

16.9.2015

None present for appellant. Mr.Shafiq-ur-Rehman,ADEO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents and counsel for private respondent No.4 present. Due to non-availability of D.B, case is adjourned for final hearing before D.B to 22.10.2015 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad

22.10.2015

Appellant in person, Mr.Shafiq-ur-Rehman ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 to 3 and private respondent No.4 in person present. Appellant submitted application for withdrawal of appeal alongwith copy of order dated 7.8.2015 according to which the grievances of the appellant have been redressed by the department.

In view of the afore-stated application, the appeal is dismissed as withdrawn. File be consigned to the record room.


Chairman
Camp Court A/Abad.

ANNOUNCED

22.10.2015

22.10.15

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23.04.2015

Appellant in person, Mr. Muhammad.Tahir Aurangzeb, GP for official respondents and private respondent No. 4 with counsel present. Written statement not submitted. Arguments could not be heard due to non-availability of D.B. To come up for arguments on stay application as well as final hearing before D.B on 19.5.2015 at Camp Court Abbottabad.


Chairman

Camp Court Abbottabad

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19.5.2015

Appellant in person, Mr.Muhammad Tahir Aurangzeb, G.P for official respondents and private respondent No.4 in person present. Comments not submitted. Due to non-availability of D.B, appeal adjourned for final hearing before D.B to 21.7.2015 at camp court A/Abad. Status-quo be maintained..


Chairman

Camp Court A/Abad

21.07.2015

Since the 21st July 2015 has been declared as a public holiday on account of Eid-ul-Fiter. Therefore case is adjourned to 16.09.2015 at Camp Court Abbottabad.


Supdt.

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18.3.2015

Appellant in person and Mr. Haroon-ur-Rashid, Supdt for respondents No.1 to 3, alongwith Mr. Muhammad Tahir Aurangzeb, G.P present. Submitted application for setting aside ex-parte proceedings against the official respondents. The same is accepted and the ex-parte proceedings are set aside.

Respondent No.4 with counsel present. Written reply on behalf of respondent No.4 to the main appeal as well as application for grant of temporary injunction submitted. To come up for written reply to main appeal by respondents No.1 to 3 and arguments on stay application on 19.3.2015.


Chairman
Camp Court A/Abad

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19.3.2015

Appellant with counsel, Mr. Muhammad Tahir Aurangzeb, G.P for official respondents No. 1 to 3 and private respondent No. 4 with counsel present. Written reply to the application submitted by the appellant for grant of temporary injunction also submitted by official respondents. Learned counsel for the parties including learned G.P were heard at length.

It is deemed appropriate to refer the final decision of the application for grant of temporary injunction to D.B. After hearing learned counsel for the parties it is deemed appropriate to maintain order dated 17.2.2015 vide which the impugned transfer order dated 2.7.2014 has been suspended. Orders accordingly.

Learned G.P requested for adjournment for submission of comments on behalf of official respondents No.1 to 3. Directed to submit the same within fortnight.

The appeal is assigned to D.B. for arguments on stay application as well as final hearing for 23.4.2015 at camp court A/Abad.


Chairman
Camp Court A/Abad

respondents for written reply for 17.2.2015 at camp court A/Abad.

Appellant Deposited
Security & Process Fee
Rs.....350/-.....Bank
Receipt is Attached with File,

CB

[Signature]
Chairman
Camp Court A/Abad

4. 17.2.2015

Appellant with counsel and private
respondent No.4 in person present. None present
for respondents No.1 to 3 despite service.
Proceeded ex-parte.
Perusal of record would suggest that prima-
facie the transfer orders were made on the
intervention of an elected MPA. In view of the
above and due to absence of respondents No.1 to 3,
the impugned transfer order dated 2.7.2014 is
suspended. To come up for written reply/comments
on behalf of respondent No.4 at camp court
A/Abad on 18.3.2015.

[Signature]
Chairman
Camp Court A/Abad

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.....
Camp Court A/Abad

1248/14

03 22.01.2015

Appellant with counsel present. Learned counsel for the appellant argued that appellant and others including respondent No.4 were promoted vide Notification bearing endst: No.3301-3921 dated 30.5.2013 to B-15. That the appellant is shown at S.No.132 of the said notification according to which he is at S.No. 602 in the seniority list and was adjusted in the same school i.e. GPS Rehar being senior to respondent No.4 Ghulam Murtaza who is shown at S.No.741 and whose number in the seniority list was 1299 and as such and being junior transferred from GPS Rehar to GPS Balag Bala as per approved policy of posting and transfer. That later on the appellant was transferred to GPS Gemong vide corrigendum dated 27.7.2013 while respondent No.4 Ghulam Murtaza, junior to appellant, was adjusted in GPS Rehar vide corrigendum dated 31.7.2013. That the appellant preferred an appeal within the prescribed time which was accepted after ^{conducting} ~~being~~ inquiry and vide notification bearing endst: No. 7605-6 dated 21.6.2014 (Annexure-G) the appellant was adjusted in GPS Rehar and respondent No.4 Ghulam Murtaza adjusted at GPS Shamlalee in the interest of public service.

That it was on the intervention of Mr.Sardar Zahoor Ahmad, Chairman DDAC Mansehra, an elected MPA from constituency of Mansehra-I who vide letter dated 21.6.2014 (Annexure-H) directed that the notification dated 21.6.2014, referred to above, be withdrawn and respondent No.4 Ghulam Murtaza HPST be adjusted in GPS Rehar. That in pursuant to the said directives of the elected representative cancellation order dated 2.7.2014 was issued vide which the office order dated 21.6.2014 passed on the departmental appeal of the appellant was cancelled. That the appellant preferred another appeal against order dated 2.7.2014 on 4.7.2014 which was not responded within the statutory period of 90 days and hence the present appeal.

Points urged by the learned counsel for the appellant transpires that due to political interference the impugned order depriving the appellant from his right to hold the position at GPS Rehar was passed and in order to adjust respondent No.4 prima facie having political affiliation. Appeal admitted to regular hearing. Process fee & security be deposited within 10 days. Let notices be issued to all the

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1248/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	20/10/2014	<p>The appeal of Mr. Raja Akhtar Zeb presented today by Mr. Ahmad Farooq Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	<p><i>29-10-14</i></p> <p><i>20-1-15</i></p>	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up there on <u><i>20-1-15</i></u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p> <p><i>Due to public holiday on account of "chahlan" of APS Shuhada case adjourned to 22-01-2015.</i></p> <p style="text-align: right;"><i>[Signature]</i> <u><i>Razvi</i></u></p>

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

Appeal No 1248/2014

Raja Akhtar ZebAppellant

VERSUS

Director, Education Khyber Pakhtunkhwa
Peshawar etc.....Respondents

SERVICE APPEAL

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4	Copy of promotion order.	"A"	9-12
5	Copy of the order dated 27.07.2013.	"B"	0-13
6	Copy of the order dated 31.07.2013.	"C"	0-14
7	Copy of the order dated 16.08.2013.	"D"	0-15
8	Copy of the application.	"E"	0-16
9	Copy of the order dated 05.06.2014.	"F"	0-17
10	Copy of the order dated 21.06.2014.	"G"	0-18
11	Copy of the letter of MPA Sardar Zahoor Ahmed.	"H"	0-19
12	Copy of the cancellation order.	"I"	0-20
13	Copy of the departmental appeal.	"J"	0-21
14	Copy of the postal receipt dated 05.07.2014.	"K"	0-22
15	Wakalat Nama.	22-3

Dated 18.10.2014

Raja Akhtar Zeb
Raja Akhtar Zeb
...Appellant

Through

Ahmed Farooq Khan
AHMED FAROOQ KHAN,
Advocate High Court,

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

Appeal No. 1248/2014

*1276
20-10-2014*

Raja Akhtar Zeb son of Raja Aurangzeb
resident of Rehar, Tehsil and District
MansehraAppellant

VERSUS

*respondents 1 & 3 placed
ex-parte vide
order sheet No-4
dt: 17-2-15.*

1. Director, Education Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Male), Mansehra.
3. Sub-Divisional Educational Officer (Male), Mansehra.
4. Ghulam Murtaza son of Ghulam Rabbani resident of Rehar, Mansehra, Head Teacher Government Primary School Rehar (PSHT) Respondents.

4/5-4 of Service Tribunal Act-1974.
**APPEAL AGAINST THE ORDER OF
RESPONDENTS NO.2 AND 3 DATED
02.07.2014 VIDE WHICH OFFICE
ORDER NO.7605-6 DATED 21.06.2014
WAS CANCELLED.**

PRAYER: -

On acceptance of this appeal,
impugned order dated 02.07.2014 of
respondents No.2 and 3 may please
be set aside and office order Endst.
No.7605-6 dated 21.06.2014 may be
restored.

20/10/14

Respectfully Sheweth!

The brief facts forming the background of the instant appeal are as under: -

1. That, the appellant is serving in Education Department, on 30.05.2013, appellant alongwith respondent No.4 were promoted as Primary School Head Teacher in BPS-15.

(Copy of promotion order is annexed as annexure "A").

2. That, at the time of promotion, petitioner was serving in Government Primary School Rehar and similarly the respondent No.4 was also serving in the same school.
3. That, as per Government policy, teacher who is senior in service would be retained in the same school and junior would be transferred on vacant post or otherwise. As per seniority list, appellant was at serial No.602 whereas respondent No.4 was on S.No.1299, therefore, the appellant retained in the same School Rehar and respondent No.4 was posted at

Government Primary School Balhag
Bala.

4. That, on 27.07.2013, due to political intervention, appellant was transferred to Government Primary School Gemang and respondent No.4 was posted at Government Primary School Rehar. *(Copy of the order is annexed as annexure "B")* whereas new order of respondent No.4 was also issued on 31.07.2013.

(Copy of the order is annexed as annexure "C").

5. That, a corrigendum was issued and appellant was again transferred to Government Primary School Kanchajri on 16.08.2013.

(Copy of the order dated 16.08.2013 are annexed as annexure "D").

6. That, the appellant submitted an application to respondent No.2 that he has been victimized for a sin, which he has not committed, an inquiry was conducted, in the meanwhile appellant was again transferred to Government Primary School Shamlaly on 05.06.2014.

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(Copies of the application and order dated 05.06.2014 are annexed as annexure "E" & "F").

7. That, after inquiry, conducted, by Mr. Shafiq-ur-Rehman, ASDEO Mansehra, appellant was adjusted to Government Primary School Rehar whereas respondent No.4 is posted at government Primary School Shamlaly on 21.06.2014.

(Copy of the order dated 21.06.2014 is annexed as annexure "G").

8. That, due to political influence of MPA PK-53 Mr. Sardar Zahoor Ahmed, order dated 21.06.2014 was cancelled on 02.07.2014.

(Copy of the letter of MPA Sardar Zahoor Ahmed and cancellation order are annexed as annexure "H" & "I").

9. That, the appellant filed a departmental appeal to respondent No.1 on 04.07.2014.

(Copies of departmental appeal and postal receipt dated 05.07.2014 are annexed as annexure "J" & "K").

10. That, the appellant challenging the validity and propriety of the

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impugned order, inter alia, on the following amongst the other grounds:

GROUNDS

- a. That, the impugned order of respondents are based on malafide, politically motivated and the result of political interference, hence not maintainable in the eyes of law.
- b. That, the impugned order is patently illegally and the result of misuse of power and political interference in the smooth affairs of the Government Departments.
- c. That, the impugned orders are against the present policy that the senior most teacher will retained in same School whereas juniors will be adjusted at vacant post.
- d. That, the other grounds will be discussed at the time of arguments.

PRAYER: -

It is, therefore, most humbly prayed that on acceptance of this appeal, impugned order dated 02.07.2014 of

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respondents No.2 and 3 may please
be set aside and office order Endst.
No.7605-6 dated 21.06.2014 may be
restored.

Dated 18.10.2014

Raja Akhtar Zeb
Raja Akhtar Zeb
...Appellant

Through

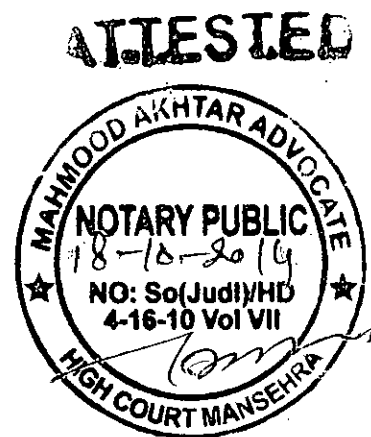
Ahmed Farooq Khan
AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

AFFIDAVIT.

I, Raja Akhtar Zeb son of Raja Aurangzeb
resident of Rehar, Tehsil and District
Mansehra, Appellant, do hereby solemnly
affirm and declare on oath that the
contents of the foregoing service appeal
are true and correct to the best of my
knowledge and belief and nothing has
been concealed from this Honourable
Court.

Dated 18.10.2014

Raja Akhtar Zeb
Raja Akhtar Zeb
(DEPONENT)



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

Raja Akhtar ZebAppellant

VERSUS

Director, Education Khyber Pakhtunkhwa
Peshawar etc.....Respondents

SERVICE APPEAL

**APPLICATION FOR GRANT OF
STATUS-QUO AND TERMINATION OF
IMPUGNED ORDER DATED 02.07.2014.**

Respectfully Sheweth!

1. That, an appeal has been also instituted with this application, which may be considered as part of this application.
2. That, the appellant has a prima facie case and balance of convenience also lies in favour of the appellant.
3. That, in absence of grant of status-quo, appellant will suffer an irreparable loss.

It is, therefore, most humbly requested that the status-quo may kindly be granted till the decision of the appeal.

Dated 18.10.2014

Raja Akhtar Zeb
Raja Akhtar Zeb
...Appellant

Through

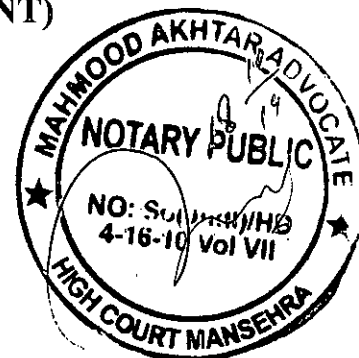
Ahmed Farooq Khan
AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.

AFFIDAVIT.

I, Raja Akhtar Zeb son of Raja Aurangzeb resident of Rehar, Tehsil and District Mansehra, Appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated 18.10.2014

Raja Akhtar Zeb
Raja Akhtar Zeb
(DEPONENT) **ATTESTED**



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

Raja Akhtar ZebAppellant

VERSUS

Director, Education Khyber Pakhtunkhwa
Peshawar etc.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Raja Akhtar Zeb son of Raja Aurangzeb
resident of Rehar, Tehsil and District
Mansehra.

RESPONDENTS

1. Director, Education Khyber Pakhtunkhwa
Peshawar.
2. District Education Officer (Male), Mansehra.
3. Sub-Divisional Educational Officer (Male),
Mansehra.
4. Ghulam Murtaza son of Ghulam Rabbani
resident of Rehar, Mansehra, Head Teacher
Government Primary School Rehar (PSHT).

Dated 18.10.2014


Raja Akhtar Zeb
...Appellant

Through


AHMED FAROOQ KHAN,
Advocate High Court,
Mansehra.



Office of the
District Education Officer
(Male) Mansehra

A.

NOTIFICATION

In pursuance of Government of Khyber Pakhtun Khawa Peshawar Notification No SO(B&A) /1-18/E&SE /2012 Dated 11/07/2012 and subsequently Notification issued by the District Education Officer (Male) Mansehra Endstt: No 1711-850 dated 25/02/2013, latter on held in abeyance by Office Order No 3066-3071 dated 30.03.2013, is revised under even No, date and condition.

The following Primary School Head Teacher B-15 are adjusted against newly upgraded Primary School Head Teacher Post with immediate effect

S.#	S.L.#	The Teachers of B-15 who already occupied the post in the same school				
1	23	AWWAL KHAN	GPS BHOGERMANG	BHOGARMANG	DHODIAL	GPS BHOGERMANG
2	29	ABDUR RAHMAN	GPS DADAR	BHOGARMANG	DHODIAL	GPS DADAR
3	333	MUHAMMAD FAROOQ	GPS BASOL	BHOGARMANG	DHODIAL	GPS BASOL
4	335	MUHAMMAD ASIF	GPS GRANTHALI	BHOGARMANG	DHODIAL	GPS GRANTHALI
5	624	AURANGZEB	GPS BHOGERMANG	BHOGARMANG	DHODIAL	GPS BHOGERMANG
6	933	NOOR HUSSAIN	GPS SULBANDI	BHOGARMANG	DHODIAL	GPS SULBANDI
7	76	AZIZ UR RAHMAN	GPS CHUNGARI	DEVLI JABAR	DHODIAL	GPS CHUNGARI
8	101	GHULAM SADIQ	GPS PANJOOOL BALA	DEVLI JABAR	DHODIAL	GPS PANJOOOL BALA
9	104	SHOUKAT ALI SHAH	GPS NALLA JABBAR	DEVLI JABAR	DHODIAL	GPS NALLA JABBAR
10	182	JEHANZEB	GPS CHILYANI	DEVLI JABAR	DHODIAL	GPS CHILYANI
11	184	MUHAMMAD RAFIQ	GPS TRADA	DEVLI JABAR	DHODIAL	GPS TRADA
12	208	SAEED AHMAD	GPS BELLA JABBAR	DEVLI JABAR	DHODIAL	GPS BELLA JABBAR
13	537	MOTABIER SHAH	GPS KERI SYEDAN	DEVLI JABAR	DHODIAL	GPS KERI SYEDAN
14	845	ANWAR ZEB	GPS CHOTA PAYEEN	DEVLI JABAR	DHODIAL	GPS CHOTA PAYEEN
15	1021	MUKHTAR HUSSAIN SHAH	GPS JABBAR	DEVLI JABAR	DHODIAL	GPS JABBAR
16	1028	SHABBIR HUSSIAN	GPS JABBAR GALI	DEVLI JABAR	DHODIAL	GPS JABBAR GALI
17	1031	MUHAMMAD IJAZ	GPS SUKIAN	DEVLI JABAR	DHODIAL	GPS SUKIAN
18	34	SASHIQ HUSSIAN SHAH	GPS TARNAIN	DHODIAL	DHODIAL	GPS TARNAIN
19	39	MUHAMMAD SADIQ	GPS DULLA MAIRA	DHODIAL	DHODIAL	GPS DULLA MAIRA
20	121	AURANGZEB	GPS SHATAY NO2	DHODIAL	DHODIAL	GPS SHATAY NO 2

95	7	ANWAR SULTAN	GPS BAJNA MERA	TANDA	BAFFA	GPS BAJNA MERA
96	20	MUHAMMAD JABIR	GPS BAILA TANDA	TANDA	BAFFA	GPS BAILA TANDA
107	72	ABDUL HAI	GPS GHAFUOR JABRI	TANDA	BAFFA	GPS GHAFUOR JABRI
108	83	RAFFIULLAH	GPS BAJNA MERA	TANDA	BAFFA	GPS BAJNA MAIRA
109	363	SADIQ HUSSAIN	GPS TANDA	TANDA	BAFFA	GPS TANDA
110	1065	SIDDIQUE ULLAH	GPS BAJNA	TANDA	BAFFA	GPS BAJNA
111	5	SAJJAD AHMED	GPS TANAWAL BANDA	TRANGRI SABIR SHAH	BAFFA	GPS TANAWAL BANDA
112	53	ISRAF AHMED	GPS TRANGRI PIAN	TRANGRI SABIR SHAH	BAFFA	GPS TRANGRI PIAN
113	133	MUHAMMAD SALEEM	GPS TERHA PAEEN	TRANGRI SABIR SHAH	BAFFA	GPS TERHA PAEEN
114	477	IRSHAD AHMED	GPS TRANGRI BALA	TRANGRI SABIR SHAH	BAFFA	GPS TRANGRI BALA
115	753	ISHTIAQ AHMED	GPS TAJAL	TRANGRI SABIR SHAH	BAFFA	GPS TAJAL
116	778	MUHAMMMAD ISMAIL	GPS NOKOT	TRANGRI SABIR SHAH	BAFFA	GPS NOKOT
117	984	SAFEER AHMED	GPS GULI BAGH NO.2	TRANGRI SABIR SHAH	BAFFA	GPS GULI BAGH NO 2
118	1148	EJAZ AKHTAR	GPS SABIR SHAH	TRANGRI SABIR SHAH	BAFFA	GPS SABIR SHAH
119	1375	RASHID AHMAD	GPS BATTANG	TRANGRI SABIR SHAH	BAFFA	GPS BATTANG
120	60	M HAMAYUN	GPS ATTER SHISHA	ATTARSHISHA	MANSEHRA	GPS ATTER SHISHA
121	169	SAJAD AHMAD	GPS GHOUTER	ATTARSHISHA	MANSEHRA	GPS GHOUTER
122	313	ROSHAN DIN	GPS LUNDI MAHANDAR	ATTARSHISHA	MANSEHRA	GPS LUNDI MAHANDAR
123	390	GHOAR AMAN	GPS SUKI KASI	ATTARSHISHA	MANSEHRA	GPS SUKI KASI
124	436	TAHIR IRFAN	GPS MANDHAR	ATTARSHISHA	MANSEHRA	GPS MANDHAR
125	455	GHULAM RABBANI	GPS ARAB KHAN	ATTARSHISHA	MANSEHRA	GPS ARAB KHAN
126	473	MAQSOOD UR REHMAN	GPS PAGALA	ATTARSHISHA	MANSEHRA	GPS PAGALA
127	486	MUHAMMAD SALEEM	GPS GUD WAI	ATTARSHISHA	MANSEHRA	GPS GUD WAI
128	779	M KHALID	GPS ATTER SHISHA	ATTARSHISHA	MANSEHRA	GPS ATTERSISHA
129	889	MUNIR AHMAD	GPS JABA	ATTARSHISHA	MANSEHRA	GPS JABA
130	1301	IBRAR HUSAIN	GPS KAGOOH GALI	ATTARSHISHA	MANSEHRA	GPS KAGOOH GALI
131	166	SAEED UR REHMAN	GPS GARHALA	BEHALI	MANSEHRA	GPS GARHALA
132	602	RAJA AKHTAR ZEB	GPS REHAR	BEHALI	MANSEHRA	GPS REHAR

719	741	HAJAT KHAN	GPS SHANAI BALA	DHODIAL	DHODIAL	GPS PAKA TIMBER
720	765	SHAFQAT UR RAHMAN	GMPS QAZI AHMAD	DHODIAL	DHODIAL	GPS DADAR QADEEM
721	919	MUHAMMAD ASHRAF	GPS TARNAIN	DHODIAL	DHODIAL	GPS QAZI KAITH
722	926	SAIF UR RAHMAN	GPS DULLA MAIRA	DHODIAL	DHODIAL	GPS HALKAI
723	1013	MUHAMMAD BASHEER	GMPS BELA BADHAN	DHODIAL	DHODIAL	GPS DEHDI DALBANI
724	1025	NAZIEER AKHTAR	GPS GIRWAL	DHODIAL	DHODIAL	GPS KHOLAY
725	1041	SARFARAZ	GPS DHODIAL	DHODIAL	DHODIAL	GPS JACHA NO 1
726	1105	SAEED RAZA	GPS SHATAY NO1	DHODIAL	DHODIAL	GPS JACHA NO 2
727	1116	SAJJAD AHMAD	GMPS PIPPEL MAIRA	DHODIAL	DHODIAL	GPS CHAPRI KATHA
728	1336	ALAMGIR	GMPS LUNDAI	DHODIAL	DHODIAL	GPS BASOO
729	454	JAVED IQBAL	GPS MAKRIHA BALA	SHINKIARI	DHODIAL	GPS CHITTA BATTA
730	921	LIAQUAT ALI	GPS MAKRIHA BALA	SHINKIARI	DHODIAL	GPS BAKKI
731	1040	ALAM ZEB	GMPS DODAL	SHINKIARI	DHODIAL	GPS KALAWAN
732	1113	MANZoor HUSSIN SHAH	GPS MAKRIHA MIANA	SHINKIARI	DHODIAL	GPS SUNDI
733	1316	ABDUL QAYYUM	GPS MAKRIHA MIANA	SHINKIARI	DHODIAL	GPS CHOTA BALA
734	1374	MOHAMD KHALID.M.ED	GPS HAJI BELA	SHINKIARI	DHODIAL	GPS CHANYANI
735	1394	IFTIKHAR AHMAD	GPS SHINKIARI	SHINKIARI	DHODIAL	GPS SURYALA
736	1410	KHURSHID AHMAD	GMPS BAGH GAOWN	SHINKIARI	DHODIAL	GPS SERI KAMASHI
737	1412	MUHAMMAD LIAQUAT	GPS SHINKIARI	SHINKIARI	DHODIAL	GPS BUNDHODER
738	559	ZAHID ISHAQ	GPS ZAFFAR MAIDAN	CITY NO 3	MANSEHRA	GPS BELA MATRAIAN
739	479	MUHAMMAD ROSHAN	GMPS MISKIN ABAD	ATTARSHISHA	MANSEHRA	GPS MORE BAFFA KHURD
740	1144	RAFAQAT ALI	GPS HUSSANIAN	BEHALI	MANSEHRA	GPS GUJRAN
741	1299	GHULAM MURTAZA	GPS REHAR	BEHALI	MANSEHRA	GPS BALAG-BALA
742	468	MALIK ASHFAQ	GMPS DHARMIAN	CITY NO 3	MANSEHRA	GPS PAKHWAL PIAN
743	924	M ABID LUGHMANI	GPS ZAFFAR MAIDAN	CITY NO 3	MANSEHRA	GPS GANDA
744	215	MANZORE ELAHI	GPS CHITTI DHARI	CITY NO 4	MANSEHRA	GPS DABGRAN
745	507	M SAEED	GPS LAHOR BANDA	CITY NO 4	MANSEHRA	GPS CHAMORA
746	69	MUHAMMAD AKRAM	GMPS LUNDIAN LABAR KOT	LABARKOT	MANSEHRA	GPS JABRI MAIDAN

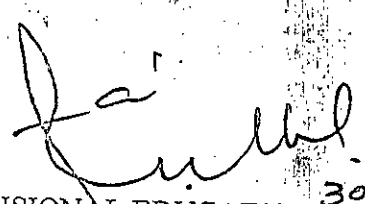
4. Charge report should be submitted to all concerned with in a week of issuance of this order.
5. Their Inter-seniority on lower post will remain intact.
6. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.
7. Checking & verification of all the documents shall be ensure by the DDO concerned.
8. Necessary entries to this effect should be recorded in their Service/Book.
9. No TA/DA is allowed for joining their duty.

Sd/-
(SYED SALAHUD-DIN SHAH)
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No. 3101-392/Estt: (M) Promotion: Primary School Head Teacher (M)/Dated 30/5/2013.

Copy forwarded for information and necessary action to the:-

1. PS to Secretary to Government of Khyber Pakhtunkhwa E&SE Department Peshawar.
2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
3. ASDEO (M) Circle , 1 Balakot, 2 Kaghan, 3 Phulrah, 4 Oghi, 5 Shergar, 6 Mansehra, 7 Battal, 8 Baffa, 9 Dhodial.
4. District Accounts Officer Mansehra.
5. Dy: District Officer Finance & Planning Manshra.
6. B&AO local office.
7. Officials concerned.


SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

30/5/13

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) MANSEHRA
Ph: No: 0997-306271 Fax No: 0997-301004

NOTIFICATION:

Where as Mr. Raja Akhtar Zeb HPST GPS Kanchajri submitted appeal that he had been transferred through various corrigenda from one school to other school and requested for cancellation of corrigenda and adjustment at GPS Rehar where he was promoted as HPST.

And where as an inquiry was conducted through Mr. Sahfiqur Rehman ASDEO (M) Circle Mansehra and the inquiry offer has submitted his report.

Now therefore the corrigenda issued Vide Endst: No. 8732-8739 dated 31-7-2013 S.No 01 & vide Endst: No. 8589-93 dated 27-07-2013 and Endst: No.9330-33 dated 16-08-2013 and Endst: No: 13532-37 dated 05-06-2014 are here by cancelled & Mr. Akhtar Zeb HPST is adjusted at GPS Rehar and MR. Ghulam Murtaza HPST is adjusted at GPS Shamlalee in the interest of public service.

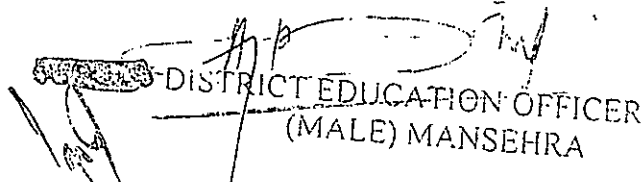
- i. Charge report should be submitted to all concerned.
- ii. No TA/DA is allowed.

Sd/= **DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

Endst: 7605-6 Dated 21/6/2014

Copy forwarded to:-

1. SDEO (Male) Mansehra.
2. District Account Officer Male Mansehra.


**DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA**

19



SARDAR ZAHOOR AHMED H

Chairman DDAC Mansehra

Cell : 0300-2274517
Office : 0997-920111
Fax : 0997-304887

Date: 21/06/14

To

The District Education Officer (M)
Mansehra

Subject: NOTIFICATION

*57200/1977
Put up on file and give
proper recommendations
25/6/14*

Reference to your Office Notification No. 7605-6 dated. 21-06-2014 on the subject cited above and to state that the above referred Notification may be withdrawn and adjusted to Mr. Ghulam-Murtaza HRST in GPS Rehar in the best interest of general public at the earliest please.

Your personal co-operation will be highly appreciated in this regard

*ADO (L)
Please see post.
22/6/14*

Thanks

(Sardar Zahoor Ahmed)
Chairman DDAC/
MPA Mansehra-I

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

CANCELLATION

As approved by the competent authority this Office Endst: No 7605-6, dated 21/06/2014, Mr. Ghulam Murtaza PSHT & Raja Akhtar Zeb PSHT, is hereby canceled, in the interest of public service with immediate effect.


Note: No TA/DA is allowed.
Charge report should be submitted to all concerned.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 7844-47
Copy for information to the:

1. District Accounts Officer Mansehra.
2. ASDEO (M) Circle Concerned.
3. Teacher Concerned.
4. Office Order file.

Dated 02/7/2014.


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

محضوٰر جناب ڈائریکٹر صاحب ایجوکیشن K.P.K پشاور

محکمانہ اپیل برخلاف حکم فاضل آفیسر ماتحت ڈسٹرکٹ ایجوکیشن مانسہرہ
آرڈر انڈورمنٹ نمبر 6-7605 محررہ 21.06.2014

جناب عالی! اپیل ذیل عرض ہے۔

(۱) یہ کہ ایپلانت گاؤں رہاڑ تحصیل ضلع مانسہرہ کا رہائشی ہے۔ جس کی تعیناتی عرصہ ایک سال قبل G.P.S ریہاڑ میں ہوئی۔ جہاں پر ایپلانت اپنی ڈیوٹی احسن طریقے سے سرانجام دے رہا تھا۔ کہ فاضل آفیسر ماتحت نے غلط اور خلاف قانون طور پر سائل کو G.P.S جیرنگ ہٹل تبدیل کر دیا۔

(۲) یہ کہ حکم فاضل آفیسر ماتحت غلط اور خلاف قانون ہے۔

(۳) یہ کہ حکم سرورنر رولز کے خلاف اور بدوں اختیار ہے۔ اور فاضل آفیسر ماتحت نے غلط طور پر بددیتی سے اور Service rules & policy کے خلاف اور سیاسی مداخلت پر حکم صادر فرمایا۔

(۴) یہ کہ ایپلانت نے متعدد بار اعلیٰ احکام سے محکمانہ اپیل کی مگر کوئی شنوائی نہ ہوئی۔

(۵) یہ کہ سائل کی اپیل پر ایک سال کے بعد سائل کا آڈر دوبارہ بحال کیا گیا مگر آڈر بحالی کے صرف چند دنوں کے بعد سیاسی مداخلت کی بناء پر آڈر کو دوبارہ منسوخ کر دیا گیا۔ فونو کاپی آڈر اور متعلقہ MPA کا Covering لیٹرف ہے۔

(۶) یہ کہ حکم زیر اپیل قانون فطرت کے خلاف ہے۔

لہذا استدعا ہے کہ آڈر محررہ 02.07.2014 کو منسوخ و کالعدم فرمایا جا کر سائل کو دوبارہ GPS رہاڑ میں تعینات رکھا جائے۔

المرقوم 04 جولائی 2014ء

Handwritten signature

راجہ اختر زیب (PSHT ٹیچر) ولد راجہ اورنگزیب سکنہ ریہاڑ تحصیل ضلع مانسہرہ
ایپلانت

وکالت نامہ

ابعدالت جناب سسوس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ
 برائے محمد عزیز زبیر نام محمد عزیز زبیر کے لئے
 ڈیوٹی یا جرم سسوس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ منجانب امید احمد

باعث تحریر آنکہ

اندریں مقدمہ عنوان اپنی طرف سے برائے پیروی و جوابدہی مقام

احمد فاروق خان ایڈووکیٹ ہائی کورٹ فیڈرل شریعت کورٹ
 حیدرآباد فیڈرل کورٹ اور فیڈرل کورٹ ہائی کورٹ
 آف پاکستان مانسہرہ

کو بریں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوں اور غیر حاضر کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقرر اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے علاوہ کسی اور جگہ سماعت ہوا یا کچہری کے اوقات کے آگے یا پیچھے سماعت ہونے پر منظر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے۔ اور صاحب موصوف کو مرضی ڈیوٹی اور درخواست اجراء ڈگری و نظر ثانی اپیل و نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی علم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور واپس لے کرنے کا ہر قسم کا بیان دینے اور سپرد نمائی و راضی نامہ و دستبرداری و اقبال ڈیوٹی کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخ ڈگری یا طرفہ درخواست حکم اختتامی یا فیصلہ قتل از ڈگری و اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا کی جگہ اختیار کرنے کا مجاز ہوگا۔ اور بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل نیز سز کو بجائے خود یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو۔ پوری فیس ہارج پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں۔ اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔

مجھے کل سامنے پروانہ موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اسی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ 2006ء

السجد السجد السجد
 راجہ عزیز زبیر دل راجہ اور ملکز زبیر سالنہ جگہ یاد حاصل ہے

ATTESTED & ACCEPTED

AHMED FAROOQ

Advocate High Court,

Manshra.

BEFORE THE KHYBER PKHATUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP AT ABBOTTABAD

Appeal No. 1248/2014

In Re;

Raja Akhtar Zeb

...APPELLANT

VERSUS

Director Education KPK & others.

...RESPONDENTS

REPLY ON BEHALF OF RESPONDENT NO. 4

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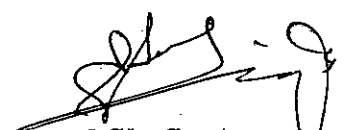
S.#	Description	Dated	Annexures	Page No.
1.	Reply alongwith affidavit	18/03/2015		1 to 7
2.	Reply of stay application alongwith affidavit	18/03/2015		8 to 10
3.	Attested copy of plaint	26/06/2014	"D-1"	11 to 13
4.	Attested copy of order of the learned Civil Judge-VI	26/07/2014 to 23/09/2014	"D-2"	14 to 15
5.	Copy of the endorsement	14/03/2015	"D-3"	16
6.	Copy of transfer order	28/06/2013	"D-4"	17
7.	Copy of letter No. 15555	24/12/2014	"D-5"	18
8.	Wakalatnama			19



Ghulam Murtaza
....RESPONDENT NO. 4

Dated: 18/03/2015

Through;


(Muhammad Shafiq Awan)
Advocate High Court, Abbottabad

1

BEFORE THE KHYBER PKHATUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP AT ABBOTTABAD

Appeal No. 1248/2014

In Re;

Raja Akhtar Zeb

...APPELLANT

VERSUS

Director Education KPK & others.

...RESPONDENTS

REPLY ON BEHALF OF RESPONDENT NO. 4

Sheweth; -

PRELIMINARY OBJECTION;

1. That the appellant has no locus standi to file the titled appeal, hence, the appeal is liable to be dismissed with costs.
2. That the appellant is estopped by his own conduct to file the titled appeal, hence, the appeal is liable to be dismissed because the appellant has failed to disclose the reason as to why he has not challenge the corrigendum issued after initial transfer order on the basis of promotion.
3. That the appellant has not come to the court with clean hands and with malafide intention suppressed the very material and damaging facts from this Honourable Tribunal which it if had

disclosed by the appellant the appeal would have been dismissed in limini by this Honourable Tribunal.

4. That the appellant is estopped by his conduct to take the benefits of his own malafide acts, thus, the appeal is liable to be dismissed.
5. That the appeal is liable to be dismissed on the principle of resjudicata as well because the appellant has filed civil suit No. 282/1 in the court of learned Senior Civil Judge Mansehra on 26/07/2014 and the same was dismissed by learned Civil Judge-VI, Mansehra on 23/09/2014 for non prosecution and the appellant has suppressed this aspect of the matter from this Honourable Court while filing appeal dated 18/10/2014. Attested copy of plaint is annexed as Annexure "D-1" and attested copy of order of the learned Civil Judge-VI is attached as Annexure "D-2".
6. That the impugned order is only suspended by this Honourable Tribunal but by misrepresenting the order of this Honourable Tribunal dated 17/02/2015 the appellant in connivance with the respondent No. 1 to 3 got issued new order Endst. No. 357-63 dated 14/03/2015 and on this score too the appeal is liable to be dismissed. Copy of the endorsement is attached as Annexure "D-3".

7. That the respondent No. 4 has not moved any application to the local MPA as alleged and in fact according to policy the Chairman DDAC Mansehra on coming to know of his own sources the injustice with the respondent No. 4 issued the appropriate order.

ON FACTS:

1. That para No. 1 is correct.
2. That para No. 2 is correct.
3. That para No. 3 is correct.
4. That para No. 4 as composed is not correct, hence, denied. The appellant with malafide intention withheld and suppressed the material facts from this Honourable Tribunal in order to get the benefits of his own malafide acts as is visible from the conduct of the appellant as he has shown no reasons as to why he has not challenge the order dated 27/07/2013 and he opted to join the duty at his place of posting. In fact the respondent No. 4 on acceptance of appeal of one Mukhtar Shah about the seniority on Circle basis, was transferred from Govt. Primary School Balag Bala to Govt. Primary School Jeemang. Copy of transfer order

is attached as Annexure "D-4". This transfer order is purposely withheld by the appellant with malafide intention. The appellant was expecting his promotion as CT Teacher in the near future, so, he verbally requested the respondent No. 4 for mutual transfer and the same was accepted by the respondent NO. 4 on the basis of which the appellant was transferred to GPS Jeemang and the respondent No. 4 was transferred to GPS Rehaar. Had this aspect been disclosed by the appellant in the titled appeal this Honourable Tribunal would certainly has dismissed the appeal in limini in view of the conduct of the appellant and on this score alone the appeal of the appellant is liable to be dismissed. This fact is clearly mentioned by the concerned officials while forwarding comments asked by the Deputy Director (Establishment) Elementary Education Khyber Pakhtunkhwa Peshawar on filing appeal by the appellant to the said official. Copy of letter No. 15555 dated 24/12/2014 is attached as Annexure "D-5".

5. That para No. 5 is correct, however, in this para too the appellant has suppressed the material facts from this Honourable Tribunal. The appellant himself got transferred to the said school for the reasons best known to him as he did not challenge the said order

too as no proof is annexed about making any protest against the said transfer order.

6. That para No. 6 as composed is based on suppression of facts and malafide of the appellant as no reason is shown as to why corrigendum dated 27/07/2013 was challenged first time on 05/06/2014 by moving the so-called application by withholding the material facts. In fact this application was moved in connivance with the respondents so that to create a ground for getting himself transferred to GPS Rehaar by the appellant.

7. That para No. 7 as composed is incorrect as the so-called inquiry is conducted at the back of the respondent No. 4 and on the basis of malafide acts and conduct of the appellant, thus, the said order was obtained by the appellant in connivance with the respondent No. 3 and was subsequently cancelled by the Chairman DDAC of his own on coming to know of the injustice done with the respondent No. 4.

8. That para No. 8 as composed is incorrect, except that the order was cancelled by the Chairman DDAC on 02/07/2014 on coming to know the injustice done to the respondent No. 4 by the appellant inclusion with the respondent No. 1 to 3.

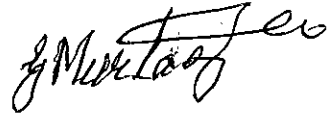
9. That para No. 9 needs no reply on behalf of respondent No. 4.
10. That para No. 10 of the appeal is incorrect, hence, denied. As submitted above the appellant has suppressed the material facts from this Honourable Tribunal by filing the instant appeal on the basis of which the appeal is liable to be dismissed with costs.

GROUND S; -

- a) That para (a) is incorrect, hence, is denied. Detailed reply is given in the above paras, which may kindly be treated as integral part of the answer to the grounds of the appeal.
- b) That para (b) is correct, hence, denied. The detailed reply is given above.
- c) That para (c) of the ground is incorrect, hence, denied. As submitted earlier the appellant cannot be allowed to take benefits of his own malafide acts by approbation and reprobation and is estopped by his own conduct by not challenging the original corrigendum for quite

long time and the appellant has failed to offer any explanation for the said silence on his part if the order was not legal and passed without the consent of the appellant.

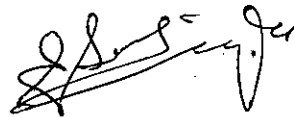
Under the circumstances, it is respectfully prayed that the appeal may kindly be dismissed to heavy costs as the appellant is vexing respondent No 4 just for no fault of him.



Ghulam Murtaza
....RESPONDENT NO. 4

Dated: 18/03/2015

Through;



(Muhammad Shafiq Awan)
Advocate High Court, Abbottabad

AFFIDAVIT OF:

Ghulam Murtaza son of Ghulam Rabbani, resident of Rehaar, Mansehra, presently Head Teacher Govt. Primary School Rehaar, Mansehra, respondent No. 4;

I, the deponent above named, do hereby affirm on oath that the contents of the foregoing reply are correct to the best of my knowledge and belief and nothing material has been concealed from this Honourable Court.




DEPONENT

18-3-15

BEFORE THE KHYBER PKHATUNKHWA SERVICE TRIBUNAL,
PESHAWAR CAMP AT ABBOTTABAD

Appeal No. 1248/2014

In Re;

Raja Akhtar Zeb

...APPELLANT

VERSUS

Director Education KPK & others.

...RESPONDENTS

REPLY TO APPLICATION FOR GRANT OF STATUS QUO

Sheweth;

The respondent No. 4 respectfully submits as under; -

PRELIMINARY OBJECTION;

1. That the application misconceived and the relief claimed amounts to granted relief on the event of accepting of the appeal which is not the scheme of law, hence, the application is liable to be dismissed.
2. That the appellant has not come to the court with clean hands and has suppressed the material facts from this Honourable Tribunal as submitted in the accompanying reply to the appeal, hence, the application is liable to be dismissed on the principle of equity and justice.

0-5
17.03.17

3. That the ingredients of order requested are not existing because no reason is shown by the appellant as to why he kept mum for sufficient long time after issuance of the original corrigendum on 27/07/2013, thus, the application is liable to be dismissed.
4. That the respondent No. 4 cannot make to suffer for the commission and omissions of the appellant, thus, the application is liable to be dismissed.

FACTS:

1. That para No. 1 of the application is correct to the extent of filing of appeal.
2. That para No. 2 as composed is incorrect, hence, denied. The balance convenience surely lies in favour of the respondent No. 4 and in favour of appellant who is guilty of suppression of material facts from this Honourable Tribunal for obtaining a favourable order.
3. That para No. 3 as composed is incorrect, hence, denied. The grant of requested relief will amount to granting relief without success of the appeal which relief is requested by the appellant in his main appeal and the grant of such relief is un-called for in view of the malafide conduct of the appellant.

Under the circumstances, it is respectfully prayed that the application may kindly be dismissed and the status quo may kindly be ordered to be maintained until the final disposal of the appeal and the earlier interim order granted may kindly be vacated in the best

interest of justice and law because the appellant in connivance with the respondent No. 1 to 3 got issued fresh order by mis-presenting the order of this Honourable Court as this Honourable Court has not ordered the respondent No. 4 to leave the charge before the success of the appeal finally and if the interim order passed by this Honourable Court is not withdrawn the respondent No. 4 will suffer irreparable loss for no fault of his own and due to the malafide acts of appellant.



Ghulam Murtaza
....RESPONDENT NO. 4

Dated: 18/03/2015

Through;

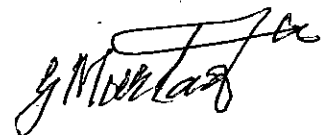


(Muhammad Shafiq Awan)
Advocate High Court, Abbottabad

AFFIDAVIT OF:

Ghulam Murtaza son of Ghulam Rabbani, resident of Rehaar, Mansehra, presently Head Teacher Govt. Primary School Rehaar, Mansehra, respondent No. 4;

I, the deponent above named, do hereby affirm on oath that the contents of the foregoing reply are correct to the best of my knowledge and belief and nothing material has been concealed from this Honourable Court.

DEPONENT

18/3/15

نقل بیان عدوی لائنل منسل لیا گیا ہے۔ من فرمانہ سنجہ اہلہ (۱۱-۱۱-۱۱)

(11)

23.9.14

171
267-14

26/05/2014

بعدالت جناب سینئر سول جج صاحب مانسہرہ

Annexure

D-1

راجہ اختر زبیر PSHT پیچر ولد راجہ اورنگزیب ساکن ریہاڑ تحصیل ضلع

مانسہرہ مدعی

بنام

ڈائریکٹر E&S ایجوکیشن صوبہ خیبر پختونخواہ پشاور (۲) ایگزیکٹو ڈسٹرکٹ آفیسر

E&S ایجوکیشن مانسہرہ (۳) صوبائی وزیر سردار ظہور ساکن مانسہرہ (۴) غلام

مرتضیٰ PSHT گورنمنٹ پرائمری سکول جینگ ٹل تحصیل ضلع مانسہرہ۔ مدعا علیہم

الف۔ دعویٰ بمراد صدور ڈگری استقراریہ مشتمل بدیں قرارداد کہ مدعی PHST

ریہاڑ کا ہیڈ ٹیچر ہے، مدعا علیہم سیاسی دباؤ میں آکر مدعی کا ٹرانسفر آڈور نمبری

78-44-47 مورخہ 02.07.2014 جاری کرنا غلط، خلاف قانون، خلاف

واقعہ یعنی بر بدعتی، دھوکہ و فراڈ اور سیاسی دباؤ کا نتیجہ ہے۔ مذکورہ آرڈر قابل تہجیح ہے۔

مالیت بغرض کورٹ فیس و اختیار سماعت

200/- روپے۔

ب۔ دعویٰ بمراد صدور ڈگری حکم امتناعی دوائی برخلاف، مدعا علیہم کہ وہ آرڈر

مندرجہ ذیل "الف" پر عمل درآمد کرنے، مدعی کو گورنمنٹ پرائمری سکول ریہاڑ میں ڈپٹی

سرانجام دینے سے روکنے کے عمل ہونے یا کسی دوسری جگہ ٹرانسفر کرنے، تنخواہ بند کرنے

یاد دیگر کوئی بھی ایسا فعل حقوق مدعی کو متاثر کرتا ہو کرنے سے علی الدوام باز رہیں۔

مالیت بغرض آرڈر فیس و اختیار سماعت

200/- روپے۔

ج۔ دعویٰ بمراد صدور ڈگری تاکیدی برخلاف مدعا علیہم نمبر 2,1 مدعی کی

جانب سے کی گئی ڈپارٹمنٹل اپیل برخلاف مدعا علیہم نمبر 2 مورخہ 04.07.2014 کا

Senior Civil Judge
Manshera
267-14

ATTESTED
26/05/2014

فیصلہ بالاتاخیر کریں۔

مالیت بغرض کورٹ فیس و اختیار سماعت

-/200 روپے۔

جناب عالی! بیان دعویٰ ذیل عرض ہے۔

۱۔ یہ کہ مدعی محکمہ تعلیم میں بطور PSHT ریہاڑ مانسہرہ میں تعینات تھا۔

۲۔ یہ کہ مدعی کی پہلی تعیناتی عرصہ 1 سال قبل G.P.S. ریہاڑ میں ہوئی جہاں پر مدعی احسن طریقے سے ڈیوٹی سرانجام دے رہا تھا کہ فاضل ایسرامتحت نے غلط طور پر سائل کو GPS جیمنگ بل میں تبدیل کر دیا۔

۳۔ یہ کہ آرڈر انڈورسمنٹ نمبر 6-7605 مورخہ 21.06.2014 کے تحت مدعی کو Merit کے مطابق گورنمنٹ پرائمری سکول ریہاڑ ہی میں Adjust کیا گیا تھا اور مدعا علیہ نمبر 4 کو گورنمنٹ پرائمری سکول شملٹی میں Adjust کیا تھا، لیکن بد قسمتی سے اسی ہی تاریخ یعنی 21.06.2014 کو مقامی MPA سردار محمد ظہور نے غیر قانونی، غیر اخلاقی، بدوں اختیارات بذریعہ لیٹرسن مدعی کی جگہ یعنی گورنمنٹ پرائمری سکول ریہاڑ میں مدعا علیہ نمبر 4 کو تعینات کرنے کا حکم صادر فرمایا جس کے تحت مدعا علیہ نمبر 1 نے سیاسی اثر رسوخ کے زیر اثر رہتے ہوئے غیر قانونی اور بدوں اختیارات من مدعی کے گورنمنٹ پرائمری سکول ریہاڑ میں Adjustment کے احکامات منسوخ کر دیے۔ (نقولات لف ہیں)۔

۴۔ یہ کہ مدعی نے سرورسز لاء کے تحت ڈیپارٹمنٹل اپیل مدعا علیہ نمبر 1 کے پاس دائر کی ہے اور بدوں فیصلہ ڈیپارٹمنٹل اپیل یا اپیل دائر کر کے نوے دن انتظار فیصلہ پر نزاع ہذا پر سرورسز ٹرائیبونل کو اختیار سماعت حاصل نہ ہے۔ چونکہ دیوانی عدالت مادر کورٹ ہے۔ بدیں وجہ دعویٰ عدالت ہذا میں دائر کیا ہے۔

۵۔ یہ کہ چونکہ مدعا علیہ نمبر 2 کا حکم بدیمتی پر مبنی ہے بدیں وجہ حکم ہذا کی استدعا کی جانی ہے کہ مدعا علیہ نمبر 1 کو ہدایت کی جائے کہ وہ مدعی کی حکمانہ اپیل پر جلد از جلد فیصلہ فرمائے۔ (اپیل بنام مدعا علیہ نمبر 1 محررہ 04.07.2014 لف ہے)۔

Signature
Date: 2.7.14

(13)

۶۔ یہ کہ مدعا علیہ یعنی بر بدینتی آرڈر متدعوئیہ پر عمل درآمد کیلئے دباؤ ڈال رہے ہیں۔ بدیں وجہ حکم متدعوئیہ پر عمل درآمد نہ کرنے کی تاکید کرنے کی بھی استدعا شق "ج" میں کی گئی ہے۔

۷۔ یہ کہ آرڈر مذکورہ سیاسی دباؤ پر کیا گیا ہے۔ اور فیصلہ میں کوئی Reason نہ ہے اور آرڈر محض مدعا علیہ نمبر 4 کو بدینتی سے ایڈجسٹ کرنے کی خاطر کیا گیا ہے۔

۸۔ یہ کہ مدعا علیہم مطالبہ مدعی سے انکاری ہیں۔

۹۔ یہ کہ مدعی کو بنائے دعویٰ و بنائے مختصم عرصہ تاریخ موصولی کاپی آرڈر ہوا۔ از مکمل انکار مدعا علیہم سے اندر حدود اختیار سماعت عنوان دعویٰ میں مفصل درج ہے۔

۱۰۔ یہ کہ مدعی کا Tenure 11 دن بھی نہیں ہوا کہ مدعا علیہم نمبر 4 کا آرڈر کر ڈالا جو کہ سراسر نا انصافی، ظلم، خلاف قانون ہے۔

لہذا استدعا ہے کہ ڈگری حسب استدعا مندرجہ عنوان دعویٰ بحق مدعی برخلاف مدعا علیہم معہ خرچہ صادر فرمائی جائے۔

المرقوم۔ 26/6/14

راجہ اختر زیب۔ مدعی

بذریعہ وکیل خود
26/6/14

تصدیق!

باقر اصرار تصدیق کی جاتی ہے کہ جملہ مراتب
رضی دعویٰ درست اور صحیح ہیں۔

المرقوم۔ 26/6/14

راجہ اختر زیب۔ تصدیق کنندہ

اختر زیب

26.7.14
26.7.14

26.7.14

26.7.14

14

IN THE COURT OF FARYAL ZIA MUFTI,
SENIOR CIVIL JUDGE, MANSEHRA.

Suit No: 282 of 2014

Year: 26/7/14

مدعی

واحد افتر دینی


Versus

D-2

خواجہ شمس الدین عظیمی ریسٹورنٹ سروسز پرائیویٹ لمیٹڈ
موبل نمبر 9999999999

ORDER 01:-
26.7.14

Suit instituted through counsel. Entrusted to the court of Civil Judge VI Mansehra for disposal in accordance with law. Plaintiff is directed to appear before the said court today.


(FARYAL ZIA MUFTI)
Senior Civil Judge,
Mansehra.

دعوتی کارروائی کے لئے مندرجہ بالا کے درجہ اولیٰ نمبر 30

MS. FARHANA TABASSUM
Civil Judge-VI
Mansehra

u-2
26-7-14

جناب عالی -
میں نے اپنے ایک دوست کے ساتھ مل کر ایک ریسٹورنٹ سروسز پرائیویٹ لمیٹڈ شروع کیا ہے۔ اس کے نام سے ایک کارروائی چل رہی ہے۔ اس کے بارے میں مزید جاننے کے لئے آپ کو اس کارروائی میں شامل ہونا چاہئے۔



میں نے اپنے ایک دوست کے ساتھ مل کر ایک ریسٹورنٹ سروسز پرائیویٹ لمیٹڈ شروع کیا ہے۔ اس کے نام سے ایک کارروائی چل رہی ہے۔ اس کے بارے میں مزید جاننے کے لئے آپ کو اس کارروائی میں شامل ہونا چاہئے۔

u-3
26.7.14

MS. FARHANA TABASSUM
Civil Judge-VI
Mansehra

ATTESTED
26.7.14

2-4
12.9.14

میں اس لئے حاضر۔
 دراصل یہ 2 دن قبل ہو گیا۔ اس لئے ان سے کوئی کارروائی نہ ہو سکی۔ بلکہ یہ 3 کو
 ہزاروں روپے کے لئے کارروائی نہ ہو سکی۔ اس لئے اس سے کوئی کارروائی نہ ہو سکی۔
 ہزاروں روپے کے لئے کارروائی نہ ہو سکی۔ اس لئے اس سے کوئی کارروائی نہ ہو سکی۔
 ہزاروں روپے کے لئے کارروائی نہ ہو سکی۔ اس لئے اس سے کوئی کارروائی نہ ہو سکی۔
 ہزاروں روپے کے لئے کارروائی نہ ہو سکی۔ اس لئے اس سے کوئی کارروائی نہ ہو سکی۔
 ہزاروں روپے کے لئے کارروائی نہ ہو سکی۔ اس لئے اس سے کوئی کارروائی نہ ہو سکی۔

FARHANA TABASSUM
 Civil Judge-VI
 Manshura

Order No. 05
 23.09.2014

No one present on behalf of plaintiff. The defendants through government pleader present and submitted an application for setting aside ex-parte proceeding, placed on file. The case was called time and again with reasonable intervals but no one turned up from plaintiff's side. It is 2:30 PM and the court time is over. Hence the instant suit stands dismissed in default of appearance and prosecution.

No order as to costs.

File be consigned to record room after its necessary completion and compilation.

Announced:
 23.09.2014

1695
 S.D. No. 2-15
 21-2-15
 23-02-15

FARHANA TABASSUM
 CIVIL JUDGE VI
 MANSEHRA
 ATTESTED
 21-2-15

16

Annexure

D-3

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSEHRAORDER

Consequent upon the approval of the competent authority that Mr. Raja Akhtar Zeb PSHT GPS Shamlaly Circle Phulra transferred under Endst No 7844-47 dated 02/07/2014 is here by suspended till further orders. Mr. Ghulam Murtaza PSHT is directed to report GPS Shamlaly Circle Phulra in the light of Honorable court of Services Tribunal Khyber Pakhtunkhwa Bench Abbottabad order dated 17/02/2015.

Sd/-
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 357-63 Dated 14/3 /2015.

Copy for information to the:

1. The Registrar Honorable Service Tribunal Khyber Pakhtunkhwa Bench Abbottabad with reference to Order No nil dated 17/02/2015.
2. District Accounts Officer Mansehra.
3. Deputy Commissioner Mansehra.
4. District Monitoring Officer Mansehra.
5. Sub Divisional Education Officer (Male) Mansehra.
6. ASDEO (M) Circle Concerned.
7. Teacher Concerned.


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

(17)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) MANSHRA

CORRIGENDUM

As approved by the competent authority the following corrigendum HPST on sonority / U.C bases issued vide this Office Endst: No 6027-6177 dated 17/06/2013, is here by made in the interest of public service with immediate effect.

S.#	Name of Teachers	Place of Posting	Adjustment	Remarks
1	GHULAM MURTAZA	GPS BALAG BALA	GPS GEMONG	Against vacant post

Note:

No TA/DA is allowed.
Charge report should be submitted to all concerned.

Annexure

D-4

Sd
DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA

Endst: No 7017-21 Dated 28-6-2013.

Copy for information to the:

1. District Accounts Officer Mansehra.
2. ASDEO (M) Circle Concerned.
3. Teacher Concerned.
4. Office Order file.

[Signature]
SUB DIVISIONAL EDUCATION OFFICER
(MALE) MANSEHRA

18

OFFICE OF THE DY: DISTRICT EDUCATION OFFICER (MALE) MANSHEHRA
No 15555 Dated 24/11/2014

Ammeelude

D-5

The Director,
Department of Secondary Education,
Khyber Pakhtunkhwa Education Department

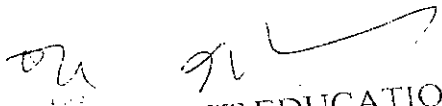
Subject:

APPEAL AGAINST ORDER ENDST: NO 7605-6 DATED 21/06/2014.

Memo:

Reference to your letter no 3042/F.No.7/Vol:1/PST(M) Manshehra dated 16/07/2014, on the subject cited above.

1. The appellant belong to village Rehar and previously was posted at GPS Rehar, and he was transfer to GPS Geemong on his verbally request/mutual transfer, and teacher applicant took over charge in GPS Geemong and regularly perform their duty and get their salary from 11 months, no application for cancellation the same was applied and Mr. Ghulam Murtaza PST Regularly performing their duty for 11 months. Applicant facilitate to Ghulam Murtaza with his own willing that he was near the promotion against the post CT but appellant nor promotion against the post. Then he try for cancellation of his order. Which is against the rules after lapses of 11 months.
2. Wrong statement.
3. No based on facts.
4. Only one app received by this office & inquiry was conducted.
5. After the inquiry the competent authority issued notification for cancellations of all the corrigendum order/adjustment. Mr. Raja Akhtar Zeb PSHT was transfer to GPS Rehar vide Endst: No 7605-06 dated 21/06/2014, the concerned MPA PK-53 request for cancellation of the said Notification, then this office cancelled the above notification no.


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSHEHRA

وکالت نامہ

کورٹ فیس
قیمتی

بعدالت جناب: سروس ٹریبونل K.P.K کمپن کورٹ اسٹریٹ آباد

منجانب: سیانڈنٹ نمبر 4

راجہ اختر حسین بی بی نام: لکڑی کنگرا ایجوکیشن و ٹریننگ

دعویٰ اپیل انگریزی آرٹ یا جرم سروس اپیل باعث تحریر آئیکہ

۱۔ مندرجہ بالا عنوان میں اپنی طرف سے بیروی وجود ہی مقام اسٹریٹ آباد کے لئے

محکمہ زمین و مکان ایجنسی کے تحت ہائی کورٹ کے فیصلے کے مطابق بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر ہوں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر یا بروز پکھری کے آگے پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اسکے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پر داخستہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل انگریزی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنیکا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپروٹاشی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ منسوفی ڈگری یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ بیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کرونگا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے سندر ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المرقوم 18/03/15

Accepted

غلام ذریعی ولد غلام ربانی ساکنہ رھائے تحصیل و ضلع عالیہ

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ABBOTTABAD.**

RAJA AKHTER ZEB

(APPELLANT)

VERSUS

DIRECTOR EDUCATION etc.....

(RESPONDENTS)

SERVICE APPEAL

0-15
17-3
Application For Setting Aside Ex-Parte proceeding & grant of permission to join the proceeding in above title appeal on behalf of respondent no.1,2,and3.

Respectfully Sheweth,

The petitioner/respondents respectfully submits as under,

1. That the appellnt has instituted above title service appeal before this honourable court and the court proceeded ex-parte against defendants/petitioner.
2. That the defendant/petitioner was summoned by this honourable court on the address given in the heading of appeal but the absence from court was not deliberate.
3. That the comments was not prepared and record was not in access of petitioner due to reasons that there was no representative of respondents and service of summon can not made on the respondents.

4. That Ex-Parte proceeding & order liable to be set-aside as the valuable right of parties are attached .
5. That according to judgments of apex court defendant can join the proceeding and cases shall be decided on merits.
6. That the absence from the court on behalf of petitioner is not deliberate and none of the parties effect if the petitioner join the proceeding in appeal & the interest of parties involve in present suit hence proceeding may kindly be set-aside.
7. That present petitioner/defendant had got knowledge and on very next date filed this petition hence this petition is well within time and this Honourable Court has got jurisdiction.


In the light of above mention averments it is humbly requested that by accepting this petition, Ex-Parte proceeding may please be set-aside and respondents may please be allowed to defend case.

Dated 18 march, 2015.


Respondents

AFFIDAVIT.

It is certified and declared on oath that content of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.


Petitioner through representative

Before the Service Tribunal, Khyber Pakhtoon Khwa
Peshawar, Bench ATD

Raja Akhter zeb vs Director Education et

Reply for Application of grant of Status
quo.

Respected Sir,

Preliminary objections,

19.03.15

1. That the appellant has concealed the material facts from Honourable Tribunal hence not entitled for equitable relief.
2. That the order dated 02.07.2014 was made to cancel order dated 21.06.2014 and till order dated 21.06.2014, the respondent no. 4 only passed eleven months in that school.
3. That the appellant has got no locus standi to file the instant appeal.

Parawise Replies

1. Para no. 1 of Petition needs no comments.
2. Para no. 2 of Petition is incorrect and got Ex-facie bad case furthermore the balance of Convenience lies in favour of respondents.
3. Para no. 3 of Petition is incorrect hence denied; the Petitioner is presently working in his previous Station.

It is therefore requested that Petition may please be dismissed.

19.03.2015

Respondents
through
GP/ATD _____

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ABBOTTABAD.**

RAJA AKHTER ZEB

(APPELLANT)

VERSUS

DIRECTOR EDUCATION etc.....

(RESPONDENTS)

SERVICE APPEAL

Application For Setting Aside Ex-Parte proceeding & grant of permission to join the proceeding in above title appeal on behalf of respondent no.1,2,and3.

Respectfully Sheweth,

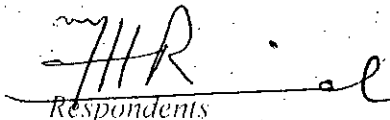
The petitioner/respondents respectfully submits as under,

1. That the appellant has instituted above title service appeal before this honourable court and the court proceeded ex-parte against defendants/petitioner.
2. That the defendant/petitioner was summoned by this honourable court on the address given in the heading of appeal but the absence from court was not deliberate.
3. That the comments was not prepared and record was not in access of petitioner due to reasons that there was no representative of respondents and service of summon can not made on the respondents.

4. That Ex-Parte proceeding & order liable to be set-aside as the valuable right of parties are attached.
5. That according to judgments of apex court defendant can join the proceeding and cases shall be decided on merits.
6. That the absence from the court on behalf of petitioner is not deliberate and none of the parties effect if the petitioner join the proceeding in appeal & the interest of parties involve in present suit hence proceeding may kindly be set-aside.
7. That present petitioner/defendant had got knowledge and on very next date filed this petition hence this petition is well within time and this Honourable Court has got jurisdiction.

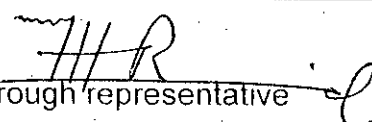
In the light of above mention averments it is humbly requested that by accepting this petition, Ex-Parte proceeding may please be set-aside and respondents may please be allowed to defend case.

Dated 18 march, 2015.


Respondents

AFFIDAVIT.

It is certified and declared on oath that content of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.


Petitioner through representative

خدمت مناجہ - صدر میں آ سرورس ٹریڈیونل KPK ایسٹ آباد نیچ

عنوان :- درخواست برائے دستبرداری اپیل 1248/2014

جناب عالی!

مذکورہ بالا گزشتہ فیصلہ سائل نے مرخلف کے خلاف فریڈ اور

نمبر 6-7605 بتاریخ 21/6/2014 اپیل دائر کی تھی۔ اس فیصلہ

اس فیصلہ حکم نے سب تحفظات دراز کے مجھے رہاڑ میں آپ کے حکم کے تحت ایڈجسٹ کیا تھا۔ اور سب مخالف

کو بھی اب لوکل اسٹیشن P.P.J حراہ میں آڈر نمبر 34-11430 بتاریخ 8/8/15 کو ایڈجسٹ کروایا گیا ہے۔

اور وہ بھی اضاغند میں کہ آڈر نمبر 6-7605 بتاریخ 21/6/14 کا دفاع کرنے سے دستبردار ہے۔

لہذا آپ سے التماس فیصلہ سائل کی اپیل

والس کی جائے۔

Applicant
العالمی
Lawyer

راجہ شہزاد

P.S.H.T
G.P.S
رہاڑ

فائل نمبر

135030575277-3

Respondent

مذکورہ بالا گزشتہ فیصلہ

سائل کے سائل کو اس پر ایڈجسٹ کیا گیا ہے

13503-0408399-9

22/10/15
Munir Ahmad

P.S.H.T
گورنمنٹ پرائمری سکول حراہ

18

9

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) MANSEHRA
 Ph: No: 0997-306271 Fax No: 0997-301004

NOTIFICATION:

Where as Mr. Raja Akhtar Zeb HPST GPS Kanchajri submitted appeal that he had been transferred through various corrigenda from one school to other school and requested for cancellation of corrigenda and adjustment at GPS Rehar where he was promoted as HPST.

And where as an inquiry was conducted through Mr. Sahiqr Rehman ASDEO (M) Circle Mansehra and the inquiry offer has submitted his report.

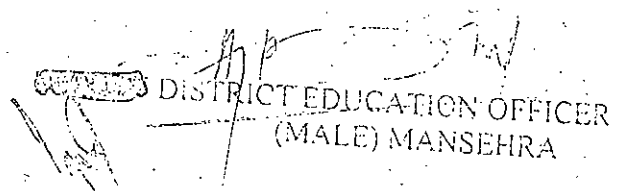
Now therefore the corrigenda issued Vide Endst: No. 8732-8739 dated 11-7-2013 S.No 01 & vide Endst: No. 1589-93 dated 27-07-2013 and Endst: No. 9330-33 dated 16-08-2013 and Endst: No: 13532-37 dated 05-06-2014 are here by cancelled & Mr. Akhtar Zeb HPST is adjusted at GPS Rehar and MR. Ghulam Murtaza HPST is adjusted at GPS Shamlalee, in the interest of public service.

- 1. Charge report should be submitted to all concerned.
- 2. No TADA is allowed.

Sd/= **DISTRICT EDUCATION OFFICER (MALE) MANSEHRA**

Endst: 7605-6 Dated: 21/6/2014

- Copy forwarded to:-
- 1. SDEO (Male) Mansehra.
 - 2. District Account Officer Male Mansehra.


DISTRICT EDUCATION OFFICER (MALE) MANSEHRA

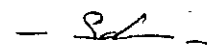
OFFICE OF THE DISTRICT EDUCATION OFFICER(MALE) MANSEHRA.

TRANSFER ORDER.

As approved by the competent authority, The following PSHT are here by transferred on their own pay and grade in the interest of public service with immediate effect.

S.No.	Name of Teacher.	From	To	Remarks.
1.	Mr. Aurang Zeb PSHT	GPS Charach	GPS Shamlali	On disciplinary Ground.
2.	Mr. Ghulam Murtaza PSHT	GPS Shamlali	GPS Charach	Vise S. No. 2 Vice S. No. 1

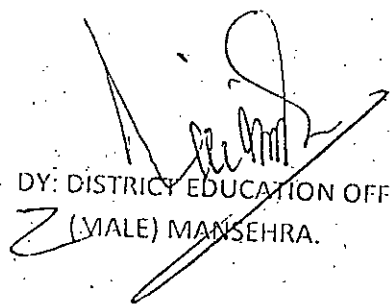
Note. Charge report should be submitted to all concerned.
No. TA/DA & TG is allowed.


DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.

Endst: 11430-34 Dated 07/8 /2014

Copy of the above is forwarded to the:-

- 1 SDEO (M) Mansehra
- 2 District Accounts Officer Mansehra
- 3 ASDEO (M) Concerned
- 4 Teachers concerned.


DY: DISTRICT EDUCATION OFFICER
(MALE) MANSEHRA.