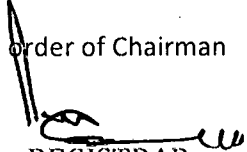


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1396/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/09/2022	<p>The appeal of Mr. Rashid Nawaz presented today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellatant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1398/2022

Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O Sarai
Salah Tehsil & District Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education, KPK, Peshawar & Others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 9	
2.	Suspension application alongwith affidavit	10 to 11	
3.	Copy of relevant posting orders	12	"A"
4.	Copy of posting order from GPS Neelan Bhutto to GPS Nikkah Pah and corrigendum cancellation order	13-15	"B" & "C"
5.	Copy of order of service tribunal dated 20/05/2015 and order dated 14/11/2015	16-17	"D" & "E"
6.	Copies of orders dated 06/09/2018, 13/11/2018 and 21/05/2019	18-20	"F", "G" & "H"
7.	Copy of impugned transfer order dated 26/05/2022	21	"I"
8.	Copy of departmental appeal	22	"J"
9.	Copy of disability certificate dated 24/07/2013	23-25	"K"
10.	Wakalatnama	26	

...APPELLANT

Dated: _____/2022

Through;

(Muhammad Arshad Khan Panoli)
Advocate Supreme Court of Pakistan
At Abbottabad

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

Service Appeal No. 1596 /2022

Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O Sarai
Salah Tehsil & District Haripur.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, KPK, Peshawar.
2. Director General Elementary & Secondary Education, KPK, Peshawar.
3. District Education Officer (Male) District Haripur.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 04 OF KPK
SERVICE TRIBUNAL ACT 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT HAS ILLEGALLY BEEN
TRANSFERRED FROM GMS KALALI TO GHS
JHAMRA ON SO CALLED BASELESS
ALLEGATIONS ON BASELESS ADMINISTRATIVE
GROUND VIDE IMPUGNED TRANSFERRED
ORDER DATED 26/05/2022 WHICH IS PERVERSE,

ILLEGAL, AGAINST THE LAW AND THE SAME IS
LIABLE TO BE SET ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT
SERVICE APPEAL, IMPUGNED POSTING
/ADJUSTMENT ORDER DATED 26/05/2022 MAY
GRACIOUSLY BE ORDERED TO SET ASIDE AND
ANY OTHER RELIEF WHICH THIS HONOURABLE
COURT DEEM FIT AND PROPER IN THE
CIRCUMSTANCES OF THE CASE MAY ALSO BE
GRANTED TO THE APPELLANT.

Respectfully Sheweth,

That the facts forming the background of the instant
service appeal are arrayed as under;-

1. That the appellant is disable person in got
appointment against the disable quota in the
respondent department and presently serving as
SST General.
2. That during the service period, the appellant was
posted from GPS Bhutri to GPS Akhoon Bandi

vide order dated 28/08/2014 in thereafter, another corrigendum order was issued and the appellant was posted from GPS Akhoon Bandi to Chak Mohri Haripur. Copy of relevant posting orders are attached as Annexure "A".

3. That appellant on promotion from SPST to PSHT was posted from GPS Chak Mohri to GPS Neelan Bhutto vide order dated 20/11/2014 as the post of PSHT was lying vacant and GPS Chak Mohri thereafter, the appellant was posted from GPS Neelan Bhutto to GPS Nikkah Pah vide order Endorsement No. 2426 dated 07/01/2015 which was again cancelled vide corrigendum of even number and date. Copy of posting order from GPS Neelan Bhutto to GPS Nikkah Pah and corrigendum cancellation order are attached as Annexure "B" & "C".

4. That the appellant challenged the order No. 2426 dated 07/01/2015 before the Honourable Tribunal which was accepted vide service appeal No. 354/2015 and during the pendency of service appeal, respondent department posted the petitioner from GPS Neelan Bhutto to GPS Nikkah

Pah vide order No. 2915-18 dated 14/11/2015.
Copy of order of service tribunal dated 20/05/2015
and order dated 14/11/2015 are attached as
Annexure "D" & "E".

5. That thereafter, the appellant was appointed as
SST General against 02% disable quota and was
adjusted in GHS Dhartian vide order dated
15/02/2016. The appellant was transfer from GHS
Dhartian to GMS Gharan Tehsil Ghazi vide order
dated 06/09/2018 but again was posted without the
completion of service tenure from GMS Gharan to
GHSS Sarai Salah and the same order was
cancelled and again posted from GMS Gharan to
GMS Kalali vide order dated 21/05/2019. Copies
of orders dated 06/09/2018, 13/11/2018 and
21/05/2019 are attached as Annexure "F", "G" &
"H".

6. That as usual, the appellant has once again been
made escape goat and has been posted from Kalali
to GHS Jhamra so called baseless allegation of so-
called unlawful immoral activities SSC
examination 2022 vide impugned adjustment order
dated 26/05/2022 which is perverse, discriminatory

against the law and the same is liable to be set aside. Copy of impugned transfer order dated 26/05/2022 is attached as Annexure "I"

7. Feeling aggrieved, appellant filed departmental appeal to respondent No. 2 on 27/05/2022 but the said respondent did not boarder to the appellant so called. Copy of departmental appeal is attached as Annexure "J". Hence, the instant service appeal is filed inter-alia on the following grounds;-

GROUND:-

- a) That the appellant is permanent disable and has been declared as such by the medical authority, in this regard, disability certificate dated 24/07/2013 is attached as Annexure "K". It is further submitted that the appellant is unable to travel in the school situated in far flung area from the place of his aboard. Hence, the impugned transfer order dated 26/05/2022 is liable to be cancelled.
- b) That the appellant has not committed any unlawful, immoral activity, BISE SSC Exam

2022. Besides, the impugned transferred order dated 26/05/2022 of the appellant is political motivated and the appellant has illegally been transferred from GHS Kalali to GHS Jhamra Tehsil Ghazi District Haripur as the appellant has not completed his service tenure. It is evident from the conduct of the respondents that during the tenure of service, the appellant was frequently transferred from once to another prior to the completion of service tenure. Frequent transfer has been declared by the Apex Court as malafide on the part of the respondent department.

- c) That the allegation leveled in the impugned posting/ adjusted order dated 26/05/2022 is illegal, against the norms of service rules. It is a sorrow state of affairs, that respondents department leveled allegation of immoral and unlawful activity against the appellant without any proof which has fully tarnished the character of the appellant as a Govt. Teacher.

- d) That the appellant as mentioned above is a disable person and has been posted in far flung area which is hundred mile away from the place of his residence. It is further submitted that the appellant is suffering from mental as well as physical pain while traveling in the far flung area.
- e) That the appellant has not committed any fault and committed no immoral or illegal activity BISE SSC Exam 2022. The allegation is so called in based on surmises, conjectures and hypothesis.
- f) That the appellant is a poor disable employee of the department and in the past as well as now has been/ is made a rolling stone and is posted prematurely just to accommodate other blue eyed. That the administration of respondent No. 3 has personal grudges towards the appellant and is being posted/ adjusted illegally with malafide intentions and the impugned posting/ adjusted order dated 26/05/2022 is liable to be set aside.

g) That the Honourable Tribunal has jurisdiction to entertain the present appeal under Article 212 of the constitution of Islamic Republic of Pakistan 1973.

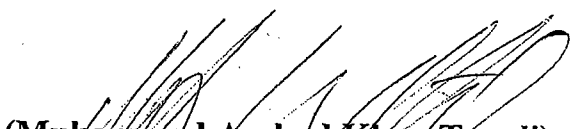
h) That the other points shall be argued at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, impugned posting/adjustment order dated 26/05/2022 may graciously be ordered to set aside and any other relief which this Honourable court deem fit and proper in the circumstances of the case may also be granted to the appellant.


...APPELLANT

Through;

Dated: _____/2022


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.


...APPELLANT

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

Service Appeal No. _____/2022

Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O Sarai
Salah Tehsil & District Haripur.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education, KPK, Peshawar & Others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, *Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O
Sarai Salah Tehsil & District Haripur*, do hereby solemnly affirm and
declare that the contents of foregoing appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed therein from
this Honourable Tribunal.


DEPONENT

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

Service Appeal No. _____/2022

Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O Sarai
Salah Tehsil & District Haripur.

...APPLICANT/ APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education, KPK, Peshawar & Others.

...RESPONDENTS

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED ORDER DATED
26/05/2022 TILL FINAL DISPOSAL OF THE
MAIN SERVICE APPEAL.**

Respectfully Sheweth;-

1. That the titled service appeal is being filed before this Honourable Tribunal and contents of the instant appeal may be treated as integral part of the main service appeal.
2. That appellant has brought a good prima facie case and balance of convenience also lies in favour of

the appellant. Moreover, there is every likelihood of success of the appellant in the case.

3. That if the impugned transfer/ adjustment order dated 26/05/2022 is not suspended, the applicant/ appellant would forebear irreparable loss. Besides, there is no rival contesting candidate in the impugned order dated 26/05/2022 and there is no loss to the Govt.

It is, therefore, humbly prayed that on acceptance of the instant application, impugned transfer/ adjustment order dated 26/05/2022 may graciously be suspended and status quo may graciously be ordered to be maintained till final disposal of the main service appeal.

...APPELLANT

Dated: _____/2022

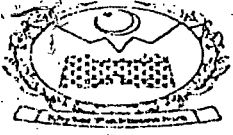
Through;

(~~Muhammad~~ Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan
At Abbottabad

AFFIDAVIT:-

I, *Rashid Nawaz son of Ghulam Fareed, resident of Village Barthal P.O Sarai Salah Tehsil & District Haripur*, do hereby solemnly affirm and declare that the contents of forgoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

DEPONENT



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE,
HARIPUR

P-12

Annex-A

ADJUSTMENT ORDER

The position of the following SPST teachers mentioned against the name of each are hereby adjusted on the rationalization basis @ 01:40 ratio on their own pay & grade in the best interest of public service with immediate effect:-

S.No	Name & School	Posted at	Remarks
01	Amjid Saeed Khan SPST GPS Said Abad	GPS Maira Ali Khan	(On Rationalization/Need Basis)
02	Adeel Ahmed Saddique SPST GPS Gar	GPS Ding Soka	(On Rationalization/Need Basis)
03	Rashid Nawaz SPST GPS Bhutri	GPS Akhoon Bandi	(On Rationalization/Need Basis)
04	Safdar Zaman Khan SPST GPS Mohra Ali Khan	GEMPS Sarai Salah	(On Rationalization/Need Basis)

Note:

1. No TA/DA is allowed to anyone.
2. Charge handing taking will be made through concerned ASDEO circle office without any delay.

Sd/-
Sub Divisional Education Officer
(M) Haripur

Ends: No 2251-53,

Dated Haripur the 28/08/2014

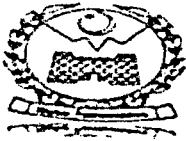
Copy to:-

1. The District Education Officer (M) Haripu for information, please.
2. The ASDEO concerned Circle for information.
3. The Head Teacher concerned Schools.
4. Office record file.

Allesha
Office of the Sub Divisional Education Officer
District: Sarabhadra

Sd/-
Sub Divisional Education Officer
(M) Haripur

P-12



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(MALE) HARIPUR

Annex-B

ORDER

The services of Mr. Khalid Mehmood PSHT GPS Nikkah Paa are hereby transferred/shifted to GPS Neelan Bhoto immediately on administrative/disciplinary ground and directed to leave the charge without any delay in the best interest of public service with immediate effect:-

Note:

1. Mr. Rashid Nawaz PSHT GPS Neelan Bhoto is hereby adjusted at GPS Nikkah Paa to fill the gap.
2. No TA/DA is allowed to anyone.
3. Charge handing taking will be made through concerned ASDEO circle office without any delay.


-----Sd-----
Sub Divisional Education Officer
(M) Haripur

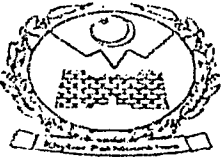
Ends: No 24-261
Copy to:-

Dated Haripur the 07/01/2015

1. The District Education Officer (M) Haripu for information.
2. The ASDEO Circle Khanpur & Sarai Salah.
3. The Head Teacher concerned Schools.
4. Office record file.


Sub Divisional Education Officer
(M) Haripur


Advocate Supreme Court of Pakistan
Office # 39 Jinnah Plaza Lahore
Dist: Bar Abbanas



P- 14
OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE)
HARIPUR

Annex-C

CORREGENDUM.

Please read GPS Chack Mohri Haripur instead of GPS Akhoon Bai Haripur against the name of Mr. Rashid Nawaz SPST vide this office order issued under Endst: No.2251-53 Dated 28-08-2014 (S.No.03), in the best interest of public service with immediate effect.

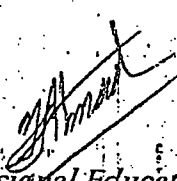
-----Sd-----
Sub Divisional Education Officer
(Male) Haripur

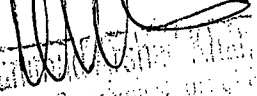
Even No. & Date.

Copy to:-

1. The District Education Officer (Male) Haripur.
2. The ASDEO Concerned for information please.
3. The Head Teachers concerned.
4. Office record file.

Attested


Sub Divisional Education Officer
(Male) Haripur


Advocate Supreme Court of Pakistan
Office # 22 Jinnah Plaza Haripur
Office Bar Association

Sub Divisional Education Officer
(M) Haripur



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER
(MALE) HARIPUR

P-15

CANCELLATION


The office order issued under Endst: No.24-26 Dated (07-01)-2015 is hereby cancelled in the best interest of public service with immediate effect.

-----Sd-----
Sub Divisional Education Officer
(Male) Haripur

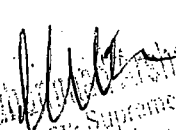
Even No. & Date

Copy to:-

1. The District Education Officer (Male) Haripur for information, please.
2. The ASDEO concerned Circle for information.
3. The Head Teacher concerned School.
4. Office record file.


Sub Divisional Education Officer
(Male) Haripur

Attested


Advocate Supreme Court of Pakistan
Office # 33, Jinnah Plaza, Lahore
Dist: Sarf-e-Azam



Annex-D



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

P-16

Service Appeal No. 364 /2015

Rashid Nawaz son of Ghulam Fareed resident of Village Barthal, P.O Sarai e Saleh. Tehsil & District, Haripur, presently Head Teacher PSHT Govt. Primary School Nikka Paa, Tehsil & District, Haripur.

...APPELLANT

S.W.A. Province
Service Tribunal

Diary No. 401

Dated 23-4-2015

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education Peshawar.
2. District Education Officer, District Haripur.
3. Sub-Divisional Education Officer SDEO (Male) Haripur.
4. ASDEO Circle Sarai e Saleh, Haripur.
5. Khalid Mehmood Head Teacher PSHT, Govt. Primary School, Neelan Bhoto, Haripur.

...RESPONDENTS

20.5.2015

Appellant in person and Said Badshah; ADO (lit) alongwith Mr. Muhammad Tahir Aurangzeb, G.P for official respondents present. Submitted application alongwith copy of affidavit according to which the appellant is to be transferred to GPS Nikkah Paa on 31st October 2015.

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

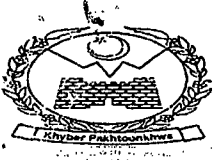
ANNOUNCED
20.5.2015

Sd/-
Chairman
Camp East Haripur

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Attended
Advocate
Office

Date of Presentation of Application 19.8.2015
 Number of Copies 400
 Filing Fee 1/-
 Stamps 2
 Total 3
 Name of Copyist [Signature]
 Date of Completion of Copy 19.8.2015
 Date of Delivery of Copy 19.8.2015



2- K-17
OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE)

HARIPUR

Ph:- 0995-611876

Annex-E

ORDER

As per judgment of Honorable Service Tribunal Peshawar announced dated 20/05/2015. Mr. Rashid Nawaz PSHT GPS Neelan Bhoto is hereby transferred at GPS Nikkah Paa & Mr. Khalid Mehmood PSHT GPS Nikkah Paa is posted at GPS Neelan Bhoto, on their own pay & grade in the best interest of public service with immediate effect.

Note:

1. No TA/DA is allowed to anyone.
2. Charge handing taking will be made through concerned ASDEO circle office without any delay.

-----Sd-----

**Sub Divisional Education Officer
(M)Haripur**

Ends: No 2915-18,

Dated Haripur the 14/11/2015

Copy to:-

1. The District Education Officer (M) Haripur for information, please
2. The ASDEO circle concerned.
3. The Head Teachers concerned Schools.
4. Office record file.

Attested

[Handwritten signature]
Sub Divisional Education Officer
(M)Haripur

[Handwritten signature]

**Sub Divisional Education Officer
(M)Haripur**



Annex- F
Office of the District Education Officer (Male)
Haripur

PH No: 0995-610268, 610178

P- 18

Order

Consequent upon the approval of competent authority, and recommendation of placement committee in its meeting held on 3/09/2018, the following transfer's orders of teaching Staff of E&SE Haripur is hereby made on their own pay & grade in the best interest of public service with immediate effect.

S. #	Name Design:	From	To	Remark
01	Muhammad Asad SST(G)	GHS Kangra Colony	GHSS Kotnajibullah	Against vacant post
02	Abdul Razaq SST(G)	GHS amgah	GHS Kangra Colony	Against Vacant post.
03	Bashrat Ali SST(G) working wrong	GHS Mang	GHS Suraj Gali	Against Vacant post (Post of SST(G) sent to NTS.
04	Habib ur Rehman SST M/P (working wrong)	GHS Badhora	GHS Karwala	Against Vacant post (post of SST(G) sent to NTS
05	Daud Shah SST(G)	GHS Jabrai	GHS Karwala	Against Vacant post
06	Masood ur Rehman SST(G)	GHS Karwala	GMS banda Mughian	Against Vacant post
07	Rashid Nawaz SST(G) NTS Disable Quota	GHS Dartian	GMS Gharan	Against Vacant post (disable and appointed on Disable quota)
08	Niaz Muhammad SST(G)	GHS Qazi Pur	GHSS Jahmra	Vice S.No 09 (Mutual Transfer)
09	Ayub Shah SST(G)	GHSS Jahmra	GHS Qazi Pur	Vice S.No 08 (Mutual Transfer)

Note:-

1. No TA/DA or TG is allowed to anyone.
2. Charge report should be submitted to all concerned.

-----Sd/-----
District Education Officer (Male)
Haripur

Endst: No. 226-36 /3-8/GB

Dated: 06/09/2018.

Cc:

1. The Senior District Accounts Officer Haripur.
2. Principal Concerned
3. Office order file

Asst: District Education Officer (M)
Haripur

Accepted
Advocate
Office # 31



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

PH No. 0995-610178, 610268
deomalehrp@yahoo.com

P-19

OFFICE ORDER.

Annex - G

In pursuance of direction & Ban Relaxation by honorable Advisor to Chief Minister K.P for Elementary & Secondary Education Khyber Pakhtunkhwa.

The following posting/transfers/Mutual Transfer are hereby ordered in their own pay and BPS in the interest of public service with immediate effect.

S#	Name of Design:	Adjustment		Remarks
		From	To	
01.	Nazim Ali SST (G) (Spouse policy)	GMS Sardhana	GCMHSS No 1 HR	Against Vacant Post
02.	Rashid Nawaz SST(G) (Disable)	GMS Gharan	GHSS Sari Salah	Against Vacant post w.e.f 31/12/2018 on the retirement of Tariq SST
03.	Ibrahim Qari (Medical Issue)	GHS Chantri	GHS Sari Gadi	Against vacant post
04.	Shoaib Amir CT (Medical Issue)	GMS Sari Nallah	GHSS Kokotri	Against Vacant post
05	Sajid Khan SST(Bio/Chem)	GHS M D Maria	GHS kalingar	Vice S.No 6 On mutual Ground
06	Gul Fraz SST(Bio/Chem)	GHS Kalingar	GHS M D Maria	Vice S.No 5

Note:-

1. No TA/DA or TG is allowed anyone.
2. Charge Report should be submitted to all concerned.

.....sd/.....
District Education Officer (M)
Haripur

Attested

Endst: No. 1845-52 /3-8/G.B/Transfer/

Dated Haripur the 13 /11/2018.

Copy for information and necessary action to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Haripur.
3. The District Nazim Haripur.
4. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
5. The Senior District Account Officer Haripur.
6. The District Monitoring Officer Haripur.
7. The Principal/ Head Master concerned.
8. Office Record file.

Assistant District Education Officer (M)
Establishment Haripur.

Annex- H

P-20



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

PH No. 0995-610178, 610268
deomalehrp@yahoo.com

OFFICE ORDER.

Mr, Rashid Nawaz SST (G) GMS Gharan Haripur is hereby adjusted at GMS Kalali against vacant post of SST (G) on his own pay and grade in the interest of public service with immediate effect.

.....sd/.....

District Education Officer (M)
Haripur

Endst: No. 3805²⁰¹⁸ /F.No.5-2/G.B/

Dated Haripur the 21 /05/2019.

Copy for information and necessary action to:-

1. The Deputy commissioner Haripur.
2. The District Monitoring Officer Haripur.
3. Office Record file.

Assistant District Education Officer (M)
Establishment Haripur.

Attested

Advocate
Office

Annex-1

P-21

Ph. No. 0995-920150, 920151, 920152
Email: deomalehrp@yahoo.com

Adjustment Order.

The following adjustment on administrative ground hereby is hereby made on his own pay & grade in the best interest of public service with immediate effect

No	Name of Teacher	From	Adjusted at	Remarks
1.	Rashid Nawaz SST (G)	GMS Kalali	GHS Jhamra	on administrative ground, d to his involvement in unlawful immoral activities in BISE SSC Exam 2022
2.	Mohib ur Rehman SST (G)	GHSS Jhamra	GHS Bagra	Against Vacant post

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed.

----- sd -----

District Education Officer (Male)
Haripur

Dated 26/05/2022

Endst.No. 12015-69 /F.No 5-2/EB/ ADEO(E)

Copy submitted to the:-

1. Senior District Accounts Officer Haripur.
2. Principals concerned.
3. District Monitoring Officer Haripur.
4. EMIS Local Office Haripur.
5. Office record file.

Amended
Mr. Mohib ur Rehman
Advocate
Office # 33
District Bar Association

1/C
District Education Officer (Male)
Haripur.

Annex-J

بجولیت جناب ڈائریکٹر ایجوکیشن اینڈ ہیومن ریسورسز گورنمنٹ سولہ ویلیج ایڈمنسٹریشن ڈیپارٹمنٹ لاہور

عنوان :- درخواست برائے ایبل (تبادلہ منظم)

جناب عالی !

گزارش خدیجہ سے کہ میں گورنمنٹ ایڈمنسٹریشن سسٹم S.S.T گورنمنٹ ڈپلومی اسکول کلاں میں پڑھتی تھی پھر اسکول چھوڑ دیا ہے۔ پانچویں جماعت تک پڑھی اور اسکول چھوڑنے کے بعد گورنمنٹ ایڈمنسٹریشن سسٹم میں داخل ہو کر پڑھنے کی بات کہی لیکن اسکول میں داخلہ نہیں دیا گیا اور اس وقت تک اسکول چھوڑ دیا ہے۔ پانچویں جماعت تک پڑھی اور اسکول چھوڑنے کے بعد گورنمنٹ ایڈمنسٹریشن سسٹم میں داخل ہو کر پڑھنے کی بات کہی لیکن اسکول میں داخلہ نہیں دیا گیا اور اس وقت تک اسکول چھوڑ دیا ہے۔ پانچویں جماعت تک پڑھی اور اسکول چھوڑنے کے بعد گورنمنٹ ایڈمنسٹریشن سسٹم میں داخل ہو کر پڑھنے کی بات کہی لیکن اسکول میں داخلہ نہیں دیا گیا اور اس وقت تک اسکول چھوڑ دیا ہے۔

جناب والا 2014 سے یہی اجازت مانگ رہی تھی کہ میں اسکول میں ڈیپارٹمنٹ کی جگہ سے تبدیل کر کے تعلیم گاہ سے اپنا حق حاصل کر سکیں اور میں نے سب سے پہلے درخواست دی لیکن اس وقت تک تبدیل نہیں ہو سکی ہے۔ اس لیے میں نے دوبارہ درخواست دی ہے کہ اگر ممکن ہو تو اس بات پر عملدرآمد کیا جائے اور میں اپنا حق حاصل کر سکیں۔

اللہ اعلم

سائلہ کی جانب سے درخواست کی گئی ہے۔

الغان

(27/05/2022)

نام :- ڈائریکٹر ایجوکیشن سسٹم S.S.T گورنمنٹ ڈپلومی اسکول کلاں ضلع لاہور

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

OFFICE ORDER

Consequent upon the approval of the Departmental Committee, approved in the meeting held on 13/11/2014 and approval of the District Education officer (M) Haripur dated 14/11/2014 Upgradation/Promotion of SPST PSHT BPS-15. The services of the following newly upgraded PSHTs BPS -15((8500-700-29500)) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government, in teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each. posts mentioned against their names w.e.f 14/11/2014 in the best interest of public service subject to the terms and conditions remain intact as mentioned in the notification referred above.

S.No	Seniority No	Teacher Name	Father Name	School Name	Place of New Posting
1	1	Pervaiz	Ghulam Haider	GPS Kainthla	GPS Raj Dhani Against vacant Post
2		Nawaz Akhter	Gulistan Khan	GPS Gali	GPS Sawar Maira
3	5	Anjid Mehmood	Khan Afsar	GPS Sarai Saleh	GPS Davi Against vacant Post
4	7	Fazal Khan	Ahmed Khan	GPS Dolni	GPS Shergah Against vacant Post
5	8	Muhammad Aslam	Said Muhammad	GPS Sijhiala	GPS Bait Gali Against vacant Post
6	9	Masroor Anwar Khan	Muhammad Anwar Khan	GPS Shah Muhammad	GPS Tavi Against vacant Post
7	12	Muhammad Yousuf	Allah Bakhsh	GEMPS Khoi Maira	GPS Kotha Against vacant Post
8	13	Sadaqat	Muhammad Saleem	Gps Aldo Jabbi	GPS Bandi Saydan Against vacant Post
9	15	Ishtiaq Hussain	Aarib Hassan	GPS Darkot	GPS Kharian Against vacant Post
10	17	Shahid Mehmood	Ghulam Nabbi	GPS Sarai Saleh	GPS Shingri Against vacant Post
11	18	Hashmat Hussain Niazi	Shafiqat Hussain Malik	Kahal	GPS Bees Ban Against vacant Post

Attested
Muhammad Arshad Khan Tani
Advocate, Supreme Court of Pakistan
Office: 33 Bahar Plaza Adjacent to
Distt. Bar, Abbottabad

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12	20	Abdul Khaliq Nasir Shah	Abdul Jalil Syed Mozamil Shah	Chajjain Gps Kali Kundi	GPS Siri Bhang Against vacant Post
13	21				GPS Kiari Against vacant Post
14	22	ABDUL HAFEEZ	ABDUL AZIZ	GPS BANDI GULLOO	GPS Khoi Nara Against vacant Post
15	23	Muhammad Shaffique	Muhammad Akram	GPS Singrari	GPS Sangreeri Against vacant Post
16	24	Toheed Ahmad	Abdul Sagheer	GPS Sarhadna	GPS Chasklan Against vacant Post
17	25	Rashid Nawaz	Ghulam Fareed	GPS Chack Mohri	GPS Neelan Ehoto Against vacant Post
18	26	Shahzada Khurram	Abdul Qayyum Khan	GPS Malilayar	GPS Dharrian Against vacant Post
19	28	Jahanger Iqbal	Abdul Hameed	GPS Kheri	GPS Kheri Against vacant Post
20	29	Umer Hayat Khan	Shukat Zaman Khan	GPS Makhan Colony	GPS Sheldar Zareen Against vacant Post
21	30	KHALID MEHMOOD KHAN	SULTAN Muhammad KHAN	GPS DEHDAN	GPS Sora Against vacant Post
22	31	MUHAMMAD IJAZ	MUHAMMAD ISMAL	GPS GANJA	GPS Sathana No,2 Against vacant Post
23	32	Raja Amer sultan	Raja Faramurz Khan	GPS Banth	GPS Banth Against vacant Post
24	33	ZARSHAD AHMAD	KALA KHAN	GPS BHERA KALU PIND	GPS Ziarat Bela Against vacant Post
25	34	NASIR SHAH	AMIN SAHABI	GPS Gadwalian	GPS Sheldar Bala Against Vacant Post

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case of their performance is found unsatisfactory during probationary period. In case of misconduct, they will be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be

sd
DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

Dated. 22/11/2014

Endst: No. 3136-39

1. Senior District Accounts Officer Haripur
2. Sub Divisional Education Officer (Male) Haripur
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. Office Record File

DY: DISTRICT EDUCATION OFFICER (MALE)
HARIPUR

Service Tribunal KPLC Peshawar

Rashid Nawaz Gori of KPLC etc

Appellant

Service Appeal

بابت ٹریبل

مقدمہ مندرجہ میں اپنی طرف سے دوائے ترقی و جواب دہی کی کارروائی متعلقہ آن مقام
ASL M - Arshad Khan Tanoli ASC

کو کیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وہ کیل صاحب
موصوف کو کرنے والی نامہ و تقررات اور فیصلوں کے ساتھ ساتھ دیگر ذمہ داریاں بھی سونپ دی جائیں گی اور اس کے لئے
Advocate Supreme Court of Pakistan

موصوف کو چیک روپیہ و مرضی و مرضی کی آمدنی اور اس کے لئے تمام اخراجات ضرورت مندوں کے لئے
کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا صاحب قانونی کو اپنے ہمراہ اپنی بجائے مقرر کا اختیار
ہوگا اور صاحب مقرر شدہ کو مرضی اور فیصلے کی اختیارات ہوں گے اور اس کا ساتھ پر واضح ہے کہ منظور
ہوگا۔ دوران مقدمہ جو شرطیں اور شرائط ہوں گے جب ہوگا ان کے سختی وکیل صاحب ہوں گے۔

نیز ہائیڈرو پمپ وصول کرنے کا بھی اختیار ہوگا اگر کوئی مرضی مقام درجہ پر ہو یا اس سے باہر ہو تو وکیل صاحب موصوف
پاکستان کے لئے کہ ترقی و مقدمہ مذکورہ کریں اور اگر مقرر کر دیا گیا ہو تو وکیل صاحب موصوف
مقدمہ کی ترقی کے باوجود ہوں گے۔ نیز درخواست برادری و اجازت نامہ کی کے دائرہ کرنے اور اس کے
ترقی کا بھی صاحب موصوف کا اختیار ہوگا۔

انہذا کالات نامہ تحریر کر دیا تاکہ سند ہے۔

مقام: Abbottabad

Arshad Khan Tanoli ASC

Arshad Khan Tanoli ASC

Arshad Khan Tanoli ASC

M. Arshad Khan Tanoli ASC

Arshad Khan Tanoli ASC