


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

677/2024

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 2 | 3 |
| 1- | 20/05/2024 | <p>The appeal of Syed Ishtiaqul Hassan received today by registered post through Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on. <u>28/5/2024</u>. Counsel for the appellant has been informed telephonically.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p> |

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. 677 /2024

Syed Ishtiaq ul Hassan (ex-cook) son of Shah Sarwar, resident of Guldana Tehsil & District Abbottabad. Ex - Cook GHS Sarcela A. Abad.
...APPELLANT

VERSUS

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Male Officer Abbottabad.

...RESPONDENTS

SERVICE APPEAL

INDEX

| S.# | Description | Page No. | Annexure |
|-----|--------------------------------------------------------------------------|----------|----------|
| 1. | Service appeal along with affidavit | 1 to 9 | |
| 2. | Copy of retirement order dated 10/10/2001 of the father of the appellant | 10 | "A" |
| 3. | Copy of appointment order dated 10/10/2020 of the appellant | 11 to 13 | "B" |
| 4. | Copy of impugned order dated 31/01/2024 | 14 | "C" |
| 5. | Copy of departmental appeal dated 10/02/2024 | 15 | "D" |
| 6. | Wakalatnama | 16 | |

...APPELLANT

Through

Dated: 17/5 /2024


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan


(Muhammad Ibrahim Khan)
Advocate High Court

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

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VERSUS

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Male Officer Abbottabad.

...RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF
SERVICE TRIBUNAL ACT 1974 FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WAS APPOINTED AS NAIB QASID
AGAINST 100% INVALID EMPLOYEES SONS
QUOTA VIDE ORDER DATED 10/11/2020 AND
AFTER SERVING IN THE RESPONDENTS'
DEPARTMENT FOR A PERIOD OF NEAR ABOUT
3½ YEARS, RESPONDENT NO. 2 WITHDREW
APPOINTMENT ORDER OF THE APPELLANT ON
31/01/2024 THE GROUND THAT ONE SISTER OF
THE APPELLANT WAS ALSO GOT APPOINTMENT**

AGAINST THE SAME QUOTA, THE IMPUGNED ORDER 31/01/2024 HAS BEEN ISSUED WITHOUT ANY INQUIRY, STATEMENT OF ALLEGATION, SHOW CAUSE NOTICE & PROVIDING OPPORTUNITY OF PERSONAL HEARING WHICH IS SINE QUA NON FOR SACKING ANY EMPLOYEES HENCE, IMPUGNED WITHDRAWL ORDER DATED 31/01/2024 OF APPLICANT IS LIABLE TO BE SET ASIDE

PRAYER: ON ACCEPTANT OF THE INSTANT SERVICE APPEAL, THE IMPUGNED WITHDRAWAL ORDER DATED 31/01/2024 OF THE APPELLANT MAY GRACIOUSLY BE SET ASIDE & RESPONDENTS MAY BE DIRECTED TO BE RE-INSTATE THE APPELLANT IN SERVICE AFTER MODIFYING THE APPOINTMENT ORDER WITH ALL SERVICE BENEFITS. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth;-

Brief Facts of the case are as under:-

1. That father of appellant was serving in the respondent department as PST and invalided out from service on 10/10/2001. Copy of retirement order dated 10/10/2001 of the father of the appellant is annexed as Annexure "A".
2. That as per law, the appellant got appointment as Cook in the respondents' department against quota of invalid employees sons vide appointment order dated 10/10/2020. Copy of appointment order dated 10/10/2020 of the appellant is annexed as Annexure "B".
3. That the appellant served the department with complete devotion, dedication and to the entire satisfaction of his superior authority that the respondent No. 2 without holding inquiry, issuing show cause notice, statement of allegation & providing opportunity of personal hearing, illegally withdrew appointment order dated 31/01/2024 of the appellant vide impugned withdrawal order dated 31/01/2024. Copy of impugned order dated 31/01/2024 is annexed as Annexure "C".

4. That feeling aggrieved, the appellant filed departmental appeal to respondent No. 7 on dated 10/02/2024 but the authority concerned did not bother to reply to the departmental representation of the appellant. Copy of departmental appeal dated 10/02/2024 is annexed as Annexure "D" Hence, the instant service appeal is filed inter-alia on the following grounds.

GROUND:

- a) That the impugned withdrawal order dated 31/01/2024 of the appellant is discriminatory, perverse, against the law, malafide without following the prescribed procedure and the same is liable to be set-aside.
- b) That the sister of the appellant Namely, Syeda Kiran Batool as well as the appellant applied for appointment against invalid employees son quota. As a result, District Education Officer Female Abbottabad appointed the sister of the appellant as PST. Similarly respondent No. 2 instead of appointing the appellant on open merit, also

appointed him against the same quota. Therefore, the appointment order of the appellant has been withdrawn on the plea that one person can be appointed against the employees' sons' quota. It is worth to mention here that the appointment order of the appellant as Cook should have been on open merit instead of employees sons' quota.

- c) That the appellant was appointed as Cook through appointed on employees son quota, but respondent No. 2 could convert appointment of the appellant on open merit. Besides, it is further submitted that as per KP Appointment, Promotion & Transfer Rules 1989 no criteria for appointment of Class-IV is mentioned in the Rules. In such circumstances, respondent No. 2 instead of withdrawing appointment order of the appellant was to delete the name of the appellant from the employees appointed against invalid employees son quota & issue another modified appointment order on merit.

- d) That it is further submitted as mentioned above, there is no criteria for Class-IV appointment mentioned in the service laws and withdrawal of appointment order of appellant from service is against the principles of natural justice. That there is no allegation against the appellant except that his sister got appointed as PST against the same quota.
- e) That the appellant is a poor person & the only source of his bread & butter was the meager salary used to receive by him from the respondents' department. The respondents' department has snatched the morsel of bread from the mouth of appellant as well as his dependent family members.
- f) That reasonable expectations of service was accrued to the appellant & the appointment order of the respondent cannot be withdrawn on the mere allegations of appointment of sister of the appellant against the employees son quota.

- g) That the respondents' department has led the appellant to the place which is utterly unknown to the principle of natural justice, fair play and good governance. This fact may not be left to fade in-oblivion that there is no criteria prescribed for appointment of class-IV. Therefore, the valuable rights to serve in the respondents' department as Cook have been accused and respondent No. 2 could modify or issue fresh appointment of the appellant giving protection to his service in the department.
- h) That matter relates to the terms & conditions of service. Therefore the Honourable Tribunal has jurisdiction to entertain the lis under Article 212 of Constitution of Islamic Republic of Pakistan 1973.
- i) That service appeal of the appellant is well within the period of limitation.

It is, therefore, humbly prayed that, on acceptant of the instant service appeal, the impugned withdrawal order dated 31/01/2024 of the appellant may graciously be set aside & respondents may be directed to be re-instate the appellant in service after modifying the appointment order with all service benefits. Any other relief which this Honourable Tribunal deem appropriate may also be granted to the appellant.

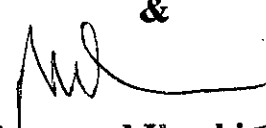
...APPELLANT

Dated: 17/3/2024

Through


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&


(Muhammad Ibrahim Khan)
Advocate High Court

VERIFICATION:-

Verified that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein.

...APPELLANT

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHUWA, PESHAWAR

Service Appeal No. _____/2024

Syed Ishtiaq ul Hassan (ex-cook) son of Shah Sarwar, resident of Guldana Tehsil & District Abbottabad.

...APPELLANT

VERSUS

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education Male Officer Abbottabad.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Syed Ishtiaq ul Hassan (ex-cook) son of Shah Sarwar, resident of Guldana Tehsil & District Abbottabad*, do hereby solemnly affirm and declare that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

DEPONENT


12/02/24

Annex-A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (M&E) PRIMARY ABBOTTABAD.

SANCTION OF RETIREMENT/ENCASHMENT.

P-10

Sanction is hereby accorded to the Encashment of 135. days, leave on full pay lieu of not availing the LPR, lying in his credit in respect of Mr; Shah Sawar Ex-PTC Govt; Primary School, Khotara (A.Abad), as admissible under the Rules 1981 of NWFI,

RETIREMENT.

He is further allowed to proceed on retirement with effect from 26-09-2001, on Medical ground in the light of invalid report issued by the Medical Superintendent, DHQ, Hospital Abbottabad, vide his No; 1079 dated 01-10-2001, and as verified by Medical Superintendent, DHQ, Hospital Abbottabad vide his No; 3325 dated 09-10-2001.

(SARDAR MUHAMMAD AYUB)
EXECUTIVE DISTRICT OFFICER
(M&E) PRIMARY ABBOTTABAD.

Endst; No; 1567-68 / Dated Abbottabad the 10-10 /2001.

Copy to;-

- 1;- The Deputy District Officer (Male) Primary Abbottabad, w/r to his No; 1890 dated 10-10-2001, alongwith service book of the teacher concerned.
- 2;- The District Accounts Officer, Abbottabad.

DISTRICT OFFICER (ADMN:&DEV:)
(M&E) PRIMARY ABBOTTABAD.

Attested
Advocate High Court
Office No. 23 Lahore
Muhammad Ali

OFFICE OF THE DISTRICT EDUCATION OFFICER MALE ABBOTTABAD

APPOINTMENT

Annex-B *P*

Consequent upon recommendations of the Departmental Selection Committee, Competent Authority is pleased to appoint the following candidates as Class-IV in BPS-03 (9610-390-21310) PM alongwith usual allowances as due and admissible under the existing rules of Government of Khyber Pakhtunkhwa, in the schools/stations noted against their names in the interest of public service with effect from the date of their taking over charge on the terms and conditions given at the end.

Medical /Deceased Quota 100%

P 11

| S.N | NAME | F/NAME/Husband Name | DOB | CNIC | P.ADRRESS | Proposed School | Post | REMARKS |
|-----|-------------------|------------------------|------------|-----------------|-------------------------------|---------------------|---------------|---------|
| 1. | Waqar Ali | Zulfiqar Ali | 10-05-1994 | 13101-1693184-7 | Kunj jadeed Abbottabad | GPS No.4 ATD | Chowkidar | AVP |
| 2. | Waqar Ahmed | Ghulam Muhammad | 16-03-1994 | 13101-5948431-1 | BandiDhund an Abbottabad | GPS BandiDhund an | Chowkidar | AVP |
| 3. | Ateeq Ur Rehman | Maqbool Ur Rehman | 10-04-1986 | 131019-759181-5 | RankotBof Abbottabad | GPS Rankot | Chowkidar | AVP |
| 4. | Muhammad Ayyaz | Muhammad Taj | 01-01-1985 | 13101-7370596-9 | Havelian Distt Abbottabad | GPS BandiQazian | Chowkidar | AVP |
| 5. | Amir Zeb | Jahanzeb | 10-11-1991 | 37405-4088568-7 | Kathwal Abbottabad | GPS Narian | Chowkidar | AVP |
| 5. | Ajaz Ahmed | Muhammad KhawasAbbas | 01-02-1991 | 13101-3027530-1 | Bakot | GPS Thallah | Chowkidar | AVP |
| 7. | Muhammad Saeed | Muhammad Haroon Abbasi | 15-12-1989 | 13101-3394123-7 | Hadora Dalola | GHSS Birote | Lab Attendant | AVP |
| 8. | Umair Ali | Muhammad Saeed | 18-03-1999 | 13101-6094181-1 | Village & PO Kuthwal | JICA Model Dhamtour | Chowkidar | AVP |
| 9. | Muhammad Mussadaq | Muhammad Parvez | 02-01-1992 | 13101-6546406-9 | Khan Khurd, Bakot | GHSS Seer | Lab Attendant | AVP |
| 10. | Shah Nawaz | M. Anwer | 31-12-87 | 13101-0377828-5 | Village MalachNathf agali | GPS Donga Gall | Chowkidar | AVP |
| 11. | KhurramRiaz | Muhammad Riaz | 01-07-1986 | 13101-1271033-3 | Upper MalikpuraAt d | GMS Banda Dilazak | Sweeper | AVP |
| 12. | Majid Ali Shah | Syed Amjad Ali | 04-03-86 | 13101-7284588-1 | BandiAttai Khan | GHSS Mohri Bed Bhen | NaibQasid | AVP |
| 13. | Muhammad Ishfaq | Muhammad Razzag | 03-01-84 | 13101-4917428-5 | Khan Khurd | GPS Sangrary | Chowkidar | AVP |
| 14. | Muhammad Akasha | MehtabUIAr feen | 05-12-1994 | 13102-0352756-7 | PO Lora Hav | GPS KundBattal | Chowkidar | AVP |
| 15. | Zeeshan Gul | Gul Farid | 03-03-99 | 13102-0345212-3 | Kalanda Nara, Tehsil Havelian | GMS Nara | NaibQasid | AVP |
| 16. | Shahnawaz | Muhammad Yousaf | 15-11-1980 | 13101-4154886-3 | Chamlali, Abbottabad | GMS Battian | Sweeper | AVP |
| 17. | Baber Ali | Abdur Rasheed | 18-05-1986 | 13102-0361078-7 | PO Satora Havelian | GPS Satora | Chowkidar | AVP |

CFO
 Muhammad Aslam Khan Tanoli
 District Officer
 Office No. 33 Adjacent to
 Distt. Office Abbottabad
[Signature]

| | | | | | | | |
|-----|-----------------------|------------|-----------------|-----------------------------------|--------------------|---------------|-----|
| | Said Ur Rehman | 13-04-1975 | 131018-434435-5 | Usman Abad Abbottabad. | GHS Sareela | Lab Attendant | AVP |
| | Shoukat Ali | 08-03-1982 | 13101-7932350-5 | Bodla Abbottabad | GMS ChehrSajkot | Sweeper | AVP |
| | Mu. eeb Ur Rehman | 01-01-1997 | 13102-0381901-7 | Bodla Abbottabad | GHS Suma Karaga | Chowkidar | AVP |
| 1. | Shahid Nawaz | 26-06-1995 | 13101-3527623-5 | Sherwan Khurd | GPS Shahkot | Chowkidar | AVP |
| 22. | Babar Ayub | 10-04-1997 | 13101-4780718-5 | Vill: Khan PO Azizabad, Abbotabad | GHSS BandiDhund an | Lab Attendant | AVP |
| 23. | Murtaza | 01-01-1990 | 13101-2198542-5 | Vill and PO Beerangali | GPS Ander. Seri | Chowkidar | AVP |
| 24. | Muhammad Touseef | 01-01-1995 | 13101-5274032-5 | KhanispurAyubia | GHSS Khanispure | Sweeper | AVP |
| 25. | Safeer Ahmed | 16-02-1983 | 35201-2336031-5 | Moraa | GMS Tandara | Chowkidar | AVP |
| 26. | Raees Ali | 02-04-1992 | 13102-0349766-1 | Rajoya | GHS Takla Sheikhan | Sweeper | AVP |
| 27. | MehboobAyub | 02-10-2000 | 13101-5232595-5 | Aziz Abad | GPS Jatal | NaibQasid | AVP |
| 28. | Shahbaz Khan | 14-08-1993 | 13101-8658210-1 | Bumlail | GHSS Nawanshehr | NaibQasid | AVP |
| 29. | Ibrar Khan | 06-04-1984 | 13101-3196125-5 | Batala | GPS Upper Sajawal | Chowkidar | AVP |
| 30. | Muhammad Rashid | 20-02-1984 | 13101-8067076-7 | Palakkian | GPS Palakkian | Chowkidar | AVP |
| 31. | Yasir Farooq | 01-02-1990 | 13101-7385414-7 | KokalBarseen | GMS Taror | Sweeper | AVP |
| 32. | Syed IshtiaqUlHusnain | 25-03-1992 | 13101-2719438-9 | Tarnawal | GHS Sareela | Cook | AVP |
| 33. | Aamir Shahzad | 21-01-1985 | 13101-3260651-9 | Mandian | GPS GatMaira | Chowkidar | AVP |
| 34. | Danish Farooq | 19-08-1994 | 13101-10402023 | Sherwan Khurd | GPS Hurnara | Chowkidar | AVP |
| 35. | Faraz Ahmed Abbasi | 01-07-1985 | 13101-7106698-3 | Seer | GHSS Seer | Chowkidar | AVP |
| 36. | Muhammad Wasiq | 02-01-1981 | 13101-9110453-1 | Uper Malik Pura | GHSS Tajwal | NaibQasid | AVP |
| 37. | Abdul Waheed | 01-10-1985 | 13101-8939807-5 | NagriBala | GPS Ramkot | Chowkidar | AVP |
| 38. | Mehar All Khan | 01-03-1997 | 13101-0484232-1 | Banda Pir Khan | GMS Mangal | Naib Qasid | AVP |
| 39. | Muhammad Zaheer | 24-03-1991 | 13101-4052076-3 | Tarhat | GPS Tarhat | Chowkidar | AVP |
| 40. | Muhammad Faz | 02-01-1981 | 13101-5818750-1 | Kuthwal | GPS Gall Kuthwal | Chowkidar | AVP |
| 41. | Muhammad Usman Khan | 09-11-2000 | 13101-0655237-1 | Nawanshehr | GPS NamliMaira | Chowkidar | AVP |

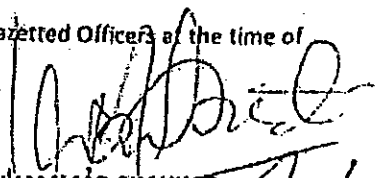
TERMS AND CONDITIONS

1. In the light of Govt. of Khyber Pakhtunkhwa Peshawar, Finance Department (Regulation Wing) letter No.SO(SR-III)FD/12-1/2005 dated 27-0-2013, all civil servants appointed to a service or posts on or after 1st July 2001 shall be deemed to have appointed on regular basis and will be eligible for pension/deduction of GP Fund as such prescribed by the Government.
2. They will get salary in BPS-03 Plus usual allowance as due as admissible under the rules.

Muhammad...
Advocate High Court
Office No. 13 Adjacent to
...

- in case of misconduct they will be proceeded under the rules framed by Government of Khyber Pakhtunkhwa for time to time & E&D Rules 2011.
4. If they want to resign from service, they will have to serve one month's prior notice failing which the appointee will have to deposit one month pay in lieu of such notice in the Govt. treasury.
 5. Only one member of the family have right to get appointment against the Retiring Class-IV Servant's/medical invalidation Son's quota. Therefore, if detected at any stage on that quota other than one (01) family member has taken appointment, the proceeding will be initiated for termination of service of the appointee over and above the quota will recovery of payment received through irregular appointment on the charges of concealing facts.
 6. They should join the post within 15 days of issuance of this order. The DDO concerned should furnish the certificate to the fact that the candidate appointed has join the post or otherwise after fifteen days' issuance of this order.

7. They should produce Health and Age Certificate from Medical Superintendent DHQ Hospital Abbottabad within seven days of taking over charge.
8. They should not be handed over charge, if their age exceeds 40 year or below 18 years.
9. Age relaxation is granted to S.No 18 in the light of Govt of Khyber Pakhtunkhwa Establishment and Administration Department (Establishment Wing) Notification No. SOE-III (E&AD) 2-1/2007 dated 01-03-2008 & of even number dated 25-10-2011
10. They should provide character certificate duly verify by the Two Gazetted Officers at the time of taking over charge.
11. They will be on probation for a period of One year.


MUHAMMAD SHAIKAT
DISTRICT EDUCATION OFFICER M
ABBOTTABAD

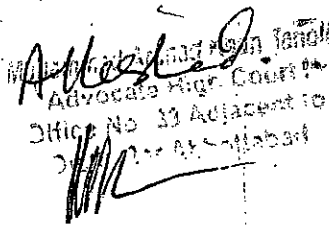
Dated. 10/10/2020

Endst No. 5626-32 /EB-III/Appointment Class-IV

Copy Forwarded to the:-

1. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Abbottabad.
3. PS to Secretary to Govt of Khyber Pakhtunkhwa Elementary and Secondary Education Department Peshawar.
4. Principal/Headmasters of the concerned schools.
5. All SDEOS District Abbottabad.
6. Official Concerned.


DISTRICT EDUCATION OFFICER M
ABBOTTABAD

cje

Advocate High Court
Office No. 33 Adjacent to
At Abbottabad

CANCELLATION OF APPOINTMENT ORDER

1. WHEREAS, Mr. Shahsawar, Ex-PST (Retired on medical ground on 26-09-2001) GPS Kothera submitted an application alongwith relevant documents / Affidavit regarding appointment of her daughter as PST (BPS-12) namely Mst. Syeda Kiran Batool on Medical /Invalidation quota and same was forwarded to DEO (Female) Abbottabad vide No. 1524 dated 24-02-2020.
2. WHEREAS, Mr. Shahsawar, submitted another application vide diary No. 2545 dated 16-06-2020 regarding appointment of his son namely Mr. Syed Ishtiaq Ul Hasnain as C-IV alongwith relevant documents / Affidavit and he was appointed as C-IV on the recommendations of DSC vide appointment order No. 5626-32 dated 10-10-2020.
3. WHEREAS, a Summon No. 107-CO dated 26-01-2024 received from the ACE Abbottabad regarding provision of information in respect of appointment of son & daughter of Mr. Shahsawar vide diary No. 481 dated 29-01-2024.
4. WHEREAS, after probing into the matter, it has been detected that Mr. Shahsawar concealed the material facts and fraudulently availed the Medical Invalidation Quota twice i.e for his son & daughter from the DEOs (Male & Female) Abbottabad which is violation of the Civil Servant (APT Rules 1989) Amendments in Rule 10 Govt. of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No. SO (R-VI) E&AD /1-3/2015 dated 19-04-2016, wherein only one of the children of Civil Servant may be appointed.

NOW THEREFORE, in pursuance to the TERMS & CONDITION No. 05 of the appointment order No. 5626-32 dated 10-10-2020 read with Civil Servant (APT Rules 1989) Amendments in Rule 10 Govt. of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No. SO (R-VI) E&AD /1-3/2015 dated 19-04-2016, I Mr. Muhammad Tanveer, District Education Officer (M) Abbottabad being Competent Authority cancel /withdraw the Appointment Order of Mr. Ishtiaq Ul Hasnain, Cook GHS Sarcela mentioned at Serial No. 32 presently posted at GHSS No. 1 Abbottabad with immediate effect.

202
District Education Officer (M)
Abbottabad

dated Abbottabad the 31-01-2024.

Endst-No. 589-96

- ✓1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary E&SED Khyber Pakhtunkhwa, Peshawar.
- ✓3. DEO (F) Abbottabad.
- ✓4. Principal GHSS No. 1 Abbottabad with the direction to recover the amount illegally drawn by the said C-IV.
- ✓5. District Accounts Officer Abbottabad.
- ✓6. Assistant Director Anti-Corruption Hazara Division with the request to lodge FIR against Mr. Ishtiaq ul Hasnain and Mr. Shahsawar Ex, PST Resident of Gadlania P.O Khas Tarnawai Tehsil & District Abbottabad under the relevant provision of the law of the land.
7. Mr. Ishtiaq Ul Hasnain Son of Shahsawar Resident of Gadlania P.O Khas Tarnawai Tehsil & District Abbottabad.
8. Office copy

Ummar
District Education Officer (M)
Abbottabad

CFC
Attes Lad
Office No. 33 Adjacent to
District Abbottabad

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

Annex - D

APPEAL AGAINST THE ORDER OF DISTRICT EDUCATION
OFFICER MALE ABBOTTABAD WHEREIN THE APPOINTMENT
ORDER OF THE APPELLANT WAS CANCELLED/WITHDRAWN.

P-15

Respectfully Submitted,

1. That my father Syed Shaisawar was retired on the basis of Medical Invalidation in the year 2001 from GPS Kothera Abbottabad and my real sister submitted an application for appointment as teacher on the basis of reserved quota and her case was forwarded by the office of DEO : male Abbottabad on 24.2.2020.

2. That in the meanwhile some posts of Naib Qasids were available in the office of DEO Male Abbottabad and I applied for the post not against any quota but against general quota and I was appointed against the invalidation quota and after selection document regarding son quota were obtained from me.

3. That during the process the application of my sister was also accepted and she was appointed as Primary Teacher in the establishment of DEO Female Abbottabad in the same year 2020.

4. That I have served the department from 2020 to date with full devotion, dedication and upto the entire satisfaction of the superiors and I have appointed against the son quota just to adjust another candidate against the general seat.


5. That on an anonymous application submitted to the Anticorruption department which was referred to DEO Male Abbottabad my appointment orders dated 10.10.2020 has been cancelled/withdrawn despite of the fact that the case of my sister was forwarded to DEO Female by the office of DEO Male Abbottabad and the irregularity was committed by the same office by referring a case to DEO Female and appointment of another person against the same quota. (Copy of the order of DEO Male Abbottabad is attached)


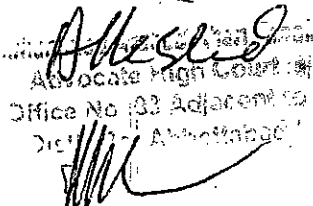
6. That as stated above I have not submitted application against same quota but were adjusted against the quota by the office of education department by mistake or in order to adjust any other candidate.

In the light of above submissions it is therefore requested that the order of DEO Male Abbottabad dated 31.1.2024 may graciously be cancelled and I may please be restored to my services.

Dated / 0 February, 2024

Yours obediently,


(Ishtiaq ul Husnen)
Class IV
Village Guldanian,
P.O Turnawai,
Tehsil & District Abbottabad



Advocate High Court
Office No 103 Adjacent to
District Abbottabad

کورٹ فیس

وکالت نامہ

The Service Tribunal KPK Peshawar بعدالت

Syed Ishaq ul-Hassan نام Govd KPK Peshawar عنوان

Appellant منجانب

Service Appeal نوعیت مقدمہ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Adv. Muhammad Arshad Khan Tanoli Asc of Pakistan at At

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل
② Muhammad Ibrahim Adv Hc At
صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر وگرنہ

کرنے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختمہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

2024 17/11/24 المرقوم:

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