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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

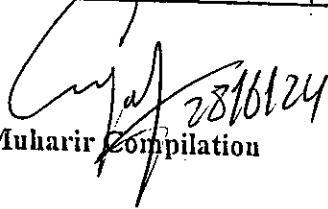
EXECUTION NO _____

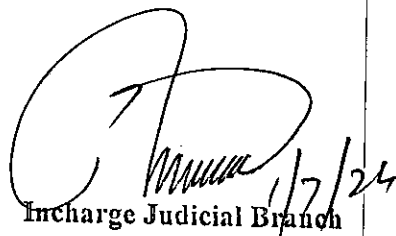
APPEAL NO	INSTITUTION	ORIGINAL INSTITUTION	DECISION	PAGES
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ABDUL SABOOR KHAN vs EDUCATION

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 Muharir Compilation


 Incharge Judicial Branch

S#	Sen #	Name, Designation & Present Place of Posting	D.O. Birth	Date of Apptt: as CT-IT	Remarks
14	14	Muhammad Iqbal (CT-IT), GHS Daraban Kalan D.I.Khan	15.02.1973	01-09-04	Recommended for promotion to SST-IT BS-16 on regular basis.
15	15	Muhammad Mobeen (CT-IT), GHS Baghicha Dheri Mardan	14-8-1978	01-09-04	Deferred due to lack of prescribed qualification/documents
16	16	Zia Ullah (CT-IT), GHSS Batal Mansehra	24.11.1974	01-09-04	Deferred due to lack of prescribed qualification/documents
17	17	Muhammad Niaz (CT-IT), GHS No.2 Mansehra	01.04.1975	01-09-04	Recommended for promotion to SST-IT BS-16 on regular basis.
18	18	Qayyum Rashid (CT-IT), GHSS Serai Naurang Lakki	12.11.1975	01-09-04	Recommended for promotion to SST-IT BS-16 on regular basis.
19	19	Adil Mumtaz Jan (CT-IT), GHS Shinkiyari Mansehra	05.03.1973	01-09-04	Deferred due to lack of prescribed qualification/documents
20	20	Sabir Shah (CT-IT), GHS Aman Kot Swat	01.01.1981	01-09-04	Recommended for promotion to SST-IT BS-16 on regular basis.
21	21	Saeed Ahmad Khan (CT-IT), GHS Paroa D.I.Khan	30-10-77	01-09-04	Recommended for promotion to SST-IT BS-16 on regular basis.
22	22	Gohar Ali Shah (CT-IT), GCMHS Timergara Dir Lower	20.03.1980	15.04.05	Recommended for promotion to SST-IT BS-16 on regular basis.
23	23	Shafi Ur Rahman (CT-IT), GHSS Garam Chashma Chitral	15.12.1981	15.04.05	Deferred due to lack of prescribed qualification/documents
24	24	Imran Ullah (CT-IT), GHS Khadi Zai Kohat	01-04-79	15-04-05	Recommended for promotion to SST-IT BS-16 on regular basis.
25	25	Mufti Kifyat Ullah (CT-IT), GHS Kuza Banda Battagram	14.05.1981	15-04-05	Deferred due to lack of prescribed qualification/documents
26	26	Fawad Khan (CT-IT), GHSS Nisatta Charsadda	02-03-82	15-04-05	Deferred due to lack of prescribed qualification/documents
27	27	Tilawat Hakim (CT-IT), GHS Dir Upper	24-01-82	15-04-05	Deferred due to lack of prescribed qualification/documents
28	28	Lutfullah (CT-IT), GHSS Maidaan Swat	13.04.1982	15-04-05	Recommended for promotion to SST-IT BS-16 on regular basis.
29	29	Rasool Din (CT-IT), GHS Karbogha Hangu	01.09.1979	15-04-05	Recommended for promotion to SST-IT BS-16 on regular basis.
30	30	Syed Mohammad Kashif Hussain Shah (CT-IT), GCMHS No.4 Cantt Peshawar	04-03-77	15-04-05	Recommended for promotion to SST-IT BS-16 on regular basis.
31	31	Yasin Shah (CT-IT), GHS Nahaqi, Peshawar	06-02-81	15-04-05	Joined SST-IT post
32	32	Riaz Muhammad (CT-IT), GHS Akbar Pura Nowshera	10-11-75	15-04-05	Deferred due to lack of prescribed qualification/documents
33	33	Kalim Ullah (CT-IT), GHS No.2 Pahar Pur D.I.Khan	04.09.1977	15-04-05	Deferred due to lack of prescribed qualification/documents
34	34	Noorullah Wahab (CT-IT), GHS Toru Mardan	04.04.1981	15-04-05	Deferred due to lack of prescribed qualification/documents
35	35	Attaullah Khan (CT-IT), GHSS Shahgram Chitral	01-12-82	15-04-05	Deferred due to lack of prescribed qualification/documents
36	36	Rahim Zada (CT-IT), GHSS Kohi Barmol Mardan	11.02.1982	29.06.06	Deferred due to lack of prescribed qualification/documents
37	37	Ayub Khan (CT-IT), GHS Gandigar Dir Upper	12.04.1983	29-06-06	Recommended for promotion to SST-IT BS-16 on regular basis.
38	38	Khalid Usman (CT-IT), GHS Ghoriwala Bannu	07-02-84	29.06.06	Deferred due to lack of prescribed qualification/documents
39	39	Mehboob Ali (CT-IT), GHS Ganduf Swabi	03-8-1983	29.06.06	Deferred due to lack of prescribed qualification/documents
40	40	Naz-Ur- Rehman (CT-IT), GHS Nahaqi Peshawar	10-3-1982	29-06-06	Deferred due to lack of prescribed qualification/documents
41	41	Hamayoun Khan (CT-IT), GHSS Khanpur Dir Lower	01.04.1978	10-02-07	Recommended for promotion to SST-IT BS-16 on regular basis.


Assistant Director (Litigation,
E&SE Department
Khyber Pakhtunkhwa Peshawar


1

28.03.2024 1. Junior to learned counsel for the appellant present. Mr. Muhammad Jan learned District Attorney for the respondents present.

2. Former requested for adjournment on the ground that learned counsel for the appellant is busy before Worthy Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 04.06.2024 before D.B at camp court, Swat. P.P given to parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

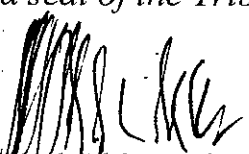
Kaleemullah


04th June, 2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Learned counsel for the appellant requested for withdrawal of the instant service appeal. As a token of admission of his submission, he signed he margin of order sheet. Dismissed as withdrawn. Consign.

3. *Pronounced in open court at camp court Swat and given under our hand and seal of the Tribunal on this 04th June, 2024.*


(Muhammad Akbar Khan)
Member (E)
Camp Court Swat


(Rashida Bano)
Member (J)
Camp Court Swat


As per instruction of my client I hereby withdraw the instant appeal. Camp Court Swat 4/6/2024


SCANNED
KPST
Peshawar

23rd Feb, 2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Learned counsel for the appellant requested that similar nature of appeal No. 930/2020 has been fixed on 26.02.2024 before this Tribunal, therefore, the instant appeal might also be clubbed with the said appeal. Request is acceded to. To come up for arguments on 26.02.2024 before D.B alongwith the connected appeal. P.P given to the parties.


(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman


Adnan Shah

26.02.2024

1. Junior to counsel for the appellant present. Mr. Muhammad Jan, District Attorney alongwith Mr. Ahmed-ud-Din, ADEO for the respondents present.

2. Junior to counsel for the appellant requested that similar nature service appeal No. 930/2020 has been fixed for arguments on 28.03.2024, therefore, the instant appeal might be clubbed with the said appeal. Request is allowed. To come up for arguments on 28.03.2024 before D.B alongwith connected service appeal No. 930/2020. P.P given to the parties.


(Muhammad Akbar Khan)
Member (E)


(Rashida Bano)
Member (J)

Kamramullah

SCANNED
Kamran
Peshawar

3

17.08.2023 1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General alongwith Hashmat Ullah, Superintendent and Ahmad Uddin, ADO for respondents present.

2. Written reply on behalf of respondents not submitted. Representative of the respondents requested sought time for submission of written reply. Adjourned. To come up for written reply/comments on 29.09.2023 before S.B. P.P given to parties.

SCANNED
KPBT
Peshawar

(Rashida Bano)
Member (J)

KaleemUllah

29-9-23

Due to Holy Day therefore case
is adjourned to 10-11-23
Reader

10th Nov. 2023 1. Learned counsel for the appellant present. Mr. Habib Anwar, Additional Advocate General alongwith Mr. Ahmad Ud Din ADEO for the respondents present.

SCANNED
KPBT
Peshawar

2. This appeal is against the appellate order dated 16.01.2023, wherein the departmental appeal of the appellant was rejected. The appeal is admitted to full hearing subject to all just and legal objections, by the other side. The appellant is directed to deposit security fees within 10 days. Reply on behalf of the respondents submitted. To come up for arguments on 23.02.2024 before D.B. P.P given to the parties.

(Kalim Arshad Khan)
Chairman

*Mutazem Shah *

03rd April, 2023

Counsel for the appellant present and sought time to complete the documents. Granted. To come up for preliminary hearing on 22.05.2023 before the S.B. Parcha Peshi given to counsel for the appellant.

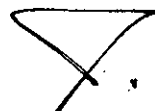
SCANNED
KPST
Peshawar


(Fareeha Paul)
Member(E)

22.05.2023

Appellant in person present and requested for adjournment on the ground that his counsel is not available today due to strike of lawyers. Adjourned. To come up for preliminary hearing on 05.07.2023 before the S.B. Parcha Peshi given to the appellant.

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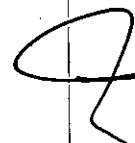

(Salah-Ud-Din)
Member (J)

Naeem Amin

5th July, 2023

1. Learned counsel for the appellant present.
2. Let a pre-admission notice be given to the other side. Mr. Asad Ali Kha, Assistant Advocate General present in the Court, is directed to contact the respondents for submission of reply. To come up for reply/preliminary hearing on 17.08.2023 before S.B. P.P given to the parties.

SCANNED
KPST
Peshawar



(Kalim Arshad Khan)
Chairman

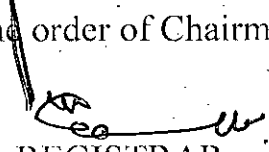

Mutazem Shah

5

FORM OF ORDER SHEET

Court of _____

Case No. - 324 /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15/02/2023	<p>The appeal of Mr. Abdul Saboor Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>17-2-23</u> Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>
17.02.2023		<p>Counsel for the appellant present and requested for adjournment in order to prepare the brief. Adjourned. To come up for preliminary hearing on 03.04.2023 before S.B.</p> <p style="text-align: right;">  (Rozina Rehman) Member (J)</p>

SCANNED
KPST
Peshawar

SCANNED
KPST
Peshawar

(6)

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Abdul Saboor Khan vs Education Deptt

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
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?	✓	
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		✓

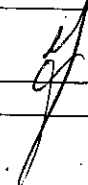
It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Noor Muhammad Cheethal

Signature:

Dated:



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

(7)

SERVICE APPEAL NO. 324 /2023

Abdul Saboor Khan

VS

Education Deptt

SCANNED
KPST
Peshawar

**APPLICATION FOR FIXATION OF THE ABOVE TITLED APPEAL AT
PRINCIPAL SEAT, PESHAWAR**

Respectfully Sheweth:

1. That the above mentioned appeal is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application the appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Appellant/Applicant

Dated: 15/2/23

Through


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

(8)

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

APPEAL No. 324 /2023

ABDUL SABOOR KHAN

VS

EDUCATION DEPTT:

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APPELLANT

THROUGH:


**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

9
-1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 324 /2023

Khyber Pakhtunkhwa
Service Tribunal

Entry No. 3606

Dated 15/2/2023

Mr. Abdul Saboor Khan, Junior Clerk (BPS-11),
GHS Domil, District Lower Chitral.

.....**APPELLANT**

VERSUS

- 1- The Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer, District Lower Chitral.

.....**RESPONDENTS**

APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 FOR FIXATION OF PAY IN BPS-11 W.E.F. 20-04-1995 I.E. FROM THE DATE OF INITIAL APPOINTMENT TO THE POST OF JUNIOR CLERK AND AGAINST THE APPELLATE ORDER DATED 16-01-2023 COMMUNICATED TO THE APPELLANT ON 07-02-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED WITHOUT ANY GOOD REASON.

Filed to date
Registrar

PRAYER:

That on acceptance of this appeal the impugned appellate order dated 16.01.2023 may very kindly be set aside and the appellant may kindly be allowed/granted pay fixation w.e.f. 20-04-1995 with all back benefits. Any other remedy which this august Service Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

- 1- That the appellant was initially appointed in the respondent Department as Junior Clerk BPS-11 vide order dated 20-04-1995. Copy of the appointment order is attached as annexure..... **A.**

- 2- That it is worth mentioning here, that service of the appellant was dispensed with on the ground that his appointment was illegal through order dated 13-02-1997. Copy of the order is attached as annexure**B.**
- 3- That appellant is a qualified and an eligible in all respect and was appointed on the subject post accordingly. Copies of the educational testimonials are attached as annexure**C.**
- 4- That it is also worth mentioning, that on promulgation of KP Sacked Employee Act, 2012 appellant submitted an application for his reinstatement being covered under the said law but the same was not considered, hence the appellant filed writ petition no. 12 M/2018 before Peshawar high court Mingora Bench, which was allowed vide judgment dated 19/11/2019. That in compliance of the judgment ibid the appellant was appointed as Junior Clerk vide order dated 28/09/2021 pursuance in response the appellant submitted charge report and started his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order dated 28/09/2021 and Charge certificate are attached as annexure **D & E.**
- 5- That the appellant filed Departmental appeal before respondents for fixation of pay w.e.f. the date of his first appointment i.e. 20/04/1997. Copy of departmental appeal is attached as annexure..... **F.**
- 6- That departmental appeal of the appellant was rejected vid appellate order dated 16.01.2023 and was communicated to the appellant on 07.02.2023. Copy of the appellate order dated 16.01.2023 is attached as annexure**G.**
- 7- That feeling aggrieved from the appellate order and having no other remedy the appellant filed the instant appeal on following grounds inter alia.

GROUND:

- A- That the inaction of respondents by not allowing pay fixation to the appellant w.e.f. 20-04-1997 is against the law, facts, norms of natural justice and materials on the record.
- B- That appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondents acted in arbitrary and mala fide manner by not allowing pay fixation to the appellant w.e.f. 20-04-1997 and as such the inaction of the respondents is violative of law and rules.

D- That the inaction of the respondents is discriminatory and against the norms of natural justice, therefore not tenable in the eye of law.

E- That under Article 38 (e) of the Constitution of Pakistan, 1973 state is bound to reduce disparity in the income and earning of the individuals including persons in the various services of Pakistan, therefore in light of the above mentioned Article the appellant is fully entitle for the grant of pay fixation w.e.f. the date of initial appointment.

F- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Dated:- 15.02.2023

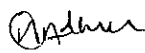

APPELLANT
ABDUL SABOOR KHAN

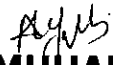
THOROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT


KAMRAN KHAN

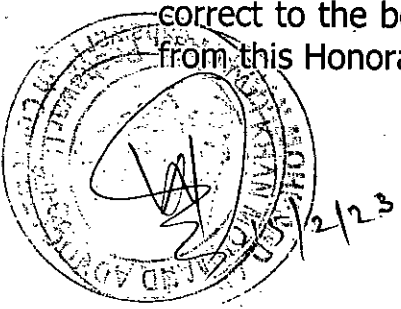

UMAR FAROOQ


WALED ADNAN

&

MUHAMMAD AYUB
ADVOCATES HIGH COURT

AFFIDAVIT

I Abdul Saboor Khan, Junior Clerk (BPS-11), GHS Domil, District Lower Chitral, do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.




Deponent

APPOINTMENT

Mr. Abdul Saboor Khan S/O Mohammad Wali Khan candidate is hereby appointed as J/Clerk on Rs. 1400/- P.M in EPS No. 5 of No. 1400-66-2290 plus usual allowance as admissible under the rules with effect from the date of his taking over charge at GHS BREF against leave vacancy of Mohammad Ibrahim J/Clerk w.o.f. 1-03-1995 to 31-05-1995 under the following terms and conditions:-

TERMS AND CONDITIONS

1. Charge report should be submitted to all concerned.
2. NO TA/DA is allowed being first appointment.
3. No joining time is allowed except that is absolutely necessary for transfer.
4. The appointment is purely on temporary basis and subject to termination at any time without assigning any reason or prior notice. In case he wishes to leave the post he shall have to submit one month's prior notice or in lieu thereof forfeit one month's pay and allowance to Govt. His educational qualification should be checked before the handing over the charge of the post.
5. He should produce his health and age certificate from the MS GHS Hospital Chitral within Seven days of reporting/arrival for duty as required under the Rules (F.R.10 & S.R.4).
6. In case the candidate fails to take over the charge within 10 days from the date of issue of this letter, his appointment will stand cancelled automatically.
7. The verification roll of character and antecedent should be obtained from the candidate concerned on the prescribed form and submit to the office for further verification and record.
8. He should execute necessary bond in case he is required to handle Government money or property.
9. The pay scale and service Rules would be subject to revision in accordance with order to be passed by the Govt. of NWFP from time to time.
10. On the expiry of leave of the original incumbent the service of Mr. Abdul Saboor Khan S/O Mohammad Wali Khan J/Clerk will be automatically cancelled.

(ALI ANBAR KHAN)
District Education Officer,
(Male) Secondary, Chitral.

E.No. 239/95 / Dated Chitral the 20th / 1995

Copy to:-

- 1:- The District Accounts Officer Chitral.
- 2:- The Headmaster G.H.S. BREF.
- 3:- The ABO (Accounts) Local Office.
- 4:- Candidate concerned.

By: District Education Officer,
(Male) Secondary, Chitral.

ATTACHED

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SECY: CHITRAL :5

APPOINTMENT.

Mr. Abdul Saboor Khan S/o Mohammad Wali Khan candidate is hereby appointed as J/ Clerk on Rs .1400/- PM in BPS No. 5 of Rs. 1400-66-2390 Plus usual allowance as admissible under the rules with effect from the date of his taking over charge at GHS BREP against leave vacancy of Mohammad Ibrahim J/ Clerk w.e.f 01.03.1995 to 31.05.1995 under the following terms and conditions:-

Terms and Conditions.

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed being first appointment.
3. No joining time is allowed except that is absolutely necessary for transfer.
4. The appointed is purely on temporary basis and subject to termination at time without assigning any reason or prior notice. In case he wishes to leave the post he shall have to submit one months prior notice or in lieu there of forfeit one months pay and allowance to Govt His educational qualification should be checked before the handing over the charge of the post.
5. He should produce his health and age certificate from the MS GHQ Hospital Chitral within seven days of reporting arrival for duty as required under the Rules (F R 10 and SE.4).
6. In case, the candidate fails to take over the charge within 10 days from the date of issue of this letter his appointment will stand cancelled automatically.
7. The verification roll of character and antecedent should be obtained from the candidate concerned on the prescribed form and submit to the office for further verification and record.
8. He should execute necessary bond in case he is required to handle government money or property.
9. The pay scale and service rules would be subject to revised in accordance with order to be passed by the Govt of NWFP from time to time.
10. On the expiry of leave of the original incumbent the service of Abdul Saboor Khan S/o Mohamad Wali Khan J/ Clerk will be automatically cancelled.

Ali Akbar Khan
District Education Officer
(Male) Secondary, Chitral

R No. 2391-94 dated Chitral the 20th 04.1995

Copy to

1. The District Accounts Officer Chitral.
2. The Headmaster GMS BREP.
3. The ADEC (Accounts) Local Office.
4. Candidate Concerned.

District Education Officer
(Male) Secondary, Chitral

ATT/STED

B

ANNEXURE "B"



-5-

On the perusal of the relevant records, the following Junior Clerks have been found illegal and against the prescribed rules. Their services are, therefore, hereby dispensed with, with immediate effect.

Name/Parasit and address.

Post.

School.

- 1- Abdul Jabbar R/O Mohammed Wali
Junior Clerk. GMS Bina Block.
- 2- Asadullah B/O Obaidullah,
R/O Zait (Chitral).
Junior Clerk. GMS Bina Block.

(Signature)
District Accounts Officer,
Chitral.

Date: 10/11/1957

Copy forwarded for information to:

- 1- Private Secretary to Chief Secretary, Govt. of India.
- 2- Private Secretary to Secretary, Govt. of India.
- 3- Director secondary education, Chitral.
- 4- Divisional Director of Education, Chitral.
- 5- Headmaster, GMS Bina Block and GMS Bina Block.
- 6- Concerned remote Clerks.
- 7- District Accounts Officer, Chitral.

(Signature)
District Accounts Officer,
Chitral.

ATTESTED

CLEAR COPY 15

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SECY: CHITRAL

OFFICE ORDER/ DISPENSED OF SERVICE.

On the perusal of relevant record, the appointments of the following Junior Clerks have been found illegal, despite valid and against the prescribed rules. Their service are, therefore, hereby dispensed with, with immediate effect.

S No	Name/ Parantage and address	Post	School
1	Abdul Saboor S/o Mohamamd Wali R/o Drosch	Junioer Clerk	GHS Birgh Hisar
2	Asadullah S/o Obaidullah R/o Zait (Chitral)	Junioer Clerk	Junior GHS Reshun Clekr

Fazluddin District Education Officer
Male Secondary Chitral

Endst No. 661-69/ Dated Chitral the 12. Feb 1997

Copy forwarded for information to the:-

1. Private Secretary to Chief Secretary of NWFP.
2. Private secretary to the (Sic)
3. Director Secondary Education Chitral
4. Divisional Director of Educational (S) MKD Div at Gulkada Swat.
5. Headmaster GHS Birga Hisar and
6. Concerned Remote Clerk.
7. District Accounts Officer, Chitral

District Education Officer
Male Secondary Chitral

ATTESTED

sNo 536103

Roll No. 2013



-6-

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 1986 SUPPLEMENTARY

THIS IS TO CERTIFY THAT Abdul Sabor Khan
Son/Daughter of Muhammad Wali Khan
and a resident of Chitral District

has passed the Secondary School Certificate Examination
of the Board of Intermediate & Secondary Education, Peshawar held in October 1986 as
a Private Candidate. He/She obtained 358 Marks out of 850

and has been placed in Grade D Representing Fair

The Candidate passed in the following subjects:

- 1. English 3. Islamiyat 5. Mathematics 7. Physics
2. Urdu 4. Pakistan Studies 6. Chemistry 8. Biology

Date of birth according to admission form is Fourteenth April,
one thousand nine hundred and Sixty Eight (14-4-1968)

Asstt. Secretary
27th December 1986

Secretary

This certificate is issued without alteration or erasure

Handwritten signature at the bottom center.

17

-7-

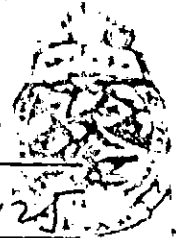
BORD OF INTERMEDIATE & SCNDARY EDUCATION PESSAWAR

No. 23202

DETAILED MARKS CERTIFICATE

Intermediate Examination (Humanities Group)

SESSION 19 89 (Annual/Supplementary)



Name Abdul Sabar Khan

Father's Name Mohammed Wali Khan Roll No. 21425

SUBJECTS	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1 English	200			63	
2 Urdu	200			87	
3 Islamic Education	50			45	
4 Pakistan Studies	50				
	200			98	
	200			81	
	200			110	
Total	1100			484-D	<i>Four hundred eighty four</i>

NOTE: Errors/Omissions excepted.



Date: 19

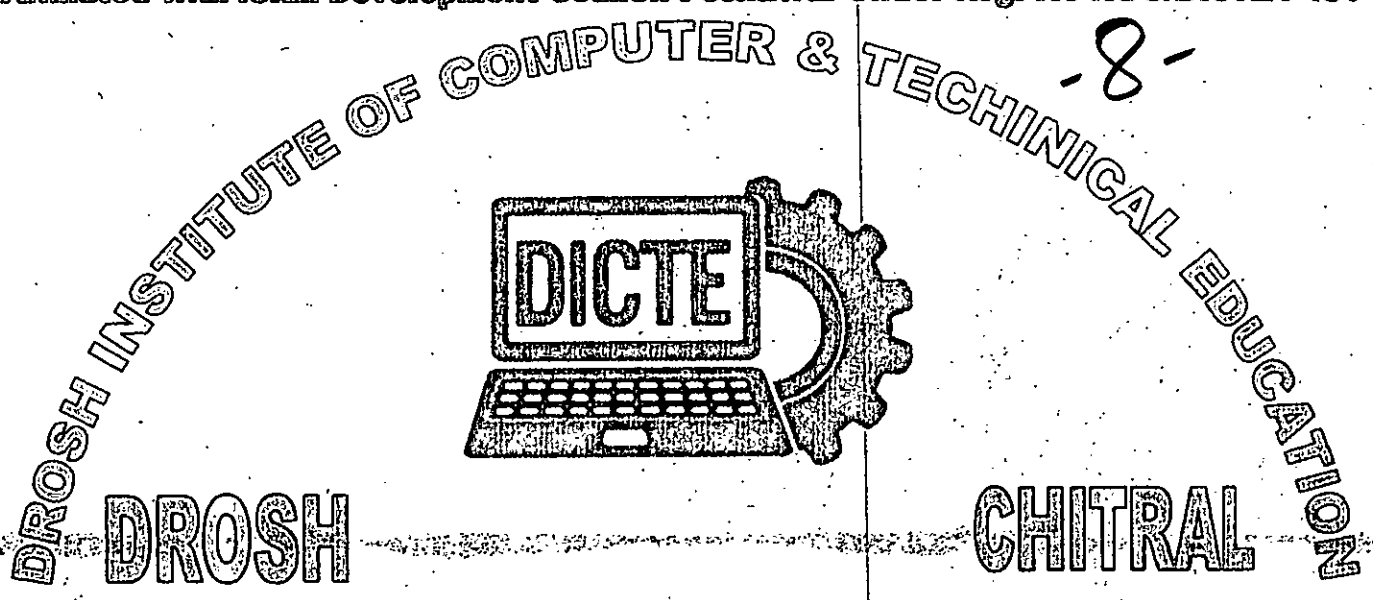
Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR



Prepared by [Signature] Checked by _____

[Handwritten signature and scribbles]

Affiliated with : Govt Trade Testing Board (TTB) Peshawar Under Reg No :DT/AB/T/TT/DIC&TECH/1007
Affiliated with :Skill Development Council Peshawar Under Reg No :SDC/DICTE/7451



-8-

TO WHOM IT MAY CONCERN:

It is to certify that Mr.: Abdul Sahor Khan
S/O: - Muhammad Wali Khan was a bonified student of Drosh Institute of Computer & Technical Education Drosh Chitral (KPK) Pakistan. He was enrolled in our Institute under R.No. DICTE/SMCC/137/2007. He has completed Three-month Ms office course in computer science.

FROM 1ST January 2007 TO 31th March 2007

The details of courses He has studied are as under.

COURSES

1. TYPING
2. MS WORD
3. INPAGE (Urdu)

His academic record and extra curriculum activities in this institute were excellent.

Issued On: June 11, 2007.

[Signature]
 ASSISTANT
 DEO (M) CHITRAL
 PESHAWAR

[Signature]
 Principal
 DROSH INSTITUTE OF COMPUTER
 & TECHNICAL EDUCATION
 DROSH, CHITRAL



AGHA KHAN RURAL SUPPORTS PROGRAMME
(AKRSP) Chitral

This is to certify that

Mr. Abul Saboor

has satisfactorily completed a training programme on

Proposal Writing and Record Keeping
for Citizen Community Boards (CCBs) Facilitated by TCA.

from March 3rd to 5th 2008.

Regional Program Manager
AKRSP Chitral

Assistant
DDO (M) Officer
Chitral

Mr. Noor-u-Din
Course facilitator
Terich Meer Consulting Associates
Chitral

9-

19



20
ANNEXURE D
OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

LOWER CHITRAL

Phone: 0943-412627

Email address: deomchitral@gmail.com



10

OFFICE ORDER

In pursuance of Judgment of Honorable Khyber Pakhtunkhwa Peshawar High Court, Mingora Bench, Darul Qaza Swat in writ petition No.12-M/2018 dated 19-11-2019 and on the recommendation of Departmental Selection Committee in its meeting held on 24/08/2021 **Mr. Abdul Saboor Khan S/O Molvi Muhammad Wali** resident of village Azudam Drosh District Lower Chitral is hereby appointed against the vacant post of **Junior Clerk BPS-11 @ Rs(12570-880-38970/-)** plus usual allowances as admissible under the rules at GHS Domil in 30% reserved quota for sacked employees under clause 3,4,5&7 of Khyber Pakhtunkhwa sacked employees(Appointment) ACT NO.XVIII OF 2012 with immediate effect in the interest of public with following terms and conditions.

TERMS & CONDITIONS:

1. He will be on probation period for one year as per section 6(1) of Khyber Pakhtunkhwa Civil Servant Act 1973 and clause 15(1) of APT rules, 1989.
2. His appointment is subject to the condition that the certificates/documents/Equivalency Certificates must be verified from the concerned authorities and if found producing bogus certificates or degrees, his appointment be treated cancelled w.e.f the date of issuance and will be reported to law enforcing agencies for further proceeding under the law and rules.
3. He will not be entitled to claim seniority and other back benefits under clause 5 of sacked employees Act 2012(KPK ACT NO.XVIII OF 2012) as well as Honorable Court Judgment.
4. Pay shall not be drawn until and unless a certificate is issued by this office to the effect that his documents have been verified.
5. He should join the post within 15 days after issuance of this order. In case of failure to join the post within 15 days, his appointment shall be treated automatically cancelled/withdrawn and no subsequent appeal etc shall be entertained.
6. Health & Medical fitness certificate should be produced from the Medical Superintendent DHQ Hospital Chitral before taking over charge under clause 3 of sacked employees Act 2012(KPK ACT NO.XVIII OF 2012).
7. He will be governed by such Rules and Regulations as may be issued for the category from time to time by the Government.
8. Concerned Headmaster is required to verify all the documents (DMCs and Degrees/Certificates/Equivalency certificates from the concerned Board/University) and provide his verified documents to this office for pay release.
9. Before handing over charge an affidavit be obtained and be placed in his Personal file by HM concerned that if any document is detected fake /bogus at any stage during his service, the appointment be treated as withdrawn w.e.f the date of issuance and all pays drawn will be recovered / deposited by him in Govt treasury. Non compliance will lead to legal proceeding.
10. Errors and omissions are excepted within the specified period of 15 days.
11. Charge report should be submitted to all concerned.
12. No TA/DA is allowed.

(Muzafar Ali Khan)
District Education Officer
(Male) Lower Chitral

ATTACHED

ATTESTED

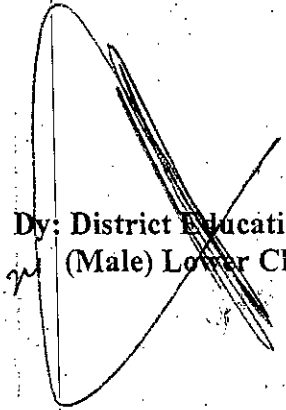


Endst. No. 1506t-7e /EB (M)S-24/Appointment/Sacked Employees Dated 28 / 9 /2021

Copy forwarded to the:-

1. Registrar, Peshawar High Court, Peshawar/ Dar-UI-Qaza Mingora Bench, Swat.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Lower Chitral.
4. District Accounts Officer Lower Chitral.
5. District Monitoring Officer (EMA) Lower Chitral.
6. Headmaster GHS Domil Lower Chitral.
7. Budget & Accounts Officer Local Office.
8. DEMIS of local office.
9. Candidate concerned.
10. PA to DEO(M) Lower Chitral.
11. Office file.

Dy: District Education Officer
(Male) Lower Chitral



ATTACHED

22
ANNEXURE

E

(12)

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that I have on the fore/afternoon of this day respectively made over and received charge of the office of Headmaster, GHS Domil vide District Education Officer (M) Chitral Lower E: No. 15066-76/EB(M)S-24/Appointment/Aacked Employees, Dated 28/09/2021.
2. Particulars of cash and important secret and confidential documents handed over are noted on the reversre.

Signature of relieved

Govt: servant

Designation Vacant j/c post

Station GHS Domil

Dated / / 2021

Endst: No. 495

Signature of relieving

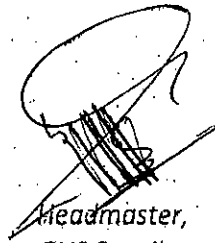
Govt: servant Abdul Saboor Khan

Designation Junior Clerk

Dated: 28/09/2021

Copy forwarded to the:-

1. Registrar, Peshawar High Court, Peshawar/ Dar-ul-Qaza Mingora, Swat.
2. Director of Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (M), Chitral Lower.
4. District Accounts Officer, Chitral Lower.



Headmaster,
GHS Domil.

Head Master DDO
GHS
Domail Chitral (L)

ATTACHED

23

"F"

-13-

To,

The Director Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar

Subject: **DEPARTMENTAL APPEAL FOR PAY FIXATION**

R/Sir,

With humble submission I would like to say that I have been appointed as Junior Clerk in the year 1995 in good self-department. That in the year 1997 my services dispensed with on the ground that my services were no more required to the department. That on promulgation of the KP Sacked Employees ACT 2012, I submitted an application for reinstatement being cover under the said law but the same was not considered. Feeling aggrieved I was filed Writ Petition before the Peshawar High Court Mingora Bench, which was allowed. Dear Sir, I was appointed as Junior Clerk w.e.f. taking over charge in light of Peshawar High Court Darul Qaza Bench Judgment. That in response I have submitted my charge report and started duty quite efficiently and up to the entire satisfaction of my superiors. That I am entitle for fixation of pay from the date of my initial appointment i.e. 20-05-1995 but the concerned authority has been appointed me with immediate effect i.e. from the date of taking over charge. Sir, I am feeling aggrieved preferred this Departmental appeal before your good self.

It is, therefore, most humbly prayed that on acceptance of this Departmental appeal I may kindly be allowed/granted for pay fixation w.e.f. 20-04-1995 with all consequential benefits. Any other remedy which your good self deems fit hat may also be awarded in my favor.

Dated 16-12-2022

Yours faithfully,



Abdul Saboor Khan
Junior Clerk, GHS, Domil,
District Lower Chitral.

ATTACHED



25

"9"

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

No. _____ /F.No./A-23/MS/Purpose of Pay

Dated Peshawar the 16/01 /2023

Phone: 091-9225344

Email: ddadmn.ese@gmail.com

To

Mr. Abdul Saboor Khan Junior Clerk,
GHS Domil District Lower Chitral.

Subject: **DEPARTMENTAL APPEAL FOR PAY FIXATION.**

Memo:

I am directed to refer to your appeal received vide this office diary No. 1742 dated 03/01/2023 on the subject cited above and to state that your appeal has been examined/analyzed by this office and **rejected** by the appellate authority.

sd

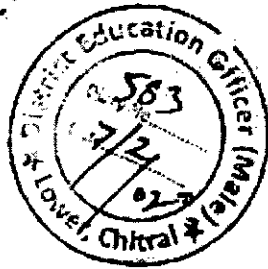
Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst; No. 7670

Copy forwarded to the: -

1. District Education Officer (Male) Lower Chitral.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

EIB
17/1
07-12-2023



13/1/23

Assistant Director (Admn)
Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

E:\Admn\Irshad Ali\MS\Appeal Rejected\Abdul Saboor JC Lower Chitral.doc

ATTESTED

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20 _____

SCANNED
KPST
Peshawar

Abdul Saboor Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We (Appellant)

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.


Dated. _____/_____/202


CLIENT

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

(BC-10-0853)
(15401-0705985-5)


KAMRAN KHAN


UMAR FAROOQ MOHMAND


WALEED ADNAN

&


MUHAMMAD AYUB
ADVOCATES

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

32

SCANNED
KPOT
Peshawar

APPEAL NO. 324 /2023

ABDUL SABOOR KHAN

VS

EDUCATION DEPARTMENT:

5/10/23

INDEX

S.NO	DOCUMENTS	ANNEXURE	PAGE
1	JOINT PARA WISE COMMENTS	1, 2
1	AFFIDAVIT	3
2	JUDGEMENT OF HONORABLE COURT AND STATEMENT OF THE THEN DEO(M) CHITRAL MR. IHSANUL HAQ	A	4, 5, 6
3	JUDGMENT & ORDER IN COC	B	4, 5, 6, 7


Ahmadud Din ADEO (Lit)

District Education Office Lower Chitral

15.8.23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No 324/2023
AWP No. 13-M/2018

33

SCANNED
KPST
Peshawar

5/10/23

MR. Abdul Saboor Khan Junior Clerk (BPS-11) GHS Domil District Lower. Chitral

APPELLANT

1. The Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Secretary Finance Department Khyber Pakhtunkhwa Peshawar
3. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
4. District education officer chitral lower.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 8133

Dated 05/10/23

RESPONDENTS

JOINT PARA WISE COMMENTS/REPLY ON BEHALF OF THE RESPONDENTS NO.1,2,3
& 4

Respectfully Sheweth:-

On facts

The respondents submit as under:

1. That the appellant has got no cause of action to file the instant appeal before this Honorable Service 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. Incorrect, the appellant did not file an application for reinstatement within stipulated time on the promulgation of the Khyber Pakhtunkhwa sacked employees Act 2012 and could not be appointed/reinstated. Feeling aggrieved the petitioner filed WP 12-M/2018 in PHC Darul Qaza Swat seeking his reinstatement and grant of back benefit. The said WP 12-M/2018 has allowed on the grounds that the petitioner would not insist for the payment of back benefits. It is also worth mentioning here that the act does not allow the petitioner to claim back benefit, even section 5 of the act ibid is very much clear regarding non claiming of basic benefits (Judgment of the Honorable Court and statement of the then DEO (M) Chitral Mr. Ihsanul Haq annexed as "A")
5. Correct. The appeal for the payment of back benefits rightly rejected, under the sacked employees Act 2012, the appellant is not entitled for payment of back benefits/ fixation of pay from the date of his initial appointment 20-04-1995.
6. Correct.
7. The appellant has no cause of action to file this instant appeal.

Grounds

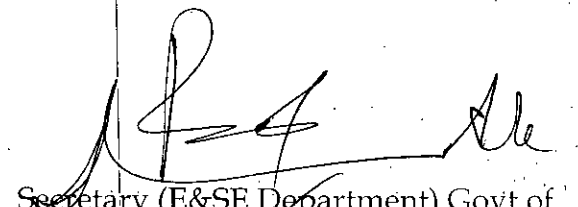
- A. Incorrect. That the appellant is not entitled for back benefits/ pay fixation WEF 20-04-1995, so the appeal was rightly rejected.
- B. Incorrect. That the appellant has been treated according to rule of Law and the constitution.

- C. Incorrect. That the respondents act are according to the law and the constitution, and the acts of respondents are not beyond the limits of law and the constitution.
- D. The appellatant has been treated according to the law in vogue.
- E. Incorrect. The constitutional rights of the appellatant have been appreciated. The appellatant has been appointed/reinstated in the pursuance of the Honorable PHC Mingora Bench judgment dated 19-11-2019 which does not allow payment of back benefits WEF 20-04-1995 Judgment & order in COC annexed as "B"
- F. It is upon the Honorable Court.

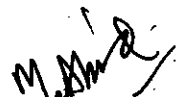
Therefore, it is humbly prayed that the instant service appeal may be Dismissed.

Respondents 1, 2, 3 & 4
Through AG.


Respondent No. 1


Secretary (E&SE Department) Govt of
Khyber Pakhtunkhwa Civil Secretariat
Peshawar


Respondent No. 2


Secretary Finance Department
Khyber Pakhtunkhwa Peshawar

Respondent No. 3


Director (E&SED) Khyber
Pakhtunkhwa Peshawar

Respondent No. 4


District Education Officer
(M) Lower Chitral

A

35

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 324 /2023

ABDUL SABOOR KHAN

VS

EDUCATION DEPARTMENT:

Affidavit

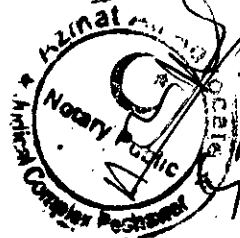
I Ahmadud Din ADEO (Lit) District Education Office (Male) Lower Chitral on behalf of respondents No1,2,3 & 4 do hereby solemnly affirm and declare that the contents of this para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court. It is further stated on oath in

this appeal the answering respondents have neither been placed ex-parte nor their defence struck off/cast.

15201-06024979

Ahmadud Din ADEO (Lit)
District Education Office Lower Chitral

ATTESTED



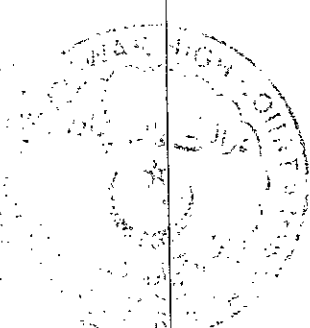
10.2.2023

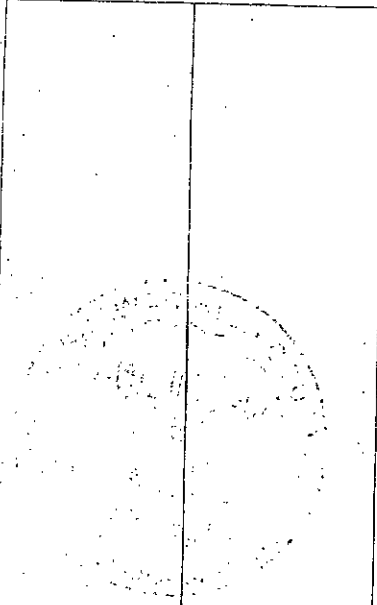
PESHAWAR HIGH COURT, MINGORA BENCH
(DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

Court of

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

Serial No. of order or proceeding	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary.	
1	2	3	
 <p align="center">EXAMINED By Examiners Peshawar High Court Bench Mingora Darul Qaza Swat</p>	<p align="center">19.11.2019</p>	<p align="center"><u>W.P 12-M/2018</u></p> <p>Present: Qazi Muhammad Fayaz Ahmad, Advocate for the Petitioner.</p> <p>Mr. Wilayat Ali Khan, A.A.G for the official Respondents alongwith Mr. Ihsanul Haq, DEO, Chitral.</p> <p align="center">***</p> <p><u>WIOAR AHMAD, J.-</u> Before taking up the main writ petition for hearing, the applications (C.Ms Nos. 152 & 883 of 2019) which are meant for additional documents stand allowed and accordingly documents annexed therewith be considered as part and parcel the main writ petition.</p> <p>2. Through this constitutional petition, the petitioner seeks the constitutional jurisdiction of this Court with the following prayer.</p> <p>"In view of the above mentioned facts and circumstances, it is therefore, most humbly prayed that this writ petition may be accepted in favour of the petitioner against the respondents and following directions be given to the respondents.</p> <ol style="list-style-type: none"> i. To reinstate the petitioner. ii. To grant back benefits to the petitioner for the period, during which he remained terminated/suspended/dismissed illegally from 	<p align="center">ACCEPT</p> <p align="center">P</p>



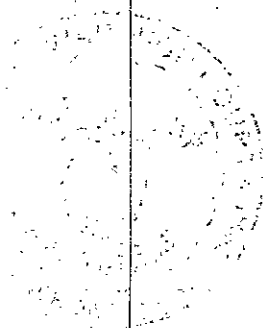
- the service.
- iii. To count the terminated/suspended dismissal period as the period in service of the petitioners and grant him promotion as well as seniority on the basis of the above mentioned period.
- iv. In alternative, the respondents be directed to decide the applications of the petitioner pending before them in accordance with law.
- v. To grant the ad-interim relief under clause (i to iv) of the prayer.
- vi. Any other relief which this Hon'ble Court may deems fit and just may also be granted.
- vii. Grant of cost of this petition.

3. The record would show that pursuant to the Khyber Pakhtunkhwa Sacked Employees (Appointment) Act, 2012 ("Act"), the present petitioner had filed an application under section 7 of the Act for his reappointment. His name was enlisted in the list of applicants to be reappointed/reinstated under the Act. However, the grievance of the petitioner is that despite his application within time he was ignored by the respondents.

4. Mr. Ihsanul Haq, DEO, Chitral present in the Court alongwith the learned A.A.G has stated that indeed the petitioner had filed an application for his appointment under the Act but he was not appointed/reinstated because he was insisting for his appointment with all back benefits whereas such plea of the petitioner was against the Act itself. He has also stated at the bar that if the petitioner is not insisting for his reappointment with back benefits, he will be

[Handwritten signature]
 [Faint text below signature]

Attested
[Handwritten signature]

		<p>appointed/reinstated against 30 percent quota earmarked under the Act for appointment of the sacked employees subject to availability of the vacancy on his own turn.</p> <p><u>5.</u> In view of the above, this writ petition is allowed with the directions to the respondents to reinstate/reappoint the petitioner against 30 percent quota reserved under the Act for the appointment of sacked employees subject to availability of the vacancy, strictly in accordance with law, on his own turn.</p> <p><u>Announced</u> 19.11.2019</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: right;"><i>[Signature]</i> JUDGE</p> <p style="text-align: center;"><i>[Signature]</i> 26-11-19</p> <p>Postage: ... Authorized ...</p> <p style="text-align: right;">39 Huzrat Usman 26-11-19 26-11-19 26-11-19</p> <p style="text-align: center;"><i>Attested</i> <i>[Signature]</i></p>
---	--	--

DE

Office 23/11/19




39

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

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 324/2023 Titled Abdul Sabir Khan VS Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 05/10/2023


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.