


# FORM OF ORDER SHEET

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

Appeal No. 1752/2024


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 03 /10/2024               | <p>The appeal of Mr. Muhammad Ikram resubmitted today by Mr. Adnan Aman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 08.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p><br/>REGISTRAR</p> |

The appeal of Mr. Muhammad Ikram received today i.e on 27.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Departmental appeal is unsigned.
- 3- Affidavit is not attested by the Oath Commissioner.

No. 849 /inst./2024/KPST,

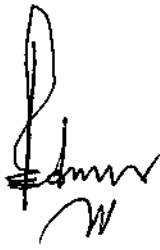
Dt. 27/9 /2024.

  
ADDITIONAL REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Adnan Aman Adv.  
High Court at Peshawar.

Respect sir,

The objections raised by  
your worthy office has  
been removed -

  
03-10-2024

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

Service Appeal No. 1752/2024

Muhammad Ikram.....APPELLANT

**VERSUS**

The Director Elementary & Secondary Education Department  
Khyber Pakhtunkhwa Peshawar & others.....Respondents

**I N D E X**

| S#  | Description of Documents                                | Annex     | Pages |
|-----|---|-----------|-------|
| 1.  | Service Appeal  |           | 1-8   |
| 2.  | Application for condonation                             |           | 9-10  |
| 3.  | Affidavit   |           | 11    |
| 4.  | Addresses of parties                                    |           | 12    |
| 5.  | Copy of appointment order                               | "A"       | 13    |
| 6.  | Copy of application form                                | "B"       | 14    |
| 7.  | Copy of the extract from leave account                  | "C"       | 15    |
| 8.  | Copy of the show cause notice                           | "D"       | 16    |
| 9.  | Copy of reply   | "E"       | 17    |
| 10. | Copy impugned order dated 20.10.2023                    | "F"       | 18    |
| 11. | Copies of departmental Appeal and medical prescriptions | "G & G/1" | 19-28 |
| 12. | Copy of FIR   | "H"       | 29-31 |
| 13. | Wakalatnama   |           | 32    |

Through Appellant

**ADNAN AMAN**  
Advocate High Court(s)

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

Service Appeal No. 1752 /2024

Muhammad Ikram.....**APPELLANT**

**VERSUS**

The Secretary to Govt. of KPK, Elementary & Secondary  
Education Department & others.....**Respondents**

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| 3.  | Addresses of parties   |           |       |
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Through

  
Appellant

**ADNAN AMAN**  
Advocate High Court(s)

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

**Service Appeal No. \_\_\_\_\_/2024**

**Muhammad Ikram, S/o Muhammad Israr,**

(Ex-Junior Clerk)

G.H.S Subhan Khwar District Mohmand.....**APPELLANT**

**VERSUS**

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, at Peshawar.
2. The District Education Officer (Male), Elementary & Secondary Education, District Mohamad.

.....**RESPONDENTS**

**SERVICE APPEAL U/S 4 OF THE  
KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL ACT, 1974, AGAINST THE  
IMPUGNED ORDER PASSED BY  
RESPONDENT NO.2 DATED 20.10.2023,  
WHEREBY MAJOR PENALTY OF  
REMOVAL FROM SERVICE WAS  
IMPOSED UPON THE APPELLANT AND  
THE ORDER OF DEPARTMENTAL  
APPELLATE AUTHORITY (RESPONDENT**

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

**Service Appeal No. \_\_\_\_\_/2024**

**Muhammad Ikram, S/o Muhammad Israr,**

(Ex-Junior Clerk)

G.H.S Subhan Khwar District Mohmand.....**APPELLANT**

**VERSUS**

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, at Peshawar.
3. The District Education Officer (Male), Elementary & Secondary Education, District Mohamad.

.....**RESPONDENTS**

**SERVICE APPEAL U/S 4 OF THE  
KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL ACT, 1974, AGAINST THE  
IMPUGNED ORDER PASSED BY  
RESPONDENT NO.3 DATED 20.10.2023,  
WHEREBY MAJOR PENALTY OF  
REMOVAL FROM SERVICE WAS  
IMPOSED UPON THE APPELLANT AND  
THE ORDER OF DEPARTMENTAL  
APPELLATE AUTHORITY (RESPONDENT**

**NO.1) DATED NIL, WHEREBY HE DID NOT PASS AN APPROPRIATE ORDER OVER THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF NINETY (90) DAYS.**

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**PRAYER:**

By accepting this appeal, the impugned order dated 20.10.2023 passed by respondent No.2 and order of respondent No.1 (departmental appellate authority) dated NIL, who did not pass any appropriate order over the appeal of appellant, may please be set aside and consequently the appellant may please be re-instated in service, with all back benefits.

---

**Respectfully Sheweth:**

1. That the appellant was initially appointed as Junior Clerk on deceased son's quota in the Elementary and Secondary Education Department Khyber Pakhtunkhwa on dated 22/02/2011 at GHSS Subhan Khwar. **(Copy of appointment order is attached as annexure "A").**

2. That the appellant after his appointment joined the respondents department by performing his duty diligently, with full devotion & to the satisfaction of his immediate superiors and no complaint or whatsoever has been made against him during his service.
3. That after serving the respondents department for twelve (12) long years, the appellant submitted an application for grant of earned leave on account of reasons mentioned there in the application
4. That the said application was forwarded by the principal concerned to the respondent No. 2 vide dairy No. 991, dated 18.09.2023. **(Copy of application form is attached as annexure "B")**.
5. That it merits to mention here that appellant having hundreds of leave in his leave account which fact can be authenticated from the extract of leave register. **(Copy of the extract from leave account is attached as annexure "C")**.
6. That the respondents department instead of deciding his application (for grant of earned leave) issued him a show cause notice dated 03.10.2023.



**(Copy of the show cause notice attached as annexure "D").**

7. That the appellant duly replied the show cause notice issued to him wherein he reiterated his stance for grant of earned leave. **(Copy of reply is attached as annexure "E").**

8. That it was on 12<sup>th</sup> of October 2023 when the respondent No. 2 passed the impugned order by imposing major penalty of removal from service upon appellant vide impugned order dated 20.10.2023. **(Copy impugned order dated 20.10.2023 is attached as annexure "F").**

9. That as the impugned order was not communicated to the appellant, therefore he got the knowledge on 10.01.2024 but by then, he was suffering from typhoid and he was strictly advised by his doctor concerned to have complete bed rest, therefore, he submitted the department appeal against the impugned order on 27.03.2024. **(Copies of departmental Appeal and medical prescriptions are attached as annexure "G & G/1" respectively).**

10. That the appellant waited for statutory period of 90 days but the respondent No. 1 did not pass any order over his departmental appeal
11. That the appellant having no other adequate remedy is constrained to move this Hon'ble tribunal for the following amongst other grounds

**GROUND S:**

- A. That the impugned order passed by respondent No. 2 is void ab-initio as while passing the same he has bull dozed the Law/Rules governing the subject, therefore the whole proceedings which resulted into passing of the impugned order are liable to be declared as illegal, unlawful and void ab-initio.
- B. That by now it is settled question of law that before imposing major penalty upon a civil servant, the employer is required to conduct a regular enquiry, but in case in hand even a fact finding has not been conducted, what to speak of a regular inquiry, therefore, this Hon'ble Tribunal needs to interfere to meet the end of justice.

- C. That under the Law/Rules governing the grant of leave (Civil Servant Leave Rules 1980), the appellant was having penalty of balance in his leave account, therefore the respondent No. 2 could not reject his application for grant of earned leave.
- D. That no charge sheet /statement of allegations have been issued to the appellant, which otherwise is sine-quanton for conducting disciplinary proceedings against a civil servant, therefore, the whole proceedings followed by the impugned order is illegal and unlawful.
- E. That the reason advanced by the appellant for grant of earned leave were apparently genuine as he was facing severe life threats, due to which he was compelled to apply for earned leave. This fact can be further authenticated from the fact that in past as father and grandfather of the appellant were brutally murdered by unknown militants, therefore he in order to secure his life applied for grant of earned leave. **(Copy of FIR is attached "H")**.
- F. That the malafide of the respondent No. 2 is floating on the surface as he has straightway issued a show cause notice without complying the codal formalities under the E&SE Rules 2011, which speaks volume,

that the respondent No.2 has acted in a hasty and hip-hazard manner.

- G. That no notice under Rule 9 of the Efficiency and Discipline Rules 2011 has been issued against the appellant, which is otherwise requirement of law before passing any order ( in case of absence) against a civil servant.
- H. That the law of the land and Rules governing the subject has framed a proper procedure to be followed while conducting disciplinary proceedings i.e. issuance of charge sheet, statement of allegations, inquiry proceedings & show cause notice etc. and deviation from the same, would be nullity in the eyes of law, but in case of appellant, he has been treated otherwise therefore, this Hon'ble Tribunal needs to declare the whole proceedings conducted against the appellant, as void-ab-initio.
- I. That the respondents have violated a century old principle "audi altrem partem" as the appellant has been condemned unheard, therefore, on this ground alone, the appellant is entitled for reinstatement in service with all back benefits.

- J. That the appellant has been treated against the law and he has also been deprived of equal protection of law.

It is, therefore, most humbly prayed that by accepting this appeal, the impugned order dated 20.10.2023 passed by respondent No.2 and order of respondent No.1 (departmental appellate authority) dated NIL, who did not pass any appropriate order over the appeal of appellant, may please be set aside and consequently the appellant may please be reinstated in service, with all back benefits

Any other relief deemed fit and appropriate in circumstances of the case, if not specifically asked for, may also be granted to the appellant.

Through

Appellant

  
**ADNAN AMAN**  
Advocate High Court(s)

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

C.M No. \_\_\_\_\_/2024

in

Service Appeal No. \_\_\_\_\_/2024

Muhammad Ikram.....**APPELLANT**

**VERSUS**

The Director Elementary & Secondary Education Department  
Khyber Pakhtunkhwa Peshawar & others.....**Respondents**

**APPLICATION FOR CONDONATION  
OF DELAY IN FILING THE INSTANT  
SERVICE APPEAL**

---

**Respectfully Sheweth:**

1. That the instant service appeal is being filed before this Hon'ble Tribunal which is yet to be fixed for its hearing.
2. That the grounds of the accompanying appeal may be read as integral part of this appeal.
3. That the delay, if any, in filing of instant appeal, is neither intentional nor deliberate but due to the reason that the impugned order was not communicated to the appellant, as by that time he was abroad due to severe life threats to the appellant by unknown militants. This fact can be further authenticated from the fact that in past as father and grandfather of the appellant were brutally murdered by unknown militants, and when the

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

C.M No. \_\_\_\_\_/2024

in

Service Appeal No. \_\_\_\_\_/2024

Muhammad Ikram.....**APPELLANT**

**VERSUS**

The Secretary to Govt. of KPK, Elementary & Secondary  
Education Department & others.....**Respondents**

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appellant came back to Pakistan he got ill and was suffering from typhoid and he was strictly advised by his doctor concerned to have complete bed rest, therefore, he submitted the department appeal against the impugned order on 27.03.2024 and in this regard the verbal request to the respondent<sup>2</sup> but was not accepted. (Copy of relevant documents is attached in annexure "B")

4. That the delay in filing the instant appeal was neither intentional nor willful but due to aforesaid reason.
5. That valuable rights of the appellant are involved, the same would be defeated, if the delay in filing of the petition is not condoned.
6. That the law favours adjudication on merit rather non-suiting the litigant on technicalities.
7. That it is just, fair and in the large interest of justice that the delay in filing instant appeal be condoned.

It is, therefore, most humbly prayed that by accepting this application, the delay in filing the instant service appeal may please be condoned.

Through

Appellant



**ADNAN AMAN**  
Advocate High Court(s)



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

**Service Appeal No.** \_\_\_\_\_ **/2024**

Muhammad Ikram.....**Appellant**

**Versus**

The Director E&SE & others.....**Respondents**

**AFFIDAVIT**

I, Muhammad Ikram, S/o Muhammad Israr, (Junior Clerk) G.H.S Subhan Khwar District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
**DEPONENT**

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

Service Appeal No. \_\_\_\_\_/2024

Muhammad Ikram.....**APPELLANT**

**VERSUS**

The Director Elementary & Secondary Education Department  
Khyber Pakhtunkhwa Peshawar & others.....**Respondents**

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

**Muhammad Ikram**, S/o Muhammad Israr,  
(Ex-Junior Clerk)  
G.H.S Subhan Khwar District Mohmand

**RESPONDENTS:**

1. The Director, Elementary & Secondary Education,  
Khyber Pakhtunkhwa, at Peshawar.
2. The District Education Officer (Male), Elementary &  
Secondary Education, District Mohamad.

Through Appellant

**ADNAN AMAN**  
Advocate High Court(s)

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

**Service Appeal No. \_\_\_\_\_/2024**

Muhammad Ikram.....**APPELLANT**

**VERSUS**

The Secretary to Govt. of KPK, Elementary & Secondary  
Education Department & others.....**Respondents**

**ADDRESSES OF THE PARTIES**

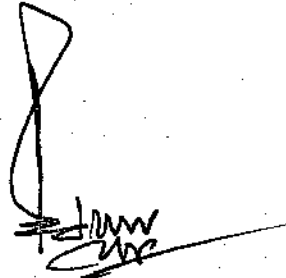
**APPELLANT:**

**Muhammad Ikram**, S/o Muhammad Israr,  
(Ex-Junior Clerk)  
G.H.S Subhan Khwar District Mohmand

**RESPONDENTS:**

1. The Secretary to Govt. of Khyber Pakhtunkhwa,  
Elementary & Secondary Education Department, Civil  
Secretariat, Peshawar.
2. The Director, Elementary & Secondary Education,  
Khyber Pakhtunkhwa, at Peshawar.
3. The District Education Officer (Male), Elementary &  
Secondary Education, District Mohamad.

Through Appellant



**ADNAN AMAN**  
Advocate High Court(s)



OFFICE OF THE AGENCY EDUCATION OFFICER  
 MOHMAND AGENCY AT GHALLANAL  
 P.O. 07242/0100 FAX 07242/0100  
 NO. \_\_\_\_\_ DATED Ghallanal \_\_\_\_\_ / 2011

Subject: **APPOINTMENT ORDER.**

Memo:

Consequent upon the approval of the competent authority i.e Director of Education FATA vide No.2290 dated 12/02/2011 and according to the Government recruitment Policy for the children of deceased Govt. Servant, following candidate of Mohmand Agency is here by appointed against vacant Junior Clerk post in the School mentioned below in BPS No.07 @ Rs.3630-150-0230 plus usual allowances in the interest of public service w.e.f the date of his taking over charge in the School.

| S. No. | Name           | Father's Name           | School                              | Remarks  |
|--------|----------------|-------------------------|-------------------------------------|--|
| 01.    | Muhammad Ikram | Muhammad Israr<br>Ex CT | GHS Khatki Sharif<br>Mohmand Agency | Post vacated due to transfer of Asadullah sha to GHS Dab Kore. |

**TERMS/CONDITIONS**

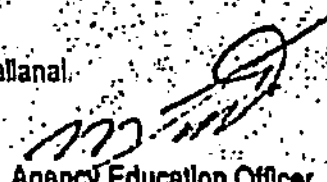
1. The appointment of the candidates is purely made on temporary basis and is liable to termination at any time without assigning any reason.
2. He is entitled to avail all kinds of benefits specified for Govt. servants, including CP Fund, except Pension, gratuity and GP Fund.
3. He will produce Health and Age certificates from Agency Surgeon Mohmand Agency.
4. He will not be handed over the charge of his post if he is below 18 and above 35 Years on the date of issuance of this order.
5. If any certificate proves fake/bogus at any stage, his appointment will be considered as cancelled.
6. The verifications of the Documents will be made through the office of the undersigned.
7. No payment will be made till the verification of his all documents from the institutions concerned.
8. If he wishes to resign the post, he will have to give one month prior notice or pay for the one month will be forfeited in lieu thereof.
9. Change Reports should be submitted to all concerned.

(SAID MUHAMMAD)  
 Agency Education Officer,  
 Mohmand Agency at Ghallanal.

Encl: No. Appt: JJC/92-92 /dated Ghallanal the/ 23-02-2011.

Copy to:-

1. Director of Education, FATA K.P.K. Peshawar w/r to his no & date quoted above.
2. Political Agent Mohmand Agency at Ghallanal.
3. MEC concerned in this office.
4. Agency Accounts Officer, Mohmand Agency at Ghallanal.
5. Agency Surgeon Mohmand at Ghallanal.
6. Candidate concerned.

  
 Agency Education Officer,  
 Mohmand Agency at Ghallanal.

D

ATTESTED

To,

The District Education Officer (Male)  
District Mohmand (NMD)

- 14 -

Annexure  
B1

Subject: Request for Ex-Pakistan Leave due to security reasons.

Respected Sir,

With due respect it is stated that I am working in the Elementary and Secondary Education Department of Khyber Pukhtunkhwa in the Hard District Area of Mohmand as a "Junior Clerk" since 22<sup>nd</sup>-Feb-2011. I was initially appointed on deceased son's quota, as my father was working as an SCT at GMS Mateen Kor District Mohmand.

As you are well aware of the situation that my father and my grandfather was brutally killed by the TALIBAN Militants (TTP) on Dated: 5<sup>th</sup>-Nov-2010, in the District Mohmand. Now I am facing the same threats from the TALIBAN Militants (TTP). As a head of the family I am worried about the future of children and wife and myself and to spend a peaceful life.

It is therefore, requested that kindly grant me Ex-Pakistan Leave on priority basis so that I may spend some time to calm my thoughts and to protect myself and my family.

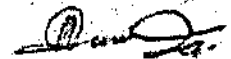
Thanking you in anticipation.

  
Sincerely Yours

Muhammad Ikram  
Junior Clerk District Mohmand(NMD)  
E&SE Dept KP

No 991 Date 18/09/2023


Forwarded to the DEO (male)  
Mohmand with the remarks  
that substitute may be  
appointed in GHS Subhan Khwar  
for daily office work.



18/09/2023

PRINCIPAL  
GHS Subhan Khwar

ATTESTED

 CamScanner

Annex: (c)

**FORM OF LEAVE ACCOUNT UNDER THE REVISED LEAVE RULES,  
(Approved vide Finance Division's letter No.F.1 (3) - Rev. 1/78, dated 18-1-1979)**

Account of **MR. MUHAMMAD IKRAM**


Date of Commencement of Service **24/02/2011**

Date of LEAVE

**17/02/2020**

**GHS SUBHAN KHWAR E/GHUND MOHMAND**

| PERIOD OF DUTY |            |         |      |      |      | LEAVE TAKEN   |   |   |   |      |   |               |      |         |      |  |      |      | Balance on 1-7-1978/return from leave (Cols. 7-20) | Remarks | Additions | Deductions |      |      |      |      |  |
|----------------|------------|---------|------|------|------|---|---|---|---|------|---|---------------|------|---------|------|--|------|------|--|---------|-----------|------------|------|------|------|------|--|
|                |            |         |      |      |      | Leave on full pay without medical certificate to maximum of 120 days & 365 days in case of LPR. | Leave on full pay on medical certificate subject to a maximum of 180 days | Leave on full pay on medical certificate subject to a maximum of 365 days in entire service | LEAVE ON HALF PAY                         |      | Recreation leave of 15 days in a year but 10 days to be debited | LEAVE NOT DUE |      | ABSENCE |      | Total leave (Columns 10+11+12+14+15+17+19) |      |      |  |         |           |            |      |      |      |      |  |
| Days           | Days       | Days    | Days | Days | Days |   |   |   | Days                                      | Days |   | Days          | Days | Days    | Days |  | Days |      |  |         |           |            |      |      |      |      |  |
| From           | To         | Y-M-D   | F.Yr | Days | Days | From  | To  | Days  | Days                                      | Days | Days  | Days          | Days | Days    | Days | Days                                       | Days | Days | Days   | Days    | Days      | Days       | Days | Days | Days | Days |  |
| 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   |  |
| 24/02/2011     | 17/02/2020 | 8-11-24 | 108  | 432  | 432  | 18/02/2020  | 16/03/2020  | 28  | EX-PAKISTAN LEAVE ON FULL PAY             |      |   |               |      |         |      |  |      | 28   | 404  | LFP     |           |            |      |      |      |      |  |
| 17/03/2020     | 20/04/2023 | 3-6-3   | 42   | 168  | 572  | 21/09/2023  | 14/04/2025  | 572   | DAYS EARNED LEAVE ON CREDIT WITH FULL PAY |      | 1144  |               |      |         |      |  |      | 572  | 0  | LFP     |           |            |      |      |      |      |  |
|                |            |         |      |      |      |   |   |   |   |      |   |               |      |         |      |  |      |      |  |         |           |            |      |      |      |      |  |

  
**PRINCIPAL**  
**GHS SUBHAN KHWAR**  
**DISTRICT MOHMAND**



- 16 - Annexure 'D'

**OFFICE OF THE DISTRICT EDUCATION OFFICER**  
**DISTRICT MOHMAND**  
Email : - deomohmand@gmail.com



**SHOW CAUSE NOTICE.**

I, LIAQAT ALI the District Education Officer (Male) District Mohmand, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, do hereby serve upon you Mr. Muhammad Ikram Junior clerk GHS Subhan Khawer District Mohmand this Show Cause Notice as follow:

1. That as per report of the Principal GHS Subhan Khawer vide his office No 992 dated 3/10/2023, you have been absent from your duty since 27/9/2023 till date and gone abroad without prior approval of leave /permission.
2. That your application for ex-Pakistan leave was received to this office on 21/9/2023 vide GHS Subhan Khawer No 991 dated 18/9/2023 in which you requested for ex-Pakistan leave (not mentioning the period of leave in your application) on the excuse of security grounds without annexing the supportive documents.
3. That in response to the letter, a letter was sent to the Principal GHS Subhan Khawer vide this office No 9347 dated 27/9/2023 in which the Principal concerned was directed to direct you to attend this office in person on 2/10/2023 at 11 a.m along with the report of the concerned SHO regarding your security issue but you failed to attend this office.
4. That you left the country as per report of the Principal concerned which shows that you have an illegal passport of illiterate person as NOC is demanded at the airport from the Government official at the time of exit. Thus you concealed the fact, being Government servant from immigration as well which is against the rule 20 of the Conduct Rules, 1987.
5. That you are guilty of professional dishonesty, inefficiency, absenteeism & committed misconduct under the Rule-3(a) & 3(d) & 3(b) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
6. That in terms of rule 5(1) (a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, I as the Competent Authority dispense with the inquiry and serve you with a Show Cause Notice under rule 7 of the rules ibid.

As a result, thereof, I, as the Competent Authority, have tentatively decided to proceed against you under the mentioned rules. You are, therefore, required to show cause as to why penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 should not be imposed upon you and also intimate whether you desire to be heard in person. If no reply to this office is received within 07 days of its delivery, it shall be presumed that you have no defense to put in and, in that case, ex-parte action shall be taken against you under the rules ibid.


(LIAQAT ALI)  
District Education Officer  
(Male) Mohmand

**Mr. Muhammad Ikram J/C GHS Subhan Khawer.**

Endst: No 9448-52 /Sec Dated 03/10/2023.

Copy forwarded to the :

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. DMO Education Monitoring Authority Mohmand.
3. Principal concerned with the direction to deliver the Show Cause notice to the concerned official under intimation to this office & also stop his pay to save Govt Exchequer from undue loss.
4. Official Concerned.
5. Office record.

  
District Education Officer 03/10/2023  
(Male) Mohmand

ATTESTED



To

The District Education Officer (Male)  
District Mohmand (NMD),

-17-

Annexure  
(E)

Through: Principal GHS Subhan Khawar District Mohmand.

Subject: Response to show cause notice.

Respected Sir,

With due respect it is in response to Endost: No:9448-52 dated:03-10-2023 the show cause notice received on dated: from DEO Male Mohmand on dated:07-oct-2023 at GHS Subhan Khawar District Mohmand.

1. I submitted a proper application for Ex-Pakistan Leave each and everything attached with this application through the Principal GHS Subhan Khawar District Mohmand. Which was tabled to you and I waited for fourteen days but no action has been taken on my application.
2. As per government servant rules 120 days ex-Pakistan leave is my legal right to avail this. And due to security reasons, I only share that information with the police officials that can be confirmed from the local police station.
3. Your good office called me for personal hearing vide letter no: 9347 dated: 27-09-2023 but unfortunately, I left the country on 26-09-2023 due to threats to my life and I kept my exit secret that is why I did not attend the meeting. Beside this before leaving the country I personally meet you sir and updated you all the situations I face and Mr. Shah Iran SST(G) GHS Subhan Khawar also explained my point of view verbally and discussed all the situation with you and requested for the ex-Pakistan Leave.
4. I left the country through my official Passport in which I am clearly mentioned as a Government Official. A copy of my passport is attached here with this application for your kind information. I did not conceal any information from any office concerned. Therefore, I did not violate any official rule. Your good office can verify my details from the passport and Immigration department.
5. Due to the past experiences as my father, Grandfather and one of my cousins lost their lives due to the Taliban Militants groups that's why to save my life I left the country on an emergency basis and that is the reason that I write officially to your good office for the ex-Pakistan leave. I am fully loyale with my country and my job and my department and did not violate any official rule but to save my life.
6. Dear sir, as I did not commit any crime nor harm anyone but to save my life and career it is therefore requested that the show cause notice imposed upon me may kindly be withdrawn.

It is pertinent to mention here that whenever the threat to my life is normalized, I will join my duty with honesty and enthusiasm and regularity. It is therefore once again humbly requested that kindly give me permission for the ex-Pakistan leave and withdraw the show cause notice imposed upon me.

All the related documents are attached herewith this application for your kind information.

Muhammad Ikram J/C GHS Subhan Khawar.

Endst: No \_\_\_\_\_ /Dated \_\_\_\_\_ /2023.

Copy forwarded for information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. DMO Education Monitoring Authority Mohmand.
3. Office record.

ATTESTED



CS CamScanner





OFFICE OF THE DISTRICT EDUCATION OFFICER  
DISTRICT MOHMAND

Ph:0924-290180

Email:- deomohmand@gamil.com



-18- Annexure (E)

**OFFICE ORDER**

1. Whereas Mr. Muhammad Ikram J/C GHS Subhan Khwar District Mohmand was proceeded for having committed the following gross irregularities which constitute inefficiency & habitual absenteeism under Rule 3(a) & 3(d) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.
2. And whereas report submitted by the concerned Principal GHS Subhan Khwar vide his office No 992 dated 03/10/2023 stated that he has been absent since 27/09/2023 till date and gone abroad without prior approval of leave.
3. And whereas his application for ex-Pakistan leave was received to this office on 21/09/2023 vide GHS Subhan Khwar No. 991 dated 18/09/2023 in which he requested for ex-Pakistan leave (not mentioning the period of leave in his application) on the excuse of security grounds without annexing the supportive documents.
4. And whereas a letter in response was sent to the Principal GHS Subhan Khwar vide this office No 9347 dated 27/09/2023 in the principal concerned was directed to direct him to attend this office in person on 02/10/2023 at 11am along with the report of the concerned SHO regarding his security issue but he failed to attend this office.
5. Whereas in terms of rule 5(1) (a) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority dispensed with the conduct of the inquiry and served him with a show cause notice under rule 7 of the rules ibid vide this office No 9448-52 dated 03/10/2023 and his reply was submitted by Muhammad Wisai CNIC 17301-9509520-1 by hand on 11/10/2023 which was found unsatisfactory.
6. And whereas another opportunity was provided to him and he was called for a "Personal Hearing" at the office of the DEO (M) Mohmand vide No. 9619 dated 11/10/2023 at 11 am but he failed to appear before the competent authority in person.
7. Whereas he left the country as per report of the principal concerned which shows that he has an illegal passport of illiterate person as NOC is demanded at the airport from the Government official at the time of exit. Thus he concealed the fact, being Government servant from immigration as well which against the rule 20 of the Khyber Pakhtunkhwa Government servants (Conduct) Rules, 1987.

By reasons of the above, he appeared to be guilty of inefficiency and habitual absenteeism under rule-3(a) & 3(d) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.

Now therefore, I, LIAQAT ALI as Competent Authority DEO (Male) Mohmand is pleased to impose upon Mr. Muhammad Ikram J/C GHS Subhan Khwar District Mohmand major penalty of "Removal from Service" under rule (1)(b)(iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 with effect from his date of absence i.e. 27/09/2023.

(LIAQAT ALI)  
District Education Officer  
(Male) Mohmand

Endst No. 9786-90 / Etab (Sec)

Dated/20 /10/2023

Copy forwarded to the:

- 1 Director of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2 DMO Education Monitoring Authority Mohmand.
- 3 Principal concerned with the direction to deliver this office order to the said official with acknowledgment on the office copy under intimation to this office and do the needful as per rules.
- 4 Official concerned
- 5 Office Copy.

District Education Officer  
(Male) Mohmand

ATTESTED

To

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

-19-

Amended

G

Subject: **DEPARTMENTAL APPEAL/REPRESENTATION AGAINST THE ORDER OF DEO (MALE) MOHMAND TRIBAL DISTRICT DATED 20.10.2023 COMMUNICATED WITH APPELLANT ON 10.01.2024) WHEREBY THE APPELLANT WAS ILLEGALLY AND UNLAWFULLY REMOVED FROM THE SERVICE.**

Respected Sir,

1. That the appellant was initially appointed on deceased son's quota in the elementary and secondary education department Khyber Pakhtunkhwa as a junior clerk on dated 22/02/2011 at GHSS Subhan Khwar. (Copy of appointment order is attached).
2. That the appellant after appointment join the E & SE department Khyber Pakhtunkhwa and was working diligently and with full devotion with the satisfaction of his immediate superiors and no complaint or whatsoever has been made against him during his service.
3. That after 12 long years in his service, when appellant applied/made an application to DEO for Ex-Pakistan leave for the 1<sup>st</sup> time because the appellant received

ATTESTED

threats against his life and he wants to protect himself and his family lives as previously applicant's father and grandfather was brutally assassinated by Taliban militants. (deaths certificates and Ex-Pakistan leave application are attached)

4. That after the appellant made an Ex-Pakistan leave application to DEO and waiting for reasonable time to receive a just and positive response but in spite of the fact appellant received an illegal and unreasonable show cause notice in this regard.
5. That appellant submitted reply to show cause notice issued, within stipulated time through his colleague Muhammad Wisal on dated 11/10/2023 in which the appellant provide proper reason for his nonappearance before the DEO on the dated fixed.
6. That prior to the date fixed the appellant appear before the DEO and informed him of his complicated situation regarding security threats, the DEO agreed to the appellant's reason and confide to his satisfaction, that no adverse action will be taken against appellant in this regard.
7. That considering the security/life threats the appellant leave the country through his official passport, in the mean while the DEO mala fide issued another letter to the appellant for personal hearing but at that time appellant was abroad and impossible to appear and consequently the DEO issued an illegal and ill-justified

 ATTESTED

removal order of the appellant in violation of appellant's legal right. (Copy of removal order is attached).

GRUNDS:

- a. That it is a settled principle of law that prior to imposition of major penalty of removal from services, the authority/employer is bound to hold a regular inquiry but in the case in hand the whole exercise is carried out in a haphazard and illegal manner which required a prompt interference by the departmental appellate authority.
- b. That no charge sheet/statement of allegation has been issued before passing the impugned order, the same act itself constitutes gross illegality on the part of competent authority.
- c. That no notice has been issued by the competent authority against the appellant as prescribed in Rule-9 of the Khyber Pakhtunkhwa Civil Servant (Efficiency & Discipline) Rules, 2011.
- d. That no notice has been published by the competent authority in the two leading newspapers which is mandatory under the rules.
- e. That the appellant has been treated against the law/rules governing the subject and has been deprived from equal protection of law.



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It is therefore, most humbly requested that, the impugned Order dated 20.10.2023 passed by the District Education Officer (Male) District Mohmand may kindly be set aside and the appellant may kindly be reinstated with all back benefit in the best interest of justice.

Appellant

Muhammad Ikram,  
S/o Muhammad Israr,  
(Junior Clerk)  
G.H.S Subhan Khwar  
District Mohmand  
Cell No.0321-3150008



ATTESTED

Annex - 23  
(Gall)

DHIS-02(F)

Sent To: \_\_\_\_\_

OUT DOOR PATIENT TICKET

District Mohamud CRP No: \_\_\_\_\_


Facility Name \_\_\_\_\_ (B.H.7) midni

Name P. S. 3 Age: 36-4 Sex: M

Father's / Husband's Name 11/11/11

Monthly OPD Serial No. \_\_\_\_\_

Provisional Diagnosis: △ Tonsillitis

| Date  | Clinical Findings / Investigations / Treatment / Referred / Test Findings |
|---|---|
| 5/7/24  | for vomiting  |
| May 10/24   | 1. v 70b Cefixime 500mg   |
|   | 2. RW Dantrolene  |
|   | 3. RW Cefixime 500mg  |
|   | 4. RW Diclofenac  |
|   | Lestine mouth wash  |
|  | ATTESTED <u>فرزاد ب. س.</u>   |

  
ATTESTED

# SHIFA DIAGNOSTIC LABORATORY MOHMAND

شفا ڈاگنوسٹک لیبارٹری مہمند



Ayaz khan

MS.C BIO.CHEMISTRY  
HAZARA UNIVERSITY  
DIPLOMA PATHOLOGY

ayazmohmand499@gmail.com Call imo whatapps 0302.5504455

|              |                     |          |           |              |
|--------------|---------------------|----------|-----------|--------------|
| Patient Name | MUHAMMAD IKRAM      | Age      | M/F       | M            |
| Refer        | BY B.H.U            | Date     | 05-Jul-24 | Time 4:33 PM |
| Specimen     | Blood investigation | Typhidot | HBS Ag    | Anti HCV     |

| TEST | REPORT | SEROLOGY |
|------|--------|----------|
|------|--------|----------|

|           |                            |                            |
|-----------|----------------------------|----------------------------|
| Typhidot: | (IGM) —NON Reactive (-ive) | (IGg) —NON Reactive (-ive) |
|-----------|----------------------------|----------------------------|

|          |                     |          |
|----------|---------------------|----------|
| Anti HCV | NON Reactive (-ive) | Virology |
|----------|---------------------|----------|

|        |                     |          |
|--------|---------------------|----------|
| HBS AG | NON Reactive (-ive) | Virology |
|--------|---------------------|----------|

## TYPHIDOT IGM (SALMONELLA)

Interpretation for Typhidot IGG and IGM positive acute typhoid fever in the middle stage of infection IGG positive only : relapse or refection or previous infection in which case current fever my not be due to typhidot correlate clinically.

## TYPHIDOT IGG (SALMONELLA)

typhidot IGM and IGG negative probably not typhidot it clinical symptoms suggest typhidot fever treat accordingly blood culture result if positive afew days later may support the clinical decision IGM positive acute typhoid fever

ایڈریس: مچھی روڈ عماشے کور بلڈ کیمبرل ایف سی اینڈ ڈی ایچ او ضلع مہمند ہمارے ہاں ہر قسم ٹیسٹ جدید مشین کے ذریعے کی جاتی ہے

*The aim of medicine is to prevent diseases and prolong life*

ATTESTED

Sent To: \_\_\_\_\_

OUT DOOR PATIENT TICKET

District Mohamud

CRP No: \_\_\_\_\_

Facility Name Bethi midline

Name Abdullah Age: 36 Sex: M

Father's/Husband's Name Abdullah

\_\_\_\_\_

Monthly OPD Serial No. \_\_\_\_\_

Provisional Diagnosis: Typhoid

| Date               | Clinical Findings / Investigations / Treatment Referred / Test Findings |
|--------------------|---|
| 15/2/24            | Rx: <u>Paras</u> , <u>moraxget 400 mg</u>                               |
| <u>ADU</u>         | <u>10x</u>  |
| Test               | Rx: <u>Panadol Extra</u>  |
| Typhoid            | <u>10x 1+1+</u>   |
| Head each          | Rx: <u>Lu Servit</u>  |
| Fever              | <u>11-11-11</u>   |
| Beat eat           | Cap <u>Contour 40mg</u>   |
| wanting            | <u>10x</u>  |
| ATTESTED           | <u>10x</u>  |
| <u>[Signature]</u> | <u>Bed Rest 10th days</u>   |

ATTESTED



# SHIFA DIAGNOSTIC LABORATORY MOHMAND

شفاہ ڈاگنوسٹک لیبارٹری مہمند

Ayaz Khan

-26-



MS.C BIO.CHEMISTRY  
HAZARA UNIVERSITY  
DIPLOMA PATHOLOGY

ayazmohmand499@gmail.com Call imo whatapps 0302.5504455

|              |                     |          |           |               |
|--------------|---------------------|----------|-----------|---------------|
| Patient Name | MUHAMMAD IKRAM      | Age      | M/F       | M             |
| Refer BY     | B.H.U               | Date     | 15-Feb-24 | Time 11:28 AM |
| Specimen     | Blood investigation | Typhidot |           |               |

| TEST | REPORT | SEROLOGY |
|------|--------|----------|
|------|--------|----------|

|           |                         |                         |
|-----------|-------------------------|-------------------------|
| Typhidot: | (IGM) — Reactive (+ive) | (IGg) — Reactive (+ive) |
|-----------|-------------------------|-------------------------|

## TYPHIDOT IGM (SALMONELLA)

Interpretation for Typhidot IGG and IGM positive acute typhoid fever in the middle stage of infection IGG positive only : relapse or refection or previous infection in which case current fever my not be due to typhidot correlate clinically.

## TYPHIDOT IGG (SALMONELLA)

typhidot IGM and IGG negative probably not typhidot it clinical symptoms suggest typhidot fever treat accordingly blood culture result if positive afew days later may support the clinical decision IGM positive acute typhoid fever

ایڈریس: مچھی روڈ عاٹے کور بلقاہل ایف سی ایڈیٹی ایچ او ضلع مہمند ہمارے ہاں ہر قسم ٹیسٹ اور ایڈیٹیشن کے ذریعے کیجاتی ہے

*The aim of medicine is to prevent diseases and prolong life*

ATTESTED

DHIS-02(F)

Sent To: **OUT DOOR PATIENT TICKET**

District Mohamud CRP No: \_\_\_\_\_


Facility Name (BHD) Mubara

Name محمد الکریم Age: 30 Sex: M

Father's /Husband's Name محمد (عمر) محمد  
محمد (عمر) محمد

Monthly OPD Serial No. \_\_\_\_\_

Provisional Diagnosis: (ARI) UTI

| Date  | Clinical Findings / Investigations / Treatment / Referred / Test Findings                     |
|---|---|
| 20/1/24   | <ul style="list-style-type: none"> <li>q. Cefixime 600mg</li> <li>q. Delectone 1ml</li> </ul> |
| Temp: 102 F   |   |
| Fever   |   |
| Cough   | <ul style="list-style-type: none"> <li>Tab Augmentin 625</li> </ul>                           |
| Adly  | <ul style="list-style-type: none"> <li>Pu. Saffron</li> </ul>                                 |
| Urine   | <ul style="list-style-type: none"> <li>Tab Pedrol Extra</li> </ul>                            |
| RE  |   |
| ATTESTED  | <ul style="list-style-type: none"> <li>Serralluc</li> </ul>                                   |
|  | <ul style="list-style-type: none"> <li>Crem Mex Sactin</li> </ul>                             |

ATTESTED

# SHIFA DIAGNOSTIC LABORATORY MOHMAND

شفاء ڈاگنوسٹک لیبارٹری مہمند

Ayaz khan

-28-



MS.C BIO.CHEMISTRY  
HAZARA UNIVERSITY  
DIPLOMA PATHOLOGY

ayazmohmand499@gmail.com Call imo whatapps 0302.5504455

Patient Name MUHAMMAD IKRAM Age M/F M

Refer BY B.H.U Date 20-Jan-24 Time 3:22 PM

Specimen Urine R/E investigation Urine R/E

## TEST REPORT URINE EXAMINATION

### PHYSICAL EXAMINATION

Quantity 30ml  
Color P Yellow  
PH Acidic  
SP.Gravity 1.030

### CHEMICAL EXAMINATION

Sugar NIL  
Albumin (+)  
Bile.Salt NIL  
Bile Pigment NIL

### MICROSCOPY EXAMINATION

RBC Cell 01 02 /HPL  
PUS Cell 20 24 /HPL  
EPT Cell NIL /HPL  
OTHER..... CA+ OXALATE.....++

ایڈریس: چچی روڈ عاٹے کور بلعابل ایف سی ایچ ڈی ایچ او ضلع مہمند ہمارے ہاں ہر قسم ٹیسٹ جدید مشین کے ذریعے کیجاتی ہے

*The aim of medicine is to prevent diseases and prolong life*

ATTESTED

VC - 4

ابتدائی اطلاعی رپورٹ

نمبر 154

P - 3

(فائل) ابتدائی اطلاع نسبت جرم کی اطلاع نامزدی پولیس رپورٹ نمبر 154 نمبر ضابطہ چوہدری

SN - 65

تاریخ وارڈن

فاتہ سروریل

19.15

5/10

13 فر 69

|   |   |                                   |                        |              |
|---|---|-----------------------------------|------------------------|--------------|
| 1 | تاریخ وقت رپورٹ                                 | 5/10 22.00                        | لکھنؤ کراچی            | 5/10 22.45   |
| 2 | نام و کنونت اطلاع دہندہ مستفیض                  | نثار و قی خان و در علی بن علی خان | خان خوجہ انشان نمبر 51 | مائن طرف کور |
| 3 | تقریبیت جرم (موند سال اگر ہو گیا یا نہ ہو گیا)  | PPC 302                           |                        |              |
| 4 | جائے وقوع قاتل قاتل سے اور سمت                  | ماخ جو ماخ آجران مسلم واقع آگرہ   | ماتہ خانہ سائبر        | تاریخ وقت    |
| 5 | نام و کنونت جرم                                 |                                   |                        |              |
| 6 | کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع اور | کارروائی خریدی دراصل              | بہر شدہ دراصل          |              |
| 7 | قاتل سے روائی کی تاریخ وقت                      |                                   |                        |              |

ابتدائی اطلاع نمبر 154 کے تحت ملکہ خانی اینٹ خریدی مبرا لکھ  
 نثار بن علی شید خان SHC بدست عدالت 1026 حوالہ ہے کہ یہ معون زمین ہے جو  
 HC کے سروریل ہے جب اللہ علی خان نے جویم بالا آیا ہے نثار بن علی خان و نثار بن علی  
 خان انشان نمبر 51 سال مائن طرف کور ہے کہ شہید نے پورے زمین کو کھرا ہے وقت و قوت  
 میں آراضیات میں رنج حالت سے پیدا ہوئے مسجد آرائش سے اس دوران نثار بن علی  
 کی آواز سننے دیکر لوگوں کی طرح ہم نے بھی آکر دیکھا تو والد نام عباس بن علی خان  
 و در علی خان مہینہ لکھنے کے بعد 10 سال دہلا کر ہم محمد ابراہیم و نثار بن علی خان نمبر 51 سال  
 بلوچ اسماعیل آتین خون میں لٹ پٹ آتین شہید بلوچ کے بھائی کسی کے شہادت  
 کوئی دشمنی یا دلیری نہیں ہے ہمیں یہ معلوم نہیں کہ والد نام عباس بن علی خان  
 ہمارے جرم خرید و سدا کر کے لے کر اور کھرا کھرا کھلا کھلا ہوتے ہیں باقاعدہ  
 دعوایاری کر کے سید بدست قلم یا ملہ خان نثار علی کے صدقہ والد نام عباس  
 علی خان دہلا کر ہم خرید و سدا کر کے لے کر اور کھرا کھرا کھلا کھلا ہوتے ہیں باقاعدہ  
 خان و در علی بن علی خان نے رپورٹ ماخ کی ماخ شہید کی رپورٹ لکھیں جس کے  
 مائن رپورٹ دیکھ پاہ ہو کر لکھ کر سنا دیا گیا ہے کہ دوست تسلیم کر کے زور دیا  
 خود دشمن ثابت لیا گیا ہے جو شہید خان دہلا کر دشا نے خود نثار بن علی خان  
 ثابت کیا جاتی ہیں لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر  
 حال نہ رہ کر کے زور دیا گیا ہے کہ لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر  
 مارنے پھینال شہید کو لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر لکھ کر  
 جا کر واسلم حکیم بالا خرید کر کے بدست اسٹیشن نمبر 1026 رائل نام  
 ہے قاتل دراصل حکیم کے

*[Signature]*

ATTESTED

Annexure  
(H-1)

-30-

OUT DOOR PATIENT TICKET

Health Department

District: Chandigarh Sent For:

Facility Name: 1/11/10

Name: \_\_\_\_\_ Age: \_\_\_\_\_ Sex: \_\_\_\_\_

Father's/Husband's Name: Dr. G. S. Singh

Yearly OPD No. 9360 Monthly OPD No. \_\_\_\_\_

Provisional Diagnosis: DEATH CERTIFICATE

23/10

| Date | Clinical Findings, Investigations / Treatment / Referred   |
|------|--|
|      | <p>Certified that MOHAMMAD<br/>ISTAR S/O ABBAS ALI<br/>R/o Zari Korona Dind<br/>on 5-11-2010 (5<sup>th</sup><br/>November 2010) (Monday)<br/>at 07:15 PM, from fire<br/>arm injuries according to<br/>the post mortem report<br/>of T.H.Q. Hospital<br/>Gurgaon.</p> |

ATTESTED

DEATH CERTIFICATE

31-

Annex  
14-2

As verified by the Political Naib Tehsildar Fkk. District that the latter are persons were expired on 05/11/2010 due to the firing of unknown militants.

1) Haji Abass Ali s/o Khan Sahib r/o Zareer, Korr Tehsil Ekkaghund

2) Mohammad Israr s/o Abass Ali r/o Zareer Korr Tehsil Ekkaghund

ATTACHED

*[Handwritten signature]*

*[Handwritten signature]*

A. I. E. U  
Mohammad A. Khan

Assistant Political Agent  
Lower Mohmands Ekkaghund

*[Handwritten signature]*  
Ekkaghund

**WAKALATNAMA**  
(Power Of Attorney)

-32-

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

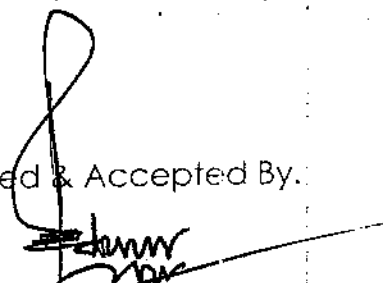
Muhammad Ikram..... (Petitioner)  
(Plaintiff)  
(Applicant)  
(Appellant)  
(Complainant)  
(Decree Holder)

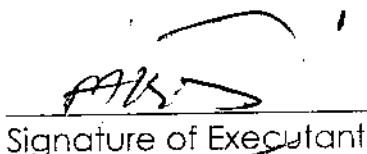
**VERSUS**

Director E&SE & others..... (Respondent)  
(Defendant)  
(Accused)  
(Judgment Debtor)

I/ We, \_\_\_\_\_ The undersigned \_\_\_\_\_ in the above noted Service Appeal, do hereby appoint **Mr. Adnan Aman and Misbah Ullah** Advocates to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my /our counsel in the above noted matter, without any liability for their default, and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

Attested & Accepted By:

  
**Adnan Aman Advocate**  
Bc-13-4253  
Cell No.0321-9853530  
&

  
Signature of Executants

**Misbah Ullah**  
Advocates High Court, Peshawar  
15-B Haroon Mansion, Khyber Bazar,  
Peshawar  
CNIC No.16102-7662033-9