخ: 28 اگست 2023ء منجانب: Legal heirs of Aurangzeb (Appellant)

مقدمہ: SA 1267/23 نام: اورنگزیب vs حکومت گلزار

دعویٰ: Service Appeal

جرم:

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ آن مقام سپریم کورٹ کے

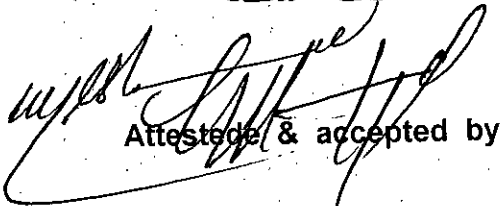
ایڈووکیٹ مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔

نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء وصولی چیک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی دائر کرنے کی اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مذکور کے عمل یا جزوی کارروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنی جانب بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ پر داخے منظور ہوگا اور دوران مقدمہ میں جو خرچہ و حرجانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز مقدمہ میں پیروی کے پابند ہونگے۔ وکالت نامہ لکھ دیا تاکہ سندر ہے۔

المرقوم 28 ماہ اگست 2023ء

العبد ذلیف بش بی بی گلزار حسین گواہ شہ

سروس سپریم کورٹ پشاور

Attested & accepted by  


Mohammad Ghasad  
Mohammed  
Advocate,

العبد ناصر علی بی  
العبد علی شہد حسین  
العبد عامر ذلیف  
Amir Zeb

①

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 1267/2023**

Aurangzeb ( Ex & Late PSHT) GPS Wana Khel Tehsil Takht Bhai,  
District, Mardan..... (Appellant)

**Versus**

Govt of KPK Through Secretary ( Elementary and Secondary) &  
Others..... (Respondents)

**INDEX**

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES	
1.	Para wise comments along with affidavit & Authority Letter		01	06
2.	Reply condonation appliation			07
2.	Copy of Death Certificate	"A"		08
3.	Copy of Letter/ Report	"B"	09	10
4.	Copy of Show cause Notice	"C"		11
5.	reply of Show cause Notice	"D"	12	13

Respondent

  
District Education Officer  
(Male) Mardan

(2)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 1267/2023**

Aurangzeb ( Ex & Late PSHT) GPS Wana Khel Tehsil Takht Bhai,  
District, Mardan..... (Appellant)

**Versus**

Govt of KPK Through Secretary (Elementary and Secondary) &  
Others..... (Respondents)

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1-4.**

**Respectfully Sheweth**

**PRELIMINARY OBJECTIONS :**

1. That the Appellant has got no cause of action/locus standi to file the instant appeal before this Honorable Tribunal.
2. That the appellant has concealed material facts from this Honorable Tribunal in the titled appeal.
3. That the Appellant has not come to this Honorable Tribunal with clean hands.
4. That the case is bad for miss-joinder and non-joinder of the necessary parties.
5. That the appeal is time barred by law of limitation Act.
6. That the appellant has been died since 29-June-2023. hence, the appeal is liable to be dismissed, hence denied.

(Copy of Death Certificate is as Annexure A)

**ON FACT:**

1. Para No 1 is correct.
2. **Incorrect & not admitted.** As there are so many complaints against the appellant, first the appellant asked the students to massage his legs and body in the school. Second the appellant has taken labour/(work) from the student during construction, Third the appellant used abusive language. Forth the appellant has not completed construction within three years. The respondent No 04 i.e SDEO (Male) sent report to the respondent No 03 i.e DEO (Male) Mardan on 13-09-2023. Further more the appellant took cash Book, Two checks books, PTC Fund Register of the School and other Financial Record of the school which is not providing to the department by their legal heirs, hence denied.

(Copy of Letter/ Report is as Annexure B)

3. Incorrect & not admitted. As the respondent issued show cause Notice vide No 7255 dated 16/09/2022, and mentioned allegation in the show cause Notice. The respondent has completed all the codal formalities and issued the order of compulsory retirement of the appellant. After that the appellant has been died since 29-June- 2023, hence the appeal is liable to be dismissed. due his death, hence denied.  
(Copy of Show cause Notice is as Annexure-C)

4. Incorrect & not admitted. As the departmental appeal of the appellant has been rejected since 06/04/2023, hence denied.

5. Incorrect & not admitted. As the departmental appeal of the appellant has been rejected since 06/04/2023, hence denied.

6. That Para needs no comments.

### GROUND:

A. Incorrect & not admitted. As, the order is legal, lawful, and is not liable to be set aside, hence denied.

B. Incorrect & not admitted. As the respondent issued show cause Notice vide No 7255 dated 16/09/2022, and mentioned allegation in the show cause Notice. The respondent has completed all the codal formalities and issued the order of compulsory retirement of the appellant. After that the appellant has been died since 29-June- 2023, hence the appeal is liable to be dismissed.


C. Incorrect & not admitted. As each and every cases have their own merits and circumstances. The service appeal of the appellant is useless due to the death of the appellant, hence denied.

D. Incorrect & not admitted. As the respondent treated to the appellant just like the respondent has treated other teachers, the appellant has given opportunity of defense and the appellant has replied to the show cause Notice, hence denied.  
(reply of Show cause Notice is as Annexure-D)

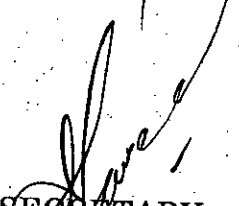
E. Incorrect & not admitted. As there are so many complaints against the appellant, first the appellant asked the students to massage his legs and body in the school, Second the appellant has taken labour/(work) from the student during construction, Third the appellant used abusive language. Fourth the appellant has not completed construction within three years. The respondent No 04 i.e SDEO (Male) sent report to the respondent No 03 i.e DEO (Male) Mardan on 13-09-2023. Further more the appellant took cash Book, Two checks books, PTC Fund Register of the School and other Financial Record of the school which is not providing to the department by their legal heirs, hence denied.

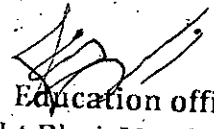
- F. Incorrect & not admitted. As the order of the compulsory retirement is legal and is not liable to be set aside, hence denied.
- G. Incorrect & not admitted. As the respondent has not violated Article 10-A of the constitution of Islamic Republic of Pakistan. The appellant has given opportunity of defense and the appellant has replied to the show cause Notice, hence denied.
- H. Incorrect & not admitted. As the respondent has not infringed the constitutional rights of the appellant under Article 4 & 25 of the constitution of Islamic Republic of Pakistan 1973, hence denied.
- I. Incorrect & not admitted. As reply is the above Para.
- J. Incorrect & not admitted. As reply is the above Para.
- K. Incorrect & not admitted. As the respondent has been treated to the appellant accordance with law, hence denied.
- L. Therefore, the Respondent also seeks leave to this Honorable Tribunal to submit additional grounds record & case law at the time of arguments.


Therefore, in view of the above made submissions, it is most humbly prayed that on the acceptance of this reply, the appeal in hand may kindly be dismissed in favor of the Respondent Department in the interest of justice.

  
 DIRECTOR

E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondent No: 2)

  
 SECRETARY  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No:1)

  
 Sub Divisional Education officer  
 (Male) Takht Bhai Mardan  
 (Respondent No: 4)

  
 District Education Officer  
 (Male) Mardan  
 (Respondent No: 3)

⑦

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 1267/2023

Aurangzeb ( Ex & Late PSHT) GPS Wana Khei Tehsil Takht Bhai,  
District, Mardan..... (Appellant)

Versus

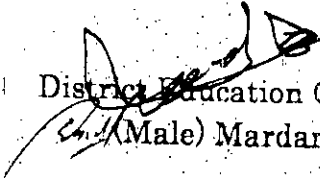
Govt of KPK Through Secretary ( Elementary and Secondary) &  
Others..... (Respondents)

Reply to Application for condonation of delay.

*Respectfully Sheweth,*

1. Para No 1 is **Incorrect, & Not admitted**, the appeal is not within time.
2. Pare No 2 is **Incorrect, & Not admitted**, as the order is valid and maintainable.
3. Para No 3 is **Incorrect, & Not admitted** as the application of the appellant may not kindly be treated as part of the service appeal because the service appeal is **badly Time barred**, and the appellant is not explain each and every day as per the relevant law.
4. Pare No 4 is **Incorrect, & Not admitted** as the appellant is careless due to which the service appeal was delay.
5. Pare No 5 is **Incorrect, & Not admitted**, as the order is valid and maintainable.
6. Pare No 6 is **Incorrect, & Not admitted**, as the appellant has provide opportunity to defense himself.
7. Para No 7 is **Incorrect, & Not admitted** as the application of the appellant may not kindly be treated as part of the service appeal because the service appeal is **badly Time barred**, and the appellant is not explain each and every day as per the relevant law.
8. Para No 8 is **Incorrect, & Not admitted** as the Honorable Tribunal to condone the delay as per limitation Act.

Therefore, it is humbly prayed that keeping in the above facts, the application may kindly be dismissed with cost.

  
District Education Officer  
C.O. (Male) Mardan

Govt of Khyber Pakhtunkhwa

مذبح وقات سرٹیفکیٹ

Death Registration Certificate

87

000246C8016  
14510214

دفتر ذبح وقات

Deceased Person's Details

Name	Eng Zeb	سن	00
Gender	Female	قومیت	پاکستانی
CCCR No.	101-7537367-7	تاریخ پیدائش	00-00-00
Date of Birth	1973	مذبح وقات	29 Jun 2023
Religion	Islam	مذبح وقات	29 Jun 2023
Age	50 Months 00 Years	مذبح وقات	29 Jun 2023
Date of Death	29 Jun 2023	مذبح وقات	29 Jun 2023
Place of Death	Home	مذبح وقات	29 Jun 2023
Reason of Death	Natural	مذبح وقات	29 Jun 2023
Nature of Death	Normal	مذبح وقات	29 Jun 2023
Buried/Last rite at	Pan Kalan	مذبح وقات	29 Jun 2023

Parental Information

Father's Name	Zahir Ud Din	مذبح وقات	29 Jun 2023
Mother's Name	Muhammad Begum	مذبح وقات	29 Jun 2023

Address

Address	Mehal Gumbaz, Pan Kalan, Mchalla Gumbaz, District FATA	مذبح وقات	29 Jun 2023
City/Town	Pan Kalan	مذبح وقات	29 Jun 2023
State	FATA	مذبح وقات	29 Jun 2023

Applicant's Details

Name	Nazam Bano	مذبح وقات	29 Jun 2023
CCCR No.	16101-8897182-4	مذبح وقات	29 Jun 2023
Relationship	Deceased Husband	مذبح وقات	29 Jun 2023

Information of Burial/Last rite by

Name	Muhammad Begum	مذبح وقات	29 Jun 2023
CCCR No.	1511-103002-7	مذبح وقات	29 Jun 2023
Relationship	Deceased's Mother	مذبح وقات	29 Jun 2023

مذبح وقات

مذبح وقات

مذبح وقات





Annexure B - 8

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER,  
(Male) Takht Bhai

EMAIL: sdeo.m.l.bhai@gmail.com

No. 1493 / Dated: 13/09/2022

To

The District Education Officer,  
(Male) Mardan.

Subject:

REPORT AGAINST MR. AURANG ZEB, PSHT,  
GPS WANA KHEL, JEHANGIR ABAD:

Memo:

In the light of various complaints of community members to your goodself as well as to this office, against Aurang Zeb PSHT the report is submitted as under:-

- 1) Mr. Aurang Zeb PSHT is working in GPS Wana Khel since 28/05/2019.
- 2) The community, school teachers and PTC committee are always at dragon drawn with MR. Aurang Zeb.
- 3) MR. Aurang Zeb is using abusive language and is bad mannered person.
- 4) He takes labour work from students in the construction work of ACR.
- 5) He could not complete construction of ACR through conditional grant in the last three Years.
- 6) He has some mental problem and is regularly using medicine for it.
- 7) He asks the students to massage his legs and body in the school.
- 8) This office has submitted various reports from time to time vide No. 2223/G

Dated: 12/09/2020, No. 2507 Dated: 02/10/2020, No. 2538 Dated: 08/10/2020, No. 589/G  
Dated: 04/01/2021, No. 1117 Dated: 16/04/2021, No. 1255 Dated: 20/05/2021, No. 1449  
Dated: 06/07/2021, No. 577 Dated: 30/03/2022, No. 1343 Dated: 22/08/2022 No. 1417  
Date: 05/09/2022 and No. 1438 Dated: 08/09/2022.

Similarly various show cause notices and explanations has been issued to him through various inquiries.

Log Book remarks has been written by SDEO and ASDEO from time to time.

In spite of all the above actions, he does not mend his ways.

In the light of the above situation, it is suggested to issue his compulsory retirement order in the best interest of public service and for the time being he may be transferred on administrative ground as per given proposal to silence the protesting public till the completion of his compulsory retirement process please.

S.No.	Name of PSHT	From	To	Remarks
1	Mr. Aurang Zeb	GPS Wana Khel	GPS Shekhano Banda	Vice No. 1 Admin Ground Vice No. 1
2	Mr. Niaz Ali	GPS Shekhano Banda	GPS Wana Khel	

Enclosed 4 Reports.

SUB-DIVISIONAL EDUCATION OFFICER,  
(Male) TAKHT BHAI.

گھوڑوں میں عمران کا بیڑہ اور تیز

GPS واصل کے بارے میں بیان

کچھ کے ساتھ افادہ سنا ہوا ہے

کچھ کو قالی سے سنا ہے

کچھ کو جا کر سے سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے



Fufman

DR, A

کچھ کو سنا ہے

کچھ کو سنا ہے

کچھ کو سنا ہے

# خدمتِ صفا اور دستبردِ اخوانِ افسرِ مردانہ مردانہ

صفحہ نمبر 1

## ضلع اعلیٰ

(17)

دفاعت ... درخواستِ اہم اور شوکار ڈی ای ٹی نوٹس

گزارش و مدعا یہ کہ آپ صاحبان اعلان اور خدمت کے بہترین میں جو حالت  
 انشاء اللہ! (1) یہ کہ یہ آپ صاحبان کی طرف سے ایک شوکار ڈی ای ٹی نوٹس  
 NO: 6813 کے تحت پیش کی گئی ہے اور وفاقیل کو پتہ نہیں کہ نام کیا ہے۔  
 جو کہ ضابطہ (ASDF-0) کے مطابق ہے اور اس میں ایک ہی جگہ نام لکھا  
 ہے۔ (2) یہ کہ یہ ڈی ای ٹی نوٹس کے مطابق یہ پیش کیا گیا ہے جو مدعا  
 طلب کی گئی ہے، سراسر من گھڑت اور جھوٹ پر مبنی ہے۔  
 جس کی کاپی درخواست کے ساتھ منسلک ہے۔

(3) یہ کہ یہ پیش کی گئی ہے اور وفاقیل 7:00 بجے سکول لافز پر نہیں  
 اور پھر 5:00 بجے کرتے ہیں اس دوران ایک عدد لکڑے کی پتھر  
 سے جاری ہے اور باقیہ تکمیل کو سمجھنے والے۔

(4) یہ کہ یہ پیش کی گئی ہے اور وفاقیل سے جو مدعا ہے اعلیٰ اور تعاون  
 کی طلب کی گئی ہے۔ اس ضمن میں مدعا پیش کی گئی ہے۔  
 کہ مطلوبہ پیش کی گئی ہے (Dell Caprat) شخص ہے۔ اور اعلیٰ  
 پر خاص توجہ دے رہا ہے۔ اور سکول میں کسی قسم کی غلطی  
 نہیں ہوئی ہے۔ جس میں کسی نے اور خود سکول کا ماسٹر  
 اور تمام کام تسلی بخش قرار دیا ہے۔ جبکہ پچھلے دنوں  
 گورنمنٹ ہائی سکول صاحبان اور کو پتہ ماسٹر اہم نہیں سکول  
 کا دفتر لکڑے کا کام کو تسلی بخش قرار دیا ہے اور پیش کی گئی ہے۔

درت کے دن وہ سنت بھارتی

2019ء کو آئیے ہیں۔ سکول میں دو گنڈرات  
 جو گنڈرات لڑ رہے تھے۔ اور سکول ہفتا کا خاص  
 خیال رکھتا ہے۔ قصیدہ پڑھائی اور سکول ہفتا کی آفرود ہفتہ  
 اور صبر میں لکھیں وہ ہر روز ہوا ہے۔ کہ وہ  
 سکول لڑائی اور دیگر مجال اختیار کر رہی ہے۔  
 اور سکول سے روزانہ (کلیک) کیے جاتے ہیں۔ جبکہ  
 ٹیس والے تو ہیں۔ اور ہم ایسے روزانہ دیکھتے ہیں۔  
 مطلوبہ شوق کارڈ لکھیں کہ کسے ہم بھیجا گیا ہے۔

اس جو شوق ہم میں ہے اور حقیقت یہ کہ ہر کس سے  
 لہذا یہ شوق ہم میں ہے اور حقیقت یہ کہ ہر کس سے  
 ہفتہ کی لکھیں ہے۔ اسے ہم نے شوق کو جاننے  
 باش اور ڈیوٹی (Duty) قرار دیا جائے۔  
 اور ان کے خلاف لکھیں لکھیں الزامات کو ہم لکھتے۔  
 ہر روز میں لکھیں اور قانون والوں نے اس بارے  
 میں سخت غم و غصہ کا اظہار کر کے شوق کارڈ کو ختم  
 کرنے کے احکامات کی سفارش کی ہے۔

2) یہ شوق کارڈ کو گورنمنٹ ہائی سکول جہان آباد میں  
 دیار گنڈرات لکھیں کہ ہفتہ منسلک لکھتے۔  
 اور اعمار کس میں لکھا گیا ہے۔ کہہ کہہ مطلوبہ شوق  
 استعمال ہفتا کی ہفتہ اور سختی شوق سے لکھتے۔  
 وہ دوسرے شوق ہر ڈاکٹر ہے۔ اور ہفتہ منسلک  
 کہ اصولوں سے پوری طور واقف ہے۔ یہ شوق  
 جہان آباد میں لکھتے کہ مطلوبہ شوق کا نام شوق ہے۔

District Education Officer  
 (Male) Mardan

مہاراجاں کے درجہ اولیٰ میں داخل ہونے پر  
 یہاں سے منافیہ تمام الزامات سے بھی آئندہ قریب  
 باہر جائے اور ان کے خلاف شوکانہ نوٹس کو حق  
 کیا جائے۔ وضاحت کی پیش نظر آپ مہاراجاں  
 مہاراجاں فرما کر مطلوبہ نوٹس کو حاضر باش  
 اہتمام میں آوری (Corporate) شخص  
 قرار دینے کی احکامات  
 صادر فرما کر  
 عنایت و مشورہ فرمادیں  
 عین لائسنس ہوگی!

فقو انظر دادہ ایہا  
 لکھنؤ

5-9-2022

گالری

آپ مہاراجاں کا نام عرض مان میں سید علی احمد صاحب  
 تحصیل تخت عالی، سرکل تخت عالی، ضلع مردان

دستور: سید علی احمد صاحب  
 تحصیل تخت عالی

Forwarded to  
 SDO (in) TTB here  
 HEAD MASTER  
 GPS Wanaulher  
 Takht Bhai

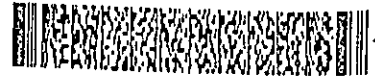
ASDEO

سرکل تخت عالی

Asst. SDO  
 Edu. Office  
 Takht Bhai



حکومت خیبر پختونخوا پاکستان  
Govt of Khyber Pakhtunkhwa Pakistan



اندراج وفات سرٹیفکیٹ

Death Registration Certificate

Tracking Id: 91100024608016

CRMS No. D519510214

OLD/M REG #:

PAT BABA\_2\_1000391 : دفتر اندراج

Old CRMS No.:

Deceased Person's Details		متوفی کے کوائف	
Name :	Aurang Zeb	نام :	اورنگزیب
Nationality :	Pakistan	قومیت :	پاکستانی
CNIC No :	16101-7537367-7	شناختی کارڈ :	16101-7537367-7
Date of Birth :	16-Jun-1973	تاریخ پیدائش :	16-Jun-1973
Gender :	Male	جنس :	مرد
Sickness Period :	00 Days 00 Months 00 Years	مذہب :	اسلام
Date of Death :	29-Jun-2023	مدت علالت :	00 دن 00 ماہ 00 سال
Date of Burial/Last rite :	29-Jun-2023	تاریخ وفات :	29-Jun-2023
Place of Death :	Home	تاریخ تدفین/آخری رسومات :	29-Jun-2023
Reason of Death :	Natural	جائے وفات :	گھر
Buried/Last rite-at :	Pati Kalan	وجہ وفات :	قدرتی
		کیسٹ وفات :	عام
		جگہ تدفین/آخری رسومات :	پاتی کلاں

Parental Information		والدین کے کوائف	
Father's Name :	Zahr Ud Din	والد کا نام :	ظہیر الدین
CNIC No :		شناختی کارڈ :	
Mother's Name :	Halima Begum	والدہ کا نام :	حلیمہ بیگم
CNIC No :		شناختی کارڈ :	

Address		پتہ	
Address :	Nawab Quatara, Pati Kalan, Mohalla Gul Bahar Colony City Takht Bhai	نواب کوآٹرے، پاتی کلاں، محلہ گل بہار کالونی، تخت بھائی	تخت بھائی
Tehsil :	Takht Bhai	تحصیل :	تخت بھائی
District :	Mardan	ضلع :	مردان

Applicant's Details		درخواست دہندہ کے کوائف	
Name :	Naheed Bibi	نام :	ناہید بی بی
CNIC No :	16102-5897382-4	شناختی کارڈ :	16102-5897382-4
Relation with Deceased :	Husband	متوفی سے رشتہ :	خاوند

Information of Burial/Last rite by		تدفین/آخری رسومات کنندہ کے کوائف	
Name :	Shafi Ullah	نام :	شفیع اللہ
CNIC No :	16102-5703602-7	شناختی کارڈ :	16102-5703602-7
Relation with Deceased :	Brother in Law	متوفی سے رشتہ :	بھتیجی

Entry Date :	04-Jul-2023	تاریخ اندراج :	04-Jul-2023
Issue Date :	04-Jul-2023	تاریخ اجراء :	04-Jul-2023
Entry Status :	Normal	اندراج اسٹیٹس :	نارمل
Additional Information :		اضافی معلومات :	

سیکرٹری دستخط

نانیبروڈ پٹ بابا-2

تحصیل تخت بھائی، ضلع مردان

**SECRETARY**  
N/C-2 Pat Baba  
Takht Bhai



Assistant Sub Divisional  
Educational Officer (Male)  
Pty Takht Bhai (Pat Baba)