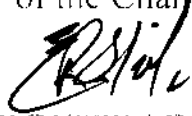


FORM OF ORDER SHEET

Court of _____

Appeal No. _____ **2437/2024**

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 11/11/2024 | <p>The appeal of Mr. Zia ul Haq presented today by Mr. Wiqar Ahmad Maidani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19/11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p> |

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No. 2437 /2024.

Mr. Zia-Ul-Haq

.....Appellant

Versus

Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar & Others

.....Respondents

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| 5. | Copy of Notification Dated 23-12-20210 is attached as Annexure "A"). | 10-11 |
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Appellant

Through

Wiqar Ahmad Maidani
Advocate High Court

Contact # 0340-2301181

①

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No: 2437 /2024

Mr. Zia-Ul-Haq S/O Ghulam Akbar Subject Specialist Islamiyat -BS-17
(Male), GHSS, Manga District Mardan.

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary Elementary & Secondary Education, Government of Khyber Pakhtunkhwa.

.....Respondent(s)

APPEAL UNDER SECTION 4 OF THE KP SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER NO. SO(SM) E&SED/4-17/2023/ZIA-UL-HAQ/SS DATED 09-04-2024 TO THE EXTENT OF NOT ALLOWING THE ANCILLARY-CUM-BACK BENEFITS WITH EFFECT FROM 19-09-20212 TO 26-04-2024 AS PRAYED IN THE DEPARTMENTAL APPEAL FILED BY APPELLANT ON DATED 15TH JUNE 2024 AND TO SUCH EXTENT MODIFICATION OF THE IMPUGNED ORDER NO. SO(SM) E&SED/4-17/2023/ZIA-UL-HAQ/SS DATED 09-04-2024 SHALL BE ORDER.

Respectfully Sheweth,

1. That the Constitution of Islamic Republic of Pakistan aims at protecting civil servants in order to ensure smooth running of affairs of the Government and Institutions so as to benefit the public citizenry.
2. That the Constitution of Islamic Republic of Pakistan equally be-

shields civil servants from being treated otherwise than in accordance with law. (2)

In Sheikh Riaz-ul-Haq's Case¹, it was held that, "Admittedly, civil servants being citizens of Pakistan have fundamental rights including the right to access to justice as envisaged under Article 9 of the Constitution".

ON FACTS

3. That initially the appellant was appointed through Public Service Commission as Subject Specialist (Islamiat) BS-17 Vide Department Notification No. SO(SM) E&SED/ 3-2/2010-SS Islamiat (Male) Dated 23-12-20210.

(Copy of Notification Dated 23-12-20210 is attached as Annexure "A").

4. That it is bring on record, that the appellant went missing in 19-09-2012 and on that score the wife of the appellant approached number of legal forums for the purpose of the lodging FIR, ultimately landing to the Supreme Court of Pakistan.

5. That FIR was lodged on the direction of the Supreme Court of Pakistan even then the sufferings of appellant wife didn't cut short, as the appellant shown up by that time and ultimately was found in the custody of Pakistan army given De-Radicalization and emancipation program PAITHOM Swat.

(Copy of FIR & Certificate of Appreciation is attached as Annexure B & C).

6. That upon the release of the appellant the legal process did not stop rather the appellant went from pillar to post for the purpose of reinstatement to service, not restricted to submission of arrival report in the concerned school because the appellant was neither suspended/Nor terminated from service.

¹ PLD 2013 SC 501.

7. That at last the department established a committee in order to look into the grievances of the appellant, so recommended that he may be allowed to rejoin his service with all back benefits and keeping his seniority intact.
8. That after the committee report the service of the appellant were restored **VIDE ORDER SO(SM) E&SED/4-17/2023/ZIA-UL-HAQ/SS DATED 09-04-2024** but short of ancillary-cum-back benefits to be drawn by the appellant with effect from **19-09-2012 To 26-04-2024** and as refer into departmental appeal dated 15th June 2024 which remains unuttered until now in accordance with law, hence the instant service appeal inter-alia on the following grounds.

(Copy of the impugned **VIDE ORDER SO(SM) E&SED/4-17/2023/ZIA-UL-HAQ/SS DATED 09-04-2024** & Departmental Appeal Dated 15.06.2024 is annexed as Annexure "D" & "E").

GROUND:

- A. That the appellant is entitled to Ancillary-Cum-Back Benefits with effect from dated 19-09-2024 to 09-04-2024 as such not allowing the stated benefits by Respondent No 1 as uncalled for, against law.
- B. That Non-Consideration/ Ancillary-Cum-Back Benefits of the appellant service as w.e.f. 19-09-2012 to 09-04-2024 the purpose of ancillary-cum-back benefits; is uncalled for, against law.
- C. That carte-blanche exercise of power; abdicates the well-entrenched principle of "structured discretion".
- D. That the purported omission on the part of respondents to the determinant of appellant itself speaks volumes engraving danger to the notion of good governance hence requires interference of the Hon'ble Court.

In *Qaiser Iqbal's Case*², it was held that, "Rule of Law meant supremacy of law as opposed to arbitrary authority of the

4

Government; said supremacy guaranteed three concepts; first, the absence of arbitrary power; second, equality before law and third the rights of a citizen".

- E. That it is cardinal principle of law and justice that what cannot be done directly cannot be done indirectly.³
- F. That public functionary has to reinforce good governance, observe rules strictly and adhere to rule of law in public service⁴.
- G. That "Expressio Unis Est Exclusio Alterius", commanding that when law requires a thing to be done in particular manner then, it should be done in that manner as anything done in conflict of the command of law shall be unlawful being prohibited.
- H. That "*Ignorantia juris non excusat*", commanding that ignorance of the law excuses not. And further necessary ground will be raised during the course of arguments.

PRAYER

It is therefore humbly prayed that on acceptance of this Service Appeal: -

1. The respondents may be directed to extend/allow **ANCILLARY-CUM-BACK BENEFITS** with effect from as sought for in departmental appeal or by modifying the impugned ORDER NO. SO(SM) E&SED/4-17/2023/ZIA-UL-HAQ/SS DATED 09-04-2024 to such extent, enabling/entitling the appellant to withdraw the financial benefits accrued to the appellant since 19-09-2012 to 09-04-2024 and the act of Respondents by not deciding Appeal of the Appellant dated 15-06-2024 as illegal without lawful authority and ineffective upon the rights of the Appellant.

2. **Declared** The act of Respondents not allowing the Ancillary-Cum-

³ PLD 1993 SC 473 at Page 687


⁴ 2015 SCMR 456; PLD 2013 SC 195


Back Benefits is illegal, unlawful, void abintio and against the law. (5)

3. Any such order may be passed which this Hon'ble Tribunal deems fit and appropriate as the circumstances may require for determination of the subject at hand.


Appellant

Through


Wiqar Ahmad Maidani
&


Muhammad Zahoor Khan
Advocates.

Contact # 0340-2301181

Certificate:

As per instructions of the appellant, no such service appeal has been filed earlier by the appellant before this honorable forum.


ADVOCATE

6

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No. _____/2024

Mr.Zia-Ul-Haq

.....Petitioner/Appellant

Versus

Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil Secretariat, Peshawar & Others

.....Respondents

SUBJECT: APPLICATION FOR THE CONDONATION OF DELAY

Respectfully sheweath:

1. That the petitioner is filing the accompanying service appeal, the contents of which may graciously be considered as integral part and parcel of the instant application.
2. That petitioner has got very good case on merits and all essentials ingredients liens in favor of the petitioner.
3. That the delay come in filing the accompanying service appeal were never deliberate nor intentional but due to reason beyond control of the petitioner.
4. That in fact the petitioner had been taken into custody by the security agencies on unwarranted allegations and remained with them for more than decade which has inversely, directly and indirectly effected not only finically but also mental health of the petitioner as well as because of the same and because of the night mare that had been


envisaged by the petitioner constrained the petition to come this
honorable tribunal in time. (7)

5. That thus delay was not deliberately but was natural in the peculiar circumstances of the instant case.
6. That otherwise to being financial issue, as the petitioner suffering financial lose as well as it also amount to recurring cause of action, wherein in this honorable tribunal as well as also superior courts have condoned delay as this score alone.
7. This law also favors adjudication on merits and technicality of may sought must be ignored for doing complete justice.

It is therefore, most humbly requested that the limitation period if any may kindly be condoned and the appeal may kindly be allowed.


Appellant

Through


Wiqar Ahamd Maidani
Advocate High Court.

8

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR

Service Appeal No. /2024

Mr.Zia-Ul-Haq

.....Appellant

Versus

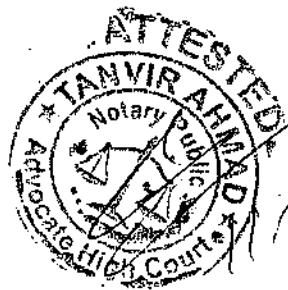
Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil
Secretariat, Peshawar & Others

.....Respondent(s)

AFFIDAVIT

I, Mr Mr.Zia-Ul-Haq S/O Ghulam Akbar Subject Specialist Islamiyat –BS-17 (Male), GHSS District Mardan, **Khyber Pakhtunkhwa**, appellant do hereby do solemnly affirm and declared on oath that the contents of the Service Appeal are true and correct to the best of my knowledge, belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent



9

BEFORE THE SERVICE TRIBUNAL KP, PESHAWAR
Service Appeal No. /2022

Mr.Zia-Ul-Haq

.....Appellant

Versus

Government of Khyber Pakhtunkhwa through its Chief Secretary, Civil
Secretariat, Peshawar & Others

.....Respondent(s)

MEMO OF ADDRESS OF PARTIES

Appellant

Mr Mr.Zia-Ul-Haq S/O Ghulam Akbar Subject Specialist Islamiyat –BS-17
(Male), GHSS, Manga District Mardan , Khyber Pakhtunkhwa

Respondent(s)

1. Government of Khyber Pakhtunkhwa through its Chief Secretary,
Civil Secretariat, Peshawar.
2. The Secretary Elementary & Secondary Education, Government of
Khyber Pakhtunkhwa.

Appellant

Through

Wiqar Ahmad Maidani
&
Muhammad Zahoor Khan

Advocates

Contact # 0340-2301181

Annexure 'A' (10)

Registered



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the December 23, 2010

NOTIFICATION

NO. SO(S/M) E&SED/3-2/2010/ SS-Islamiyat (Male) Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following Subject Specialists Islamiyat (BS-17) (Male) (Rs. 9850-740-24650) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government:-

| S. No. | Name/Father's Name and Address |
|--------|--|
| 1. | Mr. Abzahir Khan S/O Munsif Khan, Garrison Cadet College Kohat. |
| 2. | Mr. Abdul Wadood S/O Haji Muhammad Zaman, Village Dharma Khel P.O Nizam Bazar Bannu. |
| 3. | Mr. Abdullāh S/O Hayatullah, Village Shahed Bazar P.O Prang Distt. & Tehsil Charsadda. |
| 4. | Mr. Abdur Razzaq Khan S/O Chudhri Abdul Latif, House No:1551/c, Kucha opposite boring. Moh. Dewan Sahib Dera Ismail Khan |
| 5. | Mr. Aminullah Khan S/O Abdul Ghani, Nurar Bannu |
| 6. | Mr. Amanullah Khan S/O Haq Nawaz Khan, Poltry Shop Rahim Bazaar D.I. Khan |
| 7. | Mr. Amir Nasrullah Khan S/O Hashim Khan, Village & P.O Kachi Kamar Teh. & Distt. Larkki Marwat |
| 8. | Mr. Anwar-ul-Haq S/O Muhammad Munir, Village Muhabat Koto P.O Manial Tensil Lal Qilia Dir Lower |
| 9. | Mr. Ashraf Ali S/O Ghazi Khan, Mohallah Haji Khel P.O Gandaf Teh. Topi Distt. Swabi. |
| 10. | Mr. Badsnah Zamin S/O Muhammad, Yamin, Mohallah Sheshan Village & P.O Lilownai Teh. Alpur Distt. Shangla |
| 11. | Mr. Burhan-ud-Din S/O Khuna Gul, Ihsan Tailor behind Mingora Telephone Exchange, Mingora Swat. |
| 12. | Mr. Habib-ur-Rehman S/O Abdur-Rehman, Mohallah Saddar Khel Village & P.O Abba Khel Teh. & Distt. Larkki Marwat. |
| 13. | Hafiz Inayatullah S/O Noorullah, Mohallah Khattah Village & P.O Sawalder Mardan ✓ |
| 14. | Hafiz Muhammad Ibrahim S/O Mulvi Amir Said, Mohallah Zafar Khel, Village & P.O Bakhsbah Mardan ✓ |
| 15. | Hafiz Razaullah Khan S/O Latif Khan, Khurram Medical Laboratory Opposite Gate No.1 DHQ Hospital Bannu |
| 16. | Mr. Hayat Muhammad S/O Sahib Wali, Village Karkan Shah P.O Khazana Teh. Munda Dir Lower |
| 17. | Mr. Ihsan-ud-Din S/O Sheer Muhammad, Mohallah Darbar Village Ramora Tensil Adenzai Distt. Dir Lower |
| 18. | Mr. Inamullah Khan S/O Nawab Shah, Village & P.O Sudher Tehsil Lahor Distt. Swabi |
| 19. | Mr. Isiam-ud-Din S/O Shahab-ud-Din, Village Kambat Tehsil Samar Bagh Distt. Dir Lower |
| 20. | Mr. Jamil-ur-Rehman S/O Aziz-ur-Rehman, Village Rahmal Shah P.O Mama Khel Banochi Bannu |
| 21. | Mr. Kha r-ul-Abrar S/O Muhammad Ismail, Village & P O Chinglai Tehsil Daggar District Buner |
| 22. | Mr. Kiramāt Ali S/O Sharbat Khan, Mohallah Batar Khel Village & P.O Lahor Distt. Swabi |
| 23. | Mr. Maqtool Khan S/O Khairullah Khan, Haki Khel Anwar Shah Opposite Bannu Woolan Mill Bannu |
| 24. | Mr. Maseehullah S/O Shamsur Rehman, Mohallah Kandi-Bala Village Mazara P.O Haji Zai Tehsil Shabadar Distt. Charsadda. |
| 25. | Mr. Muhammad Saqib S/O Naseebullah, Michallah. Scoti Abad Village & P.O Kotha Tehsil Topi Distt. Swabi. |
| 26. | Mr. Muhammad Abubakar S/O Muhammad Yousof, House No:552 Muhammadi Dawakhana Mohallah Shali Koban Narkak Mandi Pesh. City |
| 27. | Mr. Muhammad Farooq S/O Rehmat Hussain, C/O Almadina Tent Service Kachehry Road |

S.No. 19

103-11-14

(11)

| S. No. | Name/Father's Name and Address |
|--------|--|
| 31. | Mr. Muhammad Tahir Khan S/O Fazal Rahman, Ghari Loaran Charkhena Road Landi Yarghala Peshawar |
| 32. | Mr. Muhammad Tahir S/O Hafiz Lutfur-Rehman, Mohallah Adin Khel Village & P.O Adina Tehsil & Dist. Swabi |
| 33. | Mr. Muhammad Yaqoob Shah S/O Sahibzada Mehmood Sahib, Khanqah Yasinzal P.O Fariata Tehsil Peshawar Dist. D.I. Khan |
| 34. | Mr. Muhammad Hasser S/O Sher Jung, Village Pahari Kati Khel Tehsil & Dist. Nowshera |
| 35. | Mr. Muhammad Khair S/O Sarai Khan, Mohallah Battakzal, Village Kneshgi Baia Tehsil & Dist. Nowshera |
| 36. | Mr. Musa Ahmad S/O Feroz Din, Mohallah Dano Khel Village & P.O Bagra Tehsil & Dist. Haripur |
| 37. | Mr. Nisar Ahmed S/O Muhammad Younis, C/O Zaka Baryana Store near Pir Khan Market Chavallan Abbottabad |
| 38. | Mr. Raj Wali Khan S/O Arshulian Khan, Village Kulyari P.O Dewane Baba Teh. Dagar Dist. Buner |
| 39. | Mr. Raz Ali Shah S/O Amin-ul-Haq, Working Folks Grammar School, Amengarh Nowshera |
| 40. | Mr. Sedaratullah S/O Asmatullah, Village Nusratzai P.O & Tehsil Shabcadar Fort Dist. Charsadda |
| 41. | Mr. Said Zamin S/O Alim Khan, Village & P.O Tetoi Teh. Batkhela Malakand |
| 42. | Mr. Shan Jenan S/O Abdul Khenan, Moh. Addul Salam Khan Vill. & P.O Garhi Dautaze Dist. Mardan |
| 43. | Syed Alam Shah S/O Syed Farman Shah, Master Keryana Store Baldra Road Lehar Banda Mansehra |
| 44. | Mr. Tanveer Ahmad S/O Kala Khan, House No. 09 Street No. 5 Moh. Paitan Chhonar Road Haripur |
| 45. | Mr. Tasawar Gul S/O Muhammad Akber, Village & P.O Laban Bandi (Changi Bandi) Teh. & Dist. Haripur |
| 46. | Mr. Ubaichullah S/O Hafiz Ghulam Muhammad, Mohallah Haji Abad Vill. & P.O Shaidu Dist. Nowshera |
| 47. | Mr. Wajeehullah S/O Muhammad Nawaz, Village & P.O Ghazni Khel Dist. Lakk Marwat |
| 48. | Mr. Waris Khen S/O Ghazi Gul, Village Tuhren Koi Mohabat Khel P.O Mitha Khel Dist. Karak |
| 49. | Mr. Zia-ul-Haq S/O Ghulam Akber, Mohallah Qadar Khan P.O Par Hoti Mohib Road, Dist. Mardan |

2. On their appointment, they are posted in Government Higher Secondary Scholcis/Regional Institutes of Teachers Education (RITEs) as noted against each, subject to the conditions given below:-

| S. No. | Name/Father's Name & Address | Proposed Place of Posting | Remarks |
|--------|---|--|---------------------|
| 1. | Mr. Abzalin Khan S/O Munsif Khen, Garrison Todei College Kohat. | Subject Specialist Islamiyat (BS-17) G.I.S.S. Ghazi Kot Dist. Buner | Against Vacant Post |
| 2. | Mr. Abdul Waseed S/O Haji Muhammad Zaman, Village Dharna Khel P.O Niran Bazar Barau. | Subject Specialist Islamiyat (BS-17) GHSS. Hakim Havel Dist. Bannu | do |
| 3. | Mr. Abdullah S/O Hayatullah, Village Shaked Bazar P.O Prang Dist. & Tehsil Charsadda. | Subject Specialist Islamiyat (BS-17) GHSS. Pirzad Dist. Mardan | Against Vacant Post |
| 4. | Mr. Abdul Razzaq Khan S/O Chudhri Abdul Latif, House No. 1551c, Kocho opposite boring Moh. Dawar Sahib Dera Ismail Khan | Subject Specialist Islamiyat (BS-17) GHSS. No. 3 Dist. D.I. Khan | do |
| 5. | Mr. Aminullah Khan S/O Abdul Ghani, Nurar Barau. | Subject Specialist Islamiyat (BS-17) GHSS. Chare Lakk Dist. Kohat. | do |
| 6. | Mr. Amanullah Khan S/O Haq Nawaz Khan, Poultry Shop Rahim Bazaar D.I. Khan | Subject Specialist Islamiyat (BS-17) GHSS. No. 2 D.I. Khan. | do |
| 7. | Mr. Amir Muhammad Khan S/O Hashim Khan, Village & P.O Kachi Kharan Teh. & Dist. Lakk Marwat | Subject Specialist Islamiyat (BS-17) GHSS. Nari-Pangos Dist. Karak. | do |
| 8. | Mr. Amir-ul-Haq S/O Muhammad Ismail, Village Mohabat Koro P.O Manna Tehsil Lal Qilla Dist. Lower | Subject Specialist Islamiyat (BS-17) G.I.S.S. Zaidara Dist. Dir Lower. | do |

Ammeine (13)

DE-RADICALIZATION AND EMANCIPATION PROGRAMME

CERTIFICATE OF APPRECIATION

Mr. Zia Ul Haq (196909-4000970-7) Son of Ghulam Akbar Arrested by Pakistan Army on 12 Sep 2012. He has successfully completed Pakistan Army De-Radicalization Program (Mishal) organized by HQ Army Div Mkd in collaboration with Civil Administration. During the program, he displayed good conduct and discipline and developed sufficient skill as Yellow Handicraft. Due to his unconditional surrender and oath to abide by the writ of the state, he will not be subjected to apprehension / harassment or punishment on account of his activities committed before he surrendered. This certificate is conferred to him on DRFP-25 / PILOT PROJ Re-Integration Ceremony of DRC Mishal, held on 26 Apr 2022.

Dated: 25 Apr 2022


Director
De-Radicalization & Emancipation Programme
PAITHOM Swat



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533 Email: sschoolmale@gmail.com

Dated Peshawar the April 09th, 2024

ORDER.

No. SO(SM) E&SED/4-17/2023/Zia-ul Haq/SS/:

WHEREAS Mr. Zia-Ul-Haq S/O Ghulam Akbar was appointed as Subject Specialist (Islamiat) BS-17 vide this Department Notification No. SO(SM) E&SED/ 3-2/2010-SS-Islamiat (Male) dated 23-12-2010. He was found missing w.e.f 19.09.2012 to 26.04.2022.

2. AND WHEREAS The officer concerned submitted an application for joining his duty with a clearance certificate issued by Director De-Radicalization and Emancipation Program PAITHOM Swat.

3. AND WHEREAS The Inquiry Committee comprising Mr. Ahmad Kamal (PMS-18), Deputy Secretary (Estb :) E&SED and Mr. Shah Jehan, District Education Officer (Male) Nowshera was constituted to examine the case and give their recommendations.

4. AND WHEREAS The Inquiry Committee concluded that Mr. Zia-ul-Haq S/O Ghulam Akbar, Subject Specialist (Islamiat) BS-17 GHSS Manga Mardan is innocent and recommended that he may be allowed to rejoin his service with all back benefits and keeping his seniority intact.

5. AND WHEREAS The Elementary & Secondary Education Department after examining the Inquiry Report, available record, personal hearing of the officer placed his appeal before the Chief Secretary for appropriate order.

6. NOW THEREFORE The Competent Authority i.e (Chief Secretary Khyber Pakhtunkhwa has been pleased to allow Mr. Zia-ul-Haq, Subject Specialist (Islamiat) BS-17 to rejoin/continue his service with the direction that the absence period from 19-09-2012 to 26-04-2024 shall be treated as leave without pay, however, his seniority shall be kept intact.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE Department

Endst of even No & Date:

Copy forwarded to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. Director, EMIS E&SE Department.
3. The District Accounts concerned.
4. The District Education Officer (Male) concerned.
5. The Officer concerned.
6. P.S to Secretary E&SE Department.
7. Office order file.

Annexure "D" (14)

(MUHAMMAD ISILKHO) 9/4/24
SECTION OFFICER (SCHOOL MALE)

AD EP/S

Annexure "E" (15)

To

The secretary
Elementary and secondary education
Khyber Pakhtunkhwa

Subject: Appeal for Back benefit of Zia ul Haq SS (Islamiat GHSS Manga Mardan) from
19-09-12 to 09-04-2024

Respected sir

1/1/23

It is humbly stated that,

1. I was appointed as SS Islamiat in order no :SO(SM) E&SED/ 3-2-2010 -SS-ISLAMIAT (MALE)BY PUBLIC SERVICE COMMISSION DATED 23-12-2010 (Annex 1)
2. I was miss placed by Pak army since 19-09-2012 to 26-04-2022 and was stated innocent and gave clearance certificatè (Annex 2)
3. After releasing from Pak Army, I made my arrival to GHSS Manga Mardan on 27-04-2022 , because I was not suspended, but the concerned authority did not accept my arrival (Annex 3)
4. The respectful department established a committee for my inquiry. The committee recommended rejoining my post with back benefits and keeping my seniority intact (Annex 4 /Para no: 3 & 4)
5. So i was again allowed to rejoined my post (SS Islamiat) by the order of the competent authority i.e chief secretrory (KPK) as well as my seniority intact order no SO (SM) E& SED/4-17/2023/ZIA UL HAQ/SS/: Dated 09-04-2024 (Annex 5 Para no 6)
6. I made my arrival to SO male on 09-04-2024 and took charge at GHSS Manga on 01-05-2024(Annex 6)

Therefore it is humbly requested in your respect to issue order for my all back benefit i.e from
19-09-12 to 09-04-2024

Hope your decision will favor me.

Thanks

2178
24/05/2024

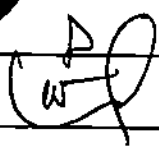



ZIA UL HAQ S/O GHULAM AKBAR
SS ISLAMIAT BPS-17
GHSS MANGA MARDAN

[Signature]

Date: 15th June 2024

Forwarded in original to DEO (M) Mardan for further N/ action under the rules. please

[Signature] *[Signature]*

| | | |
|---|-----------------------------|---|
| قیمت 50 روپے | 64900 | پشاور بار ایسوسی ایشن، خیبر پختونخواہ |
|  | ایڈریس: |  |
| BC-18-1118 | بار کونسل ایسوسی ایشن نمبر: |  |
| 0340-2301181 | رابطہ نمبر: |  |

بعدالت جناب: صید حسن سے روس ٹریڈ سینٹر

| | |
|---|----------------------|
| مخاطب: <u>Appellant</u> | دعویٰ: <u>APPEAL</u> |
| <u>صیاء الحق</u> | علت نمبر: |
| <u>بنام</u> | موضوع: |
| <u>گورنمنٹ آف صید زمینوں خواتین و مردوں</u> | جمع: |
| | تھانہ: |

باعت تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام لٹا اور سیکے و مہاراجہ صید انجی اینڈ محمد ظہور سلطان لٹا اور سیکے کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر نامہ لکھنا و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا کسی ایک طرفہ 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 کارروائی 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 ساتھ پر ذراختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوا ہے مقدمہ کے سبب سے ہوگا لکھائی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا ہندوستان ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا جائے کہ سند رہے

المقوم: 1/20



المقام: لٹا اور سیکے

واہ شد العبد

صیاء الحق ولد غلام اکبر سکے صید اور وڈ پارٹی، محلہ تھیل آباد جامع مسجد، لٹا اور سیکے

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