


FORM OF ORDER SHEET

Court of _____

Appeal No. 800/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/06/2024	<p>The appeal of Mr. Muhammad Ashfaq presented today by Mr. Muhammad Iqbal Lodhi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13.06. 2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Before The Hon'able Service Tribunal of KPK at
Peshawar

Appeal No. 800 /2024

Muhamamd Ashfaq son of Nadir Khan Secretary Village Council-2
Muhib Banda, Tehsil and District Mardan

.....Appellant

VERSUS

1. Assistant Director Local Government and Rural Development
Mardan
 2. Director General local Government and Rural Development
Mardan
- Respondents

APPEAL

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Appellant ASfaq

Trough counsel
Muhammad Iqbal Iodhi advocate
High Court at Distt: courts
Mardan.

Dated: 10-06-2024

1

**Before The Hon'able Service Tribunal of KPK at
Peshawar**

Appeal No. 800 /2024

(1)

Muhamamd Ashfaq son of Nadir Khan Secretary Village Council-2
Muhib Banda, Tehsil and District Mardan

.....Appellant

VERSUS

1. Assistant Director Local Government and Rural Development
Mardan
2. Director General local Government and Rural Development Mardan
..... Respondents

*Appeal U/S-4 of KPK Service Tribunal Act 1974 against
the order of respondent No.1 dated 20/02/2024 whereby,
appellant is terminated from his service which is illegal,
against law and facts.*

Respectfully Sheweth;

Appellant humbly submits as under

1. That appellant was appointed as Village Secretary and was performed his duty in Village Council-2 Mubib Banda Mardan.
2. That appellant was promoted as a Senior Secretary BPS-11 on 08/10/2021. (Copy of order of promotion is hereby attached).
3. That, the appellant submitted application for grant of long leave such two years which was granted to the appellant on 13/10/2021 w-e-f 18/10/2021 to 17/09/2023. (Copy of order dated 13/10/2021 is hereby attached).

4. That before the expiration of leave i-e 17/09/2023, the appellant had submitted application on 05/09/2023 for extension in his already granted leave such for further two years. (Copy of application is hereby attached).
5. That the appellant was waiting for his application as well as for further extension in leave but in the meanwhile, the respondent NO.1 issued the impugned termination order vide which, the appellant was terminated from his service without any cogent reason dated 20/02/2024. (Copy of order dated 20/02/2024 is hereby attached).
6. That in this respect, the appellant preferred departmental appeal/ representation before the respondent No.2 b dated 04/03/2024 but in vain.
7. that order of respondents is against law, facts , illegal and liable to be set aside on the following grounds inter alia..

GROUNDS

- A. That order of respondent No.1 vide which he was terminated from his service is wrong, against law, facts, against the provision of law, against the service rules hence, not tenable and is liable to be set aside, consequently, the appellant may be re-instated on his post along with all back benefits.
- B. That, no authorized officer has been appointed nor he has recommended appellant for major penalties.
- C. That, from the record no inefficiency and misconduct has been committed by the appellant, the department has violated laid down procedure and standing rules as well as standing practice.
- D. That no inquiry was conducted neither any inquiry officer has been appointed.

- E. That, the respondents were duly bond to serve a legal or show cause notice upon the appellant but the said legal formality was not fulfilled.
- F. That the petitioner was also kept un-heard and similarly no opportunity of hearing was given to the appellant.

It is, therefore, humbly prayed that on acceptance of this appeal, order of respondent No. dated 20/02/2024 may kindly be set aside, the appellant may be re-instated in service with all back benefit from the date of termination till re-instatement.

Appellant ASfhaq

Trough counsel
Muhammad Iqbabl lodhi advocate
High Court at Distt: courts
Mardan.

Dated 10/06/2024

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that all the contents of the appeal mentioned above are true and correct to the best of my knowledge and belief and noting has been concealed from this Hon'able court.

Advocate



OFFICE OF THE DEPUTY COMMISSIONER MARDAN

No. 604/DC (M) Dated Mardan, the: 23/02/2016

APPOINTMENT ORDER

Consequent upon the recommendation of the Selection & Recruitment Committee made in its Meeting held on 23-02-2016 at 10:00 am, the following persons placed on the merit list are hereby appointed as Secretary (BPS-07) of Village / Neighborhood Council as noted against their names, in district Mardan, with immediate effect, on the terms and conditions appended below:

Sr.#	Name	Father Name	D.O.B	Appointed for VC/NC
1	Tahir Rahman	Ghafoor Rahman	05-03-1989	Rorya-1
2	Syed Bilawal Hussain	Syed Bashir Hussain	25-09-1990	Rorya-2
3	Salmanullah	Pir Muhammad	15-03-1993	Bakyana
4	Hamad Ali	Niaz Ali	20-03-1990	Manga-1
5	Muhammad Asad zia	Farman-ud-Din	05-03-1990	Manga-2
6	Muhammad Abbas	Muhammad Shafi	07-10-1988	Mardan Khas-2
7	Muhammad Arif	Muhammad Ghawas	27-03-1989	Kaskoroona-1
8	Waqas Khan	Riaz Khan	21-04-1992	Kaskoroona-2
9	Nasir Khan	Mehraban Shah	19-01-1991	Kaskoroona-3
10	Yaseen Ahmad	Noor Muhammad	12-12-1991	Khazana Dheri-1
11	Arshad Ali	Jan Sald	17-03-1991	Khazana Dheri-2
12	Tahir Hussain	Akbar Hussain	11-02-1990	Shelkh Yousaf-1
13	Syed Amjad Ali Shah	Syed Jamal Shah	15-08-1991	Shelkh Yousaf-2
14	Ammar Hassan	Gulzar Ali	23-09-1992	Bughdad Rural-1
15	Umar Hayat	Nadir Khan	31-10-1987	Bughdad Rural-2
16	Mubassar Shah	Fazle Malik	18-03-1992	Chamtar Dheri
17	Junid Rahman	Kifayatullah	01-02-1991	Dagal-1
18	Muhammad Ismail	Sher Muhammad Khan	02-2-1993	Dagal-2
19	Muhammad Junid	Muhammad Yaseen	03-01-1992	Bagh-e-Irum-1
20	Habibullah	Niaz Nabl	15-04-1986	Bagh-e-Irum-3
21	Tamloor Khan	Abdul Sattar	01-03-1987	Chak Toru
22	Muhammad Iltaf	Muhammad Khursheed	16-03-1992	Khawaja Rashaka

23	Imtiaz Ali	Azizullah	10-01-1989	Bakri Banda
24	Hazrat Umar	Khan Bahadar	11-04-1992	Khanjar
25	Amjid Khan	Munir Khan	22-02-1993	Maho Dheri
26	Syed Rashid Ali Shah	Syed Farooq Shah	17-07-1991	Behram Khan Killi
27	Sabir Khan	Momin Khan	13-01-1989	Koragh
28	Falzi-ul-Islam	Falzi-ur-Rahman	19-09-1986	Chowki
29	Naseer Khan	Jafar Khan	02-05-1994	Ghala Dher
30	Farhad Ali	Liaqat Ali	03-04-1990	Khawo
31	Raid Ali	Muhammad Ali	16-03-1990	Hoti-3
32	Haider Sher	Umar Sher	15-03-1993	Gull Bagh-1
33	All Raza	Nisar Muhammad	15-12-1990	Bicket Gunj-1
34	Shahan Khan Naqvi	Muhammad Naqvi	08-04-1994	Bicket Gunj-3
35	Zahoor Ali	Riqab Shah	29-04-1987	Shahbaz Garhi-1
36	Muhammad Asif	Gulam Hussain	31-03-1991	Shahbaz Garhi-2
37	Muhammad Zeb	Falzi Muhammad	08-04-1992	Chak Shahbaz Garhi
38	Syed Saifullah	Syed Ahmad Hussain	30-04-1994	Mohib Banda-1
39	Ishfaq	Nadir Khan	06-10-1981	Mohib Banda-2
40	Atta-ur-Rahman	Meher Gul	04-03-1991	Kandar
41	Sadiq-ur-Rahman	Raj Muhammad	04-01-1988	Qasim
42	Asad Ali	Karim Khan	01-11-1990	Sharif Abad
43	Billal Khan	Akmal Khan	17-01-1992	Alla Dad Khel-2
44	Muhammad Imran	Said Ahmad Jan	12-12-1989	Chak Hoti
45	Shah Fahad	Gul Rahman	03-01-1988	Shahmat Pur-1
46	Court Case			Shahmat Pur-2
47	Ishfaq Ali	Muhammad Irshad	20-10-1994	Geeder
48	Muhammah Haris Amin	Rooh-ul-Amin	29-04-1993	Baghicha Dheri-1
49	Gul Taj	Zahir Taj	01-03-1990	Baghicha Dheri-2
50	Imad Naeem	Fazil Naeem	03-10-1992	Garhi Dolat Zai-1
51	Akbar Ali	Abdul Samad	02-02-1995	Garhi Dolat Zai-2
52	Zahoor Muhammad	Fazal Muhammad	81-03-1988	Garhi Ismail Zai-2
53	Salman Akhtar	Ameeruddin	16-03-1991	Gujar Garhi-1

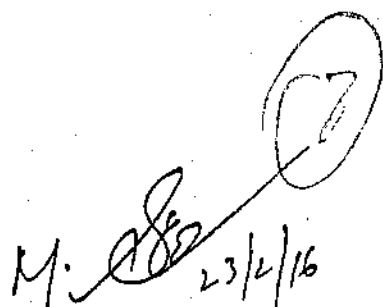
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147	Muhammad Waqas	Shelkh Muhammad Yousaf	20-02-1996	Fatima-1
148	Jafar Khan	Gul Rahman	01-07-1991	Fatima-2
149	Amin-ul-Haq	Mumtaz Khan	30-05-1992	Hamza Khan
150	Ibadullah	Darwish Khan	04-06-1993	Qazi Abad
151	Hamair Ali	Gul Sher	04-04-1991	Garyala
152	Muhammad Sahib	Namooos Khan	05-01-1994	Bahl Khan
153	Amir Seeyab Yousaf	Haji Mir Zaman	14-04-1988	Gujrat-2
154	Habibullah	Kifayatullah	08-05-1992	Jungara
155	Shakoor Khan	Gulzar Muhammad	20-03-1991	Barikab
156	Safarish Khan	Abdullah	04-03-1994	Katakhat
157	Muhammad Tayyab	Shamshad Khan	02-04-1986	Kotarpan
158	Basit Ali	Muhammad Ali	29-04-1995	Chak Mardan-1
159	Shams-ul- Islam	Taj Muhammad	20-04-1987	Chak Mardan-2
160	Hussain Muhammad Irshad	Zahir Shah	04-06-1988	Mardan Rural-1
161	Zakir Khan	Taza Gul	17-03-1991	Mardan Rural-2
162	Wajid Khan	Muhammad Umar Khan	20-04-1994	Par Hoti-2
163	Sajjad Khan	Abdur Rahman	25-04-1993	Par Hoti-3

Terms and Conditions:

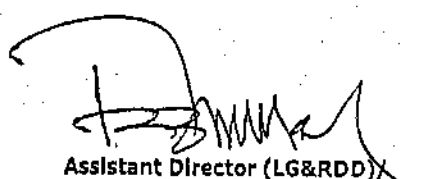
1. Their services shall be governed by rules / prescribed Policy of the Government.
2. They will be considered on probation for a period of one year which may be extended for further one year. During the probation period, their services are liable to be dispensed without assigning any reason or notice, if their performance was not found up to the mark.
3. This offer of appointment is subject to verification of their academic credentials/ Degrees, certificate etc. from the concerned recognized Board/ Institute/ University etc. If any of the credentials of a person are found fake, his appointment will liable to be cancelled. Moreover, necessary legal action would also be initiated against him.
4. Health and age certificate issued by the medical superintendent DHQ Hospital, Mardan be produced before joining the post.
5. Every candidate will have to produce an affidavit on stamp paper of worth Rs. 500/- that the candidate belongs to the same VC/NC In which he/she is appointed.
6. Any other law, rules or instructions issued from Government from time to time would also be applicable.
7. If the above offer is accepted, you should report to the office of Assistant Director, Local Govt: & Rural Development Department, Mardan within fifteen days of the issuance of this office order, otherwise the offer will automatically stand cancelled.

M. A. S.


M. J. J. 23/2/16
Deputy Commissioner/
(Chairman S & R Committee)
Mardan.

Endst. Even No. Date:
Copy is forwarded to the:

1. The Secretary to Govt: of Khyber Pakhtunkhwa, Local Govt. Elections & Rural Development Department, Peshawar.
2. The commissioner Mardan Division, Mardan
3. The Director General, Local Govt. & Rural Development Department, Khyber Pakhtunkhwa, Peshawar.
4. The PSO to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
5. The PSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
6. The Section Officer (Establishment), Local Govt. & Rural Development Department, Khyber, Pakhtunkhwa, Peshawar.
7. The Medical Superintendent DHQ Hospital Mardan.
8. The District Accounts Officer, Mardan.
9. Assistant Director, Local Govt. & Rural Development Department, Mardan.
10. All concerned for compliance.


Assistant Director (LG&RDD)
(Secretary S & R Committee)
Mardan.



Office of The
Assistant Director
Local Government & Rural Development Department
Mardan

Dated MRD/Estab/8/10/2021

OFFICE ORDER:

No./AD/LG&RDD/MRD/ESTAB/Promotion/2021: ²³⁷ Consequent upon the recommendation of Departmental Selection/recruitment Committee meeting held on 30-09-2021. the following Junior Secretaries Village/Neighborhood Council (BPS-09) are hereby promoted to the post of senior Secretary Village/Neighborhood Council (BPS-11) in District Mardan With Immediate effect, in the best public interest:

S.No	Name	Father Name	Date of Birth	Appointment Date	Remarks
1	Jamal Ahmad	Riaz Ahmad	13/04/1990	24/12/2011	Promoted from BPS-09 to BPS-11
2	Muhammad Farooq Shah	Muhammad Zahir Shah	20/11/1976	23/02/2016	Promoted from BPS-09 to BPS-11
3	Asifq	Nadar Khan	10/06/1981	23/02/2016	Promoted from BPS-09 to BPS-11
4	Feroz Shah	Syed Zahir Shah	02/04/1985	23/02/2016	Promoted from BPS-09 to BPS-11
5	Niaz Muhammad	Muhim Muhammad	09/11/1985	23/02/2016	Promoted from BPS-09 to BPS-11
6	Ihsan Ullah	Nadar Khan	15/01/1986	23/02/2016	Promoted from BPS-09 to BPS-11
7	Kumail Hamza	Adam Khan	17/02/1986	23/02/2016	Promoted from BPS-09 to BPS-11
8	Abid Ali	Gul Zada	20/03/1986	23/02/2016	Promoted from BPS-09 to BPS-11
9	Habib Ullah	Niaz Nabi	15/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11
10	Syed Waqas Ali Shah	Syed Ghafar Shah	30/04/1986	23/02/2016	Promoted from BPS-09 to BPS-11
11	Faiz Ul Islam	Faiz Ur Rahman	19/09/1986	23/02/2016	Promoted from BPS-09 to BPS-11
12	Janas Khan	Khan Sher	01/01/1987	23/02/2016	Promoted from BPS-09 to BPS-11
13	Ismail	Ahmad	02/02/1987	23/02/2016	Promoted from BPS-09 to BPS-11
14	Muhammad Younas	Said Zahir Shah	06/02/1987	23/02/2016	Promoted from BPS-09 to BPS-11
15	Asad Ali	Ali Rahman	11/02/1987	23/02/2016	Promoted from BPS-09 to BPS-11
16	Taimur Khan	Abdul Sattar	01/03/1987	23/02/2016	Promoted from BPS-09 to BPS-11
17	Yasir Khan	Sher Zamin	02/03/1987	23/02/2016	Promoted from BPS-09 to BPS-11
18	Sajjad Khan	Abdur Rahman	20/04/1987	23/02/2016	Promoted from BPS-09 to BPS-11
19	Khalid Khan	Newsber Khan	12/07/1987	23/02/2016	Promoted from BPS-09 to BPS-11
20	Umar Hayat	Nadir Khan	31/10/1987	23/02/2016	Promoted from BPS-09 to BPS-11
21	Shafi Ullah	Atta Ullah	20/12/1987	23/02/2016	Promoted from BPS-09 to BPS-11
22	Amir Zeb	Alam Zeb	25/12/1987	23/02/2016	Promoted from BPS-09 to BPS-11

Dist. Govt. NWFP-Provincial
District Account Officer

23	Ajmal Khan	Umar Khan	02/01/1988	23/02/2016	Promoted from BPS-09 to BPS-11
24	Shah Fahad	Gul Rehman	01/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
25	Muhammad Shafiq	Mir Zaman	10/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
26	Riaz Ali Shah	Qadsem Shah	18/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
27	Zahoor Muhammad	Fazal Muhammad	31/03/1988	23/02/2016	Promoted from BPS-09 to BPS-11
28	Sadiq Ur Rehman	Raj Muhammad	01/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
29	Hussain Muhammad Irshad	Zahir Shah	06/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
30	Sajid Ali Jan	Allah Bakhsh	12/04/1988	23/02/2016	Promoted from BPS-09 to BPS-11
31	Ali Shah	Maqsood Gul	05/01/1989	23/02/2016	Promoted from BPS-09 to BPS-11

2) The Officials on promotion will remain on probation for the period one year, in light of (Appointment, promotion & transfer) Rules 1989, with Rules-15(1) of Khyber Pakhtunkhwa Civil Servants.


Assistant Director,
Local Govt: & Rural Dev: Department
Mardan

Endst: No & Date Even.

Copy of the above is forwarded to:-

1. Director General, LG&RDD Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Mardan.
3. District Account Officer, Mardan.
4. The Tehsil Municipal Officer (TMA, Mardan)
5. PS to Secretary LG&RDD Khyber Pakhtunkhwa.
6. Accountant LG&RDD, Mardan.
7. Progress officer LG&RDD, Mardan.
8. Supervisors LG&RDD Mardan.
9. Officials concerned.


Assistant Director
Local Govt: & Rural Dev: Department
Mardan

70,

The Assistant Director,
Local Government and Rural
Development Merdan.

(10)

Subject: Application for Long leave
with-out-pay (2-year).

Dear Sir,

With profound regard it is stated
that there is enmity with my relatives,
so many people tried for counsels, but
failed to do so. I am uns-ful for
performing duty.

Therefore it is requested to grant me
a 2-year without pay leave from
25th Sep-2021. I will not forget your's
kind act of reimburse. Thanks

Dated = 6th 9/2021

Your's obediently,
A. D. F. Ishfaer,
V/C Mahib-Banda.



Office of The
Assistant Director
Local Government & Rural Development Department
Mardan

Dated MRD/Estab/13/00/2021

11

OFFICE ORDER:

No./AD/LG&RDD/MRD/Transfers/postings/2021/256 : In exercise of the power delegated to me under the Civil Servants revised leave rules 1981 of Khyber Pakhtunkhwa, Section no.12 extraordinary leave without pay for period of two years is hereby granted to Mr.Muhammad Ishfaq Secretary Village Council Mohib Band-II, (Without Pay) with effect from 18-10-2021 to 17-09-2023.


Assistant Director
Local Govt. & Rural Dev: Department
Mardan

Endst: No & Date Even.

Copy of the above is forwarded to:-

1. Director General, LG&RDD Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Mardan.
3. Supervisors, LG&RDD, Mardan.
4. Officials concerned *for strict compliance.*


Assistant Director
Local Govt. & Rural Dev: Department
Mardan

گورنمنٹ آف پاکستان ڈیپارٹمنٹ آف ایجوکیشن، مردان

درخواست مزید
Extra ordinary leave
without pay for period of
two years as under
مذکورہ

12

مذکورہ: درخواست

- 1) سیکرٹری ایجوکیشن، راولپنڈی کی طرف سے ایف آئی سی کے تحت اس دوران سیکرٹری ایجوکیشن، راولپنڈی کے تحت
- 2) سیکرٹری ایجوکیشن، راولپنڈی کے تحت 17/9/2023ء کو منظور کیا گیا ہے۔
- 3) سیکرٹری ایجوکیشن، راولپنڈی کے تحت ایف آئی سی کے تحت ایف آئی سی کے تحت
- 4) سیکرٹری ایجوکیشن، راولپنڈی کے تحت ایف آئی سی کے تحت ایف آئی سی کے تحت
- 5) سیکرٹری ایجوکیشن، راولپنڈی کے تحت ایف آئی سی کے تحت ایف آئی سی کے تحت
- 6) سیکرٹری ایجوکیشن، راولپنڈی کے تحت ایف آئی سی کے تحت ایف آئی سی کے تحت

اسی لئے کہ منظور ہو سکے

سیکشن ایجوکیشن کو دو سال خیرہ کے لئے دینے کے لئے
حصہ دو فریڈم

ایف آئی سی کے تحت ایف آئی سی کے تحت

گورنمنٹ آف پاکستان ڈیپارٹمنٹ آف ایجوکیشن، مردان 5/9/2023

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OFFICE OF THE ASSISTANT DIRECTOR (SENIOR)
LOCAL GOVERNMENT &
RURAL DEVELOPMENT DEPARTMENT
MARDAN



Dated: 20.02.2024

OFFICE ORDER:

No./AD/LG&RDD/MRD/Removal/Establishment/2023-24/ 67; WHEREAS, In light of the Show-Cause Notice No.INF(P)167/24 published in daily Mashriq dated:27.01.2024 Mr. Ishfaq Nadir Secretary Village Council Mohib Banda-II (BPS-11), at Office of the Assistant Director (Senior) LG&RDD Mardan is charged under Government Servants(Efficiency & Discipline) Rules, 1973, on account of the following acts of omissions & commission constituting inefficiency and misconduct as mentioned in Rule-2(4) and 3(a) & (b) of the said rules:-

- I. That he has been keeping himself absent from duty w.e.f 17.09.2023 to date, without application/prior permission.
 - II. That he was directed to resume the duty and explain the reasons of his absence from duty vide this department letters/Absent Notice No: Absent Notice-I (No.LG-MRD/Notice/2023-24/541 dated: 21.11.2023) Absent Notice-II (LG-MRD/Notice/2023-24/560 dated: 04.12.2023) Absent Notice-III (No.LG-MRD/Notice/2023-24/581 dated: 18.12.2023) but he failed to resume his duty.
 - III. That his above act is tantamount to inefficiency and misconduct towards official duties.
2. WHEREAS, Keeping in view the above facts I, Mr. Kashif-Ur-Rehman Assistant Director (Sr), being an Authorized Officer after examining the service record of Mr. Ishfaq Nadir Secretary Village Council Mohib Banda-II (BPS-11), reached the proportional conclusion that he has been prima-facie guilty of the charge of misconduct and decide that conducting of an inquiry in your case is not necessary in term of Rule-5(iii)(b) of Government Servants(Efficiency & Disciplinary) Rule,1973.
3. NOW THEREFORE, Mr. Ishfaq Nadir Secretary Village Council Mohib Banda-II (BPS-11), at Office of the Assistant Director (Senior) LG&RDD Mardan is hereby charge under Rule-4 of Government Servants (Efficiency & Disciplinary) Rules, 1973 " Removal from service" with immediate effect.

Assistant Director (Senior)
LG&RDD Mardan

Copy for information is forwarded to:

- 1- PS to Secretary, LGRDD Khyber Pakhtunkhwa.
- 2- PA to Director General LGRDD Khyber Pakhtunkhwa.
- 3- Progress Officer & Supervisor Tehsil Garhi-Kapoora, District Mardan.
- 4- Office Assistant, LG&RDD Mardan.
- 5- Accountant, LG&RDD Mardan.
- 6- Mr. Ishfaq Nadir (Ex-Secretary Village Council Mohib Banda-II) Tehsil Garhi-Kapoora, District Mardan.

Assistant Director (Senior)
LG&RDD Mardan

0937 9230067

adlgmardan1@gmail.com

Before the Director General (Local Govt. & Rural Development) KPIS Pashwan
Mohammad Ishaq, s/o Mader Secretary Village Council Mowla Bando II (BPS II) Mardan

(14)

versus

(Appellant)

Assistant Director (senior) LR & RDD Mardan
Respondent

Appeal against order NO AD/LR & RDD (MAD) Removal / Establishment 2023/24 87 dated 20th 2024 of Respondent NO: 1 wherein Appellant was removed from service is illegal, against Law, fact.

Prayer: on acceptance of this appeal the order of Respondent dated 2023-24-20-22-2024 may please be set aside and appellant may please be re-instated with all back benefit.

Sin; Appellant humbly submits as under:

- ① This appellant was appointed as Secretary Village Council Mowla Bando II (BPS II) Mardan
- ② This appellant was allowed Extraordinary leave without pay for period of two years with effect from 19-10-2021 to 17-10-2023. (copy letter is attached) dated 13-10-2021 (copy letter is attached)

1894

Received of the Treasurer of the County of ...

the sum of ...

for ...

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...

5) that punishment is too harsh and needs interference of the departmental authority

(16)

(F) that no show cause notice was given to appellant

(F) that no personal hearing was been conducted

(G) no strict allegation / charge sheet was been given to appellant

(H) no enquiry has been conducted.

NO Enquiry has been appointed for the subject officer

NO Cancellation letter has been issued to the appellant on the extension application dated ^{leave}

5/9/07

It is therefore, prayed that on acceptance of this appeal the impugned order of Respondent dated 20-2-2014/2022-24/1087 may please be set aside and appellant may please be reinstated with all back benefit and arrears of pay and interest thereon may please be awarded.

محمد رفیق
محمد رفیق (16)
Secretary Village Council
Mokib Bonda mandan.

Affirmed

I undersigned declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief.

محمد رفیق
Deponent



محمد رفیق

dated 4/3
2024

قیمت 100 روپے بریل نمبر 21422



ڈسٹرکٹ بار ایسوسی ایشن مردان

18

بعدالت جناب: _____

مخائب:

دعویٰ مقدمہ:

علت نمبر:

جرم:

تھان:

باعث تحریر آئنگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام _____ کیلئے _____ کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زر پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ برداشتہ منظور قبول ہوگا۔

دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا خرچہ کی وصولی کا بھی اختیار ہوگا۔ اگر کسی تاریخ پیشی پر وکیل موصوف دورہ پر ہو یا مقام سے باہر ہو یا بیمار ہو یا کوئی ضرورتی کام ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

الموقعہ _____ 10 _____ مقام _____ کے لئے منظور ہے۔

دستخط وکیل موصوف

منظور تصدیق شدہ