

30.05.2022

Nemo for the appellant.

Previous date was changed on the strength of Reader note, therefore, notice be issued to the appellant and his counsel for the date fixed. To come up for preliminary hearing on 25.07.2022 before S.B.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal stroke extending to the right.

(Mian Muhammad)
Member (E)

27.10.2021


Counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 04.01.2022 before S.B.


Chairman


04.01.2022

Nemo for the appellant.

Notices be issued to appellant as well as his learned for the next date. Case to come up for preliminary hearing on 01.03.2022 before S.B.


(Rozina Rehman)
Member (J)

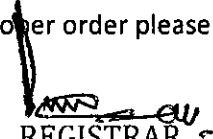
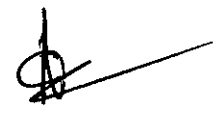

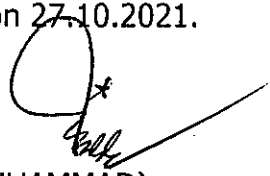
1-3-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-5-2022

Reader

FORM OF ORDER SHEET

Court of _____

Case No.- 4529 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/04/2021	<p>The appeal of Mr. Naseem Iqbal resubmitted today by Mr. Muhammad Saeed Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	26/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>31/05/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	31.05.2021	<p>None present for the appellant.</p> <p>Notice be issued to appellant and his counsel. To come up for preliminary hearing on 09.09.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	09.09.2021	<p>None for the appellant present.</p> <p>Due to general strike of the legal fraternity, the case is adjourned. Notice be issued to the appellant and his counsel. To come up for preliminary hearing before the S.B on 27-10.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Naseem Iqbal Senior PET GHS Metha Khel Karak received today i.e. on 11/03/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Annexures-A & C of the appeal are illegible which may be replaced by legible/better one.

No. 536 /S.T,

Dt. 11/03/2021


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


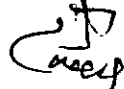
Mr. Muhammad Saeed Khattak Adv. Pesh.

R/sir,

That the pages under objection are not vital for the disposal of the titled appeal, however if needed, can be produced before the Hon'ble Bench during the course of hearing of the case, kindly the same may be placed before the Hon'ble Bench.

R/sir,

Resubmitted after removal of objections as mentioned above.


19/3/2021

15/4/2021

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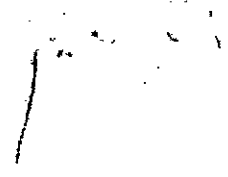
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1/2/11



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

S.A. 4529
C.M. No. ____/2021

Naseem Iqbal.....(Appellant)

VERSUS

Secretary Elementary and Secondary Education and
others.....(Respondents)

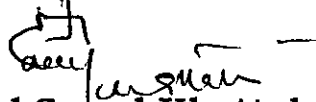
I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-8
2.	Application for condonation of delay		9-10
3.	Copy of appointment order	A	11-13
4.	Copies of the academic testimonials	B	14-16
5.	Copy of the notification	C	17
6.	Copies of the notification dated 20/04/2018	D	18-20
7.	Copy of the application form	E	21-23
8.	Copies of departmental appeals	F	24-25
9.	Wakalat Nama		26


Applicant/Appellant

Through

Dated: 10/03/2021


Muhammad Saeed Khattak
Advocate High Court,
Peshawar.
Cell No. 0333-6272753

(A)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2021

Naseem Iqbal, Senior PET, Government High School Metha
Khel, Karak.....(Appellant)

VERSUS

1. Secretary Elementary and Secondary Education, Government
of Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar.....(Respondents)

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974.

Prayer in appeal:

On acceptance of this Service Appeal:

1. *To examine the amendments dated 26/04/2018 vide notification No. SO (B&A) 1-18/2018/DPE- Service Rules, whereby condition of Bachelor of Education (B.Ed) was included for the appointment and promotion of the post of Instructor Physical Education (BPS-17) and so on, is based on malafide and is just to accommodate their own blue eyed person.*
2. *After declaring the condition of B.Ed null and void and ineffective upon the rights of the appellant then directing the respondents concerned for conducting a meeting of DPC without any further delay.*
3. *Any other relief which deems fit in the circumstances of the case.*

Respectfully Sheweth:

1. That the appellant is serving as Senior Physical Education Teacher in BPS-16 at GHS at Metha Khel (Karak) since his appointment vide notification/ office order dated 15/11/1990. (Copy of appointment order is attached as annexure "A").

2. That, the appellant is having a Master Degree in Health and Physical Education as well as having one year Senior Diploma in Health and Physical Education. (Copies of the academic testimonials are attached as annexure "B").

3. That the respondents have not conducted any DPC for promotion from BPS-16 to BPS-17 since 11/06/2020 and so many vacancies are lying vacant in the department under their kind command. In their last meeting total member of 10 SPET serving in BPS-16 were promoted to the post of IPE, BPS-17 on regular basis with immediate effect vide notification No. SO (PE)2-6/DPC-Meeting (11-6-2020). (Copy of the notification is attached as annexure "C").

4. That above mentioned promotion were made in the light of notification having No. SO (B&A) 1-18/2018/DPE Service Rules whereby certain amendments were, made in the existing rules regarding the subject matter. (Copies of the notification dated 20/04/2018 are attached, as annexure "D").

5. That in the previous service structure, the condition of B.Ed is/ was not mentioned anywhere, but in the instant one it has been included just to benefit only few their own blue eyed and to deprive the appellant along with the so many other employees the promotion.

6. That in order to accommodate some blue eyed persons an extra qualification in shape of B.Ed was entered in shape of amendments in the existing rules. The appellant like many other has a Senior Diploma in Physical Education which is at par/ equivalent to B.Ed was ignored.

7. That the appellant has already submitted an application in Higher Education Commission on 23/12/2020 having a subject as "Application Form for equivalence of Pakistani Degree" whose reply is awaited and will positively be provided when it is received. (Copy of the application form is attached as annexure "E").

8. That being highly aggrieved of the same, the appellant submitted several departmental appeals/ representations in the office of respondent No. 1; i.e. one dated 13/11/2019 and another 23/11/2019. (Copies of departmental appeals are attached as annexure "F").

9. That appellant paid continuous visits to the offices of the official concerned till then but every time he was turned back on one pretext or the other.

10. That having no other adequate alternate speedy and efficacious remedy before him the appellant prefers the instant Service Appeal, inter-alia on the following amongst others:

GROUND:

A. That the appellant has not been treated in accordance with law nor equal protection of law has been extended to him.

B. That the amendment made vide notification Peshawar dated the 26/04/2018 having No. SO(B&A)-18/2018/DPE Service Rules, in pursuance of the provision contained in Sub Rule (2) of Rule 3 of the KPK Civil Servants (APT) Rules, 1989 the E&SE Department in consultation with the Establishment Department and the Finance Department Notification No. SO (PE)4-5/SSRC/Meeting/ 2012/ Teaching cadre dated 13/12/2012 made further amendments, whereby for the post Instructor Physical Education (BPS-17) with qualification of at least second class Master's Degree in Physical Education a condition of Bachelor of Education (B.Ed) was inserted which is/ was based for accommodating only their own blue eyed persons whose were also promoted to the post vide notification dated 20/10/2020 although they

are/ were otherwise juniors to the appellant and to many other leaders.

- C. That previously a condition of Senior Diploma in Physical Education was included for promotion along with Master Degree (Second Class) in Physical Education which is not only as par with Bachelor of Education (B.Ed) but is relevant for the post of Physical Instructors.
- D. That Bachelor of Education (B.Ed) has no relevancy in the subject matter where a person only study/ seek teaching methods and there exist no single subject regarding the physical activities of students.
- E. That PET's having Bachelor of Education werehaving 3 % quota for promotion to post of SST General, which was abolished by the Government in 2012 while amending up-gradation and promotion policy.
- F. That for promotion from the post of SPET to IPE/HPE qualification was at least second class

Master for degree in H&PE as well as 5 years experience which existed upto 2018.

G. That on 9th June 2020 a meeting of DPC was held where a condition of B.Ed was inserted which was only for benefiting only few while ignoring many others like the application.

H. That interestingly a meeting of PSB for promotion to SIPE BPS-18 from the post of IPE-BPS-17 wherein the some condition of B.Ed and M.Ed was ignored.

I. That as per case law reported as PLD 1976 Qta 59 (C), Tribunal under Service Tribunal Act, 1973 is deemed to be a Civil Court with all powers under Code of Civil Procedure, 1908 Tribunal like any other of Civil Court possessed of jurisdiction to examine whether or not certain law is ultra vires or order made is malafide.

J. That in the similar way as per case law reported as 1990 PLC (CS) 257 (C), Administrative Court or Tribunal established in pursuance of Article 212 is competent like a Civil Court, to examine whether or

not a law is void by reason of its conflict with the fundamental rights or is otherwise ultra vires or that the order made is malafide or that a service rule is ultra vires of the law or whether a particular order is with or without jurisdiction.

K. That any other ground can also be taken with permission of this Hon'ble Tribunal during the arguments.

It is, therefore, humbly prayed that titled Service Appeal may kindly be allowed as per prayer.

Any other relief as deemed appropriate in circumstances of the case, not specifically asked for, may also be granted to the appellant.

[Handwritten signature]
Appellant

Through

[Handwritten signature]
Saeed Khattak

Dated: 10/03/2021

Muhammad Saeed Khattak
Advocate High Court,
Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

C.M. No. ____/2021

In

Service Appeal No. ____/2021

Naseem Iqbal.....(Appellant)

VERSUS

Secretary Elementary and Secondary Education and
others.....(Respondents)

APPLICATION FOR CONDONATION OF
DELAY IF ANY.

Respectfully Sheweth:

1. That the titled service appeal has been filed today in which no date has yet been fixed for hearing.
2. That the applicant/ appellant has a got prima facie case and is sanguine of its success.
3. That huge interest of the applicant are involved in the instant case and will suffer irreparable loss if non-suited on the ground of limitation.

4. That the grounds taken in the main appeal may kindly be considered as per Courts have already governed the cases to be decided on merits rather than technicalities including the limitation.

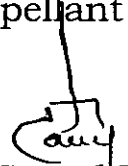

5. That the question under discussion is of continuous cause of action, where no limitation lie.

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


Applicant/Appellant

Through

Dated: 10/03/2021


Muhammad Saeed Khattak
Advocate High Court,
Peshawar. 

11
Annex-A

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS) KOHAT DIVISION

APPOINTMENT

Appointments of the following candidates are hereby ordered against the vacant post of P.T.E.T on temporary and adhoc basis @ Rs. 830/- P.M fixed plus usual allowances as prescribed under the rules in the MS-3,

at the institutions noted against each name:-

No.	Name/Candidate Name/Address	Posted at	Remarks
1.	Easa Khan, S/o Sher Din, XXXX Ex-Serviceman, R/o Chokara, Karak.	GMS Harisu, Kohat.	Against the newly created post
2.	Shar Afzal Khan, S/o Sardar Ali, P.A Ex-Serviceman, P/o Takkhi-Karachi, Karak.	GMS Dab-Sayand, Karak.	
3.	Nasoor Iqbal, S/o Noor Shah Jan P.A P/o Karak.	GMS Kurad Karak.	
4.	Hazrat Khan, S/o Hazrat Umar, P/o Wazir, Karak.	GMS Khattak Danda, Kohat.	

TERMS & CONDITIONS.

1. Their appointment is purely temporary & liable to termination at any time without assigning reasons or notice.
2. In case of resignation they will have to submit one month's prior notice to the Deptt. or forfeit one month's pay in lieu thereof to the Govt. authority concerned before taking over charge provided they are not employed in Government Service.
3. They should not be allowed to take over charge of their posts after 18 years or above 25 years of age.
4. Their appointment is subject to other condition that may be notified of M.S. 3.
5. All documents, the letter & B. Certificate should be thoroughly checked before handing over of the post. If necessary it should be verified by the institution concerned.
6. If they failed to take over charge of the post within a week receipt of this order, the order of appointment will stand cancelled.
7. Charge papers should be submitted in duplicate to the concerned authority, etc in allowed.

KOHATA
1/3 P.M. DIRECTOR

- 1-2. District Education Officer (M)
- 3-4. District Education Officer (S)
- 5-6. District Education Officer (A)
- 7-12. P/Os

A. Masoodi
ANNA MEMORANDUM
SET BY M.A. KHAN
GMS (M.S. 3) (M.S. 3)

DIVISION OF EDUCATION (SCHOOLS)
KOHAT DIVISION

1st APPT (2) Date

112

Annex-A

1.	2.	3.	4.	5.	6.	7.	8.
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state— (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term "pay"	Date of appointment	Signature of Government servant
درجہ ملازمت	تاریخی مستقل قائم مقام	اگر عارضی ہے تو کیا وہ رول کے مطابق ہوتی ہے؟	تعمروا بطور عارضی ملازمت	زائدہ تعمروا بطور قائم مقام	معمروا دیگر الاؤنس	تاریخ تقرری	دستخط سرکاری ملازم
2 BT Post			Rs. 830/-			15-11-1990	
GMS Kund Sharif			Rs. 830/-			12/90	Nasir
do - do			Rs. 1185/-			22-11-1985	
do - do			Rs. 1185/-			16/91	Nasir
do - do			Rs. 1185/-			12/91	Nasir
GMS Mela Banta			Rs. 1185/-			25-3/92	Nasir
GMS Parkha Kori	do		Rs. 1185/-			28-5/92	Nasir
do - do	do		Rs. 1185/-			12/92	Nasir
do - do	do		Rs. 1185/-			17/93	Nasir
do - do	do		Rs. 1185/-			12/93	Nasir

13

1

1. Name (نام)..... Naseem Ishaq

2. Nationality and Religion
(قومیت اور مذہب)

Pakistan Islami

3. Residence (مستقل رہائش).....

Labbi Ghat Post Karak

4. Father's name and residence.....
(والد کا نام اور رہائش)

Teh. Kawal Distt. Kawal
Nara Shekhar

5. Date of birth by Christian era as
nearly as can be ascertained.....
(تاریخ پیدائش مطابق سن عیسوی)

10-1-1972
Tenth January 1972 Sunday

6. Exact height by measurement.....
(قد و قامت)

5' 7"

7. Personal mark for identification.....
(نشان شناخت)

Black mole on chin

8. Left hand/right hand thumb and finger-impresions of (Non-gazetted) officer

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھٹکیا)

Ring Finger (چھٹکیا کے ساتھ کی انگلی)

Middle Finger (تکشت میالہ)



Fore-Finger (انگشت شہادت)

Thumb (انگولہا)

9. Signature of Government servant.....
(سرکاری ملازم کے دستخط)

Naseem Ishaq

10. Signature and designation of the
Head of the Office, or other Attesting
Officer.....
(تصدیق کنندہ سرکاری دستخط اور مہر)

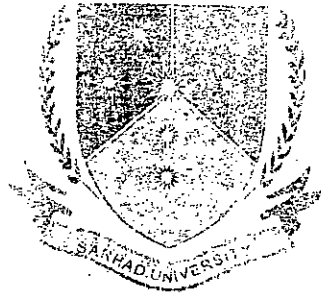
S. D. E. O.
(M) Karak

Ali Rana

Note.—The entries in this page should be renewed or re-attested at least every five years and the signature in lines 9 and 10 should be attested. Finger prints need not be taken after every 5 years under this r

یہ صفحہ کے مندرجات کم از کم ہر پانچ سال بعد تصدیق ہونا چاہئیں۔ انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں ہوتی۔ دستخط اور مہر کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں ہوتی۔

Registration No. SUT/10-03-50148



14
Date No. 612036

Annex-B

14

Annex-B

Sarhad University of Science & Information Technology

This is to certify that **Nasim Iqbal** son/daughter of **Noor Shah Jehan**

Having passed the requisite examination, is hereby awarded the degree of

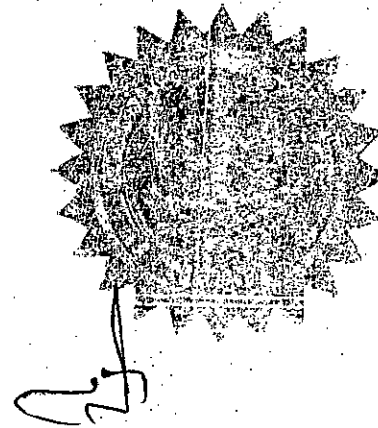
Master of Health & Physical Education

With all the rights and privileges appertaining thereto.

Given at Peshawar (PAKISTAN) on the Fifteenth Day of April Two Thousand Thirteen.

Registrar

Vice Chancellor



President

Serial No. GU 35945
1

GOMAL UNIVERSITY



DERA ISMAIL KHAN

(Khyber Pakhtunkhwa, Pakistan)

15

DETAILED MARKS CERTIFICATE
SENIOR DIPLOMA IN PHYSICAL EDUCATION 2nd TERM

Examination Held in April 2005 / Supplementary
Session 2003-2004


Roll No: 373

Name: **Naseem Iqbal**

The candidate secured the following marks & has been placed in **Second** Division.

SUBJECTS	Total Number of Marks Allotted	MARKS OBTAINED	
		In figures	In words
Health Education	100	34	Thirty Four
Track & Field	100	33	Thirty Three
Science of Movement	100	50	Fifty Only
Athletics	100	48	Forty Eight
Teaching of Games	100	50	Fifty Only
Gymnastic	100	52	Fifty Two
Teaching Practice	100	87	Eighty Seven
Project	50	42	Forty Two
Aggregate of 1 st Term	300	112	One Hundred & Twelve
Total Marks	1050	508	Five Hundred & Eight

Result declaration date: 13-06-2005


Controller of Examinations
Gomal University D.I.Khan





Serial No. GU 00956

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

16

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN

KHYBER PAKHTUNKHWA



(Session 2003-2004)

NASEEM IQBAL SON of NOOR SHAH JEHAN and
a student of LAWAGHAR ACADEMY OF EDUCATION & RESEARCH KARAK Gomal University
(PVT)
having passed the prescribed examination in APRIL 2005,
is this day admitted by the GOMAL UNIVERSITY to the

SENIOR DIPLOMA IN PHYSICAL EDUCATION

in the SECOND Division, is qualified to supervise Physical Education and
to teach this subject in Colleges and Schools.

The Examination was taken ~~as a whole~~ in parts.

Date of Birth 10-01-1972 (TENTH JANUARY N.H & SEVENTY TWO)

Registered No. 51-LAWAGHAR-03

Roll No. 373

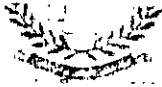
RESULT DECL. ON: JUNE 13, 2005

Countersigned

DB
Controller of Examinations

M. Khan
Vice-Chancellor

[Signature]



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order copy

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17

Dated Peshawar the 20.10.2020

NOTIFICATION

No. SDPE/2-6/DPC Meeting (11.06.2020):- On the recommendations of the Departmental Promotion Committee (DPC) in its meeting held on 11.06.2020, the Competent Authority (Chief Secretary) is pleased to promote the following Ten (10) Male/Female Senior Physical Education Teachers (SPET) to PS-16 to the post of Instructor Physical Education (IPE) BPS-17 on regular basis with immediate effect. Their adjustment/posting are given as under:-

Sr.	Name, Designation, Present place of posting	Proposed place of posting	Remarks
1.	Mr. Zia-ur-Rahman, SPET BPS-16 GHSS NO. 7 Peshawar City	Retired from service on 15-06-2020 after completion of the age of superannuation	His promotion is effective from the date of DPC meeting held on 11.06.2020 on notional basis for pension purpose
2.	Mr. Munir Gul, SPET BPS-16 GHSS Nawanshah, Abbottabad	IPE BPS-17, GHSS Ziarat Masoom Abbottabad	Against vacant post
3.	Mr. Muhammad Reoman, SPET BPS-16 GHSS Mulla Khel Kanak	IPE BPS-17 GHSS Chahar Orakzai	Against vacant post
4.	Mr. Jehan Zeb, SPET BPS-16 GHSS, Seer Swat	IPE BPS-17 GHSS Kishwara Swat	Against vacant post
5.	Mr. Muhammad Ahsad, SPET BPS-16 GHSS Sangar Manshra	IPE BPS-17 GHSS Bher Kund Manshra	Against vacant post
6.	Mr. Sitar Baig, SPET BPS-16 GHSS Bahachi Chitral	IPE BPS-17 GHSS Bang Uper Chitral	Against vacant post
7.	Mr. Sabir Sultan, SPET BPS-16 GHSS Chaharri Abbottabad	IPE BPS-17 GHSS Karori Manshra	Against vacant post
8.	Mr. Samad Khan, SPET BPS-16 GHSS Charora Buner	IPE BPS-17 GHSS Charora Buner	Against vacant post
9.	Mr. Furman Elahi, SPET BPS-16 GHSS NO. 2 Haripur	IPE BPS-17, GHSS Pind Hashim Khan Haripur	Against vacant post
10.	Mst. Rani Begum, IPE BPS-16 GHSS Shahqadir Fort Chaman	IPE BPS-17 GHSS Khesher Nowshera	Against vacant post

On their promotion, the Instructor Physical Education (IPE) concerned will be on probation for a period of one year extendable for another one year as specified in Rule-15 of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and transfer) Rules, 1989.

SECRETARY

Encl: No. & details as above
Copy forwarded to

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director, E&SE, Khyber Pakhtunkhwa Peshawar
6. The Director, SRU, Khyber Pakhtunkhwa
7. The Deputy Director FMIS, E&SE Department, with the request to upload this notification on E&SE Department website (www.kpe.gov.pk)
8. The Section Officers (Male/Female), E&SE Department, Peshawar.
9. The District Education Officers, Elementary & Secondary Education concerned.
10. The District Accounts Officers concerned.
11. PS to Secretary, E&SE Department.
12. Officers concerned.

بخدمت جناب ڈائریکٹر ایجوکیشن اینڈ سیکنڈری ایجوکیشن خیبر پختونخوا

(24)
(F)

Amman

عنوان :- درخواست براد مہمردانہ اپیل برائے ڈی پی سی

گذشتہ ہے کہ میں گذشتہ (20) سال سے محکمہ تعلیم میں بطور سینئر فزیکل ٹیچر خدمات انجام دے رہا ہوں۔
سنیارٹی اور فٹنس کی بنیاد پر ڈی پی سی ایگریڈ 17 میں ترقی کیلئے میرے کوائف ہر لحاظ سے مکمل ہیں۔
میرا سینئر ڈپلومہ ان فزیکل ایجوکیشن (ایک سالہ) بی ایڈ کے برابر ہے۔ ہم جملہ پی ای ٹی اساتذہ
اسی ڈپلومہ کی بنیاد پر مائیکرو کلاسز کو صحت و جسمانی تعلیم کی نصابی کتابیں پڑھاتے ہیں جو بذات خود
اس بات کا ثبوت ہے کہ میرا یہ ڈپلومہ بی ایڈ کے برابر ہے۔

ڈی پی سی ایگریڈ (17) کی آسامیوں پر پروموشن کیلئے ایم ایس سی پھانچہ فزیکل ایجوکیشن
کی شرط پہلے سے موجود ہے، ایسے میں بی ایڈ کی شرط اور اس کی آرٹیکل ڈی پی سی کا اجلاس
بولانے میں غیر معیاری تاخیر ناالفاظی ہے۔

جناب عالی! ہماری استدعا ہے کہ آپ صاحب ڈپٹی ڈائریکٹر (ہیڈ فزیکل ایجوکیشن)
کو ڈی پی سی کا اجلاس فوری طور پر کرنے کیلئے جنگی بنیادوں پر ورننگ پیپر تیار کرنے
کے احکامات جاری کریں اور جلد از جلد باضابطہ اجلاس طلب کریں۔
تاحیات ممنون ہونگے۔

محمد طارق

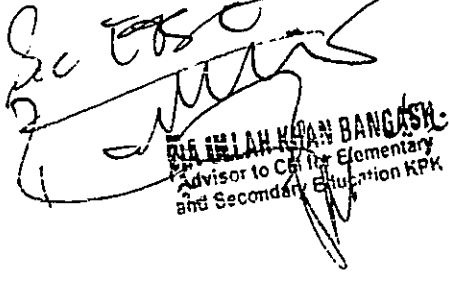
آپ کا خالص نسیم اقبال ایس پی ای ٹی - گورنمنٹ ہائی سکول پھانچہ ریکرڈ

تاریخ 13 نومبر 2019

- نقل برائے اطلاع ① سیکرٹری ایجوکیشن، خیبر پختونخوا
② وزیر تعلیم، خیبر پختونخوا
③ سیکشن آفیسر ایجوکیشن اینڈ سیکنڈری ایجوکیشن

25

بخدمت جناب سیکرٹری ایلیمینٹری اینڈ سینکنڈری ایجوکیشن خیبر پختونخوا


DR. IQBAL NISIM BANGASH
Advisor to CBI for Elementary
and Secondary Education KPK

عنوان: ڈیپارٹمنٹل پروموشن کمیٹی کے اجلاس کیلئے ہمدردانہ

جناب عالی!

گزارش ہے کہ میں گزشتہ 29 سال سے محکمہ تعلیم میں بطور سینئر فزیکل ٹیچر خدمات انجام دے رہا ہوں۔ محکمہ تعلیم خیبر پختونخوا میں ڈی پی ای کی درجنوں آسامیاں عرصہ دراز سے خالی ہیں، موجودہ سروس سٹرکچر کے مطابق سناریائی اور فٹنس کی بنیاد پر ڈی پی ای (گریڈ 17) میں ترقی کیلئے میرے کوائف ہر لحاظ سے مکمل ہیں، لیکن گزشتہ طویل عرصے سے ڈیپارٹمنٹل پروموشن کمیٹی کا اجلاس نہ بلائے جانے کی وجہ سے میں اور مجھ جیسے درجنوں حق دار سینئر پی ای ٹی اساتذہ مذکورہ آسامیوں پر ترقی ملنے سے محروم ہیں۔

جناب والا! مبینہ طور پر ڈی پی ای آسامیوں پر ترقی کیلئے سروس سٹرکچر میں ترمیم اور بی ایڈ کی شرط شامل کرنے کیلئے ڈیپارٹمنٹل پروموشن کمیٹی کا اجلاس بلانے میں غیر معمولی تاخیر کی جا رہی ہے حالانکہ ہمارا سینئر ڈپلومہ ان فزیکل ایجوکیشن (ایک سالہ) بی ایڈ کے برابر ہے۔ ہم جملہ پی ای ٹی اساتذہ اسی ڈپلومہ کی بنیاد پر ہائی کلاسز کو صحت و جسمانی تعلیم کی نصابی کتابیں پڑھاتے ہیں جو بذات خود اس بات کا ثبوت ہے کہ ہمارا یہ ڈپلومہ بی ایڈ کے برابر ہے۔

ڈی پی ای گریڈ 17 کی آسامیوں پر پروموشن کیلئے ایم ایس سی ہیلتھ اینڈ فزیکل ایجوکیشن کی شرط پہلے سے موجود ہے، ایسے میں بی ایڈ کی اضافی شرط اور اس کی آڑ میں ڈی پی ای کا اجلاس بلانے میں تاخیر نا انصافی ہے۔

جناب عالی! میری استدعا ہے کہ آپ صاحب ڈائریکٹوریٹ آف ایجوکیشن کو ڈی پی ای کا اجلاس اور اس کیلئے جنگلی بنیادوں پر ورکنگ پیپر تیار کرنے کے احکامات جاری کر کے ممنون فرمائیں۔

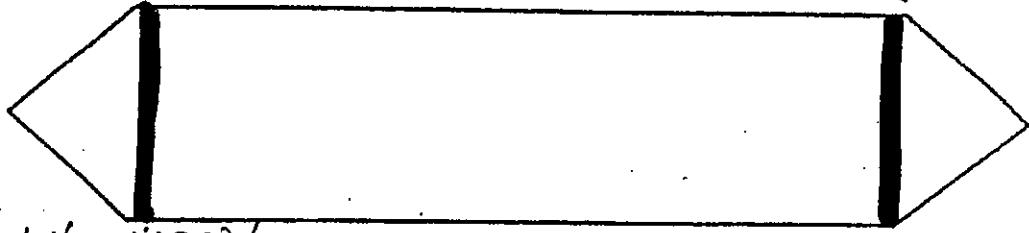
العارض

تاریخ: 23 نومبر 2019

آپ کا مخلص نسیم اقبال، سینئر پی ای ٹی۔ گورنمنٹ ہائی سکول میٹھاخیل (کرک)



بعدالت حیا۔ KAK روس سر بیلی



2022 پنجاب ایسٹ

اسم اصغر بنام سکریٹری
سکریٹری

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ در
آن مقام لسا کیلئے چھ سہ ماہی و م و م
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا۔ نیز
دکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی 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 منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب 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 ادکالت نامہ لکھ دیا کہ سند ہے۔

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الرقوم 10 ماہ مارچ 20

واہ العب

کے لئے منظور ہے۔

لسا

بمقام

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"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

SB

No.
Recd

APPEAL No. 4529 of 20 21

Naseem Iqbal

Appellant/Petitioner

Versus

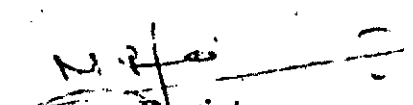
Sery E8SE Govt. of KPE Pesh:

RESPONDENT(S)

✓
Notice to Appellant/Petitioner: Naseem Iqbal, Senior PET
Govt. High School Metha Khel
Karak

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 9/11/2021 at 9:00 AM at

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

APPEAL No. 4529 of 20 21.

Nasim Iqbal

Appellant/Petitioner

Versus

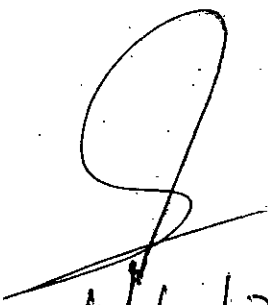
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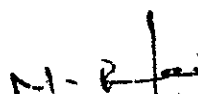
RESPONDENT(S)

(counsel)
Notice to Appellant/Petitioner: Muhammad Saeed Khattak
Advocate High Court Peshawar.
Cell No 0333-6272753

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 9/9/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


14/6/21


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. SB

No. APPEAL No. 4529 of 20 21

Reqd
Naseem Iqbal

Appellant/Petitioner

Versus

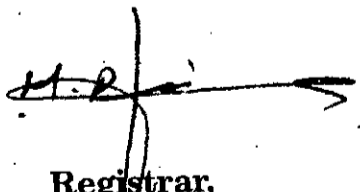
Secy E & SE Pesh.

RESPONDENT(S)

✓
Notice to Appellant/Petitioner Naseem Iqbal, Senior PET
Govt. High School Metha Khel Karak,

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27/10/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

SB

No.

APPEAL No. 4529 of 2021

Naseem Iqbal

Appellant/Petitioner

Versus

The Secy E&SG Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Muhammad Saeed Khattak
Advocate High Court - Peshawar
0333-6272753

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27/10/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

11/10/21

Registrar
Khyber Pakhtunkhwa Service Tribunal
Peshawar

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. SB

No.

APPEAL No. 4529 of 20 21

Naseem Farbal

Appellant/Petitioner

Regd

Versus

Reg. ERSE Govt. of KP Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Naseem Farbal Senior PET
Govt. High School Metha Khil Karak.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 1/3/22 at 9:am.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

[Signature]
Registrar

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

APPEAL No. 4529 of 20 21.

Naseem Iybal

Appellant/Petitioner

Versus

Secy: ERJE Court CF KPH Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

counsel

Muhammad Saad Ullatkar
Advocate High court Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 1/3/22 at 9:am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

(9) 2/22