


FORM OF ORDER SHEET

Court of _____

Appeal No. 762/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/06/2024	<p>The appeal of Mr. Khaled Nawaz resubmitted today by himself. It is fixed for preliminary hearing before touring Single Bench at Swat on 04.07.2024. Parcha Peshi given to appellant .</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Khalid Nawaz received today i.e on 03.06.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- The paper used in the printing of grounds of appeal is letter size which is not acceptable.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Four more copies/sets of the appeal along with annexures i.e. Complete in all respect may also be submitted with the appeal.


No. 109 /Inst;/2024/KPST,

Dt. 3/6 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Umar Khitanb Adv.
High Court Swat.

R/Sir,
Re-submitted after Remove all the
objections.


4/6/2024

①

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

Service appeal No. ___/2024.

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 13106

Dated 3/6/24

1. **Khaild Nawaz S/O Amir Aman
Ullah Drawing Master
Government High school
Chancherai Madyan
Swat.....Appellant.**

VERSUES.

1. **Director Elementary and
Secondary Education Khyber
Pukhtoonkh Peshawar.**
2. **District Education Officer
Male Elementary and
Secondary Education
Swat.....Respondents.**

Service appeal under section 4
service tribunal Khyber Pukhtoon
khaw Act, 1974 against the
impugned order/ Removal from
service of Respondent No,2 vide
order No, 5796-99 dated
15/02/2024

Prayer of Service appeal.

It is therefore, most humbly
prayed that on acceptance of
instant service appeal the
impugned office order No,

Filedte-day

Registrar

3/6/24

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHOON KHWA PESHAWAR.

A-NO-762/24

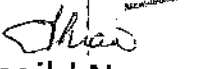
1. Khaïd Nawaz D.M Government High school Chancherai Madyan Swat.Appellant.

VERSUES.


1.The Diretor Elementary and Secondary Education K.P.
Peshawar and others.....Respondents.

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Khaïd Nawaz.....Appellant.

Through


Umar Khitab Advocate High
Court/Darulqaza Mingora Bench.
Cell No. 0345- 9524854

(7)

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

762

Service appeal No ___/2024.

**1. Khald Nawaz S/O Amir Aman Ullah Drawing
Master Government High school Chancherai
Madyan Swat.....Appellant.**

VERSUES.

- 1. Director Elementary and Secondary Education
Khyber Pukhtoonkh Peshawar.**
- 2. District Education Officer Male Elementary and
Secondary Education Swat.....Respondents.**

**Service appeal under section 4 service tribunal
Khyber Pukhtoon khaw Act, 1974 against the
impugned order/ Removal from service of
Respondent No,2 vide order No, 5796-99 dated
15/02/2024**

Prayer of Service appeal.

**It is therefore, most humbly prayed that on
acceptance of instant service appeal the
impugned office order No, 5796-99
dated 15/02/2024 and the respondents orders
may please be declared as illegal, unlawful, with
out law full authority, void and initio and of no
legal effect, hence be set aside and appellant be
re instated in service with all back benefits, so
as to secure the ends of justice.**

**2. Grant any further or better relief that this
Honorable Tribunal may deem just and proper
in the facts and circumstances of the appeal.**

Facts.

- 1) That the appellant is the permanent resident of
langar Khawaza Khela Swat and is law abiding
citizen.**
- 2) That the appellant was initially appointed as
Drawing Mater BPS 15 at Government Middle school
Pechar Matta Swat vide Respondent No. 2 order No**

62

2116-20 dated 28/05/2016(copy appointment as Annex: A)

- 3) That the Respondent No,2 issued the transfer order from Government Middle school Peochar Matta Swat to Government High school Chancherai Madyan Swat.
- 4.)That the appellant moved two applications dated 18/12/2023 to Respondent No,2 due to the missing of the appellant service book (Application dated 18/12/23 as Annex: B & C)
- 5.)That the Respondent No, 2 nominated Mr. Fayaz Aftab Principal Government High school seer Manglowar vide dated 9/1/2024 for to enquire / investigation of missing service book of the appellant.(Nomination letter dated 9/1/2024 as Annex: D)
- 6.)That Respondent No, 2 , I,e. District Education Office Male Swat has unjustifiably , illegally and in sheer violation of law and rules, terminated/ removal from service the delinquent teacher for a ridiculous reason that the service book of the so called delinquent teacher has been lost/ misplaced, despite the fact that keeping of the ibid service book is the direct responsibility of the Respondent No,2 office. (Removal from service/ Impugned order dated 15/2/2024 as Annex: E)
7.)That the Respondent No,2 issued the removal from service order of the appellant due to three (3) days absent from duty.
- 8.)That the appellant is a very punctual and hardworking teacher and no complaint is against the appellant.
- 9)That the appellant moved an application for earned leave with out pay with effect from 01/09/2023 to 31/08/2025 (730 days) which was converted with effect from 20/09/2023 to 18/12/2023 (90 days) vide No, 8607-10 dated 25/09/2023.(Copy of application for earned & Leave sanction order are as Annex: F & G)
- 10) That after the sanction of earned leave the appellant service book in the custody of Respondent No, 2 which was misplace from the concerned dealing assistant.

11). That the enquiry officer submitted the missing service book enquiry report to Respondent No, 2 vide No, 849 dated 18/01/2024. (Enquiry Report as Annex: H)

12.) The appellant submitted departmental service appeal to Respondent No,1 but not yet decided in the prescribed period.(Departmental service appeal as Annex: I)

GROUND.

1)That the impugned order of removal by learned respondent No,2 is un lawful and contrary to the established norms of law , natural justice and sharia.

2)That the said impugned of removal form service of the appellant is quite illegal, unlawful, without lawful authority, without jurisdiction. Hence liable to be set aside.

3)That the appellant is innocent, no proper procedure has been adopted by the concerned authority before the passing the

4)impugned removal order, thus, the same is illegal and void abnatio.

5)That no proper enquiry has been conducted in the case of the appellant.

6)That the absence of the appellant was not intentionally but due to the circumstances which are beyond the control of appellant. Because that the could not attend the enquiry due to the out of District swat and winter vacation with effect from 24/12/2023 to 29/2/2024.

7)That the Respondent No 2 was not competent to pass the impugned order.

8)That the law on the subject is very clear and removal of the appellant is baseless and on proof less grounds, thus is against his legal and fundamental rights enshrined in the service laws , rules, judgments of the superior courts and constitution of Islamic Republic of Pakistan . 1973.

9)That the respondents have not adopted the prescribed procedure as laid down by the law and procedure given in the said rules.

10.)he major penalty of removal from service has been imposed against the

out providing an opportunity to the appellant to clarify the real situation .

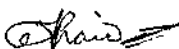
11) That the appellant has Condemned unheard order of removal has been passed without providing opportunity of hearing to the appellant , thus the appellant remained unheard and golden principal of justice " audi alteram partem " has been violated and ignored in very case of the appellant, so the impugned order is liable to be set aside.


12.) That the impugned Order have been passed with out any jurisdiction and lawful authority that as the appellant was recruited through the course of law and therefore, could not be removed without adopting due course of law and terminating him without providing the opportunity of being heard is unlawful and comes in the bound of injustice.

13.) That the appellant is the only source of income of his family and service of the appellant is the only source of livelihood .

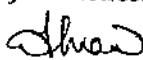
14. That the permission of this Hon" Court other grounds which are not mentioned in this appeal shall be argued at the time arguments.

It is therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned order of respondent No,2 may kindly be set aside and the appellant may graciously be re instated on post/ service with all back benefits.


Khaild Nawaz ...Appellant
Through
Attorney.


Umar Khitab Advocate High Court /
Darulqaza Swat Bench.
Cell No, 0345-9524854

Certificate
Certificated that no such like appeal has earlier been filed before this Honorable Tribunal on the subject matter.


Appellant.....Khaild Nawaz
Through attorney.

5

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHW
PESHAWAR MINGORA BENCH SWAT.

SERVICE APPEAL No. _____/2024

Mr. Khaild Nawaz S/O Amir Amanullah Drawing Master
G.H.S. Chancheri Madyan Swat(Village Langar Khawaz Khela
SwatAppellant.

VERSUS

1. Director Elementary and Secondary Education
2. Khyber Pukhtoon Khaw Peshawar Peshawar and
others..... Respondents

AFFADAVIT.

*It is stated on oath that the contents of this
application are true and correct to the best knowledge and
belief. Moreover, no such like service appeal is pending
before this Honorable Service Tribunal K.P. Peshawar camp
court Swat.*

Khaw
Khaild Nawaz.....Appellant.

Through

Attorney

G. Muraza Khaw
Advocate Oath Commission
No. 175 Date 24/06/24

BEFORE THE SERVICE TRIBUNAL KHYBER

PUKHTOON KHAWA PESHAWAR.

SERVICE APPEAL No. _____/2023.

Mr. Khaild Nawaz Drawing Master Government
High school Chancheri Madyan Swat (Village
Langar Khawaza Khela Swat...Appellant.
VERSUS

1. The Director Elementary and Secondary Education
Khyber Pukhtoonkhw Peshawar.
2. The Disrtrict Education officer Male Swat.....Respondents.

MEMO OF ADRESSES OF THE PARTIES.

1. Khaild Nawaz Drawing Master G.H.S. Chancheri
Madyan Swat.....Appellant

Cell No. 0342- 9605977

Addresses of Respondents.

1. The Director Elementary and Secondary Education
Khyber Pukhoon khawa Peshawar.
2. District Education Officer Male District Courts
Saidu Sharof Swat.

Khaild
Khaild Nawaz.....Appellant.

Umar
Through Council
Umar Khitab advocate High
Cour/Darulqaza Swat.
Cell No. 0345-9524854

Amma 'A G O S



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)

APPOINTMENT

Consequent upon the recommendations of the Departmental Selection Committee, appointment of the following candidate is hereby ordered against the vacant DM post on one year Adhoc School based policy in BPS: 15 (Rs.8500-700-29500) Fixed plus usual allowances as admissible under the Rules and existing policy of the Provincial Government on the terms & conditions given below with immediate effect from the date of in the interest of the public service.

S. #	Name of candidate	Father's Name	D/O Birth	Score	School
1	Khalid Nawaz	Amir Amanullah	01.07.1981	86.98	GMS Peochar

Terms & Conditions

1. No TA/DA.s allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year with effect from 30.05.2016 to 29.05.2017
4. He should not be handed over charge if he exceeds 38 (Thirty Eight) years or is below 18 years of age.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities, anyone found producing bogus certificate/s or degree/s his appointment shall be cancelled and he will be reported to the Law enforcing agencies for further legal action.
6. His service is liable to termination on one month's prior notice from either side. In case of resignation without notice his one month pay /allowances shall be forfeited to the Government treasury.
7. Pay shall not be drawn until and unless a certificate issued by this office that his documents are verified.
8. He should join his post within 30 days of the issuance of this notification. In case of failure to join the post within 30 days of the issuance of this Notification his appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. He will be governed by such Rules and Regulations as may be issued from time to time by the Government.
11. His service shall be terminated at any time in case his performance is found unsatisfactory during his service period. In case of misconduct, he shall be proceeded under the relevant rules & regulations announced from time to time.
12. His appointment is Ad hoc and school based. He shall have to serve at the place of posting and his service is not transferable to any other station.
13. Before handing over charge his documents may be checked and if found bogus or irrelevant as per qualification and rules charge of the post may not handed over.
14. Errors and omissions will be acceptable within the specified period.

(DR. HAFIZ MUHAMMAD IBRAHIM)
DISTRICT EDUCATION OFFICER
SWAT GUL KADA

AT
Umair Khattar
Adm

Kam
واہشند

کریم محمد ولد نیکو

گ
واہشند

محمد علی ولد محمد ایوب خان

شماره کارڈ: 5-7290225-9

Erdst No: ^{2/16-20} /DM/Appointment/Ad hoc/NTS dated: ^{28/5/16}

Copy of the above is forwarded for information & necessary action to: -

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Comptroller of Accounts Swat.
3. The Principal/Headmaster concerned.
4. The Deputy DEO Male Local Office.
5. The B&AO Local Office
6. The Supdt Secondary Local Office.
7. The candidates concerned.
8. PA to DEO Local Office.

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) SWAT GUL KADAL

AFC
[Signature]

Umar Khatib
A.M.

DM RECRUITMENT

Amma! ۲ B (۲)

بھنور جناب DEO صاحب سید و شریف سوات۔

عنوان: درخواست برائے سروس بک گشدگی۔

جناب علی:

گزارش کی جاتی ہے کہ بندہ بحیثیت D.M پوسٹ GMS پیو چار میں بحوالہ رڈ نمبر 20-2116 تاریخ 28-5-2016 کو عمل میں لائی گئی تھی۔

بندہ 21.12.2022 تک GMS پیو چار میں ڈیوٹی سرانجام دے رہا تھا۔ پھر بندے کا تبادلہ چانچرے کو آرڈر نمبر 4411-12 تاریخ 21.12.2022 کو ہوا۔

بندہ GMS پیو چار میں پندرہ دن تک چھٹی لینا چاہتا تھا۔ چھٹی کیلئے درخواست جمع کرائی۔ اور شہزاد جوئیز کلرک ڈی ای او صاحب سوات سے سروس بک وصول کی۔ ڈی ای او آفس کی DM کی متعلقہ کلرک کے حوالہ کر دی۔ چونکہ چھٹی منظور نہیں ہوئی۔ اور بندہ ڈیوٹی سرانجام دیتا رہا۔ جب سروس بک کو دوبارہ شہزاد جوئیز کلرک کے ساتھ پتا کیا۔ تو سروس بک دفتر میں نہیں ملا۔ لہذا آپ صاحبان سے درخواست کی جاتی ہے۔ کہ بندہ کے سروس بک کے بارے میں متعلقہ زمرہ سے پوچھ لیں اگر نہیں مل رہا تو ڈپلیکیٹ سروس بک بنوانے کی احکامات صادر فرمائیں تو عین نوازش ہوگی۔

Forwarded to DEO (M)
Swat for further info please

DM العارض خالد نواز

جی ایچ ایس چانچرے سوات۔

AT
Umar Khitab
Advocate High Court

کامیاب

کامیاب

کامیاب

واہشہ

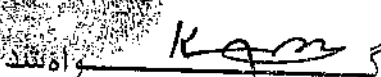
Annex: 9
کھوڑا - DEO صاحبان (صوبہ سوات)
عنوان: سروس تک گھنٹی

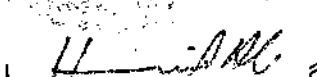
صاحبِ عالی: گزارش کی جاتی ہے کہ سروس تک آفس میں گم ہو گیا ہے۔ اس بار سروس تک علی بیاد در فلٹر سے بار بار لوٹنے کے باوجود نہیں ملا۔ یعنی سروس تک علی بیاد، جو سروس تک نے Missplace کیا ہے۔ لہذا وہ مسئلہ فلٹر سے پوچھ کر منسلک علی تک جائے۔

العارض
Kushtaq
DM خالد فوار
9HS صوبہ سوات

ATC

Umar Khitab
Advocate High Court


واہ شہد
کریم محمد ولد نیکو


واہ شہد
محمد اویس ولد نیکو

Amma: D= (10)



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

#: (0946) 9240228
Email: deomswat@gmail.com

#: (0946) 9240228
Web: www.sed.edu.pk

OFFICE ORDER

Consequent upon application received from Mr. Khalid Nawaz DM GHS Chanchary regarding misplacement of service book. The competent authority is pleased to nominate Mr. Fayaz Aftab Principal GHS Seer District Swat as inquiry officer to enquire the case on the bases of the statements of both the teacher & Junior Clerk of local office. The inquiry officer is required to record statements of both officials concerned and fix responsibility. The enquiry officer is requested to submit detail report (Finding and recommendation) to this office within 07 days for further necessary action please.

(Muhammad Riaz)

DISTRICT EDUCATION OFFICER (M)
SWAT.

Endst: No: M/50 /P File No.33/ DM Dated 9/11 /2024.

Copy forwarded for information to the:

- 1- Mr. Fayaz Ahmad Principal GHS Swat Swat.
- 2- P.A to District Education Officer (M) Swat the local office.

DISTRICT EDUCATION OFFICER (M)
SWAT

Umar Khitab
Advocate High Court

واہشند

Kam

کریم محمد ولد نیک محمد

واہشند

H. Khilji

11 11 2024



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT.

Amman; E/11

NOTIFICATION

1. Whereas Mr. Khalid Nawaz DM GHS Chanchary Swat, remained absent from duty w.e.f 19-12-2023 as per report of the Headmaster GHS Chanchary Swat vide letter No.195 dated 27-12-2023.
2. Whereas a Call notice as required under the Rules 2011 was sent on his home address vide Endst.No.4266 dated 30.12.2023, but he failed to resume his duty.
3. Whereas a final absence notice mandatory under article 9 of the E&D Rules 2011, was also published in "The Daily Mashriq" and "Daily Chand" on 31-01-2024.
4. Whereas he was asked in the said notice to resume his duty and explain the reasons of his absence but he failed to resume his duty within the stipulated period.
5. Whereas the District Education Officer (M) Swat being the competent authority after having considered the charges and evidences on record against him found as proved.
5. Now, Therefore I Muhammad Riaz District Education Officer (M) Swat being the competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, do hereby impose upon him "the major penalty of **"REMOVAL FROM SERVICE"** under the Rules 4 (b) (iii) of the ibid Rules with effect from 19-12-2023 in the interest of public service.

(MUHAMMAD RIAZ)
DISTRICT EDUCATION OFFICER (M)
SWAT

Endst:No: 5786-88 /P.F/33/Khalid Nawaz/DM/DEO/M.

Dated 15/2/2024

Copy forwarded to:

- 1- The Director Elementary & Secondary Education KPK Peshawar.
- 2- The District comptrollers of Account Swat at Saidu Sharif.
- 3- The District Monitoring EMA District Swat.
- 4- The Headmaster GHS Chanchary Swat.
- 5- P.A to District Education Officer (M) Swat the local office.
- 6- Mr.Khalid Nawaz S/O Amir Amanullah R/O Langar P.O Khwazakhela Tehsil Khwazakhela District Swat Contact No. 03439615696.

DISTRICT EDUCATION OFFICER (M)
SWAT

Umar Khan
Advocate High Court

واہشہ

Kam

کریم محمد ولد نیک محمد

واہشہ

محمد علی ولد محمد ایوب خان

محمد علی ولد محمد ایوب خان

Amma: F" Ahmed 1/6 (K)
5/9/23

TO: -

The District Education Officer (M)
Saidu Sharif swat

Through: Head Master GHS Chanchary swat

Subject: - APPLICATION FOR EARNED LEAVE WITHOUT PAY W.E.F 01-09-2023 TO 31.08.2025(730 DAYS)

Respectfully,

With reference to the subject cited above, It is humbly requested that I have been serving as D.M post BPS -15 at Govt High School Chanchary District Swat since 01.6.2016 up to date. I have been performing my duty regularly and diligently. I build house for myself at Village Langar Khwaza Khela P.O & Tehsil Khwaza Khela District Swat due to old house is congested and large family is residence in the old home, therefore I cannot attend my duty regularly. With utmost respect,

I would be highly obliged if you kindly grant me leave without pay w.e.f 01-09-2023 TO 31.08.2025 (730) DAYS as without pay (PERIOD OF leave 2 YEARS)

I shall remain very thankful to you for this act of kindness.-

- Enclose: (1) Application.
(2) CNIC
(3) Payroll copy
(4) Leave Account Form
(5) Service Book copy.
(6) 1st appointment order.

Forwarded to the
D.E.O (M) Swat for
info please

Yours obediently

(KHALID NAWAZ)
D.M BPS -15 GHS CHANCHARY
DISTRICT SWAT

DISTRICT SWAT
D.M BPS -15 GHS CHANCHARY
(KHALID NAWAZ)

وہاشد

کریم محمد ولد نیکو

وہاشد

حمید علی ولد محمد ایوب خان

Annex: 4" (13)



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

#: (0946) 9240228
Email: deomswat@gmail.com

#: (0946) 9240228
Web: www.sed.edu.pk

GRANT OF LEAVE

Sanction is hereby accorded to the grant of Earned leave in respect of Mr. Khalid Nawaz S/O Amir Amanullah Post DM BPS-15 at GHS Chancharey Madyan swat for the period with effect from 20-09-2023 to 18-12-2023 (90 days) with full pay as due and admissible to him under the leave rules 1981.

NOTE:

1. Necessary entries to this effect should be made in his S/Book

(Muhammad Riaz)
DISTRICT EDUCATION OFFICER
(M) SWAT

Endst: No. 3607-10 / File-33/DM Dated: 19 /2023

Copy of the above is forwarded:-

1. The District Comptroller of Accounts Swat at Saidu Sharif.
2. The Budget and Account Office (M) District Swat local office.
3. The Principal / Headmaster concerned.
4. P.A to the District Education officer (M) Swat local office.
5. The Official Concerned.

DISTRICT EDUCATION OFFICER
(M) SWAT

Amir
FMM

ATC

Umar Khitab
Advocate High Court

واہشند

Kam

کریم محمد ولد نیک

واہشند

H. M. M.

Amma: H 16

OFFICE OF THE PRINCIPAL
Government High School Seer District Swat

PH 0946-835455

Email: ghsseer@gmail.com

NO : 849/ Missing Service Book

Dated: 18/01/2024

To

The District Education Officer (M)
Elementary & Secondary Education
District Swat

Subject: Submission of Enquiry Report Regarding The Misplacement of Original Service Book in R/o Mr. Khalid Nawaz DM GHS Chanchary Madyan Swat.

R/Sir,

With reference to your letter No 4648/P/File No.33 Dated 09-01-2024 and received on 13/01/2024 on the subject cited above detail of the inquiry as under:

PROCEDURE:-

In compliance with your letter No 4648/P/File No.33 on the subject cited above , the undersigned was Appointed as Enquiry officer, the undersigned informed the Head Master GHS Chanchary 15-01-2024 to notify the concerned staff Members to attend the Enquiry proceeding on 16-01-2024 at GHS Chanchary Madyan and record their statements. Accordingly I, visited the station of enquiry on 10:00 am. Unfortunately Mr. Khalid Nawaz DM GHS Chanchary Madyan was found absent I the undersigned obtained a written statement from the Head Master GHS Chanchary Madyan duly signed by him to know their view point about the Misplacement of Service Book.

FINDINGS:-

In view of the Verbal and Written statements of all the relevant officer recorded and duly signed by them, I found that:-

1. Mr. Khalid Nawaz has took over the charge of DM BPS-15 at GHS Chanchary Swat on 24-12-2022
2. Mr. Khalid Nawaz DM GHS Chanchary Madyan did not Submit his service book to Head Master GHS Chanchary Madyan after transfer from GMS Peochar till now.

واہشہ

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کریم محمد ولد نیکو

واہشہ

محمد علی ولد محمد ابوب خان

محمد علی ولد محمد ابوب خان

3. The Head Master GHS Chanchary Madyan handed over charge to Mr. Khalid Nawaz DM GHS Chanchary Madyan without the Service book and necessary entries were not recorded in his service book.
4. Mr. Khalid Nawaz DM GHS Chanchary Madyan avail the Ninety Days (90 days) Earned Leave w.e.f. 20-09-2023 to 18-12-2023 on full pay vide DEO male Swat Endst: No 8607-10/File-33/DM Dated 25-09-2023.
5. Mr. Khalid Nawaz DM GHS Chanchary Madyan has not resume his duty at GHS Chanchary Madyan after the completion of his Leave on 18-12-2023 and till now he absent from duty.
6. As per the Statement of Head Master GHS Chanchary Madyan that Mr. Khalid Nawaz DM GHS Chanchary Madyan absent from duty w.e.f 19-12-2023 till now and his cell phone number is off.
7. As per Head Master GHS Chanchary Madyan statement that he has not issue him absent notice though official letter on his home address on account of his absentee from duty.
8. As per Head Master GHS Chanchary Madyan statement that he reported Mr. Khalid Nawaz DM GHS Chanchary Madyan absentee from duty w.e.f 19-12-2023 to DEO Male Swat.
9. As per Head Master Statement till now his salary has not been activated in GHS Chanchary Madyan due to non availability of his service book.
10. As per the record of service book entries register at serial no 71 in the office of DEO Male swat Mr. Khalid Nawaz DM personally received his service book from the office on 08-10-2020.

Conclusion:-

In view of the findings mentioned above it is clarified that :

1. Mr. Khalid Nawaz DM GHS Chanchary Madyan has not resume his duty at GHS Chanchary Madyan after the completion of his Earned Leave on 18-12-2023 and till now he absent from duty.
2. Mr. Khalid Nawaz DM GHS Chanchary Madyan Personally received his service book from DEO Male Swat Office on 08-10-2020 as per Record and not returned to any office for necessary entries till now.

ATC

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Umar Khitab
Advocate High Court

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واہشند

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16.

ion:-

In view of the findings mentioned above it is recommended that :

1. Absent call notice may be issue to him on his home Address to resume duty at GHS Chanchary Madyan.
2. He may be directed to provide his service book and necessary entries may be made in his service book after resuming his duty.

(All the Relevant Statements / documents are attached)

PRINCIPAL
GHS Seer District Swat

Dated: 18-01-2024

Endst: No. _____ /

Copy of the above is forwarded to the:-

- 1- The office file concerned.

PRINCIPAL
GHS Seer District Swat

Handwritten signature/initials

Umar Khitab
Advocate High Court

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واہند

8. 1. 2024

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واہند

To

The Director
ESP SE Peshawar

Amna: 11.17 99

Subject: Application for Reinstatement

R/Sir,

with profound regards it is stated that I was performing my duties against (D.M) Post at G.H.S chancharey Madyan Swat.

I took grant of earned leave w.e.f 20-9-2023 to 18-12-2023 (90 days) with full pay vide D.E.O Male Swat no 870-10 dated 25.9.23. Due to some domestic problems I was removed from duty on 19 December 2023.

The D.E.O Male Swat targeted me and made inquiry against me and removed me from service vide Endst; No 5796-99 dated 15.02.2023, which is unjustness.

Now I assure you sir, that next time I will be so careful about my duties and never give any chance for complaint.

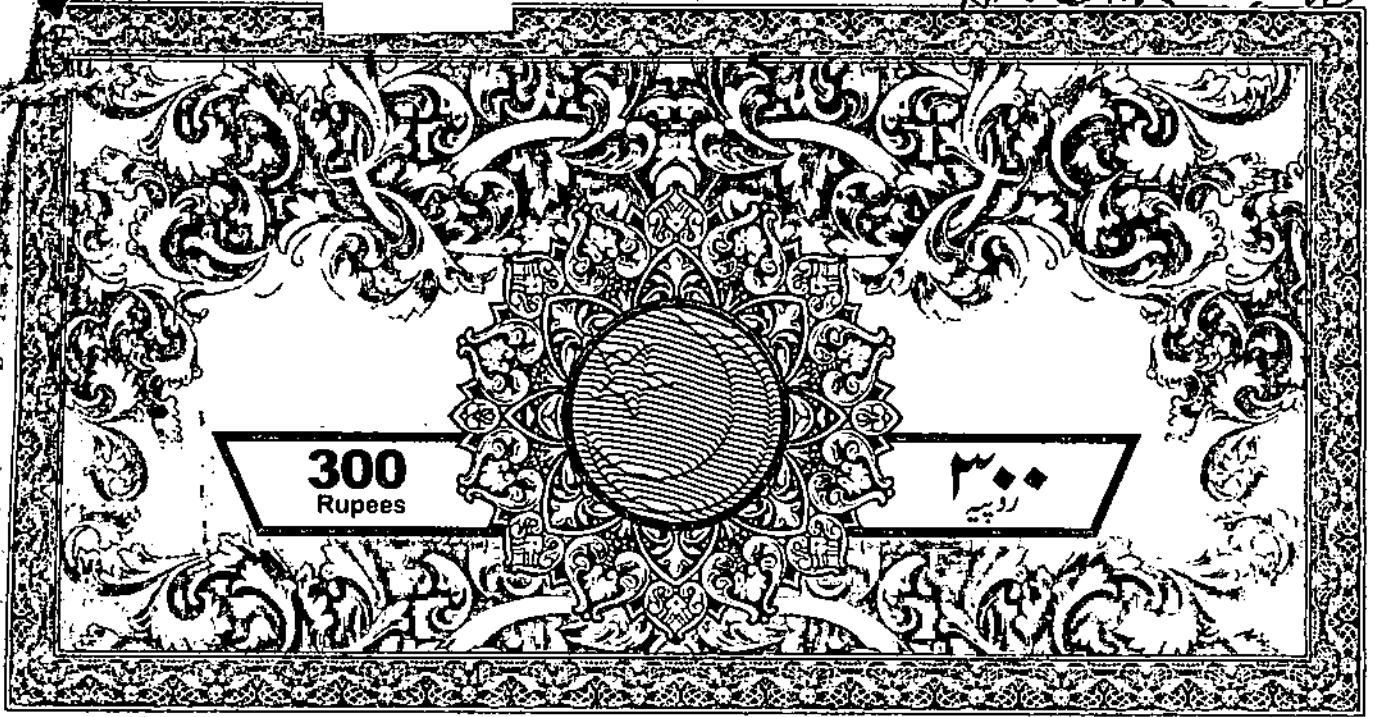
Therefore, you are requested to please reinstate me in my service so I shall be very thankful to you.

Omar Khitab
Advocate High Court
21/2/24
ADL (EST)/DA
29/02/2024

Yours obediently
Khaid Nawaz (D.M)
G.H.S chancharey

Kam
واحد
کریم ولد نیکنہ

H. Khitab
واحد
محمد علی ولد محمد ایوب خان



{مختیار نامہ}

مایا نکه اختیار (۱) خالد نواز ولد امیر امان اللہ سکنہ لنگر خوازہ خیلہ ضلع سوات کا ہوں۔ اندر میں وقت بقائی ہوش و حواس خستہ برضا و خوشی خود بذریعہ تحریر ہذا لکھ دیتی ہوں۔ کہ من مخلص کا ایک سروس ایپل بعنوان خالد نواز بنام سیکسٹری ایجوکیشن، کے پی پشاور وغیرہ بعد الٹ جناب سروس ٹریپول کے پی پشاور کیمپ کورٹ ضلع سوات میں زیر ساعت ہے۔ من مخلصان اپنے گھریلوں مصروفیات کی وجہ سے مقدمہ بالا کی پیروی کرنے سے اصالتاً قاصر ہے۔ لہذا ابوجہ متذکرہ اپنی جانب سے (1) مسی طاہر حسین ولد میاں بادشاہ سکنہ لنگر خوازہ خیلہ ضلع سوات (2) مسی فرمان علی ولد امیر امان اللہ سکنہ لنگر خوازہ خیلہ ضلع سوات (3) مسی فیاض حسین ولد میاں بادشاہ سکنہ لنگر خوازہ خیلہ ضلع سوات کو بذریعہ مختار نامہ ہذا اختیار دیتے ہے۔ کہ وہ سروس ایپل ہذا میں میرے طرف سے پیشی پیروی کرے، وکیل مقرر کرے، ترمیمی دعویٰ دائر کرے، درخواست، جواب درخواست، بیان حلفی داخل کرے، شہادت رگواہان رفرست گواہان پیش کرے، مقدمہ فیصلہ ہونے کی صورت میں ایپل رگوانی داخل کرے، ہمارے طرف سے عالیہ، عدالت عظمیٰ پاکستان میں پیشی کرے، ہمارے طرف سے مقدمہ میں ہمارے مفادات کا تحفظ کرے، اگر ہمارے طرف سے ایپل، نگرانی، رٹ کی ضرورت ہو، تو کر سکتا ہے۔ درخواست، جواب درخواست داخل رد دائر کرے، جواب الجواب داخل کرے، شہادت پیش کرے، سروس ایپل فیصلہ ہونے کی صورت میں ایپل رگوانی داخل کرے۔ اگر ہماری طرف سے ضرورت ہو، تو ہماری طرف سے ایپل، نگرانی، رٹ داخل کر سکتا ہے۔ مختصر ہمارے طرف سے ہمارے مفادات اور تحفظ کے لئے جو بھی کارروائی مذکورہ مقدمہ میں ضروری ہو، کرنے کا مجاز ہے۔ جملہ کارروائی مختار خاص بابت مقدمہ ہذا، مامقرہ کو قبول و منظور ہوگی۔ لہذا مختار نامہ سندا تحریر ہے۔

مختار خاص بابت مقدمہ ہذا، مامقرہ کو قبول و منظور ہوگی۔ لہذا مختار نامہ سندا تحریر ہے۔


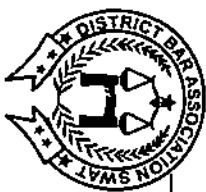

خالد نواز ولد امیر امان اللہ

شناختی کارڈ نمبر: 15601-2596488-3

کریم محمد ولد نیک محمد

حمید علی ولد محمد ایوب خان

ATTESTED
Syed Haider Shah Advocate
NOTARY PUBLIC
3-2024

پرائس نمبر: <u>Be-18-1058</u> پرائیوی ایشن نمبر: <u>375</u> رابطہ نمبر: <u>0300-954455</u> ای میل ایڈریس: _____	  <p>143426</p>  <p>ڈسٹرکٹ بار ایسوسی ایشن سوات</p>
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مخاطب: آپ لائٹ خیال کنرز بنام سٹیٹ ایئر انڈیا میٹرو	عدالت جناب: _____ دعویٰ اور فرماست: <u>کوکہ آپیل</u> عدالت نمبر: _____ مورخہ: _____ جرم: _____ حقانہ: _____
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مقدمہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے بیرونی مقدمہ

آئن تمام عدلوں کے لیے محکمہ جوائنٹ ریلوے کے اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کاپی کا روائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راشی نامہ کرنے، پتھر رسالت کرنے، دعویٰ جواب دہی، اقبال دعویٰ اور درخواست برائے سربراہ کی مقدمہ منسوخی ڈگری کی طرف اجراء، بیرونی کرنے کا اختیار ہوگا، نیز راز کرنے کی اپیل کرانی، نظر ثانی و بیرونی کرنے کا اختیار ہوگا۔ اور مقدمہ بیکورہ کیلئے کل وقتی یا جزوی کا روائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہر راہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب تقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پروا منظر قبول ہوگا، بدوران مقدمہ جوڑ چہ و ہر جانب کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی تمام مذکورہ بالا سے باہر ہو، تو وکیل صاحب بیرونی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کی عدالت میں بعد م بیرونی خارج ہونے یا ڈگری کی طرف ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے، لہذا یہ نکات نامہ لکھو یا کہ مندر ہے

نشانی

خیال کنوز..... آپیل نمبر نمبر نمبر مخاطب

محمد شفیق

تمام عدلوں سب سے شرفی صورت

محمد شفیق

ایڈووکیٹ اور مختار

الموجودہ