


4 18.5.2015

None present for appellant. Notice to counsel for the appellant be issued for preliminary hearing for 15.6.2015 at Camp Court A/Abad.


Chairman
Camp Court A/Abad

5 15.6.2015

None present for appellant despite repeated calls as well as notice to counsel for the appellant through registered post. The Court time is about to over. The appeal is dismissed for want of prosecution. File be consigned to the record.

ANNOUNCED
15.6.2015


Chairman
Camp Court A/Abad

15.06.15

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 46 / 2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10/01/2014	<p>The appeal of Mr. Ejaz Ahmad presented today by Syed Shahid Mahboob 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	27-1-14	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up there on <u>16.6.14</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>
3.	16.6.2014	<p>Neither appellant nor counsel for the appellant present. To come up for preliminary hearing at camp court A/Abad on 15.12.2014.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman Camp Court A/Abad</p>
	15.12.2014	<p>No one is present on behalf of the appellant. The Tribunal is incomplete To come up for preliminary hearing at c/c A/Abad on 18.5.2015.</p> <p style="text-align: right;"><i>[Signature]</i> Reader</p>

C-F

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Appeal no - 46/2014

Ejaz Ahmed s/o Allah Baksh Lab Assistant Govt. Akhtar Nawaz Khan (S) Degree College KTS, Haripur R/o House No. 164 Sector 1 Khalabat Township Tehsil & District Haripur.

.....APPELLANT

Versus

Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar and others

.....RESPONDENTS

SERVICE APPEAL

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4	Wakalatnama		

Dated: 10-1-2014

Appellant

Ejaz Ahmed

Through


(SYED SHAHID MAHBOOB)
Advocate High Court
at Haripur

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Ejaz Ahmed s/o Allah Baksh Lab Assistant Govt. Akhtar Nawaz Khan (S) Degree College KTS, Haripur R/o House No. 164 Sector 1 Khalabat Township Tehsil & District Haripur.

Appeal no 46/2014

.....APPELLANT: *W. F. Bhattarai*

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar.
2. Secretary to Govt. of Khyber Pakhtunkhwa Education Department, Peshawar.
3. Deputy Director (Establishment), Education Department, Peshawar.
4. Director Higher Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
5. Muhammad Naveed s/o. Khan Afzal Lab Attendant, GPGC, Haripur.
6. Wajid Khan s/o Muhammad Aman Khan Lab Attendant, GPGC, Haripur.

.....RESPONDENTS

SERVICE APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 13-09-2013 ISSUED BY RESPONDENT NO. 3 & 4 PROMOTING THE RESPONDENT NO. 5 & 6 IN BPS-07 BY SUPERCEDING THE APPELLANT INJURING SENIORITY OVER RESPONDENT NO. 5 & 6 BEING ILLEGAL IN VIOLATION OF RELEVANT LAW AND PROCEDURE HENCE LIABLE TO BE SET ASIDE, WITH DIRECTION TO THE RESPONDENT NO. 3 TO PROMOTE THE APPELLANT BEING SENIOR AND ELIGIBLE.

PRAYER:

ON ACCEPTANCE OF ABOVE TITLED SERVICE APPEAL, THE IMPUGNED ORDER DATED 13-09-

W. F. Bhattarai
10/11/2014

42
10-1-2014

**2013 WITH REGARD TO THE PROMOTION OF
RESPONDENT NO. 5 MAY GRACIOUSLY BE SET
ASIDE AND A DIRECTION MAY KINDLY BE ISSUED
TO RESPONDENT NO. 3 TO PROMOTE THE
APPELLANT ON BPS-07 BEING SENIOR MOST AND
ELIGIBLE FOR THE POST.**

Respectfully Sheweth:-

1. That the Appellant joined the Education Department Govt. of Khyber Pakhtunkhwa in the year 1992 and since he is performing his assigned duties with zeal and zest and never given to the Respondent Department any chance of reprimand. (Copies of appointment letter along with CNIC are attached and marked as Annex-A).
2. That while performing his duties as Laboratory Attendant at Govt. Akhtar Nawaz (S) Degree College KTS, Appellant came to know about the impugned order dated 13-09-2013 for promotion of Class-IV to post of Junior Clerk BPS-07, according to which despite being senior most on the seniority list the Appellant was ignored and Respondent No. 5 & 6 who are next and junior to Appellant on the seniority list has been promoted by superseding Appellant for which Appellant is suffering irreparable loss. (Copies of the impugned Order dated 13-09-2013 as well as seniority list are annexed and marked as Annex-B & B-1 respectively)
3. That the Appellant protested against this unlawful act of Respondent No. 3 & 4 and forwarded a departmental appeal to Respondent No. 4 on 03-10-2013 but no action from Respondent No. 4 has so far been taken, hence this appeal. (Copy of the departmental appeal dated 03-10-2013 is attached herewith and marked as Annex-C).
4. That Appellant preferred an appeal to Respondent No. 4 on 03-10-2013 (through proper channel) coupled with the

recommendation letter of Principal Govt. Akhtar Nawaz Khan (S) Degree College KTS, Haripur on 03-10-2013 but the same was not entertained neither Appellant was informed about the fate of it and the statutory period of 90 days has been elapsed hence, the instant appeal inter alia on the following grounds:-

GROUNDS:-

That impugned order, entailed upon the promotion list is ab anitio illegal and void, circulated in sheer violation of the mandatory statutory provisions of law, mala fidely, illegally, without any lawful authority hence, liable to be discarded on the following grounds:-

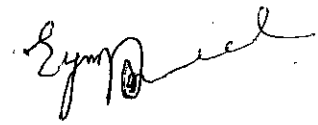
- a. That as per seniority list the name of Appellant is shown on serial No. 1 and the Respondent No. 5 & 6 are shown on serial No. 2 & 3. As per above mentioned seniority list the Appellant's date of birth is 16-03-1968 and date of appointment is 14-04-1992 whereas, the Respondent's No. 5 date of birth is 17-04-1977 and date of appointment is 27-05-1995 as well as the Respondent's No. 6 date of birth is 11-10-1975 and date of appointment is 03-10-1995. All are designated as Laboratory Attendants in the seniority list and promotion of Respondent No. 5 & 6 instead of Appellant is illegal and mala fide hence, the impugned order is liable to be set aside.
- b. That the Appellant is senior and the Respondent No. 5 & 6 are juniors and holding of Respondent No. 5 & 6 as Senior by the Respondent No. 3 & 4 is against facts and law which is not sustainable. The Respondent No. 3 & 4 committed illegality deliberately and ignored the Appellant on the basis of liking and disliking mala fidely by promoting the Respondent No. 5 & 6 instead of Appellant and

exposed him to suffer perpetual monetary loss and mental torture during the entire remaining service, which is not tenable and should be rectified honestly hence, the impugned order is liable to be discarded.

- c. That the impugned order which claims to be on consequent upon the recommendation of Departmental Promotion Committee meeting held on 04-09-2013 regarding promotion of Class-IV to the post of Junior Clerk is not in compliance with the mandatory statutory rules for promotions which provides while making promotions of civil servants the seniority order must be taken into consideration hence the impugned order is liable to be set aside.

It is therefore, respectfully prayed that on acceptance of instant appeal the Respondent No. 3 & 4 may please be directed to set aside the impugned order to the extent of Respondent No. 5 & 6 and to issue order of promotion of the Appellant being senior to the Respondent No. 5 & 6. Any other relief which this Honourable Tribunal deems fit in the circumstances of the case, may also graciously be awarded.

Dated: 10-1-2014

Appellant 

Through

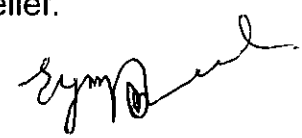


(SYED SHAHID MAHBOOB)
Advocate High Court
at Haripur

VERIFICATION:

Verified on oath that the contents of the above titled memorandum of appeal are true and correct to the best of my knowledge and belief.

Dated: 10-1-2014

Appellant 

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

Ejaz Ahmed s/o Allah Baksh Lab Assistant Govt. Akhtar Nawaz Khan (S) Degree College KTS, Haripur R/o House No. 164 Sector 1 Khalabat Township Tehsil & District Haripur.

.....APPELLANT

Versus

Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar and others

.....RESPONDENTS

SERVICE APPEAL

CERTIFICATE

Certified that no such appeal has ever been filed or is pending before any other forum.

Dated: 10-1-2014

Appellant



Through


(SYED SHAHID MAHBOOB)
Advocate High Court
at Haripur

OFFICE OF THE PRINCIPAL GHSS TURBELA TOWNSHIP HARIPUR

OFFICE ORDER NO. 157/

DATED 14.4.1992

APPOINTMENT

The following appointment of Class Iv Servant is hereby ordered in the public interest in SPS-1 920-26-1013 plus usual allowances as admissible under the rules with effect from the date of taking over charge against the post with the following terms and conditions:-

S.No.	Name & Father's Name and address.	Appointed against post.	Remarks.
1.	Ijaz Ahmed S/O Allah Bakhsh House No.164 Sec:No.1 Khalabat Township Haripur.	L/Att:	Against vacant post of late Monammad Miskii

CONDITIONS

1. Charge report should be submitted to all concerned.
2. The appointment is purely temporary basis and liable to be terminated with out any notice/reasons.
3. The candidate is required to produce a e and health certificate from the Medical Max Supdt Abbottabad.
4. The appointment shall stand automatically cancelled if he failed to join the post with in 15 days of the issue of this letter.
5. In case the candidate with to resign from the service he should have to gives one month notice of forefiat one month any in lieu of notice.
5. The candidate may not be given charge of post if his age below 18 years or exceed 45 years.

(Sd/UMAR FARUQI, B.A., M.Ed)
Principal,
Govt Higher Secondary School
Turbela Township(Haripur)

Enclst No 475-78 /Apptt dated T.T. Ship the 14.4.1992.

- Copy of the above is forwarded to the;-
1. P/S to Sahibzada Mohammad Sabir Shah MPA Shataloo Sharif Sirikot with ref to his recommendation.
 2. District Education Officer (M) Secondary Abbottabad.
 3. District Accounts Officer Abbottabad.
 4. Candidate concerned.
 5. Office file.

Principal
Govt Higher Secondary School
Turbela Township(Haripur)

(Handwritten signature)
ASW

OFFICE OF THE PRINCIPAL G.H.S.S. TURBELA TOWNSHIP (HARIFUR)

HEALTH AND AGE CERTIFICATE

Name of official Ijaz Ahmad s/o Allah Bux
Caste of race Awan resident of Chalabat Town Ship Sect: No. I N.H. 164
Exact height by measurement 5'3 date of birth 16-3-1968
Personal mark of identification _____
Signature of official [Signature]

I do hereby certify that I have examined Ijaz Ahmad candidate of employment in the office of the Class-IV in this education department and can not discover that he/she is any disease Communicable or other constitutional affection or bodily infirmity except _____.

I do not consider this as disqualification for employment in this office of the _____ in the _____ deptt; his are according to this own statement is _____ years and by appearance _____ years.

LEFT/RIGHT HAND THUMB AND FINGER IMPRESSION.

Station Abbottabad
Dated _____

[Handwritten Signature]

Medical Superintendent
DHO Hospital Abbottabad.

All Principals
Concerned

DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA,
KHYBER ROAD PESHAWAR

9

(18)

Phone # 091-9210242, 9211023/Fax # 9211021
Dated Peshawar the 13/09/2013

ORDER

Consequent upon the recommendation of Departmental Promotion Committee meeting held on 04.09.2013 regarding promotion of Class-IV to the post of Junior Clerk, the following Class-IV Servants are hereby promoted to the post of Junior Clerks BPS-07 as admissible under the rules.

MARDAN DIVISION

S. NO.	NAME & ADDRESS	POSTED AT	REMARKS
1.	Mr. Mohammad Riaz N/Qasid GPGC, Mardan	GPGC, Mardan	AVP
2.	Mr. Hussain Mohammad N/Qasid GGC, Maneri (Swabi)	GGDC, Panjpir (Swabi)	AVP
3.	Mr. Noor Mohammad Behishti GDC, Takht Bhai (Mardan)	GGDC, Rustam (Mardan)	AVP
4.	Mr. Wahid Zaman Baldar GPGC, Swabi.	GPGC, Swabi	AVP
5.	Mr. Mohammad Haider Lab: Attendant GPGC, Mardan.	GPGC, (W) Mardan	AVP
6.	Mr. Imranullah Lab: Attendant GDC, No. 2 Mardan	GPGC, Mardan	AVP
7.	Mr. Shoaib ur Rehman Lab: Attendant GDC, Lahor (Swabi).	GGDC, Marghuz (Swabi)	AVP
8.	Abdur Rehman Lab: Attendant GDC, Kallang (Mardan).	GDC, Kallang (Mardan)	AVP

MALAKAND DIVISION

1.	Mr. Saleh Zada, Lab: Attendant GDC, Daggar (Buner).	GDC, Totalai (Buner)	AVP
2.	Mr. Aziz ur Rehman Bearer GDC, Thana (Malakand Agency)	GDC, Wari (Upper)	AVP
3.	Mr. Umer Mohammad Sweeper GDC, Chakessar (Shangla)	GGDC, Khawaz Khela (Swat)	AVP
4.	Mr. Mauccin Din, Chowkidar GDC, Alpuri (Shangla).	GDC, Puran (Shangla)	AVP
5.	Mr. Mass Khan, Lab: Attendant GDC, Chitral	GDC, Chitral	AVP
6.	Mr. Sher Ali Khan, N/Qasid GGDC, Dargai (Malakand Agency).	GDC, Palai (Malakand Agency)	AVP
7.	Mr. Suleman, N/Qasid GPGJC, Swat.	GPGJC, Saidu Sharif (Swat)	AVP
8.	Mr. Mohammad Saeed N/Qasid GDC, Thana (Malakand Agency).	GDC, Agra (Malakand Agency)	AVP
9.	Mr. Nadar Shah, Chowkidar GDC, Chakessar (Shangla)	GDC, Chakessar (Shangla)	AVP
10.	Mr. Mohammad Yar Lab: Attendant GPGJC, Swat.	GPGC, Matta (Swat)	AVP
11.	Mr. Raza Mohammad Lab: Attendant GDC, Alpuri (Shangla).	GDC, Chamla (Buner)	AVP
12.	Mr. Khan Zada N/Qasid GPGJC, Swat.	GPGJC, Saidu Sharif (Swat)	AVP

Assesd
[Signature]
[Signature]

9A

D.I. KHAN DIVISION

1.	Mr. Hamid Ullah Khan, Lab: Attendant GDC, Paharpur (D.I.Khan).	GGDC, Tank	AVP
2.	Mr. Fazl-e-Elahi, Lab: Attendant GDC, No. 2 D.I.Khan	GDC, No. 2 D.I.Khan	AVP
3.	Mr. Mohammad Ramzan Lab: Attendant GDC, No. 2 D.I.Khan	GDC, Balot Sharif (D.I.Khan)	AVP

KOHAT DIVISION

1.	Mr. Tasawar Shah, Lab: Attendant GDC, Takht-e-Nasrati (Karak).	GGDC, Takht-e-Nasrati (Karak)	AVP
2.	Mr. Mohammad Ayaz, Mall GDC, Ahmadabad (Karak).	GPGC, Kohat	AVP
3.	Mr. Sharif Hussain, Lab: Attendant GDC, Ahmadabad (Karak).	GGDC, Thall (Hangu)	AVP
4.	Mr. Gullistan, Chowkidar GDC, Sabirabad (Karak).	GPGC, Kohat	AVP

HAZARA DIVISION

1.	Mr. Liaqat Hussain, Lab: Attendant GDC, Balakot	GDC, Balakot (Manschra)	AVP
2.	Mr. Mohammad Saeed, Chowkidar GDC, Lissan Nawab	GPGC, (W) Manshra	AVP
3.	Mr. Munir Ahmad, N/Qasid GDC, Lissan Nawab	GGDC, Kalabat Township (Haripur)	AVP
4.	Mr. Abdur Rahim Chowkidar GDC, Balakot (Manschra).	GGDC, Chiti Dheri (Manschra)	AVP
5.	Mr. Mohammad Naveed Lab: Attendant GPGC, Haripur	GPGC, (W) Haripur	AVP
6.	Mr. Wajid Khan, Lab: Attendant GPGC, Haripur	GGDC, Qalandar Abad (Abbottabad)	AVP
7.	Mr. Badar, Zaman, Lab: Attendant GDC, Lissan Nawab	GGDC, Parhina (Manschra)	AVP
8.	Mr. Mohammad Sadique Lab: Attendant GDC, Lissan Nawab	GDC, Lissan Nawab (Manschra)	AVP
9.	Mr. Abdur Rauf, Lab: Attendant GPGC, Manshra.	GPGC, Manshra	AVP
10.	Mr. Jehanzeb, Lab: Attendant GDC, Lissan Nawab	GDC, Akora Khattak (Nowshera)	AVP

PESHAWAR DIVISION

1.	Mr. Minqad ud Din, N/Qasid GSSC, Peshawar.	Directorate of Higher Education Khyber Pakhtunkhwa	AVP
2.	Mr. Naveed Khan, T.W.O GDC, Peshawar.	Directorate of Higher Education Khyber Pakhtunkhwa	AVP
3.	Mr. Parveen Akhtar, Lab: Attendant GDC, Peshawar	GGDC, Bacha Khan (Peshawar)	AVP
4.	Mr. Shah Nazar, N/Qasid GPGC, Nowshera.	Directorate of Higher Education Khyber Pakhtunkhwa	AVP
5.	Mr. Madad Khan, Chowkidar GSSC, Peshawar.	Directorate of Higher Education Khyber Pakhtunkhwa	AVP

8.	Mr. Munir Khan Lab: Attendant GDC, Mathra (Peshawar).	GGDC, Mathra (Peshawar)	AVP
9.	Mr. Mohammad Saddique, Lab: Attendant GPGC, Nowshera.	GPGC, Nowshera	AVP
9.	Mr. Tajamul Shah, Mali GPGC, Nowshera.	GDC, Pabbi (Nowshera)	AVP
10.	Mr. Razi ud-Din, Lab: Attendant GC, Peshawar.	GC, Peshawar	AVP
11.	Mr. Mohammad Tariq, Lab: Attendant GPGC, Charsadda.	GPGC, Charsadda	AVP
12.	Mr. Mohammad Ayaz Chowkidar, GGC, Gulshan Rehman Colony Peshawar.	GGDC, Gulshan Rehman Colony Kohat Road Peshawar	AVP
13.	Mr. Maccenullah, N/Qasid GDC, Tangi (Charsadda).	GDC, Naugman (Peshawar)	AVP

NOTE:-

- i. The Principals concerned are directed to verify the certificates/ documents of the promotees before handing over charge to them.
- ii. Charge report should be sent to all concerned.

Endst; No.

17705-17859,

DIRECTOR HIGHER EDUCATION

Copy of the above is forwarded to the:-

1. Section Officer (Colleges-II) Govt. of Khyber Pakhtunkhwa, Higher Education Department Peshawar for information.
2. Principals concerned.
3. District Accounts Officer, concerned.
4. Official concerned.

BY: DIRECTOR (ESTABLISHMENT)

10A

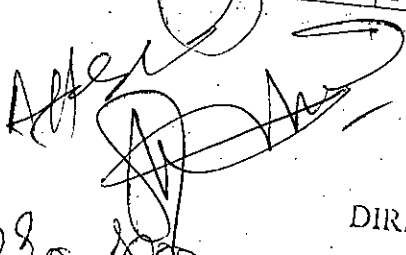
DIRECTORATE HIGHER EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone #091-9211025, 091-9210242, Fax # 091-9211025

CORRIGENDUM.

Dated Peshawar the 27/9 /2013.

In partial modification of this office order issued under endst.No.17705-17859 dated 13.09.2013, the competent authority is pleased to issue corrigendum in respect of the following officials as noted against each.

S.No	Name of promotee along with place of previous posting	Correction made	Remarks
1	Mr.Imran ullah Junior Clerk GPGC, Mardan	GDC, Bakhshali (Mardan)	Against V/post
2	Mr.Haider Junior Clerk GPGC (W), Mardan	GPGC, Mardan	Vice S.No.1
3	Mr.Sharif Hussain Junior Clerk GGDC, Thall (Hangu)	GDC, Ahmad Abad (Karak)	Against V/post
4	Mr. Muhammad Yar Junior Clerk GPGC, Matta (Swat)	GPGJC, S/Sharif, Swat	Against V/post
5	Mr.Jehanzeb Junior Clerk GDC, KKK, Akora Khattak	GPGC (W), Mansehra	Against V/post
6	Mr.Madad Khan Junior Clerk Directorate of Higher Edu; KPK Pesh;	GSSC, Peshawar	Against V/post
7	Mr.Liaqat Ali Junior Clerk GGDC, Chagharmatti Peshawar	GDC, Tangi	Against V/post
8	Mr. Shah Nazar Junior Clerk Directorate of Higher Edu; KPK	GDC, KKK, Akora Khattak (Nowshera)	Vice S.No.05
9	Mr.Shuaibur Rehman Junior Clerk GGDC, Marghuz (Swabi)	GDC, Lahor (Swabi)	Against V/post
10	Mr.Wajid Khan Junior Clerk GGDC, Qalanderabad(A/Abad)	GGDC, KTS, Haripur.	Vice SNo.11
11	Mr.Munir Ahmad Junior Clerk GGDC, KTS, Haripur	GPGC No.1 A/Abad	Against V/post
12	Mr.Naveed Khan Directorate of Higher Education KPK Pesh;	Govt.College, Peshawar.	Against V/post



DIRECTOR HIGHER EDUCATION

Endst.No. 17705-17859

Copy of the above is forwarded to the:-

1. Principals Govt.Colleges (Male & Female) concerned.
2. District Accounts Officers concerned.
3. Cashier, local Directorate.
4. PA to Director Higher Education Khyber Pakhtunkhwa Peshawar.
5. Officials concerned.


(DEPUTY DIRECTOR (ESTABLISHMENT))

ANNEXURE BI 11

SENIORITY LIST OF MATRIC PASS CLASS IV SERVANTS FOR THE PURPOSE OF PROMOTION DISTRICT HARIPUR.

Sr.No.	Name	Father's Name	Qualification	Date of Passing SSC	Date of Birth	Designation	Date of Appointment	Date of Taking Over Charge	Remarks
1	Ejaz Ahmed	Ailah Baksh	S.S.C	1989	16.03.1968	Laboratory Attendant	14.04.1992	14.04.1992	GDC, K.T.Ship.
2	Muhammad Naveed	Khan Afzal	B.A/B.Ed	1995	17.04.1977	Laboratory Attendant	27.05.1995	27.05.1995	GPGC,Haripur.
3	Wajid Khan	Muhammad Aman Khan	S.S.C	1996	11.10.1975	Laboratory Attendant	03.10.1995	03.10.1995	GPGC,Haripur.
4	Imran Iqbal	Muhammad Iqbal	S.S.C	1996	10.03.1980	Laboratory Attendant	23.11.1998	23.11.1998	GPGC,Haripur.
5	Muhammad Shafique	Abdul Rehman	S.S.C	1993	25.03.1976	Cook	23.11.1998	23.11.1998	GPGC,Haripur.
6	Tahir Mehmood	Shahzada Khan	S.S.C	1993	01.01.1973	Naib Qasid	23.11.1998	23.11.1998	GPGC,Haripur.
7	Muhammad Khurshid	Abdul Rasheed	S.S.C	1991	04.02.1974	Naib Qasid	24.11.1998	24.11.1998	GPGC,Haripur.
8	Muhammad Zahid	Muhammad Maskeen	F.A	1992	15.11.1974	Laboratory Attendant	20.03.1999	20.03.1999	GDC, Khanpur.
9	Tariq Mehmood	Sardar Muhammad Iqbal	S.S.C	1992	01.12.1974	Laboratory Attendant	20.03.1999	20.03.1999	GDC, Khanpur.
10	Ashiq Mehmood	Muhammad Mazloom	S.S.C	1996	03.12.1978	Laboratory Attendant	20.03.1999	20.03.1999	GDC, Khanpur.
11	Muhammad Mursleen	Malik karam Elahi	S.S.C	2002	24.02.1972	Sweeper	20.03.1999	20.03.1999	GDC, Khanpur.
12	Masroor Habib	Khushal Khan	F.A	2002	01.04.1973	Cook	20.03.1999	20.03.1999	GDC, Khanpur.
13	Shams-ur-Rehman	Zakri zaman	F.A	2000	30.05.1984	Bearer	02.04.2005	02.04.2005	GDC, Khanpur.
14	Tariq-ur-Rehman	Khalil-ur-Rehman	S.S.C	1999	31.03.1981	Naib Qasid	08.08.2005	08.08.2005	GGPGC,Haripur.
15	Badar Zaman	Muhammad Iqbal	S.S.C	1991	02.02.1975	Caller	08.08.2005	08.08.2005	GGPGC,Haripur.
16	Rizwan Khan	Ali Asghar Khan	F.A	2003	21.04.1986	Naib Qasid	08.08.2005	08.08.2005	GGPGC,Haripur.
17	Zia-ur-Raj	Abdul Qasim	S.S.C	1994	28.09.1974	Chowkidar	08.08.2005	08.08.2005	GGPGC,Haripur.
18	Shoaib Khan	Iqbal Khan	S.S.C	1998	12.04.1978	Chowkidar	01.10.2005	01.10.2005	GDC, K.T.Ship.
19	Ume Salma	Muhammad Zaman	S.S.C	1988	22.12.1969	Tube Well Operator	01.10.2005	01.10.2005	GDC, K.T.Ship.
20	Muhammad Ishaq	Fareed Muhammad	S.S.C	1994	11.04.1978	Naib Qasid	11.10.2006	11.10.2006	GGDC, K.T.Ship.
21	Ijaz Ahmed	Tariq Javed	S.S.C	2001	10.02.1984	Tube Well Operator	11.10.2006	11.10.2006	GGDC, K.T.Ship.
22	Zahid Ali	Farman Ali	S.S.C	1983	17.08.1965	Mali	11.10.2006	11.10.2006	GGDC, K.T.Ship.
23	Asghar Khan	Muhammad fareed	S.S.C	1985	30.03.1967	Mali	02.11.2006	02.11.2006	Z.A.G.G.D.C,Ghazi.
24	Gul Fareen	Sher Afzal	S.S.C	1993	19.09.1974	Pump Operator	02.11.2006	02.11.2006	Z.A.G.G.D.C,Ghazi.
25	Asima	Mian Khan	S.S.C	1996	06.07.1978	Naib Qasid	02.11.2006	02.11.2006	Z.A.G.G.D.C,Ghazi.
26	Sardar Ali	Amir Dil	S.S.C	1999	01.01.1981	Laboratory Attendant	02.11.2006	02.11.2006	Z.A.G.G.D.C,Ghazi.
27	Imran Hussain Shah	Abdul Rauf Shah	S.S.C	2002	03.05.1985	Chowkidar	02.11.2006	02.11.2006	Z.A.G.G.D.C,Ghazi.
28	Arshad Nawaz	Fazal Din	S.S.C	1999	08.02.1980	Naib Qasid	01.01.2007	01.01.2007	GGPGC,Haripur.
29	Dilshad Khan	Khurshid Khan	S.S.C	1999	05.03.1975	Laboratory Attendant	16.07.2007	16.07.2007	GPGC,Haripur.
30	Saif-ur-Rehman	Fazal Ur Rehman	F.A	1994	13.10.1976	Naib Qasid	06.02.2009	06.02.2009	GGDC, Sarai Saleh.
31	Shahid Mehmood	Allah dad	S.S.C	1999	28.03.1983	Laboratory Attendant	01.10.2009	01.10.2009	GDC, Khanpur.
32	Abdul Waheed	Abdul Rasheed	S.S.C	2001	30.03.1982	Sweeper	01.08.2010	01.08.2010	GPGC,Haripur.
33	Adil Jamil	Jamil-ur-Rehman	S.S.C	2006	15.02.1990	Mali	01.08.2010	01.08.2010	GPGC,Haripur.
34	Amjid Rasheed	Abdul Rasheed	S.S.C	1992	06.05.1976	Naib Qasid	01.02.2011	01.02.2011	GGC,Pharhala.
35	Yasir Ali Chishti	Muhammad Ayaz Shishti	S.S.C	1994	17.01.1978	Driver	03.02.2011	03.02.2011	GPGC,Haripur.
36	Muhammad Latif	Muhammad Saddique	F.A	1994	25.10.1980	Driver	28.07.2011	28.07.2011	GPGC,Haripur.
37	Muhammad Kamran	Muhammad Sultan	S.S.C	1990	09.03.1974	Naib Qasid	18.08.2011	18.08.2011	GDC, Ghazi
38	Amina Bibi	Gul Jabbar	F.A	1992	06.08.1969	Naib Qasid	23.01.2012	23.01.2012	GGC,Pharhala.
						Laboratory Attendant	27.01.2012	27.01.2012	GGPGC,Haripur.

Attested
Principal
Degree College
Haripur

ANNEXURE

12

(C)

To,

Dated: _____

The Director Higher Education,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

SUBJECT: APPEAL AGAINST THE BY-PASSING OF PROMOTION.

Through: Proper Channel.

Sir,

It is stated that I have been serving as Lab Attendant since 14.04.1992 and I placed on the seniority of Matric Pass Class-IV servants at Serial No.1, (Distt.Haripur). According to the order of promotion issued by the directorate of Higher Education on 13.09.2013. Although I am on the No. 1 place in the list, I was ignored and instead my two juniors namely Mr. Mohammad Naveed (S.No.2)GPGC, Haripur and Mr. Wajid Khan(S.No.3) GPGC Haripur have been promoted.

I have therefore right to demand a reconsideration of this order and strongly appeal to remove my grievances by promoting to the post of Junior Clerk.

I hope that my case will take your due attention.

Thanking You,

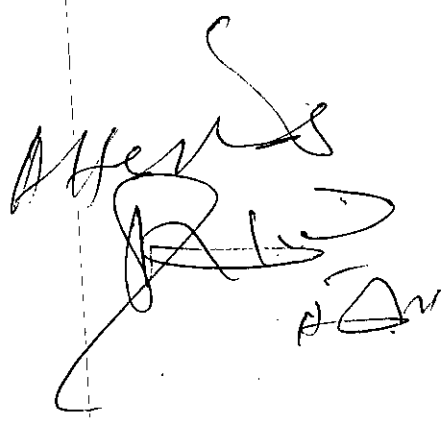
Yours obediently,


(EJAZ AHMED)

Lab. Attendant
Govt. Akhtar Nawaz Khan (S) Degree College
KTS, Haripur.

Encl:

- Copy of Lab. Attendant seniority list.
- Copies of SSC & other documents.
- Copy of order dated 13.09.2013.



AMIR

C-1

(13)



OFFICE OF THE PRINCIPAL

GOVT. AKHTAR NAWAZ KHAN (SHAHEED) DEGREE COLLEGE KTS, HARIPUR

Address: Near Chandni Chowk, Sector No. 1, Khalabat Township, Tehsil & District Haripur

(Ph # 0995-621918)

No. 331

Dated: 03-10-2013

To,

The Director Higher Education,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject:

APPLICATION REGARDING APPEAL AGAINST THE BY PASSING OF PROMOTION EJAZ AHMED (CLASS-IV SERVANTS)

Memo.

It is hereby stated that Mr. Ejaz Ahmed, Lab Attendant of this college has not been promoted as per office order No. 17705-17859 dated 13.9.2013, while juniors to him, Mr. Mohammad Naveed GPGC, Haripur and Mr. Wajid Khan GPGC Haripur have been promoted as Junior Clerk. Sympathetic consideration in this regard is required. The application of Mr. Ejaz Ahmed in original is hereby attached with.

Principal

Govt. Akhtar Nawaz Khan (S) Degree College
KTS, Haripur

Principal

Govt. Akhtar Nawaz Khan (Shaheed)
Degree College Khalabat Township

[Handwritten signatures and initials]

وکالت نامہ

کورٹ فیس
قیمتی

بعدالت جناب _____
KPK سروسز ٹرانسپورٹ سہارو

مخانب _____

اعجاز احمد _____

دعویٰ یا جرم _____
سروسز اپیل

مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی مقام _____

ایڈووکیٹ بدین شرط وکیل مقرر کیا۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص

رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی

پیشی پر مظہر حاضر نہ ہوں۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ

ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقرر اوقات سے پہلے یا بروز

تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز پکھری کے اوقات

کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے

بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب

موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق

کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے

کا ہر قسم کا بیان دینے اور سپروائشی و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعوے کا اختیار ہوگا۔ اور بصورت اپیل و

برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو

بشرط ادا ہوگی علیحدہ پیروی مختار نامہ کرینکا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پیرسٹر

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 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۔ لہذا مختار نامہ لکھ دیا ہے کہ مندر ہے مضمون

مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

10 جنوری مورخہ: 2013ء

Accept

العبد العبد العبد

اعجاز احمد
