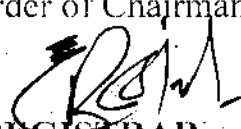


FORM OF ORDER SHEET

Court of _____

Appeal No. 750/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/06/2024	<p>The appeal of Mr. Abdullah re-filed today by registered post through Mr. Muhammad Riaz Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 25.06.2024. Counsel for the appellant has been informed telephonically .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 750 / 2024

Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O Komila,
Tehsil Dassu, District Kohistan.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page #	Annexure
1.	Service appeal along with affidavit	1 to 9	
2.	List of books	10	
3.	Copy of appointment order	11	"A"
4.	Copy of attendance register	12-14	"B"
5.	Copy of impugned order dated 26.06.2021	15	"C"
6.	Copies of departmental appeal and order dated 08.05.2024	16-18	"D" & "E"
7.	Copy of reinstatement order dated 31.08.2023	19	"F"
8.	Wakalatnama	20-21	


...APPELLANT

Through

Dated: 30.05.2024


(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

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

Service Appeal No. 750 /2024

Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O Komila,
Tehsil Dassu, District Kohistan, *SPST, GPS, Ucher Nala Kohistan upper*
...APPELLANT

VERSUS

1. District Education Officer (Male), Kohistan Upper.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa,
Peshawar.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974, AGAINST THE IMPUGNED OFFICE
ORDER BEARING ENDST. NO.4400-07 DATED
26.06.2021 ISSUED BY THE RESPONDENT NO.1,
WHEREBY, THE RESPONDENT NO.1 IMPOSED
MAJOR PENALTY OF REMOVAL FROM SERVICE
UPON THE APPELLANT AS WELL AS AGAINST
THE IMPUGNED ORDER BEARING

NO.3417/FILE.563/RTIP.F.ABDUL LAH/KOHISTAN
UPPER/2024 DATED 08.05.2024 ISSUED BY THE
RESPONDENT NO.2, WHEREBY, THE
RESPONDENT NO.2 DISMISSED/ REJECTED THE
DEPARTMENTAL APPEAL OF THE APPELLANT,
ARE ILLEGAL, UNLAWFUL, WITHOUT LAWFUL
AUTHORITY, PERVERSE, ARBITRARY,
FANCIFUL, AGAINST THE RELEVANT LAW,
RULES AND REGULATIONS, BASED ON
MALAFIDE AND CONSEQUENTLY OF NO LEGAL
EFFECT UPON THE RIGHTS OF THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL, THE IMPUGNED OFFICE
ORDER BEARING ENDST. NO.4400-07 DATED
26.06.2021 AND IMPUGNED ORDER BEARING
NO.3417/FILE.563/RTIP.F.ABDULLAH/ KOHISTAN
UPPER/2024 DATED 08.05.2024 ISSUED/ PASSED
BY THE RESPONDENTS NO.1 & 2 RESPECTIVELY
MAY GRACIOUSLY BE SET-ASIDE AND THE
APPELLANT MAY KINDLY BE REINSTATED INTO
SERVICE WITH ALL BACK BENEFITS. ANY
OTHER RELIEF WHICH THIS HONOURABLE
TRIBUNAL DEEMS FIT AND PROPER IN THE
CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth: -

1. That the appellant was appointed as Primary School Teacher vide order bearing Endst. No.8577-85 dated 11.12.2006. (Copy of appointment order is annexed as Annexure "A").
2. That since her appointment, the appellant was performing her duties with great zeal and zest to the entire satisfaction of her superiors.
3. That the appellant remained absent for few days due to illness and that too was brought into the notice of her high-ups and appellant never remained absent as alleged. (Copy of attendance register is annexed as Annexure "B").
4. That the respondent No.3 without adopting legal procedure/ codal formalities, removed the appellant from service by imposing major penalty vide impugned order bearing No.4400-07 dated 26.06.2021. (Copy of impugned order dated 26.06.2021 is annexed as Annexure "C").

5. That feeling aggrieved from the impugned order, the appellant filed a departmental appeal before the respondent No.2, which was dismissed/ rejected by the respondent No.2 and communicated vide impugned order bearing No.3417/File.563/RTIP.F.Abdullah/Kohistan Upper/2024 dated 08.05.2024. (Copies of departmental appeal and order dated 08.05.2024 are annexed as Annexure "D" & "E").
6. That the appellant being aggrieved from the impugned orders dated 26.06.201 and 08.05.2024, seeks the gracious indulgence of this Honourable Tribunal, inter-alia, on the following grounds: -

GROUNDS: -

- a) That the impugned order dated 26.06.2021 is illegal, unlawful, without lawful authority, arbitrary, perverse, fanciful, against the relevant law, rules and regulations and based on malafide, hence, liable to be set aside.

- b) That the appellant never remained absent as alleged and the entire illegal proceedings were carried out fictitiously, while sitting in office by the respondent No.1 out of the malafide.
- c) That, before imposing the impugned penalty, no publication as required under Rule 9 of E&D Rules, 2011 was ever made in the leading newspaper, commonly available in the district of the appellant. The reference of newspaper publication in the impugned order is not commonly available in the area of the appellant, hence, the impugned order is wholly illegal, unlawful, without lawful authority and of having no legal effect.
- d) That no inquiry into the alleged allegations was ever conducted and the impugned penalty was imposed without having the allegations proved.
- e) That the appellant was never confronted order, appellant was not put on notice to

present her view point/ explanation under the doctrine of audi-alterm-partem, hence, the impugned order is not sustainable and maintainable under the law on this very sole ground.

- f) That on same set of allegation C howkidar/ Naib Qasid of the same school was removed and this worthy Tribunal accepted the appeal and allowed all back benefits. (Copy of reinstatement order dated 31.08.2023 is annexed as Annexure "F").
- g) That no evidence worth name was attempted to collect by the respondent No.3 against the appellant for the alleged absence from the duty and she has been condemned on flimsy and perverse ground with malafide intention.
- h) That appellant had a long unblemished service record at her credit and she has been removed from service with a single stroke of pen without observing the due process of law and having the allegations proved.

- i) That no complaint was ever filed by any one against the appellant for her being absent from duty as alleged on any working day with any authority.
- j) That the appellant has unblemished service career as the appellant was performed her duties with great zeal and zest and never remained negligent in performing of her assigned duties. Similarly, neither any departmental nor any public complaint is available against the appellant.
- k) That the respondents No.2 & 3 have not rendered any cogent, confidence and inspiring findings while delivering their impugned orders.
- l) That the other points will be agitated at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of the instant service appeal, the impugned office order bearing Endst. No.4400-07 dated 26.06.2021 and impugned order bearing No.3417/File.563/

RTIP.F.Abdullah/Kohistan.Upper/2024 dated 08.05.2024 issued/ passed by the respondents No.1 & 2 respectively may graciously be set-aside and the appellant may kindly be reinstated into service with all back benefits. Any other relief which this Honourable Tribunal deems fit and proper in the circumstances of the case.


...APPELLANT

Through

Dated: 30.05.2024


(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath 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 Tribunal.


...APPELLANT

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. _____/2024

Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O Komila,
Tehsil Dassu, District Kohistan.

...APPELLANT

VERSUS

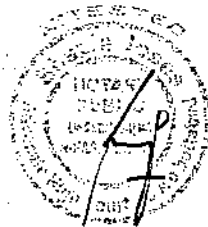
Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O
Komila, Tehsil Dassu, District Kohistan, do hereby solemnly affirm and
declare on oath 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 from this Honourable Tribunal.



30/5/2024

DEPONENT

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

Service Appeal No. _____/2024

Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O Komila,
Tehsil Dassu, District Kohistan.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary
Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan, 1973.
2. All relevant service laws.
3. Other relevant case law will be cited at Bar.


...APPELLANT

Through

Dated: 30.05.2024

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY KOHISTAN

A/11
 14/11/2006
 11/11/2006
 10/11/2006
 09/11/2006
 08/11/2006
 07/11/2006
 06/11/2006
 05/11/2006
 04/11/2006
 03/11/2006
 02/11/2006
 01/11/2006

APPOINTMENT ORDER

Consequent upon the approval of Departmental Selection Committee, the competent authority has been pleased to appoint the following (Male) Trained candidates of Tehsil Office Fresh Union Council (who) against the vacant Posts of PTC in BPS-07 (Rs. 2555-140-8755) plus usual allowances as admissible under the rules, on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools order against each with immediate effect in the interest of public service.

S.#	Name of candidate	Father's Name	Residence/ UIC	Appnt	School where posted	Remarks
1	M. Nabi	Samandar	Sazin	PTC	GPS Bhalal Kot	Agate V. Post
2	Fazal Rabbi	Alam Geer	Sigloo	PTC	GPS Dabba S60	Agate V. Post
3	Juma Khan	Said Akbar	Sigloo	PTC	GPS Dogah Razika	Agate N.C. Post
4	M. Bashir	Amdal Shah	Sigloo	PTC	GPS Dogah Razika	Agate N.C. Post
5	Sahib Zada	Haji Bhadar	Sigloo	PTC	GPS Dalgel Abad	Agate N.C. Post
6	M. Mustafa	Rajee Akbar	Sigloo	PTC	GPS Dalgel Abad	Agate N.C. Post
7	M. Asim	Abdul Mateen	Dasau	PTC	GPS Uchar Malah	Agate V. Post
8	Said Ur Rahman	Dar Jahan	Komila	PTC	GPS Arpola	Agate N.C. Post
9	Jahan Zeb Khan	Abdar	Komila	PTC	GPS Arpola	Agate N.C. Post
10	Abdul Mateen	Zourdas Khan	Komila	PTC	GPS Arpola	Agate N.C. Post
11	Gul Shah Zida	Raj	Komila	PTC	GPS Ramal	Agate N.C. Post
12	M. Bashir	Abdul Qayoum	Komila	PTC	GPS Ramal	Agate N.C. Post
13	Shakeel Khan	Brother Khan	Kuz Jalkot	PTC	GPS Charloo	Agate N.C. Post
14	Saffoor Khan	SKindar Khan	Kuz Jalkot	PTC	GPS Jalkot	Agate N.C. Post
15	Abdul Mallik	Haji Kaptan	Thooth	PTC	GPS Jachol	Agate V. Post
16	Aurang Zeb	Raheem Deen	Thooth	PTC	GPS Thooth	Agate N.C. Post
17	Abdullah Farooq	M. Rafiq	Thooth	PTC	GPS Afreenabad	Agate N.C. Post
18	Russain Ali	Haji Harang	Thooth	PTC	GPS Afreenabad	Agate N.C. Post
19	Noor Nabi	M. Sadique	Thooth	PTC	GPS Isgal	Agate V. Post
20	Didar Shah	Abdul Qudoos	Gabrial	PTC	GPS Gabrial	Agate V. Post
21	Amanullah	Juma Khan	Kiroen	PTC	GPS Uthoor	Agate N.C. Post
22	Sher Zaman	Jan Khan	Karnen	PTC	GPS Chawal Dong	Agate V. Post
23	Nimat Aman	Nawab	Harban	PTC	GPS Bakhi No.1	Agate N.C. Post
24	Abdur Raziq	Abdul Shakoos	Harban	PTC	GPS Bakhi No.1	Agate N.C. Post
25	Abdul Qaycum	M. Ghulam	Harban	PTC	GPS Bakhi No.1	Agate N.C. Post
26	Hussain Ahmad	Walli Ahmad	Harban	PTC	GPS Boer	Agate V. Post
27	Saif Ullah	Qadam Khan	Soo	PTC	GPS Gaidor No.1	Agate N.C. Post
28	Ahsan Shah	Ahmed Shah	Soo	PTC	GPS Gaidor No.1	Agate N.C. Post
29	A. Khaboor Shah	S. Karim Shah	Soo	PTC	GPS Janisabad	Agate N.C. Post
30	Hikmat Shah	Rabeen Shah	Soo	PTC	GPS Janisabad	Agate N.C. Post
31	Imam Khan	Said Bazar	Soo	PTC	GPS Janisabad	Agate N.C. Post
32	Mutbar Shah	Abdul Mateen	Bar Jalkot	PTC	GPS Bar Gahcen	30/1/96
33	M. Zaboos	Abdul Mallik	Bar Jalkot	PTC	M/S Dhar	01/1985
34	Abdullah	Qalandar	Bar Jalkot	PTC	GPS Gikandar Qadir	1/6/1976
35	M. Saddiqui	Saddar Khan	Bar Jalkot	PTC	GPS -do-	3/6/1979

CONDITIONS:-

- Their appointments are purely on temporary basis and liable to termination at any time / stage without assigning any reason/notice.
- Their Certificates if not verified earlier, should be verified by the DDO (M) to Mr. Fazal-e-Razaq Dy. DO S&L, Kohistan before handing over their charge.
- Charge reports should be submitted to all concerned.
- No YADA is allowed to any one.
- They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong.
- In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
- They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
- They should produce age and health certificate from EDO Health, Kohistan before taking over charge.
- They should not be allowed over charge and their salaries should not be drawn up during the absence of Disbursing Officers concerned till verification of their Degrees/ Certificates etc. from the concerned Universities/ Boards/ Institutions by the concerned DDO's.

Executive District Officer
 Schools & Literacy Kohistan

857285 / App PTC's (M) UIC Wise M&M 12006 Dated Kohistan the 11/11/2006.
 Copy of this above is forwarded to:-
 1. Director Schools & Literacy NWFP Peshawar.
 2. Minister of Education NWFP Peshawar.
 3. Secretary Government of NWFP (S & L) Department Peshawar.
 4. District Nazim Kohistan
 5. District Coordination Officer Kohistan with reference your notification No. 10202-85 dated 10/11/2006 & 10-07-10 dated 04/11/2006.
 District Accounts Officer Kohistan.
 District Officer Schools & Literacy Kohistan.
 District Officer (P) S&L Kohistan.
 Candidate concerned.

Executive District Officer
 Schools & Literacy Kohistan

Your suggestions will be welcome

18/06/2022

Day	Time	Activity	Time	Activity	Time	Activity	Time	Activity
1	8:30	AM	18:35	AM	8:30	AM	18:35	AM
2	8:30	AM	12:35	AM	8:30	AM	12:35	AM
3	8:30	AM	12:35	AM	8:30	AM	12:35	AM
4	8:30	AM	12:35	AM	8:30	AM	12:35	AM
5	8:30	AM	12:35	AM	8:30	AM	12:35	AM
6	8:30	AM	17:35	AM	8:30	AM	17:35	AM
7	8:30	AM	11:20	AM	8:30	AM	11:20	AM
8	8:30	AM	12:35	AM	8:30	AM	12:35	AM
9	8:30	AM	12:35	AM	8:30	AM	12:35	AM
10	8:30	AM	12:35	AM	8:30	AM	12:35	AM
11	8:30	AM	12:35	AM	8:30	AM	12:35	AM
12	8:30	AM	11:30	AM	8:30	AM	11:30	AM
13	8:30	AM	12:35	AM	8:30	AM	12:35	AM
14	8:30	AM	12:35	AM	8:30	AM	12:35	AM
15	8:30	AM	12:35	AM	8:30	AM	12:35	AM
16	8:30	AM	12:35	AM	8:30	AM	12:35	AM
17	8:30	AM	12:35	AM	8:30	AM	12:35	AM
18	8:30	AM	12:35	AM	8:30	AM	12:35	AM
19	8:30	AM	12:35	AM	8:30	AM	12:35	AM
20	8:30	AM	12:35	AM	8:30	AM	12:35	AM
21	8:30	AM	12:35	AM	8:30	AM	12:35	AM
22	8:30	AM	12:35	AM	8:30	AM	12:35	AM
23	8:30	AM	12:35	AM	8:30	AM	12:35	AM
24	8:30	AM	12:35	AM	8:30	AM	12:35	AM
25	8:30	AM	12:35	AM	8:30	AM	12:35	AM
26	8:30	AM	12:35	AM	8:30	AM	12:35	AM
27	8:30	AM	12:35	AM	8:30	AM	12:35	AM
28	8:30	AM	12:35	AM	8:30	AM	12:35	AM
29	8:30	AM	12:35	AM	8:30	AM	12:35	AM
30	8:30	AM	12:35	AM	8:30	AM	12:35	AM
31	8:30	AM	12:35	AM	8:30	AM	12:35	AM

13401-9007299-7 PST
 13401-2941616-1
 0344415944
 0346-853277

Office of the
 Director of
 Health Services
 13401-9007299-7
 13401-2941616-1
 0344415944
 0346-853277

6/12

attested

Integrated High Court
Office: 10, Feroz Khan Noon Road, Faisalabad
10000-13532

رجسٹرڈ حاضری مدرسین سپین

2020

سال دسمبر

نام: عبد اللہ
 پوسٹ: SPSI
 13401-2241616-1
 قومی شناختی کارڈ نمبر:
 فون نمبر: 03444415944

روز	صبح	رات	صبح	رات	صبح	رات	صبح	رات	صبح	رات	صبح	رات	صبح	رات	صبح	رات	صبح	رات	
P	P	P	Poleo																1
P	P	P																	2
P	P	P																	3
P	P	P																	4
P	P	P	N/A	12:35	N/A	8:30													5
P	P	P	SUNDAY																6
P	P	P	N/A	12:35	N/A	8:30													7
P	P	P																	8
P	P	P	N/A	12:35	N/A	8:30													9
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									10
P	P	P	N/A	12:00	N/A	8:30	Am	12:00	Am	8:30									11
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									12
P	P	P	SUNDAY																13
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									14
P	P	P	PDD Training				X	DDD Training											15
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									16
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									17
P	P	P	N/A	11:30	N/A	8:30	Am	11:30	Am	8:30									18
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									19
P	P	P	SUNDAY																20
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									21
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									22
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									23
P	P	P	N/A	12:35	N/A	8:30	Am	12:35	Am	8:30									24
P	P	P																	25
P	P	P																	26
P	P	P	SUNDAY																27
P	P	P																	28
P	P	P																	29
P	P	P																	30
P	P	P																	31

No teacher at school

(Your suggestions will be welcome)

Sub Division
 Education Officer
 Faisalabad

18/06/2020

Case No.	Case Name	Case Type	Case No.	Case Name	Case Type	Case No.	Case Name	Case Type	Case No.	Case Name	Case Type
13401-9007202-7	SPST	SPST	13401-1509005-7	SPST	SPST	0346-85732-77	0346-85732-77	0346-85732-77	0346-85732-77	0346-85732-77	0346-85732-77
1	Police on duty X		2			3			4		
5			6			7			8		
9			10			11			12		
13			14			15			16		
17			18			19			20		
21			22			23			24		
25			26			27			28		
29			30			31			32		

Your suggestions will be welcome)

14

OFFICIAL

High Court

2021

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) KOKHISTAN (UPPER)

Email: emiskohistan@yahoo.com * Phone Number: 0998407128

OFFICE ORDER/REMOVAL FROM SERVICE

1. Whereas Mr. Abdullah, SPST GPS Uchar Nala Kohistan Upper remained willfully absent from his duty without proper permission, intimation or leave.

2. Whereas he was found absent during visit of Deputy District Education Officer (M) Kohistan on 03.12.2020, 24.02.2021 and 29.04.2021.

3. Whereas he was called several times to resume his official duty properly, but he badly failed to comply the Departmental Orders.

4. Whereas he has drawn his salary illegally during his absent period without performing his duty.

5. Whereas a show cause notice was served upon him vide this office order No. 2776-81 Dated: 09.06.2021, which was delivered to him, vide his proper acknowledgment and dated signature.

6. Whereas he replied to the show cause which was termed as unsatisfactory and non-convincible.

7. He badly failed to avail the chance of personal hearing.

8. Whereas while going through the material on record and personal observations of the undersigned all the charges/allegations levelled against him have been proved to the full satisfaction of the undersigned.

Therefore the undersigned being the competent authority do hereby impose Major Penalty of Removal from Service, upon Mr. Abdullah, SPST GPS Uchar Nala Kohistan Upper under Rule 4(b) of E&O Rules 2011, with immediate effect, in the interest of public service.

(AMUHAMMAD AMIN)

District Education Officer (M)

District Kohistan Upper.

Dated: 24/6/2021

End No. 4480-07

Copy for information and necessary action forwarded to:

1. The PA to Director Elementary & Secondary Education, Shyber Pakhtunkhwa, Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The District Accounts Officer Kohistan Upper.
4. The PA to District Education Officer (M) Kohistan Upper.
5. The Sub-Divisional Education Officer (M) Dassa Kohistan Upper.
6. The B&AO local office to stop the pay of the concerned teacher immediately.
7. The Ex-SPST Mr. Abdullah, GPS Uchar Nala Kohistan Upper.
8. Copy to Master file for record.

Handwritten signature and stamp of District Education Officer (M) Kohistan Upper.

Handwritten initials: C/S

Handwritten signature and initials: attested

Stamp: District High Court, Peshawar, dated 24/6/2021

08-07-2021 14:00

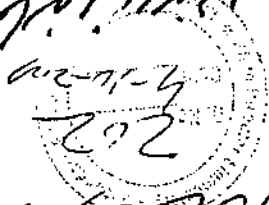
13401-15090057-0546-8673277

Handwritten notes and signatures in the top right corner.

Handwritten notes in the upper middle section.

Handwritten notes in the middle section.

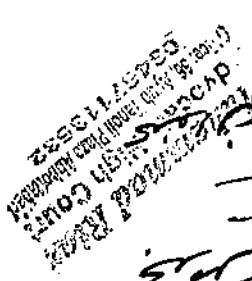
Handwritten notes in the lower middle section.



Handwritten notes in the lower section.

Handwritten notes in the bottom middle section.

Handwritten notes in the bottom section.



D/116

Handwritten text at the top left, possibly a name or title.

13401-1509057-0346-8573277

08-07-2021

Handwritten notes in Arabic script, including:

- ⑤ ...
- ④ ...
- ③ ...

Handwritten notes in Arabic script, including:

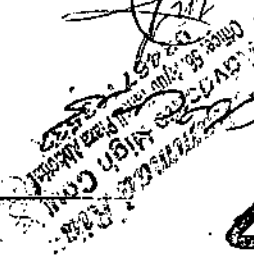
- ② ...
- ① ...

Handwritten notes in Arabic script, including:

- ② ...

Handwritten notes in Arabic script, including:

- ① ...





Reg.

E/18 (4)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

2117

To

Mr. Abdullah,
EPST GPS Aochar Nala Kohistan Upper
Cell No. 0346-8573277

attskd
[Signature]

Munammad Raza
Advocate High Court
Office: 2nd Floor, Plaza, Peshawar
0346-37413532

Subject - PROVISION OF INFORMATION UNDER RTI ACT 2013

I am directed to refer to your application dated 02.08.2014 and the
order dated 05.08.2014 and to state that your appeal for reinstatement dated 05.08.2014
seen & filed by the Member Director, Elementary & Secondary Education,
Pakhtunkhwa Peshawar.

Dr. A Q Khan
AD RTI & Ombudsman

Encl No _____

Copy forwarded to the -

- 1 P A to Director E&SE KPK Peshawar

Dr. A Q Khan
AD RTI & Ombudsman

F/19

DISTRICT EDUCATION OFFICER (M) / I

KOHISTAN UPPER

Email: miskohistan@yahoo.com Phone No: 0998-207126

attested

Muhammad Riaz
District High Court
S-1, Jinnah Road, Peshawar
Phone: 352713532

OFFICE ORDER/RE-STATEMENT IN SERVICE

1. Whereas Mr. Noor Wali Khan Chowkidar was removed from service vide DEC Kohistan Upper bearing No. 4433-40 dated 26-06-2021
2. Whereas he filed service appeal No. 7914/2021 before Honourable Service Tribunal Hyber Pakhtunkhwa Peshawar. The Honourable Service Tribunal Peshawar accepted his service appeal and re-instated in service with all back benefits vide order dated 28/03/2023.
3. Whereas the department approached the Law Department for getting opinion for filing of CPLA vide No. 2479 DEO (M) KH Dated 20-05-2023
4. Whereas the meeting of the scrutiny committee was held on 07-06-2023 and the case was declared fit for filing CPLA vide letter No. SOL/CAW/8-26 (11) C8/W/2023 702A/23 dated Peshawar the 07-06-2023.

In view of the above, Mr. Noor Wali Khan Chowkidar GFS Uchar Nala District Kohistan Upper is re-instated in service with all back benefits and adjusted as Chowkidar at GPS Uchar Nala Dassu Kohistan Upper with effect from 26.06.2021.

[Signature]
District Education Officer (M)
Kohistan Upper

Ends: No. 4731-37 / Estt. Pry/DEO/ (M) KH Dated: 31 /08/2023.

Copy forwarded of the above is forwarded to the:-

1. PA to Director Elementary and Secondary Education, Hyber Pakhtunkhwa Peshawar
2. The Deputy Commissioner Kohistan Upper.
3. The Sub Divisional Education Officer (M) Dassu Kohistan Upper.
4. The District Monitoring Officer (EMA) Kohistan Upper.
5. The District Accounts Officer Kohistan Upper
6. Incharge DEMIS Branch Local Office.
7. Official concerned.

DIA
put up the
case for
reinstatement
[Signature]
01/09/2023

[Signature]
District Education Officer (M)
Kohistan Upper

[Signature]
Sub Divisional Education Officer
Dassu Kohistan Upper
23

OFFICE OF MUHAMMAD RIAZ
Advocate High Court, office at Abbottabad

To

1. District Education Officer (Male), Kohistan Upper.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

Subject: **NOTICE OF FILING OF SERVICE APPEAL.**

On the instructions of my client, Abdullah son of Qalandar, resident of Uchar Nala Thoki Jalkot, P.O Komila, Tehsil Dassu, District Kohistan, a service appeal is being filed before the Khyber Pakhtunkhwa Service Tribunal, Peshawar. A notice/ intimation of the same is being sent to you for your information.

Dated: 30.05.2024

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad
Office No.56, Ayub Tandi Lawyers Plaza,
Kutchery Compound, Abbottabad
Cell 0346-7113532

