


FORM OF ORDER SHEET

Court of _____

Appeal No. 2168/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/10/2024	<p>The appeal of Mr. Ali Hamayun resubmitted today by Mr. Humaira Gul Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 05.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ali Hamayun received today i.e on 17.10.2024 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. 3 to 5 are un-necessary/improper parties, 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 respondents.
- 2- Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Memorandum of appeal is not signed by the appellant.
- 4- Copy of enquiry report mentioned in the heading of the appeal is not attached with the appeal be placed on it.

No. 921 /Inst./2024/KPST,

Dt. 17/10 /2024.

Amirulloh
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Humaira Gul Adv.
High Court at Peshawar.

*In Resubmitted after doing the
needful.*

*Justice
Advocate.*
29/10/2024

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

Service Appeal No. 2168 /2024

Ali Humayun

VERSUS

Director Education & others

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Dated: 5.10-2024

Appellant

Through

Jee
Advocate

Humaira Gul

Advocate High Court.

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

Service Appeal No. 2168 /2024

Ali Humayoon S/O Atta Muhammad Khan R/O Pohan colony near TB Hospital ,Baghdada
Mardan presently posted at GPS,Kalukhan tehsil Razar District Swabi

..... Appellant

VERSUS

1. **The Director Elementary & Secondary Education Khyber
Pakhtukhwa,Peshawar**

2. **The District Education Officer Male ,Swabi**

..... Respondents

**Appeal u/s 4 of the Khyber Pakhtunkhwa Services Tribunal Act -1974
against the impugned order No.2735/F.No/16 dated 18.09.24 where the
Departmental Appeal of appellant seeking release of salaries/back
benefits & against inquiry report & order No.7505-11 dated 03.08.2023,
has been turned down by the office of Director of Elementary &
Secondary Education ,Peshawar, in a classical, cursory and whimsical
manner.**

Respectfully Sheweth,

1. *That the appellant was terminated from service by the respondents on the basis of absentees and he filed appeal against the impugned orders before services tribunal ,Peshawar where after the appeal No.1063/2022 was allowed by KP services Tribunal Peshawar, and the appellant was re-instated in service for the purpose of DE novo inquiry . attested copy of judgment attached as annexure—A*
2. *That after inquiry by inquiry committee With reference to notification Endst.No7505-11 dated 03.08.2023 the DEO Male Swabi has re-instated the appellant into service on his original post on the basis of inquiry report but converted all the intervening period in to Extra Ordinary Leave.*
3. *That the findings of inquiry committee on the absentees of appellant as per inquiry report are baseless & against law & facts whereby the DEO Male Swabi converted all the*

(2)

intervening period in to Extra Ordinary Leave as per notification Endst.No7505-11 dated 03.08.2023 which is wrong, illegal & against the facts of the case . copy of order & inquiry report attached as annexure-B

4. That the appellant filed departmental appeal against the findings of inquiry report on the absentees of the appellant & order Endst.No7505-11 dated 03.08.2023 on the basis of inquiry report , which is turned down by the respondent No.01. copy of departmental appeal & order dated 18.09.24 attached as annexure C & D respectively
5. Besides other legal and factual fact of the case, the impugned order dated 18.09.24 is incorrect & unjustified further the findings of inquiry committee on the absentees of appellant as per inquiry report are against facts as his signs were there on the attendance register & the head teacher did not marked him absent then the appellant attendance & performing his duty has been proved the inquiry committee cannot assume him absent further direction of DEO Male Swabi of converting alleged absence & intervening period as per notification Endst.No7505-11 dated 03.08.2023 on the basis of inquiry report is wrong, illegal & against the facts of the case on the following amongst other ,

GROUND

1. The impugned order dated 18.09.24 is against law, rules, facts, record & circumstances & inquiry report and order dated 03.08.23 on the basis of inquiry report is against law & facts , appellant is entitled for all back benefits
2. That appellant performed his duties in GPS Para Kalu Khan regularly, while he was penalized for the absentees made in GPS Adina and the inquiry committee cannot punished him for that absentees again & he is entitled for his salaries when he regularly performed his duties in GPS, Parra Kalkhan which is evident from the attendance register.
3. That the findings of inquiry reports about appellant's absentees are wrong and against facts, he performed his duty regularly for all that period & he is entitled for all the salaries accordingly.
4. That the findings of inquiry committee are based on wrong assumptions, appellant was performing his duty regularly.
5. That the direction of DEO Male Swabi of converting absence & intervening period as per notification Endst.No7505-11 dated

(3)

03.08.2023 on the basis of inquiry is wrong, illegal & against the facts of the case as appellant performed his duties & attendance register is reflecting his presence on duty.

6. That the inquiry report is completely silent about the details of appellant's attendance then straight away refusing his salaries for 19 months has no legal footings & peak of cruelty.
7. That the appellant has not been treated according to law.
8. That the legal infirmities have been found in the proceedings & illegal notifications has been passed.
9. That the appellant is regularly attending his school when he got knowledge about the dismissal of his appeal some days ago, hence the appeal is well within time and in case of any technicality the appellant also submit for condonation.
10. That the Act, commission & omission of the respondents & inquiry committee are patently illegal, unlawful, without lawful authority of no legal effect, hence no value in the eyes of law.
11. That in all respect appellant is entitled for all back benefits/salaries of intervening period.
12. That any other ground not specifically mentioned will be raised if call for hearing.

It is therefore most humbly prayed that on acceptance of this appeal, the impugned orders may kindly be set aside & back benefits/salaries of 19 months of appellant's may kindly be released.

Dated: 05.10.2024 appellant

Ali Humayun
Ali Humayun

Through

Humaira Gul
Humaira Gul
Advocate High Court

NOTE:

That as per information of my client, no such service appeal has been moved by the Appellant, prior to this one.

Humaira Gul
ADVOCATE

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BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

Service Appeal No. 2168 /2024

Ali Humayun

VERSUS

Director Education & others

ADDRESSES OF THE PARTIES

ADDRESSES OF THE APPELLANTS:

Ali Humayoon S/O Atta Muhammad Khan R/O Pohan colony near TB Hospital ,Baghdada Mardan presently posted at GGPS Parra Kalukhan tehsil Razar District Swabi

ADDRESSES OF THE RESPONDENTS:

1. The Director Elementary & Secondary Education Khyber Pakhtukhwa, Peshawar
2. The District Education Officer Male ,Swabi

Dated: 05.10-2024

Through

Ali Humayun
Appellant
Humaira Gul
Advocate

Humaira Gul
Advocate High Court,

(5)

Annexure "A"

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1063/2022



BEFORE: SALAH-UD-DIN --- MEMBER (J)
MUHAMMAD AKBAR KHAN --- MEMBER (E)

Ali Humayun S/O Atta Muhammad Khan R/O Pohan Colony near TB Hospital Baghdada, Mardan..... (*Appellant*)

VERSUS

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer (M) Swabi.
3. The Sub-Divisional Education Officer Tehsil Razar (Swabi).
4. The Secretary Education Khyber Pakhtunkhwa Peshawar.
5. The Headmaster Government Primary School Parra Swabi.

.....(*Respondents*)

Present:

AMJID MAKHDOOM,
Advocate --- For Appellant

ASIF MASOOD ALI SHAH,
Deputy District Attorney, --- For respondents

Date of Institution.....16.06.2022

Date of Hearing.....16.05.2023

Date of Decision..... 16.05.2023

JUDGMENT

MUHAMMAD AKBAR KHAN, MEMBER(E):- The instant service appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer as copied below;

"On acceptance of this appeal the Notification No. 1251-56 dated 27.02.2022 issued by respondent No. 2 may please be set aside and the appellant may please be restored to his

ATTESTED

EXHIBIT
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

position with all back benefits from date of his termination."

02. Brief facts of the case are that the appellant was appointed as PST in the year 2018. The appellant was issued Show Cause Notice bearing No. 2070-G dated 24.11.2020 followed by an enquiry, whereby he was awarded minor penalty of withholding of two annual increments for a period of two years and was transferred to GPS Parra Kalu Khan Swabi on administrative grounds on the allegation of absence from duty w.e.f 02.11.2020 vide order dated 29.07.2021. The appellant assumed the charge on 04.08.2021. The appellant was removed from service vide order dated 27.02.2022 on the allegation of absence from duty w.e.f. 17.08.2021 to 16.10.2021. Feeling aggrieved, the appellant filed department appeal on 05.03.2022 which was turned down on 18.05.2022, hence, the present service appeal.

03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant and learned Deputy District Attorney and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant contended that the impugned orders are against law, facts and norms of justice; that the absence mentioned in the show cause notice is false as the attendance register shows regular duty of the appellant. He submitted that the appellant was regular in his duties and was not absent in the alleged period i.e. 17.08.2021 to 06.10.2021 and the allegations of the respondents are wrong and without any cogent reason which is based on malafide and ill will. Further

ATTESTED

Khairpur
Service Tribunal
Machhwar

submitted that the malafide of the respondents floats from the termination order wherein the proceedings of previous inquiry have been relied by refereeing to advertisement dated 10.12.2020 & 11.12.2020, while the period in dispute is w.e.f. 17.08.2021 to 06.10.2021 and in the said period also, the appellant was not absent from duty; that the respondents have referred in the comments to the previous inquiry while the matter is in respect of a later period; that the appellant has been punished twice, firstly withholding of two annual increments for two years and the second is removal from service which is against law as one person cannot be punished twice. He submitted that the appellant has never been issued show cause notice nor he was provided any opportunity of defense. Lastly, he submitted that neither statement of concerned Headmaster has been recorded nor the attendance register has been examined. Therefore, he requested for acceptance of the instant service appeal.

05. Learned Deputy District Attorney argued that the appellant was rightly removed from service as he was willfully absent from duty. He submitted that the impugned order is in accordance with law and norms of justice and the appellant has been proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. Further submitted that the attendance register has been signed by the concerned Head Teacher by force as the appellant belongs to an influential family; that the whole service of the appellant is spotted with absenteeism, disobedience and disinterest towards his job and the department by taking lenient view has given several chances and by given minor penalty for mending his ways but no avail. Further submitted that the appellant is a


ATTESTED

ENABLING
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

habitual absentee and has been issued show cause notice which remained un-responded from appellant. Lastly, he submitted that the appellant has less than four years service which is full of irregularities, inefficiency and disobedience, therefore, he has been rightly removed from service.

06. The impugned order of removal from service dated 27.02.2022 would reveal that actually absence period of two different periods have been combined against the appellant. In fact the appellant was penalized for absence period relating to year 2020 by imposing minor penalty of stoppage of two annual increments for two years vide order dated 29.07.2021. However, the same period has again been made one of the ground for imposition of major penalty of removal from service imposed on him vide order dated 27.02.2021. The ground of proceedings against the appellant is the period of willful absence with effect from 17.08.2021 to 06.10.2021 as per report of the SDEO Tehsil Razzar, district Swabi. In such a situation the procedure as provided in Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was required to be adopted but the required procedure for initiating proceedings against the appellant on ground of willful absence from duty were not complied by the competent authority. Moreover, if it was at all required to dispense with the formal inquiry the competent authority was required to invoke the provision of Rule-5(a) of the Rules ibid by recording reasons in writing which has not been done. The impugned order dated 27.02.2022 is thus not sustainable in accordance with the law and liable to be set aside.

07. Foregoing in view the instant appeal is allowed by setting aside the impugned order dated 27.02.2022 and the appellant is reinstated in

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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service for the purpose of de-novo inquiry. Back benefits including release of salary to the appellant shall be subject to the outcome of de-novo inquiry. The appellant shall be associated with the inquiry proceedings providing him opportunity of proper defense. De-novo inquiry shall be conducted in accordance with the relevant law and rules within a period of 60 days after receipt of copy of this judgment. Consign.

08. Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 16th day of May, 2023.

(SALAFI-UD-DIN)
MEMBER (J)

(MUHAMMAD AKBAR KHAN)
MEMBER (E)

Certified to be true copy

Khatmullah

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 27/6/23
Number of ~~Words~~ Page 5
Copying Fee 75/-
Urgent 30/5/23
Total 30/5
Name of Copier -
Date of Completion 27/6/23
Date of Delivery of Copy 27/6/23

Inquiry Report

Inquiry Committee:

Dr. Ayaz Ahmad Head Master GHS Lohor Shargi

Engr. Ahsan Ali Superintendent DEO (M) Swabi

Place:

GPS No.2 Adina Swabi

GPS Para Kalu Khan Swabi

Date: 08 July 2023

Nature: The case of Mr. Ali Humayun Ex PST who had been removed by

DEO (M) Swabi and re-instored by Service Tribunal Peshawar

for the purpose of re-bid enquiry on Y.

Findings & Conclusions: The Enquiry team along with ASDO Tehsil

Razor paid a visit to GPS No.2 Adina & GPS Para Kalu Khan. A

questionnaire was circulated among the teaching and non

teaching staff of both schools & ample time was given to them,

and later on the responses (in hand written) were collected in

very friendly environment. On the basis of the collected

responses from all concerned staff members of both schools

the following findings & conclusions were made:

1. He performed his duties at GPS Para Kalu Khan while

occasional at GPS No.2 Adina Swabi, on which he has been

penalized by the authority that is withholding of two annual

increments and transfer to other school).

His signatures were found in attendance register at GPS Para

Kalu Khan but its authenticity is questionable because

head teacher left the space for signature blank while some

signatures were missing at GPS No.2 Adina Swabi (on which he

Handwritten notes and scribbles at the top of the page.

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B

Dr. A. Al-Humayri Head of the GIS Unit (Iraqi Swabi)
Dr. A. Al-Humayri Head of the GIS Unit (Iraqi Swabi)

Handwritten initials or mark

at this report

Hotel A, necessary with in proofs and documents have been attached
may be requested to be without any effect
particular in duties and how was not. Therefore he
was made and a survey was taken. He will
but he is young and energetic, he requested if he
Iraqi Al-Humayri remained absent which is proved
Recommendations:

time

at the night, the space between them did not meet. However we
in proper terms, the head to be may be caused why they
because that he a teacher concerned did not make him absent
the signatures in attendance register were questionable
transfer to other school.

has been provided by an authority with authority to do

Handwritten initials or mark

Handwritten number 12



DISTRICT EDUCATION OFFICE (MALE) SWABI

Office No. 100/1000 & Fax No 092422-1049, e-mail: swabi@edot.gov.pk

Notification.

WHEREAS Mr. Ali Humayun Ex-PST, GPS Parra Kalu Khan District Swabi has proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, on account of absence from duty.

AND WHEREAS, the District Education Officer (Male) Swabi imposed major penalty of 'Removal from service' upon Mr. Ali Humayun Ex-PST, GPS Parra Kalu Khan District Swabi vide order Under No. 1251-S6 dated 07/02/2022.

AND WHEREAS, Mr. Ali Humayun Ex-PST, GPS Parra Kalu Khan District Swabi (the appellant) filed service appeal No. 1063/2022 in Khyber Pakhtunkhwa Service Tribunal Peshawar which was allowed by setting aside the impugned order dated 07/02/2022 and the appellant was re-instated in service for the purpose of de-novo inquiry, back benefits including release of salary, to the appellant shall be subject to the outcome of de-novo inquiry. The appellant shall be associated with the inquiry process by providing her opportunity of proper defense. De-novo inquiry shall be conducted in accordance with the relevant law and rules within a period of 60 days after receipt of copy of this judgment.

AND WHEREAS, inquiry committee was constituted, statement of allegations and charge sheet was served. The inquiry was conducted. The inquiry committee suggested that lenient view may be taken in the case due to his young age and he must be re-instated into service with immediate effect.

NOW, THEREFORE, in exercise of powers, conferred, Irfan Ali District Education Officer (Male) Swabi, being competent authority after having examined the inquiry report on record is pleased to agree with the inquiry committee findings and recommendations and re-instate/adjust Mr. Ali Humayun Ex-PST, GPS Parra Kalu Khan District Swabi into service at his original post/station with immediate effect and to convert all his absence and intervening period into Extra Ordinary leave (EOL) in the best interest of public service.

(IRFAN ALI)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Endst.No. _____

Dated Swabi the: 12/12/2023.

Copy of the above is forwarded for information and n/action to:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar, Service Tribunal, Peshawar.
3. District Accounts Officer Swabi.
4. District Monitoring Officer (DMO) Swabi.
5. SDEO (Male) Razzar, Swabi.
6. Mr. Ali Humayun Ex-PST, GPS Parra Kalu Khan District Swabi (S/C - 1000, Muhammad Khan R/O Pohan Colony Near TB Hospital Boghdada, Mardan), Under Registered cover.
6. Master file.

DISTRICT EDUCATION OFFICER
(MALE) SWABI

**BEFORE DIRECTOR ELEMENTORY & SECONDARY
EDUCATION (MALE), KHYBER PAKHTUNKHWA. SWABI**

Subject; Appeal against the order of district education

Officer (male) Swabi , whereby application for

Release of salary filed by appellant has been dismissed.

Respected sir,

With reference to notification Endst.No7505-11 dated 03.08.2023 ,whereby the DEO Male Swabi has re-instate me into service in my original post on the basis of inquiry report, after the appeal No.1063/2022 was allowed by KP services Tribunal Peshawar, and I was re-instated in service for the purpose of DE novo inquiry ,further the findings of inquiry committee on the absentees of appellant as per inquiry report & direction of DEO Male Swabi of converting absence & intervening period as per notification Endst.No7505-11 dated 03.08.2023 on the basis of inquiry report is wrong, illegal & against the facts of the case .(copy of order & inquiry report attached as annexure-A B)

I filed application for the release of salary of 19 months which has been dismissed by DEO Male Swabi. .(copy of order attached as annexure-C)

Besides other legal and factual fact of the case, the impugned order is incorrect & unjustified further the findings of inquiry committee on the absentees of appellant as per inquiry report & direction of DEO Male Swabi of converting absence & intervening period as per notification Endst.No7505-11 dated 03.08.2023 on the basis of inquiry report is wrong,illegal & against the facts of the case on the following amongst other grounds:

- 1. The impugned order is against law, rules, facts, record & circumstances.**
- 2. That appellant performed his duties in GPS Para Kalu khan regularly, while he was penalized for the absentees made in GPS Adina & he is entitled for his salaries when he regularly performed his duties.**
- 3. That the findings of inquiry reports about appellant's absentees are wrong and against facts, he performed his duty regularly for all that period & he is entitled for all the salaries accordingly.**
- 4. That the findings of inquiry committee are based on wrong assumptions, appellant was performing my duty regularly.**
- 5. That the direction of DEO Male Swabi of converting absence & intervening period as per notification Endst.No7505-11 dated 03.08.2023 on the basis of inquiry is wrong, illegal & against the**

- facts of the case as appellant performed his duties & attendance register is reflecting his presence on duty.*
6. *That the inquiry report is completely silent about the details of appellant's attendance then straight away refusing his salaries for 19 months has no legal footings & peak of cruelty.*
 7. *That the appellant has not been treated according to law.*
 8. *That the legal infirmities have been found in the proceedings & illegal notifications has been passed.*
 9. *That the appellant is regularly attending his school when he got knowledge about the dismissal of his application on some days ago, hence the appeal is well within time and in case of any technicality the appellant also submit for condonation.*
 10. *That the Act, commission & omission of the DEO & inquiry committee are patently illegal, unlawful, without lawful authority of no legal effect, hence no value in the eyes of law.*
 11. *That in all respect appellant is entitled for salaries of 19 months.*
 12. *That any other ground not specifically mentioned will be raised if call for hearing.*

It is therefore most humbly prayed that on acceptance of this appeal, the impugned order may kindly be set aside & salaries of 19 months of appellant's may kindly be released.

Dated: 01.07.24

Ali Humayun
 yours obediently
Ali Humayun PST
GPS Para KaluKhan
Tehsil Razzar District-Swabi
Mob No.0316-0935868

(15)

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION

KHYBER PAKHTUNKHWA PESHAWAR

The District Education Officer
(Malerkotla)
AGAINST

It is directed to refer to the subject noted above and to
submit a copy of an appeal lodged by Mr. Ali Hameed PST GPS
to the District Education Officer Swabi and to ask you to submit detail report to
proceed further into the matter please

Assistant Director (Estab-1)

Elementary & Secondary Education
Peshawar, Peshawar

It is directed to refer to the subject noted above and to
submit a copy of an appeal lodged by Mr. Ali Hameed PST GPS
to the District Education Officer Swabi and to ask you to submit detail report to
proceed further into the matter please

Assistant Director (Estab-1)

Elementary & Secondary Education
Peshawar, Peshawar

It is directed to refer to the subject noted above and to
submit a copy of an appeal lodged by Mr. Ali Hameed PST GPS
to the District Education Officer Swabi and to ask you to submit detail report to
proceed further into the matter please

Annexure 'D'

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**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 2735 /F.No./16/Deptt: Appeal/Estab-1
Dated Peshawar the 18/09/2024.

To

The District Education Officer
(Male) Swabi.

Subject: **APPEAL AGAINST**

Memo:

I am directed to refer to your office letter No. 9260 Dated 01-08-2024 on the subject cited above and to state that the Competent Authority (Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar) has regretted the appeal in respect of Mr. Ali Humayun PST (BPS-12) GPS Para Kalu Khan Tehsil Razzar District Swabi.

I am further directed to ask you to inform the appellant concerned accordingly please.

(Signature) 18/9/2024
Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst; No. 2736

Copy forwarded to the: -.

1. Mr. Ali Humayun PST GPS Para Kalu Khan Tehsil Razzar District Swabi.
2. P.A to Director Elementary and Secondary Education local office.

(Signature) 18/9/2024
Assistant Director (Estab-1)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

WAKALATNAMA

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR**Dated: 14/10/2024For AppellantTitle of case: Ali Hamayan versus Director Education and othersAppeal No 12024

KNOW ALL MEN that in the above-mentioned case **HUMAIRA GUL** Advocate high Court district courts Mardan has been engaged as my counsel. My counsel is authorized to conduct and perform all legal duties in my case on my behalf. My counsel is authorized to file suit, written statement, applications, replications, objection petition, execution petition, Revision petition, Review Petition, Appeal before the Court of District / session Judge, Senior Civil Judge, High Court, against the decision of the lower courts. He is also authorized to file reply, comments, list of witnesses, deposit diet money, withdraw the case on basis of compromise, receive cost, rather he is fully authorized to do and take all legal actions for the best defense of my case. In case of any emergency or his ailment if my counsel is not available then he will not be responsible for any act of the court and I will not claim any cost in this regard from my counsel.

Advocate ID: BC-15-6092**Bar Association : Mardan/ Peshawar High Court.****Contact No. 0334-5587109****CNIC:16102-0259622-6****Email address :teacherstudent143@gmail.com**

Attested & Accepted

Jawani
Advocate

Name & signature of client /attorney

Humaira gul
Advocate High Court

Ali Hamayan
Ali Hamayan S/o. Alla Muhammad Khan.