


Form- A  
FORM OF ORDER SHEET

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

Implementation Petition No. 1319/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	31.10.2024	<p>The implementation petition of Mr. Khial Muhammad submitted today by Syed Waqas Naqvi Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on 26.11.2024. Original file be requisitioned. AAG has noted the next date. Parcha Peshi given to counsel for the petitioner.</p> <p>By order of the Chairman  REGISTRAR</p>

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

E.P.  
EM No. 1319 / ~~11~~ / 2024  
IN  
Service Appeal No. 1377/2018

Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Allai Battagram.

....PETITIONER

VERSUS

1. Director Elementary and Secondary Education, Khyber Pakhtunkhawa Peshawar.
2. District Education Officer Male Battagram.

...RESPONDENTS

**IMPLEMENTATION PETITION**

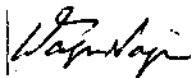
**INDEX**

S. #	Description	Page No.	Annexure
1.	Petition alongwith affidavit	1 to 2	
2.	Copy of appeal	3 to 6	"A"
3.	Copy of judgment dated 06/06/2024	7-13	"B"
4.	Copies of applications	14-16	"C"
5.	Wakalatnama	17	

...PETITIONER

Through

Dated: 30/10 /2024

  
(SYED WAQAS NAQVI)  
Advocate High Court, Abbottabad

①

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 17469

E-P  
GM No. 1319 ~~13~~/2024

Dated 31-10-24

IN

Service Appeal No. 1377/2018

Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Allai Battagram.

....PETITIONER

VERSUS

1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. District Education Officer Male Battagram.

...RESPONDENTS

**IMPLEMENTATION PETITION**

**APPLICATION** FOR IMPLEMENTATION OF JUDGMENT DATED 06/06/2024 PASSED BY THIS HONOURABLE TRIBUNAL IN THE TITLED SERVICE APPEAL.

Respectfully Sheweth;-

1. That the petitioner / appellant filed service appeal No.1377/2018 before this Honourable Tribunal. Copy of appeal is attached as Annexure "A".
2. That this Honourable Tribunal decided service appeal of the appellant / petitioner on 06/06/2024. Copy of judgment dated 06/06/2024 is attached as Annexure "B".
3. That vide judgment dated 06/06/2024 the appeal of the appellant/ petitioner was accepted and the petitioner was reinstated in service.
4. That the respondents were duty bound to implement the judgment passed by this Honourable Tribunal, but the respondents in blatant disregard of the judgment dated

2

06/06/2024 have neither reinstated the appellant / petitioner nor provided the reinstatement order.

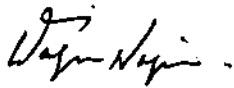
5. That petitioner moved numerous applications to the respondents for the implementation of the judgment passed by this Honourable Tribunal, but the respondents have turned a deaf ear to the request of petitioner. Copies of applications are annexed as Annexure "C".
6. That the act of respondents is contemptuous, contumacious and violation of the judgment dated 06/06/2024 of this Honourable Tribunal and the respondents have committed gross contempt and are liable to be punished accordingly.

In view of the above, it is prayed that on acceptance of the instant implementation petition, respondents may graciously be directed to reinstate the petitioner into service and provide him the reinstatement order forthwith and contempt proceedings may also be initiated against the respondents.

...PETITIONER

Through

Dated: 30/10/2024

  
(SYED WAQAS NAQVI)  
Advocate High Court, Abbottabad

**AFFIDAVIT:-**

I, Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Allai Battagram, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



DEPONENT



(3) A



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

Service Appeal No. 1377 /2018

Khial Muhammad (PST) (BPS-12) S/O Nooran Shah R/O Village Rashang, Tehsil  
Allai, District Battagram

.....Appellant

**VS**

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
2. District Education Officer (Male), Battagram
3. District Account Officer, Battagram

.....Respondents

**SERVICE APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE UNLAWFUL STOPPAGE OF MONTHLY  
SALARIES OF THE APPELLANT SINCE MARCH 2015 WITHOUT ANY COGENT  
JUSTIFICATION KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS  
ALWAYS PERFORMED HIS DUTY WITH DEDICATION AND DILIGENCE SINCE  
INCEPTION OF HIS SERVICE (06/07/2008) AND FOR ISSUANCE OF  
DIRECTIONS TO ADJUST THE APPELLANT ON HIS DUTY PLACE AND SEAT AS  
THE APPELLANT HAS NEITHER BEEN TEMINATED NOR DISMISSED FROM  
SERVICE HITHERTO**

The appellant is pleased to beseech before this Honorable Court as under;

1. That the appellant was appointed as PST (BPS-07) on 06/07/2008 on the recommendation of the Departmental Selection Committee and approval of the competent authority and was directed to perform his duties at "GPS Lagri Sar Nasim, Battagram". (Copy of Appointment Order is attached as F/A)
2. That the appellant has always performed his duties with efficiency and diligence and never ever caused hardships for his high-ups. (Copy of Service Book and Pay Slips is attached as F/B)

**ATTESTED**

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

31-10-24

4

2

3. That the stroke of misfortune hit the appellant in the month of March 2015 when his salary was stopped unceremoniously without specifying any justification. In this regard, the appellant immediately informed the concern quarters but no heed was paid. (Copy of Request Application is attached as F/C)
4. That with the passage of time, the appellant submitted a number of applications but his salary was not released which further increased the miseries and agonies of the appellant. (Copy of the Applications are attached as F/D)
5. That it is axiomatic to submit that despite repeated application to the different quarters, the appellant at last submitted his departmental appeal to the Respondent No. 01 (Director, E&S Education K-P Peshawar) on 05/04/2018. (Copy of the Departmental Appeal is attached as F/E)
6. That despite the submission of the aforesaid departmental appeal, the appellant didn't get any reply or response from the Respondents so another reminder was sent on 26<sup>th</sup> June 2018 where the appellant was telephonically informed that such appeal was forwarded to Respondent No. 02 and was also informed that as soon as they get the reply there will be a response. (Copy of the Reminder is attached as F/F)
7. That the appellant after great struggle, acquired a copy of the rejection letter of the departmental appeal on 08/10/2018 where Respondent No. 01 conveyed the message to Respondent No. 02 regarding rejection of the departmental appeal vide letter no. 3336/F.No.162/Vol:15/Appeal of PST (M) General Dated Peshawar the 8/10/2018. (Copy of the Rejection is attached as F/G)

8. That feeling aggrieved from the un-lawful stoppage of the salaries of the appellant and rejection of the departmental appeal, the petitioner being a civil servant approaches this Honorable Tribunal on the following grounds inter-alia;

**GROUND:**

- A. That the act of the Respondents to stop the salary of the appellant is against the mandate of law, rules and natural justice.
- B. That it is pertinent to submit that the appellant is still of the strength of the education department as so far, the appellant has neither been

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



5

3

dismissed from service nor terminated but the salary has been blocked without any justification and explanation which is sheer violation of the fundamental right of the appellant.

- C. That it is also submitted that no disciplinary action so far, has been initiated against the appellant by the Respondents in shape of any explanation, enquiry or show-cause but without specifying any reason stopped the salary of the appellant which has further increased the problems of the appellant.
- D. That the universal adage "Audi Alterem partem" provides that no one can be condemned unheard" which means if any action is to be taken against any person, at least a fair opportunity is required to be provided to such person but in the instant case, no opportunity has been provided and the salary has been stopped.
- E. That it is also essential to submit that the stoppage of salary provides and causes recurring cause of action so, the appellant right's has been violated very badly.
- F. That there are plethora of judgments of the Honorable Courts that salaries cannot be stopped without any reason and cause and if it is done, such would be unlawful and against the mandate of law. Thus, by stopping the salary of the appellant without any reason and justification is against the mandate of law, rules and natural justice.
- G. That any other ground can be raised at the time of arguments:

**PRAYER:**

In light of the foregoing submissions, it is therefore; most convincingly and humbly prayed that on acceptance of the instant appeal, this Honorable Tribunal may graciously be pleased to;

1. Declare the stoppage of monthly salaries of the appellant since March 2015 as unlawful, without lawful authority, against the fundamental rights of the appellant and void ab-initio
2. Direct the Respondents to release/start the monthly salaries of the appellant:

**ATTESTED**

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

**Certified to be true copy**

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar  
31-10-21

6

8

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

Service Appeal No. \_\_\_\_\_/2018

Khali Muhammad (PST) (BPS-12) S/Onoran Shah R/O Village Rashang, Allai,  
Battagram

.....Appellant

VS

Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar et.  
al.

**APPLICATION FOR CONDONATION OF DELAY IF ANY**

1. That the accompanied service appeal is being submitted for the release of the stopped monthly salaries of the appellant.
2. That this application may be considered as part and parcel of the main accompanied service appeal.
3. That as the departmental appeal was filed on 05/04/2018 but despite the passage of three months appeal was not submitted before this Honorable Tribunal because the appellant was time and again informed by the respondents that the departmental appeal would be decided soon and in this regard an application was also written on 26<sup>th</sup> June 2018 and resultantly, the departmental appeal was rejected and the appellant got such rejection on 08/10/2018 and hence filed this service appeal within time.
4. That the applicant is a poor man having profound reliance on his job and salary so graciously seeks indulgence of this Honorable Court.

It is therefore, prayed that on acceptance of this application the delay, if any, may kindly be condoned please.

Applicant

Through

(Mian Muhammad Imran)  
Advocate High Court



7



Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kalim Arshad Khan, Chairman and Fareeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

BEFORE: **KALIM ARSHAD KHAN** ... CHAIRMAN  
**FAREEHA PAUL** ... MEMBER (Executive)

*Service Appeal No. 1376/2018*

Date of presentation of appeal .....07.11.2018  
Dates of Hearing.....06.06.2024  
Date of Decision.....06.06.2024

**Sarfaraz Khan (PST) (BPS-12) S/O Umar Fad, R/O Kas Qalandar,  
Allai, Battagram. ....(Appellant)**

Versus

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Male), Battagram.
3. District Account Officer, Battagram. ....(Respondents)

Present:

Syed Waqas Naqvi,  
Advocate.....For appellant.

Mr. Asif Masood Ali Shah,  
Deputy District Attorney.....For respondents.

.....  
**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE UNLAWFUL STOPPAGE OF MONTHLY SALARIES OF THE APPELLANT SINCE MARCH 2015 WITHOUT ANY COGENT JUSTIFICATION KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS ALWAYS PERFORMED HIS DUTY WITH DEDICATION AND DILIGENCE SINCE INCEPTION OF HIS SERVICE (17/06/2008) AND FOR ISSUANCE OF DIRECTIONS TO ADJUST THE APPELLANT ON HIS DUTY PLACE AND SEAT AS THE APPELLANT HAS NEITHER BEEN TERMINATED NOR DISMISSED FROM SERVICE HITHERTO.**

**ATTESTED**

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

31-10-24

*Service Appeal No. 1377/2018*

Date of presentation of appeal .....07.11.2018  
Dates of Hearing.....06.06.2024  
Date of Decision.....06.06.2024

**Khial Muhammad (PST) (BPS-12) S/O Nooran Shah, R/O Village  
Rashang, Tehsil Allai, District Battagram. ....(Appellant)**

Versus

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

8

Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kalim Arshad Khan, Chairman and Farzeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.

2. District Education Officer (Male), Battagram.
3. District Account Officer, Battagram.....(Respondents)

Present:

Syed Waqas Naqvi,  
Advocate.....For appellant.

Mr. Asif Masood Ali Shah,  
Deputy District Attorney.....For respondents.

.....  
**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE UNLAWFUL STOPPAGE OF MONTHLY SALARIES OF THE APPELLANT SINCE MARCH 2015 WITHOUT ANY COGENT JUSTIFICATION KEEPING IN VIEW THE FACT THAT THE APPELLANT HAS ALWAYS PERFORMED HIS DUTY WITH DEDICATION AND DILIGENCE SINCE INCEPTION OF HIS SERVICE (06/07/2008) AND FOR ISSUANCE OF DIRECTIONS TO ADJUST THE APPELLANT ON HIS DUTY PLACE AND SEAT AS THE APPELLANT HAS NEITHER BEEN TERMINATED NOR DISMISSED FROM SERVICE HITHERTO.**  
.....

**CONSOLIDATED JUDGMENT**

**KALIM ARSHAD KHAN, CHAIRMAN:** Through this single judgment, this appeal and the connected Service Appeal No. 1377/2018 titled "*Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others*" are decided as both are regarding the same subject matter and can conveniently be decided together.

2. According to the facts gathered from the available record, the appellant namely Sarfaraz Khan was appointed as PST (BPS-07) on 17.06.2008, while appellat namely Khial Muhammad was appointed as PST (BPS-07) on 06.07.2008, however, their salaries were stopped in the month of March 2015 without specifying any reason. The appellants filed several applications to the quarter concerned for release

**ATTESTED**

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

91

Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kalim Arshad Khan, Chairman and Fareeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.

of their salaries but no heed was paid, therefore, they filed separate departmental appeals on 05.04.2018 but the same were not responded. The appellant namely Khial Muhammad had filed reminder on 26.06.2018, while appellant namely Sarfaraz Khan had filed reminder on 27.06.2018, however it came to the knowledge of the appellants that their departmental appeals have already been rejected vide impugned order dated 02.05.2018 and they have been informed regarding rejection of their departmental appeal on 08.10.2018. The appellants have now approached this Tribunal through filing of the instant service appeals on 07.11.2018 for redressal of their grievances.

3. On receipt of the appeals and their admission to full hearing, the respondents were summoned. Respondents No. 1 & 2 put appearance through their representatives and contested the appeals by filing their para-wise comments, raising therein numerous legal and factual objections.

4. Learned counsel for the appellants has argued that the salaries of the appellants were stopped in the month of March 2015 without specifying any reason, which is against the mandate of law, rules and natural justice. He next argued that neither any disciplinary action had been initiated against the appellants nor any adverse order in the shape of dismissal, removal, termination etc has been passed against the appellants but despite that the salaries of the appellants were illegally stopped by the respondents. He further argued that universal adage *audi alterem partem* provides that no one can be condemned unheard, which means that if any action is to be taken against any person, at least a fair opportunity is required to be provided to such person but in the instant

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

10

*Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kalim Arshad Khan, Chairman and Fareeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.*

cases, no opportunities have been provided to appellants and their salaries were illegally stopped by the respondents without assigning any reason. In the last he requested, that the salaries of the appellants might be released and they may be adjusted on their post of PST in District Battagram.

5. Conversely, learned Deputy District Attorney for the respondents has contended that the appellants were not appointed by the competent Authority as Primary School Teachers and the appointment orders so annexed by the appellants with their appeals are fake, bogus and fabricated. He next argued that the appellants had never performed any duty nor their services books were prepared by the department. He further argued that the appellants had fraudulently received the earlier salaries, which are required to be refund the Government Treasury. In the last, he argued that the appellants are not civil servants, therefore, their appeals are not maintainable before this Tribunal, which are liable to be dismissed with costs.

6. We have heard the arguments of learned counsel for the parties and have perused the record.

7. Perusal of the record would show that the appellants Sarfaraz Khan and Khial Muhammad were appointed as Primary School Teachers vide appointment orders dated 17.06.2008 and 08.07.2008 respectively. After their appointment, service books were also prepared and they had received their salaries till February 2015, however, from the month of March 2015, their salaries were stopped by the department without assigning any reason in the shape of any written order. The appellants have annexed with their appeals their pay slips, which show that the

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

11

*Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khal Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kallin Arshad Khan, Chairman and Fareeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.*

appellants have received their salary since their appointment but from the month of March, 2015 their salaries were stopped by the department without any reason in the shape of any order. This Tribunal vide judgment dated 12.04.2018 passed in Appeal No. 572/2017 titled "*Fazal Wahab Versus The District Education Officer, Elementary & Secondary Education Department, Peshawar and two others*" has already dealt with almost similar matter in the following manner:

**"CONCLUSION"**

*5. Whatever has been argued by the learned Deputy District Attorney is based on the findings of the enquiry report and similarly the authority has based his findings on the basis of enquiry report which is itself a proof of the fact that the issue involved appreciation of factual controversy which could not be decided without holding of formal enquiry. But the Authority neither opted for holding regular enquiry nor dispensed with the formal enquiry. The authority further initiated the proceedings under the disciplinary rules by issuing show-cause and then culminated the proceedings by not awarding the penalty under the disciplinary rules but declared the appointment letter as bogus. Such proceedings in the eyes of law cannot be sustained. The Authority should have been clear, regarding the proceedings to be conducted under the disciplinary rules or should have withdrawn the appointment order in exercise of the powers on the basis of locus-poenitentiae. In case the authority was to exercise his powers under the latter option then this Tribunal could decide the issue on the basis of the stage at which the same power was exercised. However in any event it was incumbent upon the authority to have given full opportunity to the appellant to participate in the enquiry proceedings by giving all rights of due process which has not been done.*

7

**ATTACHED**

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

5

12

Service Appeal No. 1376/2018 titled "Sarfaraz Khan Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" and connected Service Appeal No.1377/2018 titled "Khalid Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar and others" decided on 07.06.2024 by Division Bench comprising Kalim Arshad Khan, Chairman and Fareeha Paul, Member (Executive), Khyber Pakhtunkhwa Service Tribunal, Peshawar.

6. As a sequel to the above discussion, the present appeal is accepted. The appellant is reinstated in service. However, the department is directed to hold de novo proceeding within a period of ninety days from the date of receipt of this judgment. The issue of back benefits etc. shall be subject to the final outcome of de-novo proceedings and rules on the subject. Parties are left to bear their own costs. File be consigned to the record room."

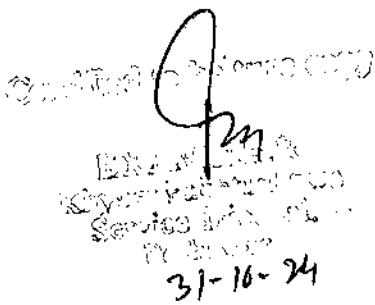
8. As the factual controversy involved in these two appeals is similar with the above referred appeal, therefore, these two appeals are also decided in the same manner. Consign.

9. Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 06<sup>th</sup> day of June, 2024.

  
KALIM ARSHAD KHAN  
Chairman

  
FARUEHA PAUL  
Member (Executive)

\*Nuzem Amin\*

  
31-10-24

Khyber Pakhtunkhwa Service Tribunal, Peshawar  
Application No. 412 31-10-24  
Name of Applicant Khayor Ahmed  
Number of Words/Pages 6  
Copying Fee 30/-  
Urgent/Ordinary 51/-  
Total 35/-  
Name & Sign of Applicant Zeeshaan  
Date of Copying 31-10-24  
Date of Filing 31-10-24


13

Service Appeal No. 1377/2018 titled "Khial Muhammad Versus Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others".

**ORDER**

06<sup>th</sup> June, 2024

1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Lutf Ullah, Assistant for the respondents present. Arguments heard and record perused.
2. Vide our consolidated judgment of today placed on file of connected Service Appeal bearing No. 1376/2018 titled "*Sarfaraz Khan vs. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others*", the present appeal is accepted. The appellant is reinstated in service. However, the department is directed to hold de novo proceeding within a period of ninety days from the date of receipt of this judgment. The issue of back benefits etc. shall be subject to the final outcome of de-novo proceedings and rules on the subject. Costs shall follow the events. Consign.
3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 06<sup>th</sup> day of June, 2024.*

  
(Farzana Paul)  
Member (Executive)

  
(Kalim Arshad Khan)  
Chairman

5017

2/7/2004

2/7/2004

دائریہ عملیاتی امور کے لئے

03015207200

2/7/2004



دائریہ عملیاتی امور کے لئے

2/7/2004

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

دائریہ عملیاتی امور کے لئے

ANX C

114



214

1 of Insurance Mark

MAN

RGL106073314

Rs.

Ps.

150

uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due

91

of a registered letter

Date Stamp

Write here "letter", "postcard", "packet" or "parcel" of Receiving Officer with the word "insured" before it when necessary. Insured for Rs. (in figures) (in words)

724

246

513

Insurance fee Rs.

Ps.

(in words)

Weight

Kilo

Grams

Name and address of sender

Handwritten signature and details: Ban Vaj...

16

# بخدمت جناب DEO صاحب ضلع بنگرام

عنوان:- بحالی برطابق سروس ٹریبونل فیصلہ مورخہ 06-06-2024

درخواست ذیل عرض ہے۔

جناب عالی!

گزارش خدمت ہے کہ مورخہ 06-06-2024 کو سروس ٹریبونل نے سائل کے حق میں عدالتی فیصلہ ہو چکا تھا۔ سائل بحال کرے اور بعد میں انکوائری کریں۔

یہ کہ سائل نے اپنے بحالی کیلئے اور عدالتی فیصلے پر سائل نے 2 عدد درخواست جناب کو حوالہ کیا تھا۔ جو کہ پہلا درخواست 02-07-2024 ڈائری نمبر 517 اور دوسرا درخواست 01-08-2024 کو دے دیا تھا۔ جس پر مجھے بحالی کا آرڈر نہیں ملا ہے۔ اور میرے خلاف انکوائری کیا گیا ہے۔

لہذا جناب کے خدمت میں عرض ہے کہ سائل کو بحالی کا آرڈر کیا جائے اور سروس ٹریبونل فیصلے کو مد نظر رکھتے ہوئے بحالی کا حکم جاری فرمایا دیں۔ سائل تاحیات دعا گو اور شکر گزار رہے گا۔

العارض:-

خیال محمد ولد نوران شاہ PST آلائی بنگرام

موبائل نمبر 0301-5707200

17/2/24

30/10/24

الرقوم:

Pakistan  
بھارت:

مقدمہ: یہ کتاب میری زندگی کے مختلف مراحل اور تجربات کا مجموعہ ہے۔ اس میں میں نے اپنی زندگی کے مختلف شعبوں پر روشنی ڈالی ہے۔

اس کتاب کے مقصد سے یہ ہے کہ میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے اور میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے۔

اس کتاب کے مقصد سے یہ ہے کہ میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے اور میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے۔

اس کتاب کے مقصد سے یہ ہے کہ میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے اور میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے۔

اس کتاب کے مقصد سے یہ ہے کہ میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے اور میری زندگی کے مختلف شعبوں پر روشنی ڈالی جائے۔

### پیش گوئی

مقدمہ: یہ کتاب میری زندگی کے مختلف مراحل اور تجربات کا مجموعہ ہے۔ اس میں میں نے اپنی زندگی کے مختلف شعبوں پر روشنی ڈالی ہے۔

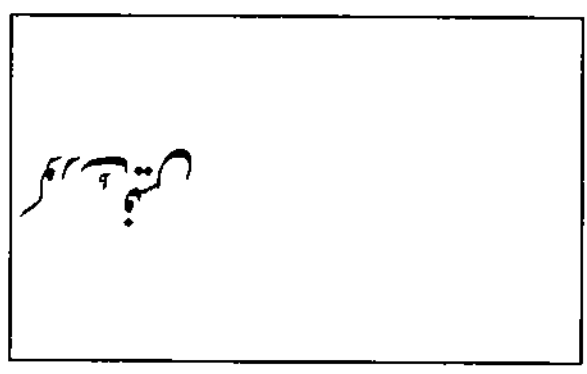
Khalid Muhammad Shah

نام: \_\_\_\_\_

پتہ: \_\_\_\_\_

تعلقہ: \_\_\_\_\_

نمبر: \_\_\_\_\_



# کتابتیں

71