

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	12.04.2022	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u></p> <p style="text-align: center;"><u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. 7245/2021</p> <p>Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra, P.O Dagai, Shalbanday, Tehsil Gagra District Buner. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar and others. ... (Respondents)</p> <p style="text-align: center;"><u>ORDER</u></p> <p style="text-align: center;"><u>KALIM ARSHAD KHAN CHAIRMAN.</u> Preliminary arguments of the learned counsel for the appellant were heard.</p> <p>2. This appeal is against the order NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General dated June 09, 2021, through which the appellant was transferred to GHSS Totalai Buner against the vacant post.</p> <p>3. This is an appeal that in compliance of the impugned order, he approached the concerned school but the Principal of GHSS Totalai, Buner refused to accept his arrival on the ground that the said post was already filled</p>

by Jehanzeb Khan; that the Principal GHSS Amanawar Buner also had given a letter to the appellant that no substitute was provided; that aggrieved from the order he filed departmental appeal which, according to the appellant was pending and no order was passed till filing of this appeal on 09.08.2021.

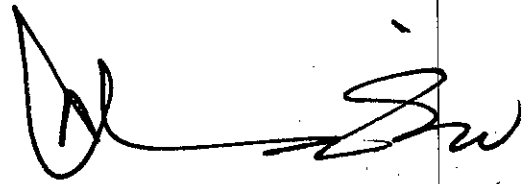
4. A pre-admission notice was given to the respondents by my learned predecessor seeking reply from them. The reply has been received according to which, the order of transfer was modified with another order and the new place of posting of the appellant was GHSS Chinglai Buner. It is also contended in the reply that the appellant had completed his normal tenure. Today when confronted with the situation that the impugned order was modified, and the appellant was given new place of posting at GHSS Chinglai District Buner, learned counsel for the appellant himself produced copy of corrigendum, whereby, the impugned order was modified. Learned counsel for the appellant was asked whether he was aggrieved of the modified notification or whether the appellant has filed any representation to which he stated that the appellant had filed representation against the same. The only ground which prompted the appellant to file this appeal is that

11
12/4/22

there is no vacancy in the school to which the appellant was transferred and because of substitute notification the appellant has been given another posting. No illegality alleged in the grounds, was pointed out in the impugned order, which otherwise, was corrected through issuance of corrigendum.

5. Therefore, I see no force in this appeal, hence dismissed in limine. Consign.

6. *Pronounced in open court in Peshawar and given under my hand and seal of the Tribunal this 12th day of April, 2022.*



(KALIM ARSHAD KHAN)
Chairman

ANNOUNCED
12.04.2022



RIAZ KHAN



Secretary GSS Edu

A.O.A:

Please transfer Mr. Shah Jahan
SS Pak Study G.H.S.S. Amniana
to G.H.S.S. Totralai Buner

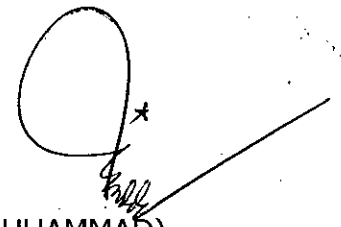
RIAZ KHAN
MPA PK-20
BUNER-1

Add: Village Malik Pur, PO Pir Baba, Tehsil Darya, District Buner, Khyber Pakhtunkhwa,
Islamic Republic of Pakistan. Mobile: 0346-9417791

01.12.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG
for respondents present.

Appellant seeks adjournment on the ground that his counsel is
not available today. Adjourned. To come up for written
reply/preliminary hearing on 03.02.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

03.02.2022

The Tribunal is non-functional, therefore, the case is
adjourned to 12.04.2022 before S.B for the same.



Reader

7245/21

10.11.2021

Shah Jehan vs Govt

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Iftikharul Ghani, DEO (M) Buner for the respondents present.


Vide order dated 11.08.2021 pre-admission notice was given to the respondents in view of the observations in the said order with direction for written reply on date fixed i.e. 09.09.2021. The respondents did not submit the written reply on the date fixed and the matter was adjourned for 27.09.2021 with the same direction for submission of written reply. On the adjourned date i.e. 27.09.2021 the written reply was again not submitted and the matter was adjourned for today. Even today the respondents are not ready to submit the written reply. They failed to comply with the direction of this Tribunal for the needful. Last chance is given to the respondents for submission of written reply failing which their right for written reply shall be deemed as struck off. To come up for reply/PH on 25.11.2021 before S.B.


Chairman

25.11.2021

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Last chance for submission of reply on pre-admission notice, was ordered on last date of hearing. Learned AAG requested that official respondent No.4 i.e DEO(M) District Buner is important for submission of requisite reply/comments. A short adjournment may be granted to contact and ~~take~~ into the loop the quarter concerned. To come up for written reply/preliminary hearing on 01.12.2021 before S.B.


(Mian Muhammad)
Member(E)

27.09.2021

Appellant in person present. Mr. Kabirullah Khattak,
Additional Advocate General for respondents

Written reply not submitted. Learned AAG sought time to contact the respondents for submission of written reply. Adjourned. To come up for written reply/preliminary hearing before the S.B on 10.11.2021. The operation of impugned order to the extent of appellant shall remain suspended till next date.


(MIAN MUHAMMAD)
MEMBER (E)

10.11.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Iftikharul Ghani, DEO (M) Buner for the respondents present.

Vide order dated 11.08.2021 pre-admission notice was given to the respondents in view of the observations in the said order with direction for written reply on date fixed i.e. 09.09.2021. The respondents did not submit the written reply on the date fixed and the matter was adjourned for 27.09.2021 with the same direction for submission of written reply. On the adjourned date i.e. 27.09.2021 the written reply was again **not** submitted and the matter was adjourned for today. **Even** today the respondents are not ready to submit the **written** reply. They failed to comply with the direction of **this** Tribunal for the needful. Last chance is given to **the** respondents for submission of written reply failing **which** their right for written reply shall be deemed as struck off. To come up for reply/PH on 25.11.2021 before S.B.

Chairman

*reprinted on
fresh page*

11.08.2021

Counsel for the appellant present.

Learned counsel for the appellant contends that the appellant because of his transfer is nowhere for the time-being as the post against which he was transferred was found to be held by another teacher. Further contends that the post from which the appellant was transferred is still vacant in view of the letter of Principal, GHSS Amnawar Buner, available at Page-12 (Annexure-D). Let pre-admission notice be given to the respondents. To come up for written reply/preliminary hearing on 09.09.2021 before S.B.

Alongwith the appeal, the appellant has submitted an application for suspension of operation of the impugned order dated 09.06.2021 to the extent of appellant. Notice of the application be also given to the respondents. The operation of impugned order to the extent of appellant shall remain suspended till next date.


Chairman

09.09.2021

appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Saleem Khan, SO for respondent No: 2 present.

Written reply not submitted. Representative of the respondents sought time for submission of written reply. To come up for written reply/preliminary hearing before the S.B on 27.09.2021. The operation of impugned order to the extent of appellant shall remain suspended till next date.

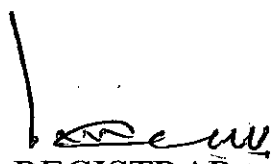

(MIAN MUHAMMAD)
MEMBER (E)

Form - A

FORM OF ORDER SHEET

Court of _____

Case No.: 7245/ 2021

S.No	Date of Order Proceedings	Order of Other proceedings with signature of Judge
1.		<p>The appeal of Mr. Shah jahan Khan presented today by Mr. Irfan Ali Yousafzai Advocate may be entered in the institution registered and put out to the worthy chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>The case is interested to S.BENCH for preliminary hearing to be put of their on</p> <hr/> <p style="text-align: right;">CHAIRMAN</p>

The appeal of Mr. Shah Jehan son of Gul Rahim Khan District Buner received today i.e. on 09.08.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 2- Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 3- Check List is not attached with the appeal.

No. 1603 /S.T,

Dt. 11/08 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

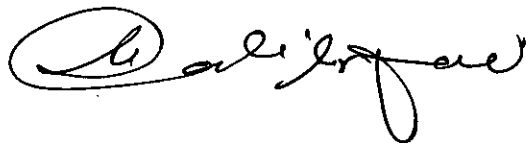
Mr. Irfan Ali Yousafzai Adv. Pesh.

Respected Sir,

Remove all the objection.

Re-submitted.

Please Place to file in Tribunal



11-08-2021

Before the Peshawar High Court Peshawar

CHECK LIST.

Case Title: <i>Shah Jehan</i> Versus <i>Cia v t</i>		YES	NO
1.	Case is duly signed.	YES	NO
2.	The law under which the case is preferred has been mentioned.	YES	NO
3.	Approved file cover is used.	YES	NO
4.	Affidavit is duly attested and appended.	YES	NO
5.	Case and annexure are properly paged/ numbered according to index.	YES	NO
6.	Copies of annexure are legible and attested. If not, then better copies duly attested have been annexed.	YES	NO
7.	Certified copies of all the requisite documents have been filed.	YES	NO
8.	Certificate specifying that no case on similar grounds was earlier submitted in this court, filed.	YES	NO
9.	Case is within time.	YES	NO
10.	The value for the purpose of court fee and jurisdiction has been mentioned in the relevant column.	YES	NO
11.	Court fee in shape of stamp paper is affixed. (for writ Rs.500, for other was required).	YES	NO
12.	Power of attorney is in proper form.	YES	NO
13.	Memo of addresses filed.	YES	NO
14.	List of books mentioned in the petition.	YES	NO
15.	The requisite number of spare copied attached. (Writ Petition-3 Nos, Civil Appeal (SB-1, DB-2) Civil Revision (SB-1, DB-2)).	YES	NO
16.	Case (Revision/appeal/petition etc.) is filed on the prescribed form.	YES	NO
17.	Power of attorney is attested by jail authority (for jail prisoner only).	YES	NO

It is certified that formalities/documents as requires in column 2 to 18 above, have been fulfilled.

Signature. *9/Jan Ali Adv*

Date: *11-10/2021*

Advocate Peshawar.

For office use only.

Case No. _____

Case received. _____

Complete in all respect; Yes/No (if No the grounds) _____

Date in court. _____

Signature. _____

(Reader)

Countersigned _____

Date. _____

(Deputy Registrar)

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. _____/2021


Shah Jehan.....Appellant

V E R S U S

Chief Secretary and others.....Respondents


I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal	*	1-5
	Application for suspension	*	6-7
2.	Affidavit	*	8
3.	Copy of the impugned order dated 09.06.2021	A	9
4.	Copy of the departmental appeal	B	10
5	Copy of letter dated 12.06.2021	C	11
6	Copy of the Letter dated 13.06.2021	D	12
7	Wakalatnama	*	13


Appellant

Through

Date: 16/07/2021


Irfan Ali Yousafzai
Advocate, High Court,
Peshawar
Cell# 0314-9070658

(1)

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. 7245 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7420

Dated 09/08/21

Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....**Appellant**

V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District Buner**Respondents**

APPEAL UNDER SECTION 4 OF
KP SERVICES TRIBUNAL ACT
1974 AGAINST THE TRANSFER
ORDER NO. SO(SM)E&SED/7-
1/2020/POSTING/TRANSFER/
GENERAL DATED PESHAWAR
THE JUNE 09TH 2021 TO THE
EXTENT OF S# 11 BY WHICH
THE APPELLANT WAS
TRANSFERRED AND HIS
SERVICE WERE PLACED AT
GHSS TOTALAI BUNER (BPS-17)

filed-to-day
Registrar
9/8/2021

WITH IMMEDIATE EFFECT
AGAINST WHICH THE
DEPARTMENT APPEAL ALSO
FILED BUT STILL PENDING

Prayer in Appeal:

On acceptance of this service appeal, the order of the Respondents No. 2 may be set aside to the extent of S# 11 and the appellant may please be restored to his prior position as SS BPS-17 Govt. Higher Secondary School Amnawar Buner.

Respectfully Sheweth:

1. That the appellant is the employee of respondents department and posted as SS BPS-17 at GGHSS Amnawar Buner and was posted at that position on 13.02.2019.
2. That the appellant performing his duty with zeal and zest at that post and suddenly the respondent No.1 issued impugned order No. SO(SM)E&SED/7-1/2020/Posting/Transfer / General dated Peshawar the June 09th 2021 and transferred the appellant to GHSS Totalai Buner BS-17. **(Copy of the impugned order dated 09.06.2021 is attached as Annexure-A)**

3. That the appellant aggrieved from the above mentioned order filed departmental appeal to the respondent No.2 which is still pending and no order yet has been passed in this regard. **(Copy of the departmental appeal is attached as Annexure-B)**
4. That in compliance of the impugned order dated 09.06.2021, the Appellant approach to the concerned School but the principal of the GHSS Totalai Buner refused to accept the arrival of the Appellant with the reason that the said post has already been filled by Mr Jehanzeb Khan SS in Pak Study, who is at the time in Judicial Custody and was suspended in this regard the concern principal issued letter dated 12.06.2021. **(Copy of letter dated 12.06.2021 is attached as annexure C)**
5. That the principal of GHSS Amnawar Buner also give a letter to the Appellant that the Appellant has been transferred to GHSS Totalai Buner but no substitute have been provide to GHSS Amnwar Buner and the post of the Appellant is still remain vacant. **(Copy of the Letter dated 13.06.2021 is attached as annexure D)**
6. That the appellant aggrieved from the transfer order dated 09/06/2021, which is illegal,

unlawful, void-ab-initio and liable to be set aside inter alia on the following grounds:

GROUND S:


- A. That the respondent No. 2 acted illegally and in violation of KPK Services Rules by issuing the impugned transfer order to the extent of S# 11.
- B. That the appellant is the employee of the respondents department in teaching cadre and transferred to other School which is already filled by another candidate, which is against the rules and policy.
- C. That malafide and misuse of authority on the part of the respondents is very much clear that the impugned order is premature because the appellant was posted as SS at GGHSS Amnawar Buner on 13.02.2019 and after hardly 2 years transfer to the other School which is against the rules and policy.
- D. That the impugned order of the respondent No.2 is illegal, unlawful and without lawful authority, liable to be set aside.

5

E. That the counsel for appellant may kindly be permitted to explain his view on the points, which shall be raised at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the order of the respondents No. 2 may be set aside to the extent of S# 11 and the appellant may please be restored to his prior position as SS BPS-17 Govt. Higher Secondary School Annawar Buner.

Any other relief may deemed fit in the circumstances of the law may also be granted in favour of the appellant against respondent.


Appellant

Through



Irfan Ali Yousafzai
Advocate, High Court,
Peshawar

Date: 09.08.2021

CERTIFICATE:

As per instruction of my client, no such like service appeal has earlier been filed by the present appellant before this Hon'ble court.

ADVOCATE



6

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

CM No. _____/2021

IN

Appeal No. _____/2021

Shah Jehan.....Appellant

V E R S U S

Chief Secretary and others.....Respondents


APPLICATION FOR SUSPENSION OF THE
IMPUGNED TRANSFER ORDER DATED
09/06/2021 TO THE EXTENT OF
APPELLANT, TILL THE FINAL DECISION
OF THE SERVICE APPEAL.

Respectfully Sheweth:-

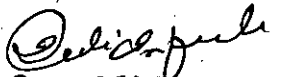
1. That the above noted service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That the facts and grounds of the service appeal may kindly be read as an integral part of this application.
3. That the applicant has got a good prima facie case in her favour, and is sanguine about its success.

4. That the balance of convenience also lies in favour of the applicant.
5. That if the transfer order dated 09/06/2021 not suspended, than the applicant would suffer irreparable loss.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned transfer order dated 09/06/2021 may kindly be suspended, till the final decision of the case.


Applicant

Through


Irfan Ali Yousafzai
Advocate, High Court,
Peshawar

Date: 09.08.2021

8

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. _____/2021

Shah Jehan.....Appellant

V E R S U S

Chief Secretary and others.....Respondents

AFFIDAVIT

I, **Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra, P.O Dagai, Shalbanday, Tehsil Gagra District Buner**, do hereby solemnly affirm and declare on oath that the contents of accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Identified by:

DEPONENT

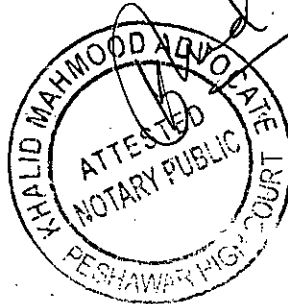
CNIC# 15101-0390938-5

Cell# 0314-9070658

Irfan Ali Yousafzai

IRFAN ALI YOUSAFZAI

Advocate, High Court,
Peshawar.





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

9

Amre

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Dated Peshawar the June 09, 2021

NOTIFICATION

NO.SO(SV)E.&SE/7-1/2020/Posting/Transfer/General: The Competent Authority is pleased to order the transfer of the following teachers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

S#	Name with designation	From	TO
1.	Mr. Taj Ahmad Khan IPE (BS-17)	GHSS Baranis Chitral Lower	IPE (BS-17) GHSS Baranis Chitral Lower against vacant post.
2.	Mr. Muhammad Ajuad HM (BS-17)	GHS Zondagram Chitral Upper w.e.f 05.05.2020	HM (BS-17) GHS GHS Gahiroth Chitral lower against vacant post.
3.	Mr. Masood Nabi SS Islamiyat (BS-17)	GHSS Ayun Chitral Lower 13.04.2017	SS Islamiyat GHSS Baranis Chitral Lower against vacant post.
4.	Mr. Muhammad Nisar Ahmad SS Islamiyat (BS-17)	GHSS Ower Chitral Upper w.e.f 15.06.2020	SS Islamiyat (BS-17) GHSS Ayun Chitral Lower against vacant post.
5.	Mr. Hamid Ali SS Economics (BS-17)	GHSS Harchin Chitral Upper w.e.f 15.03.2019	SS Economics (BS-17) GHSS Mastuj Chitral Upper against vacant post.
6.	Mr. Sajjad Ahmad Khan SS Physics (BS-17)	GHSS Und Khel Orakzai w.e.f 25.05.2018	SS Physics (BS-17) GHSS Avi Mela Orakzai against vacant post.
7.	Mr. Muhammad Asif SS Economics (BS-17)	GHSS Jarid Manshra w.e.f 31.05.2019	SS Maths (BS-17) GHSS Mohar Manshra against vacant post.
8.	Mr. Muhammad Suleman SS Islamiyat (BS-17)	GHSS Garhi Ghulam Shah Peshawar w.e.f 31.05.2017	SS Islamiyat (BS-17) GHSS Hazarkhwani Peshawar against vacant post.
9.	Mr. Sadiq Muhammad HM (BS-17)	GHS Sharkhana Palai Malakand w.e.f 23.03.2019	HM (BS-17) GHS Qaldara Dargai Malakand against vacant post.
10.	Said Nawab Principal (BS-18)	GHS Bora HSD Peshawar	Principal (BS-18) GHS Kandi Zarin Khel Peshawar against vacant post.
11.	Mr. Shah Jehan SS Pak Study (BS-17)	GHSS Annawar Buner w.e.f 13.02.2019	GHSS Totalai Buner against vacant post.
12.	Mr. Sabir Muhammad HM (BS-17)	GHS Akhen Talab Bora w.e.f 17.06.2017	HM (BS-17) GHS Mawaz Killi Bora Peshawar against vacant post.
13.	Sayed Adnan ul Haq Librarian	GHSS Gumbat Kohat	Librarian (BS-17) GHS Khesghi Nowshera against vacant post.
14.	Mr. Askar Ali SS Pak Study (BS-18)	Librarian (BS-18) GHSS Umanzai Charsadda	SS Pak Study (BS-18) GHSS Tamab Charsadda against vacant post.
15.	Mr. Muhammad Islam SS Physics	GHSS Chorlaki Kohat	SS Physics (BS-17) GHSS Sorgul Kohat against vacant post.
16.	Nisar Ahmad SS (BS-18)	GHSS Lora Abbottabad	SSS (BS-18) GHSS Nowanshehar Abbottabad

2. No TA/DA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Encl: of even No. & Date
Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, DPD Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (M), Concerned.
5. District Accounts Officers, Concerned.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PS to Special Secretary E&SE Department.
9. Officers concerned.

ATTESTED
to be true copy
Advocate

Post filled
acc. by
MR. Jehan Zehi whom is
now suspended &
Police custody.

9/6
PRINCIPAL
GHSS Totalai
(Buner)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the June 09, 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General: The competent authority is pleased to order the transfer of the following teachers of elementary & secondary education department, in the best public interest with immediate effect:

S#	Name with designation	From	To
1.	Mr. Taj Ahmad Khan IPE (BS-17)	GHSS Baranis Chitral Lower	IPE (BS-17) GHSS Baranis Chitral Lower against vacant post.
2.	Mr. Muhammad Ajmal HM (BS-17)	GHS Zondagaram Chitral Upper w.e.f. 05.05.2020	HM (BS-17) GHS GHS Gahiroth Chitral lower against vacant post.
3.	Muhammad Nisar Ahmad SS Islamayat (BS-17)	GHS Ayub Chitral Lower 13.04.2017	SS Islamayat GHSS Baranis Chitral Lower against vacant post.
4.	Mr. Muhammad Nisar Ahmad SS Islamyat (BS-17)	GHSS Ower Chitral Upper w.e.f. 15.06.2020	SS Islamayat GHSS Baranis Chitral Upper against vacant post.
5.	Mr. Hamid Ali SS economics (BS-17)	GHSS Harchin Chitral Upper w.e.f. 15.03.2019	SS Economics (BS-17) GHSS Mastuj Chitral Upper against vacant post.
6.	Mr. Sajjad Ahmad Khan SS Physics (BS-17)	GHSS Und Khel Orakzai w.e.f. 25.05.2018	SS Physics (BS-17) GHSS Avi Mela Orakzai against vacant post.
7.	Mr. Muhammad Asif SS Economics (BS-17)	GHSS Jarid Manshera w.e.f. 31.05.2019	SS Maths (BS-17) GHSS Mohar Manshera against vacant post.
8.	Mr. Muhammad Suleman SS Islamayat (BS-17)	GHSS Garhi GHulam Shah Peshawar w.e.f. 31.05.2017	SS Islamayat (BS-17) GHSS Hazarkhawani Peshawar against vacant post.
9.	Mr. Sadiq Muhammad HM (BS-17)	GHS Sharkhana palai malakand w.e.f. 23.03.2019	HM (BS-17) GHS Qaldara Dargai Malakand against vacant post.
10.	Said Nawab Principal (BS-18)	GHS Bora HSD Peshawar	Principal (BS-18) GHS Kandi Zarin Khel Peshawar against vacant post
11.	Mr. Shah jehan SS Pak Study (BS-17)	GHSS Amanawar Buner w.e.f. 13.02.2019	GHSS Totalai Buner against vacant post.
12.	Mr. Sabir Muhammad HM (BS-17)	GHS Akhen Talab Bora w.e.f. 17.06.2017	HM (BS-17) GHS Mawaz Killi Bara Peshawar against vacant post
13.	Sayed Adnan Ul Haq Librarian	GHSS Gumbat Kohat	Librarian (BS-17) GHS Khesghi Nowshera against vacant post
14.	Mr. Askar Ali SS Pak Study (BS-18)	Librarian (BS-18) GHSS Utmanzai	SS Pak Study (BS-18) GHSS Tarnab Charsadda against vacant post.
15.	Mr. Muhammad Islam SS Physics	GHSS Chorlaki Kohat	SS Physics (BS-17) GHSS Sorgul Kohat against vacant post.
16.	Nisar Ahmad SS (BS-18)	GHSS Lora Abbottabad	SSS (BS-18) GHSS Nowanshehar Abbottabad.

2. No TA/DA is allowed.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT.**

Endst: of even No & Date.

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar
2. Director, E&se Khyber Pakhtunkhwa Peshawar
3. Director DPD Khyber Pakhtunkhwa, Peshawar
4. District Education Officer (M) concerned.
5. District Accounts Officer, concerned.
6. PS to Minister for E&SE Department.
7. PS to secretary E&SE department.
8. PS to special secretary E&SE Department.
9. Officers concerned.

**HAFEEZ UR REHMAN SHAH
SECTION OFFICER (SCHOOLS MALE)**



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
(Phone No. 021-9221111)

Dated Peshawar the August 06, 2021

CORRIGENDUM.

NO.SQ(SME&SED/7-1/2021/PT/G) In partial modification of this Department notification of even number dated 09.06.2021, the Competent Authority is please to issue corrigendum in respect of Mr. Shah Jehan Subject Specialist (Pak Study) BS-17 under transferred to GHSS Totalia District Buner and post him as Subject Specialist (Pak Study) BS-17, GHSS Chinglai District Buner in best public interest with immediate effect.

No TA/DA is allowed.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
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6. PS to Secretary E&SE Department.
7. PA to Additional Secretary (Estab) E&SE Department.
8. Director, EMIS E&SE Department.
9. Officer concerned.
10. Master file.


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

The Honorable Secretary,
Elementary & Secondary Education,
K.P. Peshawar

TRANSFER

Ad Sir,

I have the honor to submit that I have been transferred from GHSS Annawar Buner to GHSS Totalai, Buner vide Order NO. SO(SM)E&SED-2020 Posting Transfer/ Genral, dated 09.06.2021 in compliance to your good self order I proceeded to GHSS Totalai for arrival, wherein the Principal of GHSS Totalai Buner told me that there is no vacant post of S.S.P. Study in the said school as the said post is filled by Mr. Jehanzeb

Therefore, with due reverence I submit that I may kindly be retained on my own post in GHSS Annawar, Buner, which is lying vacant due to my transfer

~~S. Jehanzeb~~
S.S.P. Study
GHSS Annawar, Buner
Dated: 13-6-21
Cell No 0335-9693061

Forwarded for Mr. Pleaser

[Signature]
PRINCIPAL
GHSS Annawar
District Peshawar

13/6/21

[Signature]
W.L.

[Signature]
to be true copy
Advocate

To,

The Hon'ble Secretary
Elementary & Secondary Education
KP, Peshawar

Subject:- TRANSFER

Respected Sir,

I have the honor to submit that I have been transferred from GHSS Amnawar Buner to GHSS Totalai, Buner vide Order No. SO(SM)E&SED/7-1/2020/Posting/Transfer/General, dated 09.06.2021, in compliance to your good self order I proceeded to GHSS Totalai for arrival, wherein the Principal of GHSS Totalai Buner told me that there is no vacant post of S.S Pak Study in the said school, as the said post is filled by Mr. Jehanzeb.

Therefore, with due reverence I submit that I may kindly be retained on my own post in GHSS Amnawar, Buner which is lying vacant due to my transfer.

Shah Jehan
S.S Pak Study
GHSS AMnawar Buner
Dated 13.06.2021
Cell # 0333-9693061

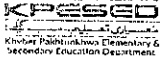
Forwarded for MG please.

ATTESTED
Q
to be true copy
Advocate

Amc "C" (11)

محکمہ ابتدائی و ثانوی خواندگی ضلع بونیو

Government Higher Secondary School Totalai



E-Mail: sherinzada2020@gmail.com Facebook: www.fb.com/ghss.totalai
Web Portal: http://schools.kpese.gov.pk/webportal/cms/content/186/36631
P h: 0939500348, GSM: 03459702331



Ref No: AFF/STF/22/ 193

Dated: 12-06-2021

To,

The District Education Officer (M),
EI & SE Education,
Buner at Daggar.

Subject: TRANSFER/VACANT POST (s)


Memo,

Referenced to Secretary E&SE Department Transfer Notification No: SO(SM)E&SED/7-1/2020/Posting/Transfer/General Dated: 09-06-2021.

It is kindly stated that the post of SS in Pakistan Studies is already filled by Mr. Jehan Zeb Khan SS in Pak Studies whom is at time in judicial custody and on suspension vide Secretary E&SED Notification No: SO(S/M)E&SED/14-1/2021FIR/Jehanzeb dated: 20-05-2021 (Copy for reference attached).

It is therefore kindly requested That Mr. Shah Jehan SS Pak Study (BPS-17) may kindly be adjusted at other station and obliged.

Regards!



Principal
GHSS Totalai, Buner

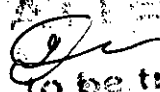
Endst No: AFF/STF/22/ 196-195

Dated: 12-06-2021

Copy forwarded for information to :

1. P.A to Secretary E&SE Department.
2. P.A to Director EI&SE Education KP.


Principal
GHSS Totalai, Buner

ATTESTED

To be true copy
Advocate

Anx "D" (12)

OFFICE OF THE PRINCIPAL GHSS AMNAWAR DISTRICT BUNER

No: 1339-

Dated: 14/06/2021

To

The Honorable Secretary,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Subject: TRANSFER OF MR. SHAH JEHAN (S.S PAK STUDY), BPS-17

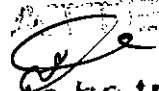
Respected Sir,

It is submitted that Mr. Shah Jehan S.S Pak Study have been transferred to GHSS Totali, Buner vide Order NO. SO(SM)E&SED/7-1/2020/Posting/Transfer/General dated 09.06.2021. Consequently, he proceeded to GHSS Totalai to submit his arrival report where he was told that the post of S.S Pak Study has already been occupied by Mr. Jehan Zeb S.S at GHSS Totalai Buner. In the transfer Order cited above, no substitute have been provided to GHSS Amnawar. So, the Post of S.S Pak Study is still lying vacant at GHSS Amnawar, Buner and by the transfer of Mr. Shah Jehan to GHSS Toalai will hamper the smooth functioning of the School.

Keeping in view the above facts, it is requested that Mr. Shah Jehan may please be retained at GHSS Amnawar Buner, in the best interest of the school and students.

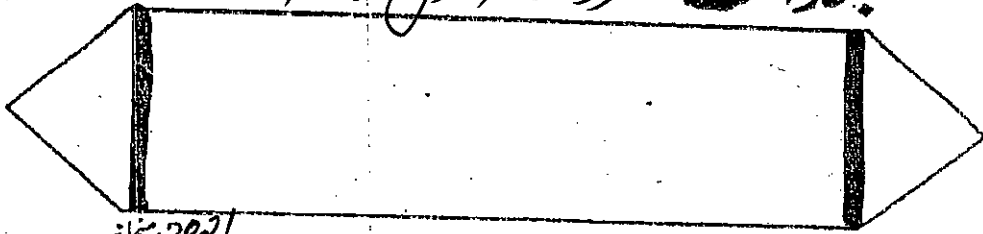

PRINCIPAL
GHSS AMNAWAR, BUNER




ATTESTED
to be true copy
Advocate

OK

بعدالت سرور کے لئے درخواست



2021ء پنجاب

بنام حکومت

سندھ پنجاب

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام لکھنؤ کیلئے عمر خان علی یوسف پوری اور پیر وید
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ یا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور مشغولی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
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 بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواخذہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہر جان التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم 9 ماہ اگست 2021

العبد _____ واہ العبد _____

کے لئے منظور ہے۔

بنام لکھنؤ

Attested
&
Accepted
Chiranjeev

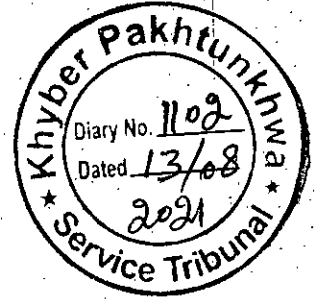
LC-09-1766

Mobile # 0314-9070658

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2021

In
S.A No. 7245/2021



Shah Jehan **Petitioner**

VERSUS

Govt. of KPK and others **Respondents**

APPLICATION FOR SUSPENSION
OF THE IMPUGNED DATED
06/08/2021 OF THE
RESPONDENT DEPARTMENT, TILL
THE FINAL DECISION OF THE
SERVICE APPEAL.

Respectfully Sheweth:

1. That the accompanying Service Appeal is being filed by the petitioner before this Hon'ble Tribunal and the main order dated 09/06/2021 has been suspended by this Hon'ble Tribunal on 11/08/2021. (Copy of order dated 11/08/2021 is attached as Annexure-A)

2. That now the instant appeal is fixed for 09/09/2021.
3. That during the pendency of the instant appeal the respondent department issued corrigendum dated 06/08/2021 in the main order dated 09/06/2021. (Copy of corrigendum order dated 06/08/2021 is attached as Annexure-B)
4. That this Hon'ble Tribunal vide order dated 11/08/2021 already suspended the main order dated 09/06/2021, therefore the superstructure built upon the main order is corrum-non-judice.
5. That the petitioner has got a good prima facie case in his favour, and are sanguine about its success.
6. That the balance of convenience also lies in favour of the petitioner.
7. That if the corrigendum order dated 06/08/2021 not suspended, than the petitioner would suffer irreparable loss.
8. That the facts and grounds of the Service Appeal may kindly be read as an integral part of this application.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned order dated 06/08/2021 of the respondent department may kindly be suspended, till the final decision of the service appeal.

Dated 12/08/2021

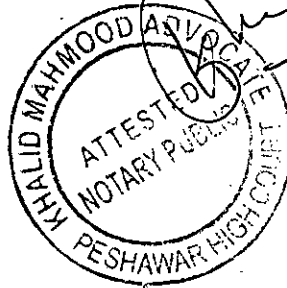
Appellant/Petitioner

Through

Irfan Ali Yousafzai
Irfan Ali Yousafzai
Advocate, High Court,
Peshawar

AFFIDAVIT

I, **Shah Jehan S/o Gul Rahim Khan R/o Buner (SS Pakistan Studies at GHSS Amnawar Buner)**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

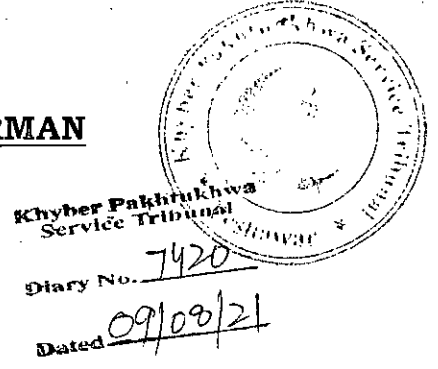


DEPONENT

①

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. 7245/2021



Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....Appellant

V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District BunerRespondents

APPEAL UNDER SECTION 4 OF
KP SERVICES TRIBUNAL ACT
1974 AGAINST THE TRANSFER
ORDER NO. SO(SM)E&SED/7-
1/2020/POSTING/TRANSFER/
GENERAL DATED PESHAWAR
THE JUNE 09TH 2021 TO THE
EXTENT OF S# 11 BY WHICH
THE APPELLANT WAS
TRANSFERRED AND HIS
SERVICE WERE PLACED AT
GHSS TOTALAI BUNER (BPS-17)

filed-to-day
14
Registrar
9/8/2021

Certified to be true copy
[Signature]
Registrar
Peshawar

A



11.08.2021

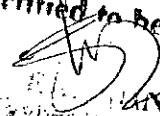
Counsel for the appellant present.

Learned counsel for the appellant contends that the appellant because of his transfer is nowhere for the time-being as the post against which he was transferred was found to be held by another teacher. Further contends that the post from which the appellant was transferred is still vacant in view of the letter of Principal, GHSS Amnawar Buner, available at Page-12 (Annexure-D). Let pre-admission notice be given to the respondents. To come up for written reply/preliminary hearing on 09.09.2021 before S.B.

Alongwith the appeal, the appellant has submitted an application for suspension of operation of the impugned order dated 09.06.2021 to the extent of appellant. Notice of the application be also given to the respondents. The operation of impugned order to the extent of appellant shall remain suspended till next date.


Chairman

Certified to be true copy


Chairman
Khuzdar Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 12/8/21

Number of 8

Copies 4/10/21

Pages 14/21

Total 14/21

Name of _____

Date of Submission of Copy 12/8/21

Date of Delivery of Copy 12/8/21



Encl "B"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
(Phone No: 091-9221511)

Dated Peshawar the August 06, 2021

CORRIGENDUM.

NO.SO(SMDE&SED)/7-1/2021/TT/G. In partial modification of this Department notification of even number dated 09.06.2021, the Competent Authority is please to issue corrigendum in respect of Mr. Shah Johan Subject Specialist (Pak Study) BS-17 under transferred to GHSS Totalia District Buner and post him as Subject Specialist (Pak Study) BS-17, GHSS Chinglai District Buner in best public interest with immediate effect.

No TA/DA is allowed.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endsl: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
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8. Director, EMIS E&SE Department.
9. Officer concerned.
10. Master file.


06/08/2021
(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MA

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2021

In

S.A No. 7245/2021

Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

APPLICATION FOR SUSPENSION
OF THE IMPUGNED DATED
06/08/2021 OF THE
RESPONDENT DEPARTMENT, TILL
THE FINAL DECISION OF THE
SERVICE APPEAL.

Respectfully Sheweth:

1. That the accompanying Service Appeal is being filed by the petitioner before this Hon'ble Tribunal and the main order dated 09/06/2021 has been suspended by this Hon'ble Tribunal on 11/08/2021. (Copy of order dated 11/08/2021 is attached as Annexure-A)


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5. That the petitioner has got a good prima facie case in his favour, and are sanguine about its success.
6. That the balance of convenience also lies in favour of the petitioner.
7. That if the corrigendum order dated 06/08/2021 not suspended, than the petitioner would suffer irreparable loss.
8. That the facts and grounds of the Service Appeal may kindly be read as an integral part of this application.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned order dated 06/08/2021 of the respondent department may kindly be suspended, till the final decision of the service appeal.

Dated 12/08/2021

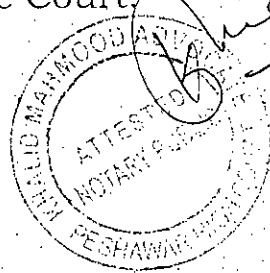
Appellant/Petitioner

Through


Irfan Ali Yousafzai
Advocate, High Court,
Peshawar

AFFIDAVIT

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A



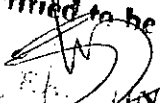
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Chairman

Certified to be true copy

CHIEF CLERK
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 12/8/21
Number of 8
Copies 10
Original 1
Total 14
Name of
Date of 12/8/21
Date of delivery of Copy 12/8/21

①

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR



Appeal No. 7245 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7420

Dated 09/08/21

Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....Appellant

V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District BunerRespondents

Filed-to-day
14
Registrar
9/8/2021

APPEAL UNDER SECTION 4 OF
KP SERVICES TRIBUNAL ACT
1974 AGAINST THE TRANSFER
ORDER NO. SO(SM)E&SED/7-
1/2020/POSTING/TRANSFER/
GENERAL DATED PESHAWAR
THE JUNE 09TH 2021 TO THE
EXTENT OF S# 11 BY WHICH
THE APPELLANT WAS
TRANSFERRED AND HIS
SERVICE WERE PLACED AT
GHSS TOTALAI BUNER (3PS-17)

Certified to be true copy

[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat, Peshawar
Phone No. (091-9221111)

Dated Peshawar the August 06, 2021

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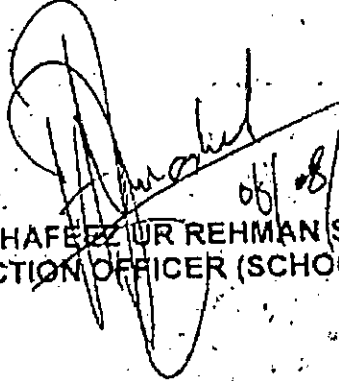
No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Ends: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
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3. District Education Officer (Male) concerned.
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6. PS to Secretary E&SE Department.
7. PA to Additional Secretary (Estab) E&SE Department.
8. Director, EMIS E&SE Department.
9. Officer concerned.
10. Master file.


(HAFEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2021

In

S.A No. 7245/2021

Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

APPLICATION FOR SUSPENSION
OF THE IMPUGNED DATED
06/08/2021 OF THE
RESPONDENT DEPARTMENT, TILL
THE FINAL DECISION OF THE
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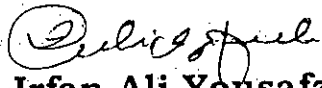
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Dated 12/08/2021

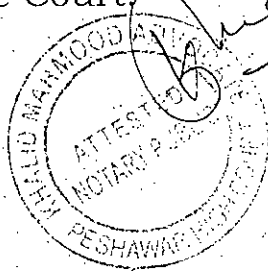
Appellant/Petitioner

Through


Irfan Ali Yousafzai
Advocate, High Court,
Peshawar

AFFIDAVIT

I, **Shah Jehan S/o Gul Rahim Khan R/o Buner (SS Pakistan Studies at GHSS Amnawar Buner)**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court



DEPONENT

A



11.08.2021

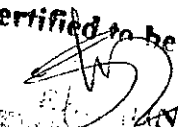
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Chairman

Certified to be true copy


OFFICER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 12/8/21

Number of 8

Copy 4/15

Urgent 14/15

Total 14/15

Name of _____

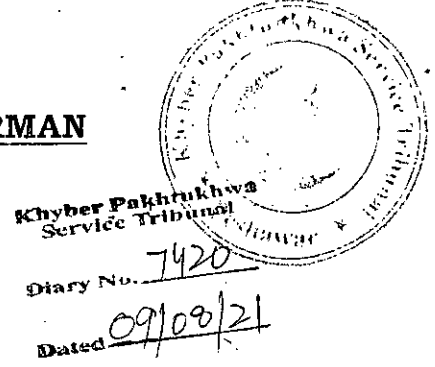
Date of 12/8/21

Date of Delivery of Copy 12/8/21

① A

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

Appeal No. 7245/2021



Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....Appellant

V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District BunerRespondents

APPEAL UNDER SECTION 4 OF
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1974 AGAINST THE TRANSFER
ORDER NO. SO(SM)E&SED/7-
1/2020/POSTING/TRANSFER/
GENERAL DATED PESHAWAR
THE JUNE 09TH 2021 TO THE
EXTENT OF S# 11 BY WHICH
THE APPELLANT WAS
TRANSFERRED AND HIS
SERVICE WERE PLACED AT
GHSS TOTALAI BUNER (BPS-17)

filed-to-day
14
Registrar
9/8/2021

Certified to be true copy
[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-A, Opposite MPA's Hostel, Civil Secretariat Peshawar
PHONE NO. (091) 7251313

B

Dated Peshawar the August 06, 2021

CORRIGENDUM.

NO. SO/SME&SED/7-1/2021/PT/G. In partial modification of this Department notification of even number dated 09.06.2021 the Competent Authority is please to issue corrigendum in respect of Mr. Shah Jehan Subject Specialist (Pak Study) BS-17 order transferred to GHSS Totalia District Buner and post him as Subject Specialist (Pak Study) BS-17, GHSS Chinglai District Buner in best public interest with immediate effect.

No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

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9. Officer concerned.
10. Master file.


(HAFEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2021

In

S.A No. 7245/2021

Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

APPLICATION FOR SUSPENSION
OF THE IMPUGNED DATED
06/08/2021 OF THE
RESPONDENT DEPARTMENT, TILL
THE FINAL DECISION OF THE
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Respectfully Sheweth:

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

C.M No. _____/2021

In

S.A No. 7245/2021

Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

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OF THE IMPUGNED DATED
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RESPONDENT DEPARTMENT, TILL
THE FINAL DECISION OF THE
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2. That now the instant appeal is fixed for 09/09/2021.
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Dated 12/08/2021

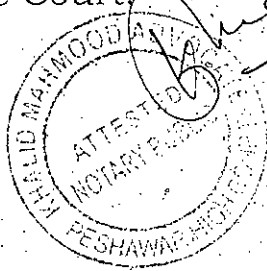
Appellant/Petitioner

Through


Irfan Ali Yousafzai
Advocate, High Court,
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AFFIDAVIT

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DEPONENT

A



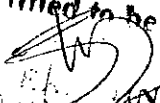
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Chairman

Certified to be true copy

ANER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 12/8/21
Number of 89
Cause 4/1/21
Brgs 14/21
Total 14/21
Name of _____
Date of Copy 12/8/22
Date of Delivery of Copy 12/8/22

①

**BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR**



Appeal No. 7245 /2021

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Diary No. 7420

Dated 09/09/21

Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....Appellant

VERSUS

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District BunerRespondents

filed-to-day
14
Registrar
9/8/2021

**APPEAL UNDER SECTION 4 OF
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THE JUNE 09TH 2021 TO THE
EXTENT OF S# 11 BY WHICH
THE APPELLANT WAS
TRANSFERRED AND HIS
SERVICE WERE PLACED AT
GHSS TOTALAI BUNER (BPS-17)**

Certified to be true copy

[Signature]
Khyber Pakhtunkhwa
Services Tribunal,
Peshawar

B



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221513

Dated Peshawar the August 06, 2021

CORRIGENDUM.

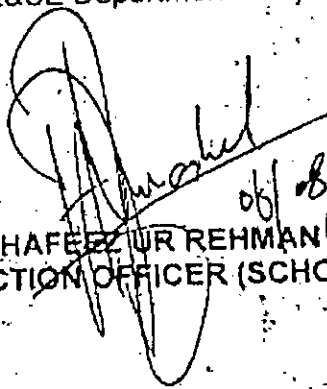
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No TA/DA is allowed.

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E&SE DEPARTMENT

Endst: of even No. & Date

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06/08/2021
(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

BEFORE THE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

C.M No. _____/2021

In

S.A No. 7245/2021

Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

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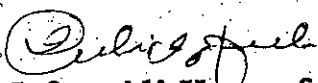
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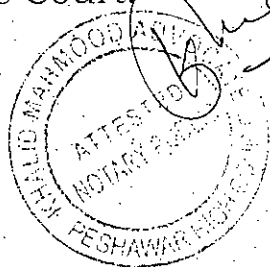
Appellant/Petitioner

Through


Irfan Ali Yousafzai
Advocate, High Court,
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AFFIDAVIT

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DEPONENT

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11.08.2021

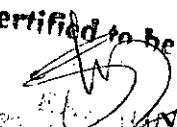
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Chairman

Certified to be true copy


Chairman
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 12/8/21
 Number of 800
 Copies 4/10
 Urgent 14/1
 Name of _____
 Date of _____ of Copy 12/8/22
 Date of Delivery of Copy 12/8/22

①

**BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR**



Appeal No. 7245 /2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7420

Dated 09/09/21

Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....**Appellant**

V E R S U S

1. Chief Secretary, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. DEO (Male) District Buner**Respondents**

filed-to-day
Registrar
9/8/2021

**APPEAL UNDER SECTION 4 OF
KP SERVICES TRIBUNAL ACT
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ORDER NO. SO(SM)E&SED/7-
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GENERAL DATED PESHAWAR
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GHSS TOTALAI BUNER (BPS-17)**

Certified to be true copy
[Signature]
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar



B

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat, Peshawar
Phone No. (091-9251517)

Dated Peshawar the August 06, 2021

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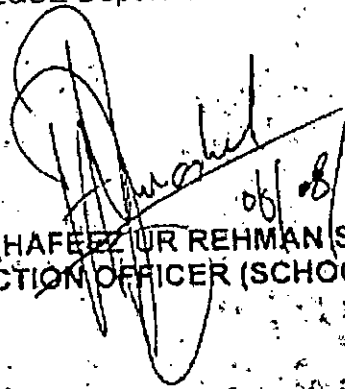
No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst. of even No. & Date

Copy forwarded to the:

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(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

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

C.M No. _____/2021

In

S.A No. 7245/2021

'Shah Jehan **Petitioner**

V E R S U S

Govt. of KPK and others **Respondents**

**APPLICATION FOR SUSPENSION
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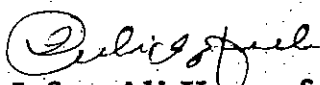
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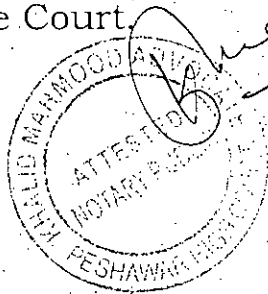
Appellant/Petitioner

Through


Irfan Ali Yousafzai
Advocate, High Court,
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DEPONENT



11.08.2021

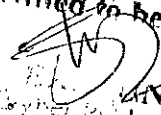
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Chairman

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Chairman
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 12/8/21
Number of 89
Copies 4/10
Urgent 14/1
Total 14/1
Name of _____
Date of _____ of Copy 12/8/22
Date of Delivery of Copy 12/8/23

1

**BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR**



Appeal No. 7245 /2021

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Diary No. 7420

Dated 09/09/21

Shah Jehan S/o Gul Rahim Khan R/o Bakhsha Hujra,
P.O Dagai, Shalbanday, Tehsil Gagra District Buner.

.....Appellant

V E R S U S

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2. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
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File-to-day
Registrar
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[Signature]
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Service Tribunal
Peshawar



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ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
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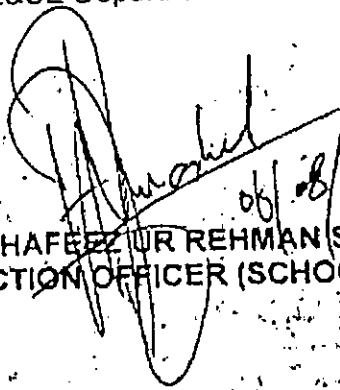
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SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endsl. of even No. & Date

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(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)