

S.No.	Date of order/ proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	09.02.2014	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></p> <p style="text-align: center;">Service Appeal No. 103/2014, Muhammad Afzal Versus Govt of KPK, through Secretary, Elementary & Secondary Education, Peshawar etc.</p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Appellant with counsel, and Mr. Muhammad Jan, GP with Afzal Khan, SDEO for the official respondents present.</p> <p>2. The appellant was serving as PST at GPS Bori Baghri, Shakardara Kohat and was transferred therefrom to GPS No. 1 Sur Gul Shakardara vide impugned order dated 3.10.2013. His departmental appeal dated 09.10.2013 was not responded by the competent authority, hence this appeal.</p> <p>3. Written reply of the respondent department is also available on file.</p> <p>4. Arguments heard and record perused.</p> <p>5. It was submitted by the learned counsel for the appellant that the appellant is PST and he has been transferred far away from his residence/Union Council in violation of Section 3 of the Khyber Pakhtunkhwa (Appointment, Deputation, Promotion, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011. It was further submitted that the impugned order being politically motivated as evident from the impugned order and not justifiable, is</p>


liable to be set aside.

6. Perusal of the entire record would show that no rationalization for the impugned order has been worked out by the respondent-department. Section 3 sub-section (4) of the above law lays down that on passing of one year of the law, all Primary School Teachers should be appointed in their respective Union Councils. There is nothing on record to show as to why this law was not taken into account by the respondent-department at the time of the impugned order. Conspicuously being in conflict with the above law, the Tribunal has no option but to set aside the impugned order. We are also mindful of the precious time of the students, therefore, without out rightly cancellation of the impugned order, we would like to direct the respondent-department to consider transfer of the appellant from the school in his Union Council strictly in accordance with Section 3 of the said law, within a period of one month failing which the impugned order shall automatically stand cancelled. Parties are left to bear their own costs. File be consigned to the record.

7. This order will also dispose of another connected appeal No. 104/2014, Muhammad Khursheed Versus Government of KPK through Secretary Elementary & Secondary Education, Kohat having common question of law and facts, in the same manner.

ANNOUNCED

9.2.2015


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

17.10.2014

Appellant with counsel, and Mr. Muhammad Adeel Butt, AAG with Muhammad Ilyas, SDEO Lachi for the respondents present. Respondents need further time to file reply to application for release of salary. To come up reply/arguments on application on 20.11.2014. Since the appellant has taken over charge at new place of posting, therefore, the respondent-department is directed to release his salary from the date of taking over charge at his new place of posting i.e. 01.9.2014.



MEMBER

20.11.2014

Appellant with counsel and Mr. Muhammad Jan, GP with Musa Hassan, SDEO for the respondents present. The Tribunal is incomplete. To come up for the same on 21.1.2015.


READER

21.01.2015

Appellant with counsel, and Mr. Ziaullah, GP with Muhammad Ilyas, SDEO for the respondents present. Arguments heard. To come up for order on 09.2.2015.



MEMBER



MEMBER

20.6.2014

Appellant in person and Mr. Muhammad Jan, GP with Muhammad Ilyas, ADO for official respondents present and reply filed. Copy handed over to appellant. To come up for arguments on 08.09.2014. Rejoinder, if any, in the meantime.

MEMBER

MEMBER

08.09.2014

Appellant with counsel and Mr. Muhammad Jan, GP with Muhammad Ilyas, SDEO for the respondents present. The learned Member is on leave. To come up for the same on 21.1.2015.

READER

30.09.2014

Appellant with counsel and Mr. Muhammad Adeel Butt, AAG present. Appellant submitted application for release of pay. Notice of application be issued to the respondents for reply/arguments on 17.10.2014.

MEMBER

7.5.2014

Appellant with counsel, Mr. Muhammad Jan, GP with Khursheed Khan, SO, Sajjad Rashid, AD and Abdul Jalil, Assistant for respondents present. Respondents No. 3 and 4 were also summoned personally. Respondent No. 4 in person present. Syed Ihsan Shah, ADO appeared and stated that respondent No.3 informed him telephonically to appear on his behalf because respondent No.3 was busy in other affairs. Salary of respondent No. 3 is attached for not obeying the order of the Tribunal.

Arguments on stay application heard and record perused. Respondent No. 4 stated at the bar that the appellant has been relieved from GPS Bori Saghri, Shakardara by the Headmaster. Therefore, his application for interim relief is rejected. To come up for written reply on main appeal on 20.6.2014. Copy of this order sheet be sent to District Accounts Officer, Kohat and Secretary, E&SE, Khyber Pakhtunkhwa, Peshawar for information and necessary action.

MEMBER

MEMBER

20.05.2014

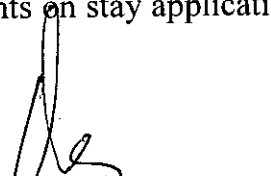
DEO (Male) Kohat appeared in person and requested for requisition of file for to-day. Case file has been requisitioned. He submitted an application for release of salary attached on 7.5.2014 which is placed on file. Application is allowed and salary of DEO (M) Kohat is released. *copy to all concerned.*

MEMBER

31.3.2014


Appellant with counsel, Mr. Ziaullah, GP with Syed Ihsan Shah, ADO and Sajjad Rasheed, AD for the official respondents present and requested for time. None is available on behalf of private respondent No.5. Fresh notice be issued to him through registered post. To come up for written reply on main appeal as well as reply/arguments on stay application on 6.5.2014.

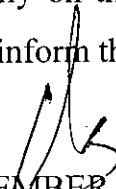

MEMBER

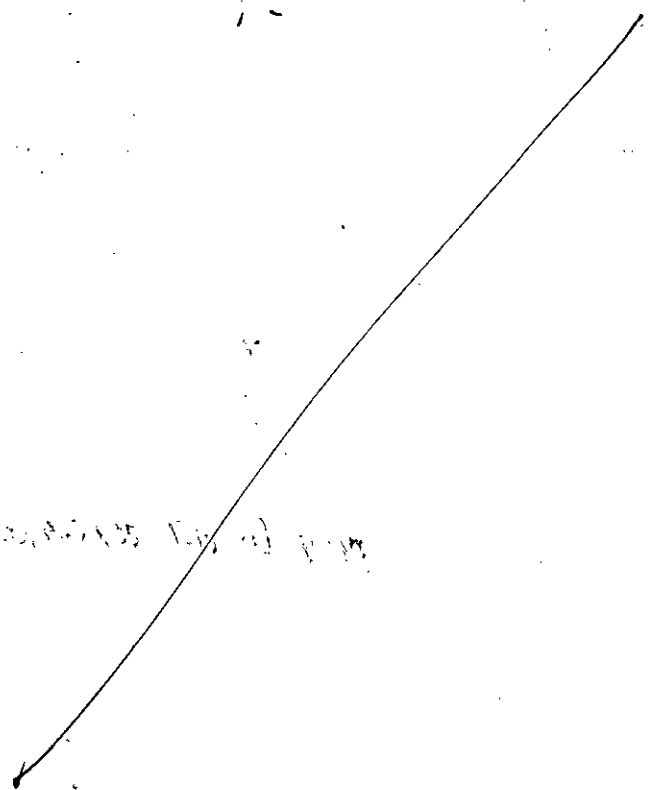

MEMBER

6.5.2014

Appellant with counsel and Mr. Muhammad Jan, GP with Khursheed Khan, SO, Sajjad Rashid, AD and Abdul Jalil, Assistant for the official respondents present and requested for time. None is available on behalf of private respondent No. 5 despite proper service, hence placed ex-parte. To come up for written reply on main appeal as well as reply/arguments on stay application on 7.5.2014. Respondents No. 3 and 4 will attend the Tribunal personally on the date fixed. Mr. Abdul Jalil, Assistant is directed to inform them.


MEMBER


MEMBER



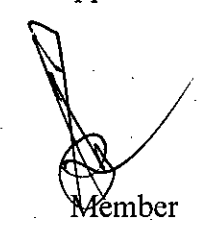
10.02.2014

Appellant in person present and requested for adjournment due to non-availability of his counsel. To come up for preliminary hearing on 04.03.2014.


Member

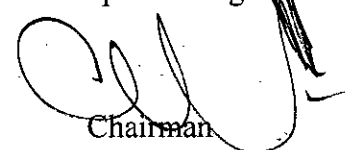
18.02.2014

Appellant with Counsel present and moved an application for early hearing; that the instant appeal fixed for preliminary hearing on 04.03.2014 may be fixed for today. Application is allowed. File requisitioned and preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned transfer order dated 03.10.2013 of the District Education Officer, Kohat, he filed departmental appeal on 05.10.2013, which has not been responded within the statutory period of 90 days, hence the instant appeal on 16.01.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents. Appellant has also filed an application for suspension of the impugned order dated 03.10.2013. Notice of application should also be issued to the respondents for reply/arguments. To come up for written reply on main appeal as well as reply/arguments on application on 31.03.2014.


Member

18.02.2014

This case be put before the Final Bench  for further proceedings.


Chairman

*Appellant deposited
4 process fees Security
Rs. 200/- Bank Receipt
attached with file*

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 103/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	21/01/2014	<p>The appeal of Mr. Muhammad Afzal resubmitted today by Mr. Hassan U.K. Afridi 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	23-1-20/4	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>10-2-20/4</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

The appeal of Mr. Muhammad Afzal PST, GPS Bori Saghri Kohat received today i.e. on 16.01.2014 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of appointment order mentioned in para-1 of the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect, shall also be shown as respondent.
- 3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.

No. 82 /S.T,

Dt. 17/01 /2014.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Hassan U.K. Afridi Adv. Pesh.

I fulfilled all the above mentioned
objections and re submitted the
appeal on - 21-1-2014 -



BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 103 / 2014.

MUHAMMAD AFZAL S/O MUHAMMAD ABBAS KHAN APPELLANT.

VERSUS.

Govt: OF K.P.K. THROUGH SECRETARY ELEMENTARY &
SECONDARY EDUCATION PESHAWAR & OTHERS... .. RESPONDENTS.

I N D E X.

S.No.	Description of documents.	Pages.
1.	Service appeal .	1 - 5
2.	Application for stay.	6- 7
3.	Application for release of salary.	8 - 9
4.	Service case.	10
5.	Transfer order dated 18/1/2012.	11
6.	Transfer order dated 3/10/2013.	12
7.	Departmental appeal, dated 9/1/13.	13
8.	Application, dated 23/9/2013.	14
9.	List of Urban Union Council.	15
10.	C.N.I.C.	16
11.	Postal receipt.	17
12.	Wakalatnama.	18

Muhammad Afzal,
Appellant.

Through:-

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated ? ____/1/2014.

1

BEFORE THE KHMBER PUKHTUN KHAWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 103 /2014.

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[Stamp]
79
16-01-14

Muhammad Afzal Son of Muhammad Abbas Khan, P.S.T.
(BPS-14) Government Primary School Bori Saghri, Shakardara,
Kohat APPELLANT).

VERSUS.

1. Government of K.P.K. through Secretary Elementary & Secondary Education , Peshawar.
2. Director Elementary & Secondary Education ,Peshawar.
3. District Education Officer (Male) Elementary & Secondary Education, Kohat.
4. Sub Divisional Education Officer (Lachi) Elementary & Secondary Education, Kohat **[Stamp]**
5. Shafiq ur Rahman ,PST, (Teacher) Govt: primary school, soor gul, shakardara, Kohat..... RESPONDENTS.

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APPEAL U/S 4 OF THE K.P.K. SERVICE TRIBUNAL
ACT, 1974, AGAINST THE IMPUGNED ORDER OF TRANSFER
No. 7101-4 DATED 3/10/2013 WHILE THE DEPARTMENTAL
APPEAL FILED BY THE APPELLANT ON 9/10/2013, (REGISTRY)
HAS NO RESPONSE / REPLY.

[Stamp]
16/1/2014

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PRAYER IN APPEAL: On acceptance of this appeal , the
impugned order dated 3/10/2013, PASSED by the
Respondent No. 3, on the proposal of Respondent No.4
may kindly be set-aside and Respondents may kindly be

directed to remain the appellant on duty in Govt: primary School Bori Saghri, Shakardara Kohat, or posted the appellant to his nearer Union Council School.

Any other relief which this Hon'ble Tribunal may deem fit / Proper for the safe administration of justice..

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RESPECTFULLY SHEWETH:-

1. That the appellant was appointed as P.T.C. Teacher in Education Department on 10/10/1988. (Copy of the *Service Card* attached).
2. That from the date of appointment , the appellant performed his duties well and to the entire satisfaction of the superiors.
3. That the appellant was transfer from Government Primary School Dervezi Banda to Government Primary School Bori Saghri on 18/01/2012. (Copy of order is attached).
4. That the appellant again transferred from Government Primary School Bori Saghra to Government Primary School Soor Gul No.1, on 3/10/2013.

5. That the appellant aggrieved from the transfer order dated 3/10/2013 , filed an departmental appeal on 9/10/2013, which has not been responded, hence this service appeal on the following amongst the other :-

G R O U N D S:-


- A). That the impugned order vide dated 3/10/2013, is against law, facts and justice and is liable to be set-aside.
- B). That the appellant has not been dealt in accordance with law and Rules.
- C). That transfer order of the appellant dated 3/10/2013, is based on malafide intention , hence not tenable.
- D). That the appellant has been transferred from Government Primary School Dervizi Banda to Government Primary School Bori Saghri on 18/1/2012, and after about 8 months the appellant again been transferred from Government primary School Bori Saghri to Government Primary School Soor Gul No.1 on 3/10/2013.
- E). That according to the policy of Provincial Government, the appellant must be posted in a School of his own Union Council , or nearer to his Union Council , but the Appellant has been transferred to the Gvt: Primary School Soor Gul No.1 , which is about 67 K.M. away from his Union Council , while Govt: Primary School Bori Saghra

is only 05 K.M. away from his Union Council.

- F). That the appellant has a legal right to be posted in a School of his Union Council , or nearer to his Union Council.
- G). That some other grounds may be adduced at the time of arguments with the permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned order dated 3/10/2013 passed by the Respondent No.3, on the proposal of Respondent No. 4, may kindly be set-aside and respondents may kindly be directed to remain the appellant on duty in Government Primary School Bori Saghri, Shakardara Kohat, or posted the appellant to his nearer Union Council School.

Any other relief which this Honourable Tribunal may deem fit/ Proper for the safe administration of justice.


Muhammad Afzal,
Appellant.

Through:-

Dated :- 16 /1/2014.

(HASSAN U.K. ARRIDI)
Advocate High Court,
Peshawar.

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR.

IN RE: SERVICE APPEAL NO. _____ / 2014.

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Muhammad Afzal Versus... Govt: of KPK, through Secretary
Elementary & Secondary Education.

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A F F I D A V I T.

I, Muhammad Afzal son of Muhammad Abbas Khan
P.S.T Govt: Primary School Borisaghra ,Kohat,
do hereby solemnly affirm and declare on Oath
that the contents of the accompanying appeal
are true and correct to the best of my knowledge
and belief and that nothing has been concealed
from this Hon'ble Tribunal.

DEPONENT.



BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL,

PESHAWAR.

C.M. NO. _____ / 2014.

IN

Service Appeal No. _____ / 2014.

=====

Muhammad Afzal Son of Muhammad Abbas Khan ... Applicant/
Appellant.

VERSUS.

Government of K.P.K. through Secretary Elementary
& Secondary Education Peshawar & others..... Respondents.

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APPLICATION FOR THE SUSPENSION OF THE IMPUGNED
ORDER DATED 3/10/2013, TILL THE FINAL DECISION OF
THE INSTANT SERVICE APPEAL.

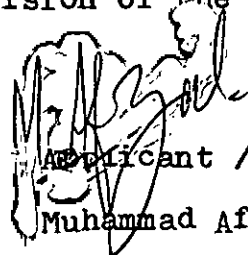
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RESPECTFULLY SHEWETH:

1. That the appellant filed the above noted Service appeal alongwith this application which has sufficient chances to succeed.
2. That the appellant has good prima facie case in his favour , as the same is on very strong grounds.
3. That the balance of convenience is also lies in favour of the applicant/ Appellant.
4. That if the impugned transfer order has not been suspended, then the appellant will suffer an irreparable loss.

5. That the grounds of appeal may please be considered as integral part of this application.

It is, therefore, most humbly prayed that on acceptance of this application, the impugned transfer order dated 3/10/2013, of the appellant may please be suspended till the final decision of the main Service appeal.



Applicant / Appellant
Muhammad Afzal,

Through:-

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated : ___/1/2014.

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A F F I D A V I T.

I, Muhammad Afzal son of Muhammad Abbas Khan,
P.S.T Teach Govt; Primary School, Bari saghra Kohat,
do hereby solemnly affirm and declare on Oath that
the contents of this application are true and correct
to the best of my knowledge and belief and that nothing
has been concealed from this Hon'ble Tribunal.

DEPONENT.



8

BEFORE THE KHYBER PUKHTUN KHAWA SERVICE TRIBUNAL,

PESHAWAR.

C.M. NO. _____ / 2014.

IN

Service Appeal No. _____ / 2014.

=====

Muhammad Afzal Son of Muhammad Abbas Khan Applicant/
Appellant.

VERSUS.

Government of K.P.K. through Secretary Elementary,
& Secondary Education ,Peshawar & others..... . Respondents.

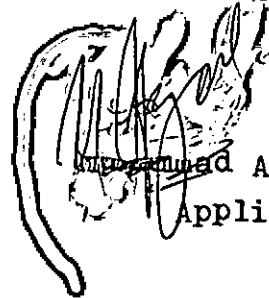
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APPLICATION FOR RELEASE OF SALARY OF THE APPELLANT.

RESPECTFULLY SHEWETH:

1. That the Service appeal and application for suspension of the impugned order dated 3/10/2013, also filed with this application , which has sufficient chances to succeed.
2. That the Salary of the appellant / Applicant has been stoped since October,2013, which is against law and rules.
3. That there is no law / rules available in the fiãld on the basis of which the salary of the appellant might be stopped.
4. That some other grounds may be adduced at the time of hearing of this appeal with the permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application the salary of the applicant/ appellatant may kindly be released which has been stopped since October, 2013.


Muhammad Afzal,
Applicant,

Through:-

(HASSAN U.K.AFRIDI)
Advocate High Court,
Peshawar.

Dated : _____/1/2014.

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A F F I D A V I T.

I, Muhammad Afzal son of Muhammad Abbas Khan
PST, Teacher, Govt; Primary school Bori saghra, Kohat
do hereby solemnly affirm and declare on Oath that
the contents of this application are true and correct
to the best of my knowledge and belief and that nothing
has been concealed from this Hon'ble Tribunal.

DEPONENT.


OFFICE OF THE DEPUTY DISTRICT OFFICER (E&S) EDU. (M) LACHI

TRANSFER ORDER.

Consequent upon the approval of the competent authority,
Mr. Muhammad Afzal PST GPS Dervezi Banda (S/Dara) is hereby transferred to
GPS Bori Saghri on his own pay and grade in the interest of public with immediate
effect.

Note: Charge report should be submitted to all concerned.

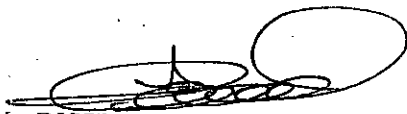
(NAZEER KHAN)
EXECUTIVE: DISTRICT OFFICER
(E&S) EDU: KOHAT.

Endst: No. 1029-30

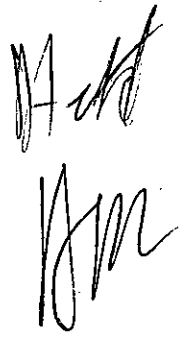
Dated Lachi the 18/01/2012

Copy of the above is forwarded to:

1. District Accounts Officer Kohat.
2. Head Teachers concerned.


DY: DISTRICT OFFICER (M)
(E&S) EDU: (M)
Lachi Tehsil

First order



19

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) KOHAT

TRANSFER

Consequent upon the approval of the competent authority, as per proposed by SDEO(M) Lachi the following PST are hereby transferred on their own pay and grade in the interest of public service, their name & school name noted against each

No TA/DA is allowed

Charge report should be submitted to all concerned

#	Name & Designation	From	To	Remarks
1	Shafiq ur Rehman PST	GPS No.1 Sur Gul	GPS Bori Saghri	VS No.2
2	Muhammad Afzal PST	GPS Bori Saghri	GPS No.1 Sur Gul	VS No.1
3	Nadir Perveez, PST	GPS Dh:Khajab Gul	GPS No.2 Chorlaki No.2	VS No.4
4	Akhtar Zaman PST	GPS No.2 Chorlaki	GS Dh:Khajab Gul	VS No.3
5	Ja'il Ur Rehman PST	GPS Salim Abad	GPS Spinki Killa	VS No.6
6	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VS No.5
7	Muhammad Tariq, PST	GPS Sudai	GPS Kirosam	Need Basis
8	Yousaf Khan, PST	GPS Shawaki	GPS No.3 S/Dara	VS No.9
9	Akhtar Hussain, PST	GPS No.3 S/Dara	GPS Shawaki	VS No.8
10	Zahoor ur Rehman PST	GPS Paloosi Banda	GPS No.1 S/Dara	VS No.11
11	Akhtar Zaman PST	GPS No.1 S/Dara	GPS Paloosi Banda	VS No.10
12	M. Sadiq ur Rehman PST	GPS Muslim Abad No.1	GPS No.2 Chorlaki	VS No.13
13	Surat Shah PST	GPS No.2 Chorlaki	GPS No.1 Muslim Abad	VS No.12

(ZAHID RASHID)
DISTRICT EDUCATION OFFICER
(MALE) KOHAT

Endst. No. 2101-4 dated 31/10/2013

Copy to the:-

1. District Accounts Officer Kohat
2. SDEO (M) Kohat & Lachi with the proposal of both SDEOs
3. ASDEO Circle Concerned
4. Head Teacher concerned

31/10/13
DY DISTRICT EDUCATION OFFICER
(MALE) KOHAT

ضابطہ

عنوان - درخواست سلسلہ سنیونی تبادلوں (اپیل)

گزارش ہے کہ درخواست دہندہ محمد افضل دہری بڑی ساغری میں غرض انجام دے رہا تھا۔
 حال ہی میں مجھے دہری بڑی ساغری سے دہری سوہیل پرا میں ٹرانسفر
 کیا گیا ہے۔ اس سے پہلے شکرہ سے آؤٹ کسٹیشن سکول میں
 کمال کا عہدہ گزار چکا ہوں۔ ضابطہ ذیل گزارشات ہیں۔
 ① ضابطہ! ایسا عہدہ درجہ سے عارضہ قلب میں مبتلا ہے اسے بر وقت
 عہدہ کی ضرورت ہے۔ میں مجھے بر وقت ٹرانسفر میں حاضر رہنا پڑتا ہے کیونکہ
 یہ سب کچھ ایسا ضروری ہے کہ اسے بر وقت ہسپتال پہنچانے
 (کا عہدہ سنبھال رہا ہے)

② ضابطہ! مجھے دہری بڑی ساغری سے دہری سوہیل ٹرانسفر کیا گیا
 ہے جہاں اسے سکول میں دہری سوہیل سے دہری بڑی ساغری کو Need Basis
 پر دہری بڑی ساغری کیا گیا ہے۔ جب کہ دہری بڑی ساغری میں
 ایک مدرسہ ضرورت تھی تو مجھے ٹرانسفر کرانا نا انصافی ہے

③ ضابطہ! درخواست دہندہ یونین کونسل اینڈ منگرو کارپوریشن میں ہے
 جبکہ یہ درخواست دی تھی کہ مجھے ایسی یونین کونسل میں ایڈجسٹ کیا جائے
 باوجود اس کے مجھے یونین کونسل جہاں کوئی سکول نہیں ٹرانسفر کیا گیا۔

ضابطہ! یہ درجہ گزارش کے لیے ہے کہ اس درخواست پر منظر
 کی جائے تاکہ مجھے انصاف مل جائے

نور محمد دہری

05/2013

محمد افضل

محمد افضل
 دہری بڑی ساغری
 یونین کونسل
 جہاں کوئی سکول نہیں ٹرانسفر کیا گیا

محمد افضل

دہری

درخواست حقیقت پر مبنی ہے
 محمد افضل
 Dasp No 100
 5/10/13

محفوظ صاحب ڈسٹرکٹ انچارج ایجوکیشن اور صاحب سرکار ڈسٹرکٹ ایجوکیشن
بوساٹ (M) P SDEO (M) P ضلع بجای

درخواست نامہ تیار (بمطابق آرڈر 03 مرفی اسکول)

گزارش ہے کہ درخواست دہندہ PST اور افضل صاحب شکرہ GPS
بڑی ساگری میں خزانہ ختم کر رہا ہے۔ درخواست دہندہ نے
25 سال سرکل out station (GPS چیمپ، GPS مسلم آباد،
GPS دروڑی بانڈہ اور GPS بڑی ساگری) میں خزانہ دیا گیا ہے
اور اب نو 2012ء سے GPS بڑی ساگری میں خزانہ ختم کر
رہا ہے۔

درخواست دہندہ کا بنیا عہدہ دروڑ سے عارضہ قلب میں مبتلا ہے
اور اس کا علاج جاری ہے۔ علاج و معالجہ کی تمام تر
ذمہ داریاں پڑھنے ہیں۔ اگر کوئی فرد میں عہدہ رکھتا
اس ضمن میں مذکورہ تکلیف کو مد نظر رکھتے ہوئے قبضے درخواست گزاروں
کہ جے مذکورہ ذیل سکولوں میں کسی اور سکول میں ٹرانسفر کیا جائے۔

Handwritten signature

1. GPS شکرہ
2. GPS شکرہ
ظہور آباد 87
3/9/2013

آئیے سے ضلع۔ اس ضمن میں ان دو سکولوں میں سے کسی
ایک سکول میں ٹرانسفر کرانیں گے کیونکہ ان میں خزانہ ختم کرنے کے
ساتھ ساتھ سر حقت عہدہ کے عوض سے پتہ سال بھیج سکتا ہوں۔
نوٹ۔ متعلقہ کالڈاٹ مستند ہیں

19/9/2013

Handwritten signature and date 19.9.2013
PST اور افضل صاحب شکرہ GPS بڑی ساگری
District Education Officer
District Office
District Education Officer
District Office

16

سلسلہ نمبر	گھرانہ نمبر	م	والد کا نام	قومی شناختی کارڈ نمبر	عمر
165	54		خان گل	14301-1930106-3	43
166	55		انتہار خان	14301-4331536-9	57
167	56		انتہار خان	14301-2021677-5	64
168	56		کامی اللہ خان	14301-4399267-3	28
169	57		گل باز خان مرحوم	14301-2006144-7	54
170	58		محمد عثمان	14301-2065874-7	37
171	59		نور شاہ گل	14301-7050981-5	27
172	60		گل بیت خان	14301-8276353-7	58
173	60		فتح خان مرحوم	14301-6866521-1	57
174	60		محمد یوسف	14301-9294799-7	28
175	60		رب نواز	14301-8705598-9	27
176	60		رب نواز	14301-7204538-9	23
177	60-A		غلام سرور خان	14301-9426597-1	78
178	60-A		محمد عباس خان	14301-3287315-1	47
179	60-A		محمد عباس خان	14301-1947205-1	42
180	61		ہیش گل	14301-2983802-1	71
181	61		فتح گل	14301-7225877-9	48
182	61		علی محمد	14301-4362217-7	43
183	61		محمد شیر	14301-2005447-1	32
184	61		محمد شیر	14301-1107248-5	28
185	61		محمد شیر	14301-2031795-9	28
186	61		علی محمد	14301-3994151-1	27
187	62		رشید گل خان	14301-3574481-1	30
188	63		محمد گل مرحوم	14301-2033346-7	65
189	63		سرسلین خان	14301-1929505-5	33
190	64A		فضل حسین	61101-7081227-5	62
191	64A		منظور حسین خٹک	61101-2353542-9	29
192	64A		منظور حسین	61101-5212445-7	24

دوبن نوسل

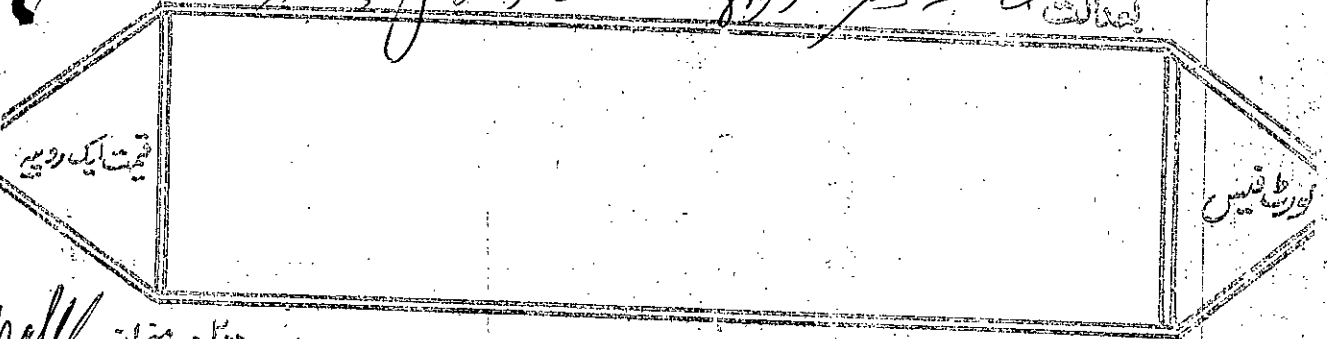
5155

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50000005

منظور حسین خٹک

بیم گورنمنٹ سٹار



Appell

مقدمہ
مقدمہ
دعوے
جہم

Service Appeal

باعث تحریر آگے

مقدمہ مقدمہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی کی کارروائی متعلقہ آگے مقام کے لئے
حسن۔ یو کے۔ آر۔ ۱۲ میں رٹس سٹار دی گئی ہے۔
مقررہ کر کے اقرار کیا جاتا ہے کہ صاحبہ موصوف کو مقدمہ کی کل کارروائی کا اختیار ہوگا۔ فیرو کیل صاحبہ کو کرتے راجھی نامہ و تقریر ثالث
و فیصلہ بر حلف دینے پر اب وہی اور ایصال دعویٰ اور بصورت مقررہ کی گئی ہے۔ ایسا اور و صولی چیک در روپیہ اور سرخی دعویٰ
اور درخواست ہر قسم کی تسلیق و اس پر دستخط کرنے کا اختیار ہوگا۔ فیرو بصورت عدم پیروی یا کوگری یا کٹرفہ یا اپیل کی برآمدگی
یا بعد منسوخی و نیز دائر کرنے اپیل منگوانی نظر ثانی و پیروی کرتے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور سے کل یا اپنی بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقررہ کا کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہونگے۔ اور اس کا ساتھ پر راجھی منظور و قبول
ہوگا۔ دوران مقدمہ میں جو خرچہ و ہر جامہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق کیا صاحب موصوف ہونگے فیرو لقا یا
خرچہ کی وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دروہ پر ہو یا حد سے باہر ہو و کل صاحب یا بندہ ہوں گے۔ کم
پیروی مذکور کریں۔ لٹرا و کات نامہ لکھ دیا کہ سندر ہے۔

ماہ
المرقوم

Receipt

Appell

محمد افضل

۱۳/۱۱/۲۰۱۵

Appell

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR.

=====

C.M. No. _____ / 2014.

IN

Service Appeal No. _____ / 2014.

=====

Muhammad Afzal Versus. Govt; of K.P.K. through secretary
E & SE) Peshawar & others.

=====

APPLICATION FOR HEARING OF THE ABOVE TITLED
CASE FOR TODAY OR TOMORROW.

=====

RESPECTFULLY SHEWETH:

1. That the above titled case has been fixed before this Honourable Tribunal on 4/3/2014.
2. That the appellant has been relieved on 31/10/2013 and the appellant has not been taken charge in the school, where he has been transferred illegally.
3. That the appellant has been performing his duties.
4. That the respondents have been taken ^{disciplinary} disciplinary action against the appellant.
5. That the stay application has been filed with the appeal.

It is, therefore, humbly prayed that on acceptance of this application, the above titled appeal ^{stay application} may kindly be heard today or tomorrow.

through:-

Appellant,

(HASSAN U.K. AFRIDI)
Advocate High Court,
Peshawar.

Dated : 18/2/2014.

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR.

C.M. No. _____ / 2014

IN

Service Appeal No. _____ / 2014.

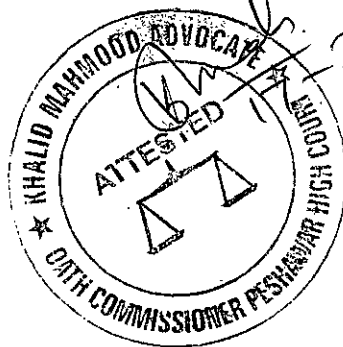
=====

Muhammad Afzal Versus.. Govt: of KPK, through secretaty
(E & SE) Peshawar & others.

=====

A F F I D A V I T.

I, Muhammad Afzal S/O Muhammad Abbas Khan R/O
Shakardara, Tehsil Lachi District Kohat, appellant
do hereby solemnly affirm and declare on Oath that the
contents of the accompanying application are true and
correct to the best of my knowledge and belief and that
nothing has been concealed from this Hon'ble Court.



Deponent.

M. Afzal
(MUHAMMAD AFZAL)

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL, PESHAWAR.

C.M. No. _____ / 2014.

IN

Service Appeal No. _____ / 2014.

Muhammad Afzal Versus. Govt; of K.P.K. through secretary
E & SE) Peshawar & others.

APPLICATION FOR HEARING OF THE ABOVE TITLED
CASE FOR TODAY OR TOMORROW.

RESPECTFULLY SHEWETH:

1. That the above titled case has been fixed before this Honourable Tribunal on 4/3/2014.
2. That the appellant has been relieved on 31/10/2013 and the appellant has not been taken charge in the school, where he has been transferred illegally.
3. That the appellant has been performing his duties.
4. That the respondents have been taken disciplinary action against the appellant.
5. That the stay application has been filed with the appeal.

It is, therefore, humbly prayed that on acceptance of this application, the above titled appeal may kindly be heard today or tomorrow.

Through:-

Dated : 17/2/2014.

Appellant,
(HASSAN U.R. AFRIDI)
Advocate High Court,
Peshawar.

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) PRIMARY CIRCLE LACHI (KOHAT).

NO. 1291 /

Dated 28 / 8 / 2013.

To

The District Education Officer,
(Male) Kohat.

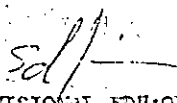
Subject:

TRANSFER/PROPOSAL

Reference:

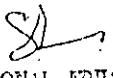
It is stated for your kind information that honorable Dy:Speaker Mr. Inayatullah have sent transfer proposal of PST teachers BPS. 12, BPS. 14 & 15 working under the control of this office for further adjustment in the schools noted against each individual. As your good aware of the fact that proposal for adjustment in BPS. 12, BPS. 14 & 15 have already been sent to your office for further necessary action.

The present list conveyed by above name Dignitary has also been submitted for consideration as he is pressing very hard for issuing adjustment order with the indulgence of such order does not fall under the competency of this Sub Division with out our your good consent. The original proposal list of transfer recommended by Honourable Dy:Speaker KPK are enclosed herewith for further n/a please.


SUB DIVISIONAL EDUCATION OFFICER
(MALE) PRIMARY CIRCLE LACHI (KOHAT).

Existing: 1292 /

Copy forwarded to the Dy:Speaker KPK for further information please.


SUB DIVISIONAL EDUCATION OFFICER
(MALE) PRIMARY CIRCLE LACHI (KOHAT).

PLR Page

The following PST teachers BPS-14 are hereby proposed for adjustment on dire need basis on the recommendation of Hon: Halq MPA are put up for further perusal and order please

Sl No	Name & Designation	From	To	Remarks
1	Muhammad Shafiq PST	GPS No.1 Sur Gul	GPS Bori Saghri	VS No.2
2	Muhammad Afzal PST	GPS Bori Saghri	GPS No.1 Sur Gul	VS No.1
3	Nasir Perveez, PST	GPS Dh:Khajab Gul	GPS No.2 Chorlaki No.2	VS No.4
4	Akhtar Zaman PST	GPS No 2 Chorlaki	GS Dh:Khajab Gul	VS No.3
5	Jalil Ur Rehman PST	GPS Salim Abad	GPS Spinki Killa	VS No.6
6	Shahid Anwar PST	GPS Spinki Killa	GPS Salim Abad	VS No.5
7	Muhammad Tariq, PST	GPS Sudal	GPS Kitosam	Need Basis
8	Yousaf Khan, PST	GPS Shawaki	GPS No.3 S/Dara	VS No.9
9	Ahmar Hussain, PST	GPS No.3 S/Dara	GPS Shawaki	VS No.8
10	Arifur Rahman, PST	GPS Inzerwala	GPS Lachi Bala	Need Basis
11	M. Oasir PST	GPS Banda Fetha Khan	GPS Lachi Pawan	Need Basis

SDEO(M) Lachi

D/Asst.

BEFORE THE KHYBER PUKHTUNKHAWA SERVICE TRIBUNAL,
PESHAWAR.

C.M. No. _____ / 2014

IN

Service Appeal No. _____ / 2014.

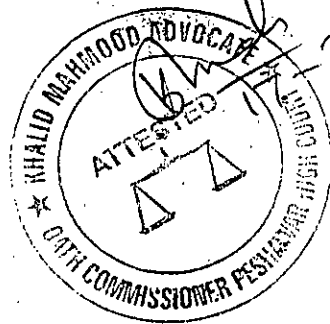
Muhammad Afzal Versus.. Govt: of KPK, through secretaty
(E & SE) Peshawar & others.

A F F I D A V I T.

I, Muhammad Afzal S/O Muhammad Abbas Khan R/O
Shakardara, Tehsil Lachi District Kohat, appellant
do hereby solemnly affirm and declare on Oath that the
contents of the accompanying application are true and
correct to the best of my knowledge and belief and that
nothing has been concealed from this Hon'ble Court.

Deponent.

(MUHAMMAD AFZAL)



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

No. 725-26 /ST,

Dated 13/05 /2014

To:


1. The District Accounts Officer,
District, Kohat.
2. The Secretary,
Government of Khyber Pakhtunkhwa,
E&SE, Peshawar.

Subject:- SERVICE APPEAL NO. 103/2014, MUHAMMAD AFZAL AND SERVICE APPEAL NO. 104/2014, MUHAMMAD KHURSHEED VERSUS GOVERNMENT OF KPK THROUGH SECRETARY E&SE, AND OTHERS.

I am directed to say that the above mentioned service appeals were fixed before the learned Member's Bench on 7.5.2014. On the same date, the learned Bench passed the following order which is sent for further necessary action:-

"Appellant with counsel, Mr. Muhammad Jan, GP with Khursheed Khan, SO, Sajjad Rashid, AD and Abdul Jalil, Assistant for respondents present. Respondent NO. 3 and 4 were also summoned personally. Respondent No. 4 in person present. Syed Ihsan Shah ADO appeared and stated that respondent No. 3 informed him telephonically to appear on his behalf because respondent No. 3 was busy in other affairs. Salary of respondent No. 3 is attached for not obeying the order of the Tribunal.

Arguments on stay application heard and record perused. Respondent No. 4 stated at the bar that the appellant has been relieved from GPS Bori Saghri, Shakardara by the Headmaster. Therefore, his application for interim relief is rejected. To come up for written reply on main appeal on 20.6.2014. Copy of this order sheet be sent to District Accounts Officer, Kohat and Secretary, E&SE, Khyber Pakhtunkhwa, Peshawar for information and necessary action". Sd/- Member Sd/- Member.


REGISTRAR,
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Before the, Wajid Hussain Khan, Senior Tribunal
Bench II (Kohat)

Title: Muhammad Azzal vs vs DEO etc.
Muhammad Khurshid

Application for release of salary
Attached with order dated 7/5/2014

Respectfully Submitted

- 1, That the above titled appeals are pending before this honorable Tribunal wherein salary of the Distt Edu. officer has been attached
 - 2, that the present respondent could not attend the Tribunal on the last date of hearing due to official exigencies.
 - 3, That reply in respondent hereby undertakes that in future every order of the Tribunal will be complied with in letter and spirit.
- It is requested that salary of reply in respondent may be very graciously released in the above titled appeals.

Affidavit
I swear on oath that in every order of the Tribunal in letter & spirit.

I am
DEO Kohat.



I am
DEO Kohat
20/5/2014

File may be recalled
to day and the
request may be made to
the Deo Kohat
20/5/14

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

No. 779-80 /ST,

Dated 22-5 /2014

To:


1. The District Accounts Officer,
Kohat.
2. The Secretary, E&SE,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject:- SERVICE APPEAL NO. 103/2014 MUHAMMAD AFZA, &
SERVICE APPEAL NO. 104/2014, MUHAMMAD KHURSHEED
VS. GOVT. OF KHYBER PAKHTUNKHWA THR.
SECRETARY, E&SE, PESHAWAR ETC.

I am directed to say that on 20.5.2014, the learned Member of this Tribunal has passed the following order, which is sent for further necessary action:-

“DEO (Male) Kohat appeared in person and requested for requisition of file for to-day. Case file has been requisitioned. He submitted an application for release of salary attached on 7.5.2014 which is placed on file. Application is allowed and salary of DEO(M) Kohat is released. Copy to all concerned.

Sd/-Member.”


REGISTRAR,
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No. 103/2014

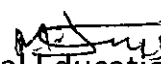
Mr. Muhammad Afzal S/o Muhammad Abbas Khan, PST/PTC Teacher Govt Primary School Bori Saghri Shakardara Kohat..... Appellant.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director (E&SE) department Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Kohat.
4. Sub Divisional Education Officer (Lachi) Elementary & Secondary Eduaction Kohat..... Respondents.

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Affidavit		1
2	Para wise comments signed by Secretary, Director, DEO(M) Kohat and SDEO (M) PRY.LACHI		2-3
3	Para wise comments vetted by Govt. Pleeder.		4-5


Sub Divisional Education Officer
(Male) Primary Lachi Kohat

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No. 103/2014

Mr. Muhammad Afzal S/o Muhammad Abbas Khan. PST/PTC Teacher Govt Primary School Bori Saghri Shakardara Kohat..... Appellant.

VERSUS

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Director (E&SE) department Khyber Pakhtunkhwa Peshawar.
- 3. District Education Officer (Male) Kohat.
- 4. Sub Divisional Education Officer (Lachi) Elementary & Secondary Eduaction Kohat..... Respondents.

AFFIDAVIT

I Muhammd Ilyas Khan SDEO (M) Primary Tehsil Lachi (Kohat) do hereby solemnly affirm and declare on oath that the contents of the accompanying Para Wise Comments on behalf of respondent No.1 are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Tribunal.

M. Ilyas

DEPONENT

CNIC No. 14202-1324299-7

Sub: Divisional
Edu: Officer (Male)
Lachi

(2)

25

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No. 103/2014

Mr. Muhammad Afzal S/o Muhammad Abbas Khan. PST/PTC Teacher Govt Primary School Bori Saghri Shakardara Kohat..... Appellant.

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Director (E&SE) department Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Male) Kohat.
4. Sub Divisional Education Officer (Lachi) Elementary & Secondary Eduaction Kohat..... Respondents.

REPLY ON BEHALF OF RESPONDENT.

PRELIMINARY OBJECTIONS:

1. That the appellant has got no cause of action/locus standi to file the present appeal.
2. That the appellant has not come to the honorable service tribunal with clean hands.
3. That the appellant has suppressed/concealed material facts from the honorable service tribunal.
4. That the appeal is barred by time.
5. That the present appeal is bad in its present form, hence not maintainable and liable to be dismissed with cost.

Facts

1. Pertains to record.
2. Subject to proof.
3. Pertains to record.
4. Pertains to record.
5. Transfer is the part of service, it is obligatory upon Govt. servants to serve anywhere.

Grounds.

- a) Incorrect, the impugned order is according to law, justice and facts and liable to be upheld.
- b) Incorrect, the order is issued within the purview of law.

- c) Incorrect, the appellant being a Govt. Servant is supposed to serve anywhere his service is required in the best interest of public service.
- d) The appellant being a Govt. Servant is supposed to serve anywhere his service is required in the best interest of public service.
- e) As replied in para "D".
- f) Incorrect, no right of appellant is violated rather he is treated according to law.
- g) The respondent seek permission to this tribunal to raise additional grounds at the time of arguments.

It is therefore humble prayed that on acceptance of this reply instant appeal may very kindly be dismissed with cost.

Sub Divisional Education Officer,
(Male) Primary Lachi Kohat.

District Education Officer
(Male) Kohat.

Director,
Elementary & Secondary Education,
Khyber Pakhtoon Khwa.

Secretary,
Elementary & Secondary Education,
Khyber Pakhtoon Khwa.

BEFORE THE HON'ABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Appeal No. 103/2014

Mr. Muhammad Afzal S/o Muhammad Abbas Khan. PST/PTC Teacher Govt Primary School Bori Saghri Shakardara Kohat..... (Appellant)

VERSUS

- 1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. Director (E&SE) department Khyber Pakhtunkhwa Peshawar.
- 3. District Education Officer (Male) Kohat.
- 4. Sub Divisional Education Officer (Lachi) Elementary & Secondary Eduaction Kohat.....(Respondents)

REPLY ON BEHALF OF RESPONDENT.

PRELIMINARY OBJECTIONS:

- 1. That the appellant has got no cause of action/locus standi to file the present appeal.
- 2. That the appellant has not come to the honorable service tribunal with clean hands.
- 3. That the appellant has suppressed/concealed material facts from the honorable service tribunal.
- 4. That the appeal is barred by time.
- 5. That the present appeal is bad in its present form, hence not maintainable and liable to be dismissed with cost.

Facts

- 1. Correct. *Pertains to record.*
- 2. Correct. *subject to proof.*
- 3. Correct. *Pertains to record.*
- 4. Correct. *Pertains to record.*
- 5. Transfer is the part of service, it is obligatory upon Govt. servants *to serve anywhere.* is to be served ~~anywhere~~ his services are required.

Grounds.

- a) Incorrect. *The impugned order is according to law, justice and facts and liable to be upheld.*
- b) Incorrect, the order is issued within the purview of law.

5

- c) Incorrect, the appellant being a Govt. Servant suppose to be serve anywhere his service is required in the best interest of public service,
- d) The appellant being a Govt. Servant suppose to serve anywhere his service is required in the best interest of public service.
- e) May be dealt with para "B". As replied in para D
- f) May be dealt with para "D". Incorrect. no right of the appellant is violated rather she is treated according to law.

"G": The respondent seek permission of this Tribunal to raise additional grounds at the time of arguments.

It is therefore humbly prayed that on acceptance of this reply instant appeal may very kindly be dismissed with cost.

[Signature]
 District Education Officer
 (Male) Kohat.

[Signature]
 Sub Divisional Education Officer.
 (Male) Primary Lachi (Kohat).
[Signature]

CPI
 pe. vet.
[Signature] 6/5/14

well's subject to correction,
 attachment of all annex, affidavit,
 and approval of S.G.P.
 The respondent is also directed to submit
 reply to application.

[Signature]
 6/5/2014
 Govt. Pleader
 Khyber Pakhtoon Khwa
 Svc: Tribunal Peshawar

Approved
[Signature]

BEFORE THE SERVICE TRIBUNAL, K.P.K. PESHAWAR.

service appeal No. 103/2014

Muhammad AfzalVersus Government of KPK etc.

RE-JOINDER ON BEHALF OF APPELLANT.

Respectfully sheweth:

PRELIMINARY OBJECTIONS.

That all the preliminary objections are incorrect and have no nexus with the present appeal and irrelevant.

FACTS

1. No need of reply.
2. No need of reply.
3. No need of reply.
4. That para-4 is incorrect to the extent that transfer is a part of service, but transfer order must be made in accordance with law and prevailing policy.
5. That para-5 is correct to the extent that government servant can be transferred anywhere, subject to rules, regulations and policies announced by the Government.

GROUNDS

- a) Incorrect, the impugned order is against law.
- b) Incorrect.
- c) Incorrect. Reply already been given in para-5.
- d) Reply already been given in para NO.5
- e) No need of reply.
- f) Incorrect.
- g) No need of reply.

*Rejoinder received
14-07-14
JIC office*

It is, therefore, prayed that on acceptance of this re-joinder, the appellant may please be ordered to remain on duty in government primary school Bori saghri shakkardara, or posted in nearer to his union council school.

Appellant

through

(Hassan U. Z. Afridi)
Advocate, High Court, Peshawar

PESHAWAR

10-07-2014

AFFI DAVIT

I, Muhammad Afzal son of Muhammad Abbas Khan, PST/PTC Teacher Govt. Primary school Bori saghri shakardara Kohat do hereby solemnly affirm and declare on oath that the contents of the above re-joinder are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.


Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 103/2014

Muhammad Afzal, PST Teacher,
Government Primary School Surgul No.1, Kohat.

812
22-9-14
(Appellant)

VERSUS

1. Government of KPK through Secretary (E&SE), Peshawar etc. (Respondents).


APPLICATION FOR RELEASE OF PAY.

RESPECTFULLY SHEWETH

1. That the above mentioned Service Appeal No. 103/2014 has been fixed for arguments on 21.1.2015.
2. That the matter pertains to posting/transfer and due to non-assumption of charge at new station salary of the appellant was attached since August, 2014.
3. That now the appellant assumed the charge at new place of posting i.e. Government Primary School No.1, Surgul, Kohat and entitled for receiving his salaries.
4. That the appellant is a low paid civil servant and due to major treatment of his son, the appellant is pressing hard for his salaries.

It is, therefore, requested that my salary may very graciously be released since 8/2014 and enable me to continue the treatment of my son, who is suffering from heart disease.

Dated 22.9.2014.


APPELLANT
MUHAMMAD AFZAL,
PTC GPS, SURGUL NO.1, KOHAT