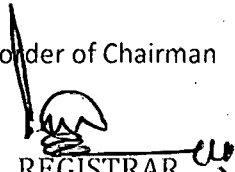


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1412/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/09/2022	<p>The appeal of Mr. Habibullah resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

9

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 1412/2022

Habib Ullah

versus


Secretary & Others

I N D E X

S. No	Documents	Annex	P. No.
1.	Memo of Appeal		1-4
2.	Application of R. No. 03 dated 3-3-22	"A"	5
3.	Adjustment of Alam Zeb at GHSS Chamkani dated 05-04-2022	"B"	6
4.	Promotion to the post of IPE dated 05-04-2022	"C"	7-9
5.	Reliving order of Alam Zeb dated 06-04-2022	"D"	10
6.	Application of appellant for adj: at Peshawar dated 08-04-2022	"E"	11
7.	Draft proposal dated 09-04-2022	"F"	12-14
8.	Adjustment order dated 27-05-2022	"G"	15-18
9.	Representation dated 30-05-2022	"H"	19
10.	Application for Interim Relief		20-21

Appellant

Through



Saadullah Khan Marwat
Advocate.
21-A Nasir Mansion,
Shoba Bazaar, Peshawar.
Ph: 0300-5872676

Dated: 26-09-2022

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWARS.A No. 1412 / 2022

Habib Ullah S/O Mohib Ullah,
Instructor Physical Education,
Government Higher Secondary
School, Shalpin Swat, presently
GHSS, Daag Peshawar Appellant

Khyber Pakhtunkhwa
Service TribunalDistry No. 1443Dated 27-9-2022**VERSUS**

1. Secretary, Government of KP,
Elementary & Secondary
Education Department, Peshawar.
2. Director Elementary & Secondary
Education, KP, Peshawar.
3. Tehseen Ullah, Instructor
Physical Education, GHSS
Haryana Bala, Peshawar Respondents

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974
AGAINST OFFICE NOTIFICATION NO. SO (SM) E & SED
/ 5-17 / 2022 DATED 27-05-2022 R. NO. 01 WHEREBY
APPELLANT WAS POSTED AT GHSS SHALPIN SWAT
BEING MOST SENIOR AND R. NO. 03 BEING MOST
JUNIOR WAS POSTED / TRANSFERRED AT GHSS
HARYANA BALA PESHAWAR:

Filed to-day
Registrar
27/9/2022

Respectfully Sheweth:

1. That since the year 1993, appellant is serving the department to the best of the ability and to the entire satisfaction of the superiors wherever he was posted.

2. That further promotion to the post of Instructor Physical Education (IPE) B-17 was taking place in the department and everyone tried to adjust himself at Peshawar. For the purpose, R. No. 03 submitted application on 03-03-2022 before R. No. 01 to adjust him at GHSS Haryana Bala Peshawar as the said post has become vacant since 06-04-2022, and not on 03-03-2022, as per Principal remarks. "Post of IPE is vacant since 06-04-2022" (Copy as annex "A")
3. That on the said application, Private Secretary to Minister for Food and Agriculture requested PS to Minister E & SE, KP, "Please honor as requested sir". Thereafter, PS to Minister E & SE, KP wrote to, "Secretary E & SE please transfer".
4. That on 05-04-2022, R. No. 01 adjusted one Alamzeb, IPE B-17 at GHSS Haryana Bala against post of Subject Specialist, B-18 at GHSS Chamkani, Peshawar in own pay and scale. (Copy as annex "B")
5. That on 05-04-2022, R. No. 01 issued office order wherein 77 Seniors Physical Education Teacher, B-16 were promoted to the post of Instructor Physical Education, B-17 Male on regular basis. The name of appellant was figured at S. No. 27 while the name of R. No. 03 was figured at S. No. 75, most junior. (Copy as annex "C")
6. That on 06-04-2022, the said Alamzeb, IPE B-17 was transferred to GHSS Chamkani, Peshawar as Subject Specialist, B-18 against vacant post. (Copy as annex "D")
7. That on 08-04-2022, appellant also submitted similar application before R. No. 01 regarding Spouse Policy too to adjust at GHSS Haryana Bala, Peshawar against the vacant post, being most senior. (Copy as annexed "E")
8. That on 09-04-2022, Deputy Director (F&A) E&SE KP Peshawar wrote draft proposal letter to R. No. 01 for adjustment of Instructor Physical Education, B-17 (M) to be placed before Placement Committee for further necessary action. The name of petitioner was figured at S. No 27 for Haryana Bala while of R. No. 03 was figured at S. No. 75 for adjustment at GHSS Shalpin, Swat against vacant post

but in the column of remarks, it was written that office is requesting for adjustment of R. No. 03 at GHSS Haryana Bala, Peshawar regarding Spouse / Wedlock Policy. (Copy as annex "F")

9. That on 27-05-2022, the impugned Notification was issued, wherein at S. No. 27, appellant was transferred / adjusted against a post of IPE B-17 at GHSS Shalpin, Swat and then adjusted against post of Senior Instructor Physical Education, B-18 at Daag Peshawar and R. No. 03 being most junior was adjusted / transferred as IPE B-17 GHSS Haryana Bala, Peshawar by figuring his name at S. No. 75. (Copy as Annex "G")
10. That on 30-05-2022, appellant submitted departmental appeal before R. No. 01 to post him at GHSS Haryana Bala because R. No. 03 was posted in the school on the recommendation / pressure of political vendetta. (Copy as Annex "H")

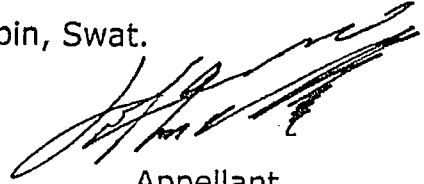
Hence this appeal, inter alia, on the following grounds:-

GROUND S:

- a. That on promotion to the post of Instructor Physical Education B-17, appellant name was figured at S. No. 27 for adjustment in any school at Peshawar and R. No. 03 name was figured at S. No. 75 for the said adjustment who was much junior to appellant.
- b. That R. No. 03 submitted application before R. No. 01 on 03-03-2022 that post of IPE is lying vacant at GHSS Haryana Bala Peshawar. But the said post became vacant on 06-04-2022 in the school. Even at the said application, Political influence was exerted and on their recommendation R. No. 03 was adjusted as IPE at GHSS Haryana Bala Peshawar.
- c. That name of appellant was figured at S. No. 27 while name of R. No. 03 was figured at S. No. 75. First priority for adjustment goes in favor of appellant being most senior as per proposal of placement Committee.

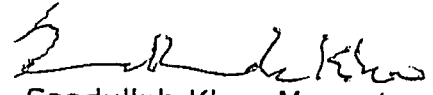
- d. That in the draft proposal dated 09-04-2022, name of appellant for adjustment was figured at S. No. 27 while that of R. No. 03 at S. No. 75 and that too for adjustment at GHSS Shalpin Swat against a vacant post.
- e. That no reason was ever given as to why appellant was superseded by most junior IPE. He also hits by Spouse Policy.
- f. That the said adjustment of R. No. 03 was not on merit but on Political pressure, so is based on malafide, favoritism and discrimination.

It is, therefore, most humbly prayed that on acceptance of the appeal, office Notification dated 27-05-2022 of R. No. 01 be set-aside and appellant be adjusted / posted / transferred at GHSS Haryana Bala, Peshawar instead of at GHSS Shalpin, Swat.



Appellant

Through



Saadullah Khan Marwat



Arbab Saiful Kamal



Amjad Nawaz

Advocates

Dated: 26-09-2022

CERTIFICATE:

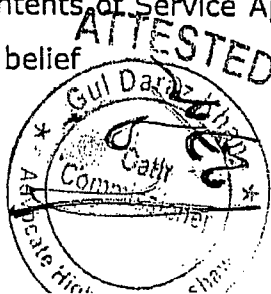
As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.



Advocate

AFFIDAVIT

I, Habib Ullah S/O Mohib Ullah, Instructor Physical Education, Government Higher Secondary School Daag Peshawar (appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief




DEPONENT

محضور جناب سیکرٹری ایجوکیشن ری ایجنڈیشن تحصیل پنجتو ننحو اہ پشاور
مذکورہ Spouse Project کے تحت IPE پوسٹ پرائیڈ سٹڈنٹ ماہر سکول ہریانہ بالا پشاور

جناب عالی!

گزارش کی جاتی ہے کہ میں گورنمنٹ ہائی سکول جو گیارہ پشاور میں SPET پوسٹ پرائیڈ سٹڈنٹ ماہر سکول ہریانہ بالا پشاور کے رہا ہوں
جو کہ اب میری SPET سے IPE پوسٹ پرائیڈ سٹڈنٹ ماہر سکول ہریانہ بالا پشاور کی 11-02-2022 کی DPG کے مطابق ترقی کر دی گئی ہے جو کہ میری
لڑکھانہ ہے جس کی GGMS کی اپنی فرائض انجام دے رہی ہے۔ اس کے گورنمنٹ روڈ کے مطابق Spouse
Policy کے تحت میری پوزیشننگ میں پشاور کے گورنمنٹ ماہر سکول ہریانہ بالا پشاور کی جائے ہو گا۔ 05-04-2022 کو
حالی ہوائے پشاور ہریانہ کیلئے میں تاحیات اس کا شکور ہو گا۔

تاریخ: 03-03-2022

Handwritten notes and signatures in the middle section, including "IPE" and "Principal" written vertically.

انصار
محمد امین
SPET
گورنمنٹ ہائی سکول جگن پشاور
موبائل نمبر: 0333-9196587

Secretary to
GGMS
Handwritten signature and notes.

Private Secretary to
the Government & Secondary
Education Officer, Bahawalpur

5-4-22

6

B

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-A, Opposite A.P.A's Hospital, Civil Secretariat Peshawar
Phone No. 9913111



NOTIFICATION

NO. SDA/RES/PS-17/2021/P/PE: Mr. Alam Zeb, JPE (BS-17) GHSS Haiyana Bala

Peshawar is hereby transferred against the vacant post of SS (BS-18) at GHSS Chankar Peshawar to OPS on stop-gap arrangement till further order.

The above officer should submit compliance report within seven (07) days (positively), otherwise disciplinary action will be initiated as per law.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
EASE DEPARTMENT

Most of even No. & Date

Copy forwarded to the

- 1. Accountant General, Khyber Pakhtunkhwa Peshawar
- 2. Director, EASE Khyber Pakhtunkhwa Peshawar
- 3. District Education Officer (Male) Peshawar
- 4. District Accounts Officers, Peshawar
- 5. Director, EAMS EASE Department
- 6. PS to Minister for EASE Department
- 7. PS to Secretary EASE Department
- 8. PA to Deputy Secretary (Admin) EASE Department
- 9. Mr. Alam Zeb, JPE (BS-17) GHSS Haiyana Bala Peshawar
- 10. Office order file

(SYEDA ZAINAB NAQVI)
SECTION OFFICER (SCHOOLS MALE)

Handwritten signature and date: 05-04-22



C F 5-4-22

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Dated Peshawar the, 05.04.2022

NOTIFICATION

No. SO (PE)-6/01/PC Meeting/Promotion of SPET(BS-16) to IPEs BS-17/2022:- On the recommendations of the Departmental Promotion Committee made in its meeting held on 11.02.2022, the Competent Authority has been pleased to promote the following Seventy-Seven (77) Senior Physical Education Teachers' BPS-16 to the post of Instructor Physical Education BPS-17 (Male), on regular basis with immediate effect.

S. No.	Name & Designation	District
1.	Mr. Abdur Rafiq, SPET	DI Khan
2.	Mr. Aurangzeb, SPET	Charsadda
3.	Mr. Arzomand, SPET	Swat
4.	Mr. Hanifullah, SPET	Dir lower
5.	Mr. Aziz Ur Rehman, SPET	Swabi
6.	Mr. Khan Muhammad, SPET	Charsadda
7.	Mr. Sher Bahader Khan, SPET	Bannu
8.	Mr. Gul Zarif, SPET	Lakki Marwat
9.	Mr. Aslam Khan, SPET	Mardan
10.	Mr. Siar Muhammad, SPET	Charsadda
11.	Mr. Arshad Naz, SPET	Charsadda
12.	Mr. Attiq Ur Rehman, SPET	Manshara
13.	Mr. Ishtiaq Ahmed, SPET	Haripur
14.	Mr. Rahim Dad, SPET	Haripur
15.	Muhammad Saleem, SPET	Haripur
16.	Mr. Saeed Ur Rahman, SPET	Dir upper
17.	Mr. Rashid Ullah, SPET	Swabi
18.	Mr. Altaf Hussain, SPET	Swabi
19.	Mr. Rashid, SPET	Haripur
20.	Mr. Raham Sher, SPET	Nowshera
21.	Mr. Nasir Khan, SPET	Charsadda
22.	Mr. Niaz Ali Khan, SPET	Nowshera
23.	Mr. Jamil Khan, SPET	Charsadda
24.	Mr. Abdul Hammed, SPET	Karak
25.	Mr. Said Hussain, SPET	Karak
26.	Mr. Khalid Jan, SPET	Charsadda
27.	Mr. Habib Ullah, SPET	Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

28.	Mr. Nour Rehman, SPET	Bannu
29.	Mr. Qaid Karim, SPET	Mardan
30.	Mr. Khulata Rehman, SPET	Charsadda
31.	Mr. Lala Khan, SPET	Karak
32.	Mr. Ino Rehman, SPET	Karak
33.	Mr. Nabil Ur Rehman, SPET.	Karak
34.	Mr. Haidar Muhammad, SPET	Karak
35.	Mr. Ahmad Gul, SPET	Karak
36.	Mr. Muhammad Nasir, SPET	Karak
37.	Mr. Wajid Muhammad, SPET	Swabi
38.	Mr. Inkhil Gul, SPET	Karak
39.	Mr. Kalim Nawaz, SPET	Di Khan
40.	M. Younus, SPET	Bannu
41.	M. Mustafa Shah, SPET	Bannu
42.	Muhammad Yousif, SPET	Di Khan
43.	Muhammad Khalid, SPET	Di Khan
44.	Mr. Syed Mohsin Abbas, SPET	Di Khan
45.	Mr. Akbar Khan, SPET	Lakki marwal
46.	Mr. Walid Jamal, SPET	Swabi
47.	Mr. Falak Naz, SPET	Bannu
48.	Mr. Salf ur Rehman, SPET	Lakki Marwat
49.	Mr. Sher Muhammad, SPET	Dir lower
50.	Mr. Muntazul Haq, SPET	Dir lower
51.	Mr. Aghzar Khan, SPET	Haripur
52.	Mr. Sarbali, SPET	Swat
53.	Mr. Mian Maz Ullah, SPET	Charsadda
54.	Mr. Sher Muhammad, SPET	Kohat
55.	Mr. Inayat Ullah, SPET	Karak
56.	Mr. Wasil Din, SPET	Buner
57.	Muhammad Ilyas, SPET	Abbottabad
58.	Mr. Manzoor Ahmad, SPET	Karak
59.	Mr. Muhammad Asif, SPET	Abbottabad
60.	Mr. Riaz Ahmad, SPET	Dir lower
61.	Mr. Shah Zamin, SPET	Charsadda
62.	Mr. Sadaqat Khan, SPET	Peshawar
63.	Mr. Sagheer Ahmed, SPET	Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

64.	Muhammad Farooq, SPET	Karak
65.	Mr. Tariq Shah, SPET	Haripur
66.	Mr. Nisar Hussain, SPET	Nowshera
67.	Mr. Alam Khan, SPET	Mardan
68.	Mr. Jehan Zab, SPET	Swabi
69.	Mr. Khurshid Alam, SPET	Mardan
70.	Mr. Malak Taj, SPET	Mardan
71.	Mr. Amjad Ali, SPET	Mardan
72.	Mr. Naseer-Ud-Din, SPET	Nowshera
73.	Mr. Faqir Hussain, SPET	Charsadda
74.	Mr. Zafar Ullah, SPET	Nowshera
75.	Mr. Tehseen Ullah, SPET	Peshawar
76.	Mr. Inam Ullah, SPET	Charsadda
77.	Mr. Janas Khan, SPET	Peshawar

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Endst. No. & date as above.

Copy forwarded to:

1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
5. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
6. The Director ESRU, Khyber Pakhtunkhwa.
7. The Director Education (Newly Merged Districts), Warsak Road Peshawar.
8. The Deputy Director EMIS, E&SE Department, with the request to upload this Notification of E&SE Department website (www.kpesc.gov.pk).
9. The Section Officers (Male/Female/General), E&SE Department, Peshawar.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary, E&SE Department.
13. PA to Additional Secretary (Estab), E&SE Department.
14. PA to Deputy Secretary (AB), E&SE Department.
15. Officers concerned.
16. Master File.

(MUSHAMMAD ISHAQ) 5/4/22
SECTION OFFICER (PRIMARY)



OFFICE OF THE PRINCIPAL GHSS HARYANA BALA PESHAWAR

Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa

Email: ghsharyanaabala@pmae.com

Endst No: 777

Dated: 06/4/2022

Relieving Certificate

Mr. Alam Zeb, IPE(BS-17) of this school has been transferred to GHSS Chamkani Peshawar as Subject Specialist (BS-18) against the vacant post vide Notification No. SO (SM) E& SED/5-17/2022/ PT/IPE: 05/4/2022 issued by the Secretary to Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

He is therefore relieved of his duties on 06/4/2022 (F.N) to report and submit arrival at the above mentioned station.

SA

Principal

PRINCIPAL
G.H.S Haryana Bala
Peshawar

ok

۱۸ فروری 2022

۵313-5943815 برائے

Dr. M. S. Pasha
3.P.E.T BPS-16 B.Sc M.A. M.Ed
GILS Hqs. Peshawar Cantt.
Mob: 0300-5943815

۸-۹-۲۲

کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں

SPET ۱۱ کی طرف سے

۱۱ کی طرف سے کوئی بوجھ نہ لگے گا۔
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے

کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
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کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے
کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے

Under Spouse Policy / IPE

کوریڈور ۱۷ کی سٹیبلنگ کے بارے میں SPET ۱۱ کی طرف سے



12
9-4-22

**DIRECTORATE OF ELEMENTARY &
SECONDARY EDUCATION KHYBER
PAKHTUNKHWA, PESHAWAR**

No. 9806 /A-25/General cases PETs/SPETs/IPEs..
Dated Peshawar the: 9/4 /2022

To

The Secretary to Govt. of Khyber Pakhtunkhwa,
(E&SE) Department, Peshawar.

Subject: - DRAFT PROPOSAL REGARDING PROMOTION FROM THE POST OF SENIOR
PHYSICAL EDUCATION TEACHER BS-16 TO THE POST OF INSTRUCTOR
PHYSICAL EDUCATION BS-17 MALE

I am directed to refer to your letter No. SO(SM) E&SED/3-17/2022/Promotion SPET to IPE BS-17 Dated. 13-04-2022 on the subject cited above to submit the Draft proposal for posting/transfer in respect of newly promoted IPEs BS-17 to your good self for perusal with the request that the case may be placed before placement committee for further necessary action, please.

Sr#	NAME OF OFFICER	PRESENT PLACE OF POSTING	PROPOSED PLACE OF POSTING	Remarks
1.	ABDUR RAFIQ	GHSS KOT JAI D.I KHAN	GHSS GHAZI KOT BUNER	A.V.P
2.	AURANGZEB	GHSS NISATTA CHARSADDA	GHSS NIZAMPUR NOWSHERA	A.V.P
3.	ARZOMAND	GHS S BILOGRAM SWAT	GHSS CHITOR SWAT	A.V.P
4.	HANIFULLAH	GHS JAWZO DIR LOWER	GHSS KAMBAT DIR LOWER	A.V.P
5.	AZIZ UR REHMAN	GHS NO. 2.TORDHER SWABI	GHSS MANKI SWABI	A.V.P
6.	KHAN MUHAMMAD	GHS RAJJAR NO-1 CHARSADDA	GHSS NARO BANDA SWABI	A.V.P
7.	SHER BAHADER KHAN	GHS BOZA KHEL BANNU	GHSS SHAMOZAI SWAT	A.V.P
8.	GUL ZARIF	GHS MATORA LAKKI MARWAT	GHSS SADIQI KOT SPIN WAM NWTD	A.V.P
9.	ASLAM KHAN	GHS PATI KALAN MARDAN	GHSS KHAIRABAD MARDAN	A.V.P
10.	SIAR MUHAMMAD	GHS TANGI NO.2 CHARSADDA	GHSS SAJBAN SWAT	A.V.P
11.	ARSHAD NAZ	GHS CHARSADDA KHAS	GHSS BARSHAWAR SWAT	A.V.P
12.	ATTIQ UR REHMAN	GHS NO.2 MANSEHRA	GHSS MOHAR MANSEHRA	A.V.P
13.	ISHTIAQ AHMED	GHS MANG HARIPUR	GHSS CHAJIAN HARIPUR	A.V.P
14.	RAHIM DAD	GHS NOORDI HARIPUR	GHSS JHAMRA HARIPUR	A.V.P
15.	MUHAMMAD SALEEM	GHS JATTI PIND HARIPUR	GHSS CENTRAL JAIL HARIPUR	A.V.P
16.	SAEED UR RAHMAN	GHS GUL MUQAM DIR UPPER	GHSS AKHAGRAM DIR UPPER	A.V.P
17.	RASHID ULLAH	GHS NO 1 TORDHER SWABI	GHS NO 1.TORDHER SWABI	Already occupied by him
18.	ALTAH HUSSAIN	GHSS KUNDA SWABI	GHSS KUNDA SWABI	Already occupied by him
19.	RASHID	GHS SARIKOT HARIPUR	GHSS SANGAR MANSEHRA	A.V.R
20.	RAHAM SHER	GHS PASHTOON GARI NOWSHERA	GHSS KOTLI SALEH KHANA NOWSHERA	A.V.P

21.	NASIR KHAN	GHS AMBADHER CHARSAJDA	GHS AMBADHER CHARSAJDA	Already occupied by him
22.	NAIAZ ALI KHAN	GHS NANAK PURA NOWSHERA	GHSS KOTAR PAN NOWSEHRA	A.V.P
23.	JAMIL KHAN	GHS DALAZAK CHARSAJDA	GHSS JALSAI SWABI	A.V.P
24.	ABDUL HAMEED	GHS MANDAWA KARAK	GHSS MIAN KILI DIR LOWER	A.V.P
25.	SAID HUSSAIN	GHSS BAHADER KHEL KARAK	GHSS GUMBAT BANDA DIR LOWER	A.V.P
26.	KHALID JAN	GHS RAJJAR NO.2 CHARSAJDA	GHSS GARMUNARA SWABI	A.V.P
27.	HABIB ULLAH	GHS NO.3 PESHAWAR CANTT	GHSS HARYANA BALA PESHAWAR AVP	The Officer concerned is requesting for adjustment at GHSS Haryana Bala Peshawar on Spouse/Wedlock Policy
28.	NOOR REHMAN	GHS NO.1 BANNU	GHSS KHIDRI MUHAMMAD KHEL BANNU	A.V.P
29.	QAID KAMAL	GHS SARO SHAH MARDAN	GHSS GARYALA MARDAN	A.V.P
30.	KHAISTA RAHMAN	GHS SHER PAO CHARSAJDA	GHSS TAWDACHENA DIR LOWER	A.V.P
31.	LAIK KHAN	GHS TAKHT-E-NASRATI KARAK	GHSS LUQMAN BANDA DIR LOWER	A.V.P
32.	PAIO REHMAN	GHSS KARAK	GHSS ASBANR DIR LOWER	A.V.P
33.	NABI UR REHMAN	GHS AHMAD ABAD KARAK	GHSS PINGAL DIR LOWER	A.V.P
34.	HAIDER MUHAMMAD	GHS SARKI LAWAGHER KARAK	GHSS GAMSEER DIR UPPER	A.V.P
35.	AHMAD GUL	GHS MIR BANDA JERMA KARAK	GHSS KHAIRABAD DIR UPPER	A.V.P
36.	MUHAMMAD NASIR	GHS DARISH KHEL KARAK	GHSS NEHAG DARA DIR UPPER	A.V.P
37.	WISAL MUHAMMAD	GHS MANERI BALA SWABI	GHSS CHANAI SWABI	A.V.P
38.	INTIKHAB GUL	GHS REHMAT ABAD KARAK	GHSS MIANDAM SWAT	A.V.P
39.	KALIM NAWAZ	GHSS KECH, DI KHAN	GHSS NAWAY KILI BUNER	A.V.P
40.	M.YOUNAS	GHS NO.2 BANNU	GHSS UTROR SWAT	A.V.P
41.	M.MUSTAFA SHAH	GHSS BANNU	GHSS MANKIAL SWAT	A.V.P
42.	MUHAMMAD YOUSAF	GHS PAROA DI KHAN	GHSS TORWARSACK BUNER	A.V.P
43.	MUHAMMAD KHALID	GHSS NO.4 DI KHAN	GHSS DAKARA BUNER	A.V.P
44.	SYED MOHSIN ABBAS	GHSS LAR DI KHAN	GHSS AMNAWAR BUNER	A.V.P
45.	AKBAR KHAN	GHSS, DARRA PEZU LAKKI MARWAT	GHSS PINDI CHENA KHYBER	A.V.P
46.	WAHID JAMAL	GHS KSK SWABI	GHSS DAGAI SWABI	A.V.P
47.	FALAK NAZ	GCMS FOR BOYS BANNU	GHSS SHAGAI SWAT	A.V.P
48.	SAIF UR REHMAN	GHS GANDI KHAN LAKKI MARWAT	GHSS CHAMTALAI SWAT	A.V.P
49.	SHER MUHAMMAD	GHSS: LAIQILLA DIR LOWER	GHSS MANIAL DIR LOWER	A.V.P
50.	MUMTAZUL HAQ	GHS: SPINA KHAWRA DIR LOWER	GHSS MANOGAI DIR LOWER	A.V.P
51.	AGHZAR KHAN	GHS REHANA HARIPUR	GHSS TALHATTA MANSEHRA	A.V.P
52.	SARBALI	GHSS ASALA SWAT	GHSS RAHAT KOT SWAT	A.V.P
53.	MIAN MAZ ULLAH	GHS SOOR KAMAR CHARSAJDA	GHSS MASKINI DIR LOWER	A.V.P
54.	SHER MUHAMMAD	GHS NO.3 KOHAT	GHSS KARBOGHA HANGU	A.V.P
55.	INAYAT ULLAH	GHS POLOSA KAMANRI	GHSS ASHARAY BUNER	A.V.P
56.	WASAL DIN	GHS BUDAL BUNER	GHSS CHANAR BUNER	A.V.P
57.	MUHAMMAD ILYAS	GHS NO.1 A/ABAD	GHSS BUDHLA ABBOTTABAD	A.V.P

58.	MANZOOR AHMAD	GHS TAPPI KOHAT	GHSS MATTA SWAT AVP	The Officer concerned is requesting for adjustment at GHSS Karbogha Sharif Hangu, While this office has proposed Mr. Sher Muhammad on merit at (Sr.54) resident of District Kohat (at GHSS Karbogha Sharif Hangu)
59.	MUHAMMAD ASIF	GHS NO.3 AJABAD	GHSS BIROTE ABBOTTABAD	A.V.P
60.	RIAZ AHMAD	GHS: MAIDAN BANDAI DIR LOWER	GHSS BAGH MIADAN DIR LOWER	A.V.P
61.	SHAH ZAMIN	GHS MATTA CHARSADDA	GHSS KALKOT DIR UPPER	A.V.P
62.	SADAQAT KHAN	GHS CIVIL QUARTERS	GHSS GATSHAWAR SWAT	A.V.P
63.	SAGHEER AHMED	GHS JHANGI ABBOTTABAD	GHSS CHAMIALY ABBOTTABAD	A.V.P
64.	MUHAMMAD FAROOQ	GHS PERSHAI KARAK	GHSS SIMPORA SWAT	A.V.P
65.	TARIQ SHAH	GHS K.T.S. NO.2 HARIPUR	GHSS KARORI MANSEHRA	A.V.P
66.	NISAR HUSSAIN	GHS ALI BAIG NOWSHERA	GHSS MARHATI BANDA NOWSHERA	A.V.P
67.	ALAM KHAN	GHS SERI BEHLOL MARDAN	GHSS FATIMA MARDAN	A.V.P
68.	JEHAN ZEB	GHSS SALEEM KHAN SWABI	GHSS NOGRAM BUNER	A.V.P
69.	KHURSHID ALAM	GHS TAKHAT BHAI MARDAN	GHSS GADDAR MARDAN	Own request A.V.P
70.	MALAK TAJ	GHS PARKHO DHERI MARDAN	GHSS QASMI KATLANG MARDAN	A.V.P
71.	AMJAD ALI	GHSS CHAMTAR MARDAN	GHSS PALO DHERI MARDAN	A.V.P
72.	NASEER-UD-DIN	GHS JAROوبا NOWSHERA	GHSS SPIN KHAK NOWSHERA	A.V.P
73.	FAQIR HUSSAIN	GHS TURANGZAI CHARSADDA	GHSS CHUPRIAL SWAT	A.V.P
74.	ZAFAR ULLAH	GHSS TARU JABBA NOWSHERA	GHSS ADAMZAI NOWSHERA	A.V.P
75.	TEHSEENULLAH	GHS JOGIWARA PESHAWAR	GHSS SHALPIN SWAT AVP	The Officer is requesting for adjustment at GHSS Haryana Balā Peshawar on Spouse/Wedlock Policy
76.	INAMULLAH	GHS MANAKRAO PESHAWAR	GHSS KALAM SWAT AVP	The Officer is requesting for adjustment at GHSS Haryana Bala Peshawar
77.	JANAS KHAN	GCMHS NO.4 PESHAWAR CANTT	GHSS BARAWAL SWAT	A.V.P

Deputy Director (F & A)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst No. 8807
Copy forwarded to the: -

1. PA to Director E&SE Khyber Pakhtunkhwa, local office.

Deputy Director (F & A)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Dated Peshawar the May 27, 2022

NOTIFICATION

NO.SO(SME&SED/5-17/2022/ Promotion of SPET (BS-16 to IPE BS-17). Consequent upon their promotion to the post of Instructor Physical Education (BS-17) as notified vide this Notification No.SO(SP)2-6/DPC Meeting/Promotion of SPET (BS-16) to IPEs BS-17/2022 dated 05.04.2022, the following posting/transfers and adjustment are hereby ordered, in the best public interest, with immediate effect:-

S. #	Name Of Officer	Present Place Of Posting	Proposed Place of Posting	Remarks
1.	Abdur Rafiq	SPET (BS-16) GHSS Kot Jai D.I.Khan	IPE (BS-17) GHSS Kotli Saleh Khana Nowshera	A.V.P
2.	Aurangzeb	SPET (BS-16) GHSS Nisatta Charsadda	IPE (BS-17) GHSS Nizampur Nowshera	A.V.P
3.	Arzomand	SPET (BS-16) GHSS Balogram Swat	IPE (BS-17) GHSS Chitor Swat	A.V.P
4.	Hanif Ullah	SPET (BS-16) GHS Jawzo Dir Lower	IPE (BS-17) GHSS Qambat Dir Lower	A.V.P
5.	Aziz ur Rahman	SPET (BS-16) GHS No.2 Tordher Swabi	IPE (BS-17) GHSS Manki Swabi	A.V.P
6.	Khan Muhammad	SPET (BS-16) GHS Rajar No. 1 Charsadda	IPE (BS-17) GHSS Naro Banda swabi	A.V.P
7.	Sher bahadar Khan	SPET (BS-16) GHS Bozakhel Bannu	IPE (BS-17) GHSS Shamoza Swat	A.V.P
8.	Gul Zarif	SPET (BS-16) GHS Matora Lakki Marwat	IPE (BS-17) GHSS Sadiqi Kot Spin Wam NWTD	A.V.P
9.	Aslam Khan	SPET (BS-16) GHS Pati Kalan Mardan	IPE (BS-17) GHSS Khair abad Mardan	A.V.P
10.	Siar Muhammad	SPET (BS-16) GHS Tangi Mardan	IPE (BS-17) GHSS Sajbin Swat	A.V.P
11.	Arshad Naz	SPET (BS-16) GHS Charsadda Khas	IPE (BS-17) GHSS Garyala Mardan	A.V.P
12.	Attiq ur Rahman	SPET (BS-16) GHS No. 2 Manshera	IPE (BS-17) GHSS Mohar Manshera	A.V.P
13.	Ishtiaq Ahmad	SPET (BS-16) GHS Mang Haripur	IPE (BS-17) GHSS Chajian Haripur	A.V.P
14.	Rahim Dad	SPET (BS-16) GHS Noordi Haripur	IPE (BS-17) GHSS Jhamra Haripur	A.V.P
15.	Muhammad Saleem	SPET (BS-16) GHS Jatti pind Haripur	IPE (BS-17) GHSS Central Jail Haripur	A.V.P
16.	Saeed ur Rahman	SPET (BS-16) GHS Gul Muqam Dir Upper	IPE (BS-17) GHSS Akhagram Dir Upper	A.V.P
17.	Rashid Ullah	SPET (BS-16) GHSS Kot Jai D.I.Khan GHS No.1 Tordher Swabi	IPE (BS-17) GHS No.1 Tordher Swabi	Already occupied by him
18.	Altaf Hussain	SPET (BS-16) GHSS Kunda Swabi	IPE (BS-17) GHSS Kunda Swabi	Already occupied by him
19.	Rashid	SPET (BS-16) GHS Sarikot Haripur	IPE (BS-17) GHSS Sangar Manshera	A.V.P
20.	Raham Sher	SPET (BS-16) GHS Pashtoon Gari Nowshara	IPE (BS-17) GHSS Ghazi Kot Buner	A.V.P
21.	Nasir Khan	SPET (BS-16) GHS Ambadher Charsadda	IPE (BS-17) GHSS Ambadher Charsadda	Already occupied by him
22.	Niaz Ali Khan	SPET (BS-16) GHSS Nanak Pura Nowshara	IPE (BS-17) GHSS Kotar Panar Nowshara	A.V.P
23.	Jameel Khan	SPET (BS-16) GHS Dalazak Charsadda	IPE (BS-17) GHSS Jalsai Swabi	A.V.P
24.	Abdul Hameed	SPET (BS-16) GHS Mandawa Karak	IPE (BS-17) GHSS Gaddar Mardan	A.V.P

25.	Said Hussain	SPET (BS-16) GHSS Bahadar Khel Karak	IPE (BS-17) GHSS Gumbat Banda Dir Lower	A.V.P
26.	Khalid Jan	SPET (BS-16) GHSS No.2 Rajar Charsadda	IPE (BS-17) GHSS GHSS Garmunara Swabi	A.V.P
27.	Habib Ullah	SPET (BS-16) GHSS No.03 Peshawar Cantt	SIPE (BS-18) GHSS Dag Peshawar	He will actualize his promotion against the vacant post of IPE (BS-17) GHSS Shalpin Swat. After actualization he is posted /adjusted against the vacant post of SIPE (BS-18) in OPS at GHSS Dag Peshawar
28.	Noor Rehman	SPET (BS-16) GHS No.1 Bannu	SIPE (BS-18) GHSS Shahbaz Azmat Khel Bannu	He will actualize his promotion against the vacant post of IPE (BS-17) GHSS Bar shawar Swat. After actualization he is posted /adjusted against the vacant post of SIPE (BS-18) in OPS at GHSS Shahbaz Azmat Khel Bannu
29.	Qaid Kamal	SPET (BS-16) GHS Saro Shah Mardan	IPE (BS-17) GHSS Khanjar Mardan	A.V.P
30.	Khaista Rahman	SPET (BS-16) GHS Sherpao Charsadda	IPE (BS-17) GHSS Towda Cheena Dir Lower	A.V.P
31.	Lais Khan	SPET (BS-16) GHS Takht e Nasrati Karak	IPE (BS-17) GHSS Luqman Banda Dir Lower	A.V.P
32.	Paio Rehman	SPET (BS-16) GHSS Karak	IPE (BS-17) GHSS Asbanar Dir Lower	A.V.P
33.	Nabi ur Rahman	SPET (BS-16) GHS Ahmad Abad Karak	IPE (BS-17) GHSS Pingil Dir Lower	A.V.P
34.	Haider Muhammad	SPET (BS-16) GHS Sarki Lawagher Karak	IPE (BS-17) GHSS Gamseer Dir Upper	A.V.P
35.	Ahmad Gul	SPET (BS-16) GHS Mir Banda Jerma Karak	IPE (BS-17) GHSS Spin Khak Nowshera	A.V.P
36.	Muhammad Nasir	SPET (BS-16) GHS Darish Khel Karak	IPE (BS-17) GHSS Palo Dheri Mardan	A.V.P
37.	Wisal Muhammad	SPET (BS-16) GHS Maneri Bala Swabi	IPE (BS-17) GHSS Chanai Swabi	A.V.P
38.	Intikhab Gul	SPET (BS-16) GHS Rehmat Abad Karak	IPE (BS-17) GHSS Matta Swat	A.V.P
39.	Kalim Nawaz	SPET (BS-16) GHSS Kech D.I.Khan	IPE (BS-17) GHSS Naway Kili Buner	A.V.P
40.	Muhammad Younas	SPET (BS-16) GHS No.2 Bannu	IPE (BS-17) GHSS Utror Swat	A.V.P

41.	M. Mustafa Shah	SPET (BS-16) GHSS Bannu	IPE (BS-17) GHSS Mankial Swat	A.V.P
42.	Muhammad Yousaf	SPET (BS-16) GHS Paroa D.I.Khan	IPE (BS-17) GHSS Torwarsak Buner	A.V.P
43.	Muhamma Khalid	SPET (BS-16) GHSS No.4 D.I.Khan	IPE (BS-17) GHSS Dakara Buner	A.V.P
44.	Syed Mohsin Abbas	SPET (BS-16) GHSSs Lar D.I.Khan	IPE (BS-17) GHSS Amnawar Buner	A.V.P
45.	Akbar Khan	SPET (BS-16) GHSS Darra Pezo Lakki Marwat	IPE (BS-17) GHSS Karbogha Sharif Hangu	A.V.P
46.	Wahid Jamal	SPET (BS-16) GHS Karnal Sher kali Swabi	IPE (BS-17) GHSS Dagai Swabi	A.V.P
47.	Falak Naz	SPET (BS-16) GCMS FOR Boys Bannu	IPE (BS-17) GHSS Shagai Swat	A.V.P
48.	Saif ur Rahaman	SPET (BS-16) GHS Gandhi Khan Lakki Marwat	IPE (BS-17) GHSS Chamtali Swat	A.V.P
49.	Sher Muhammad	SPET (BS-16) GHSS Lal Qilla Dir Lower	IPE (BS-17) GHSS Bagh Maidan Dir Lower	A.V.P
50.	Mumtaz ul Haq	SPET (BS-16) GHS Spina Khawra Dir Lower	IPE (BS-17) GHSS Manogai Dir Lower	A.V.P
51.	Aghzar Khan	SPET (BS-16) GHS Rehana Haripur	IPE (BS-17) GHSS Ziarat Masoom Abbottabad	A.V.P
52.	Sarbali	SPET (BS-16) GHSS Asala Swat	IPE (BS-17) GHSS Rahat Kot Swat	A.V.P
53.	Mian Maz ullah	SPET (BS-16) GHS Soor kamar Charsadda	IPE (BS-17) GHSS Haryan Kot Malkand	A.V.P
54.	Sher Muhammad	SPST (BS-16) GHS.03 Kohat	IPE (BS-17) GHSS Maskini Dir Lower	A.V.P
55.	Inayat Ullah	SPET (BS-16) GHS Palosa Kamanari	IPE (BS-17) GHSS Asharay Buner	A.V.P
56.	Wasal Din	SPET (BS-16) GHS Budal Buner	IPE (BS-17) GHSS Chanar Buner	A.V.P
57.	Muhammad Ilyas	SPET (BS-16) GHS No.1 Abbottabad	IPE (BS-17) GHSS Budhla Abbottabad	A.V.P
58.	Manzoor Ahmad	SPET (BS-16) GHS Tappi Kohat	IPE (BS-17) GHSS Pindi Chena Khyber	A.V.P
59.	Muhammad Asif	SPET (BS-16) GHS No.3 Abbottabad	IPE (BS-17) GHSS No.3 Abbottabad	A.V.P
60.	Riaz Ahmad	SPET (BS-16) GHS Maidan Bandai Dir Lower	IPE (BS-17) GHSS Manial Dir Lower	A.V.P
61.	Shah zamin	SPET (BS-16) GHS Matta Charsadda	IPE (BS-17) GHSS Marhiati Banda Nowsher	A.V.P
62.	Sadqat Khan	SPET (BS-16) GHS Civil Quarters Peshawar	IPE (BS-17) GHSS Gat Shawar Swat	A.V.P
63.	Sagheer Ahmad	SPET (BS-16) GHS Jhangi Abbottabad	IPE (BS-17) GHSS Chamialy Abbottabad	A.V.P
64.	Muhammad Farooq	SPET (BS-16) GHS Pershai Karak	IPE (BS-17) GHSS Simpura Swat	A.V.P
65.	Tariq Shah	SPET (BS-16) GHS K.T.S No.2 Haripur	IPE (BS-17) GHSS Karori Manshera	A.V.P
66.	Nisar Hussain	SPET (BS-16) GHS Ali Baig Nowshara	IPE (BS-17) GHSS Kalkot Dir Upper	A.V.P
67.	Alam Khan	SPET (BS-16) GHS Seri Behlol Mardan	IPE (BS-17) GHSS Miandam Swat	A.V.P
68.	Jehan Zeb	SPET (BS-16) GHSS Saleeem Khan Swabi	IPE (BS-17) GHSS Nogram Buner	A.V.P
69.	Khurshid Alam	SPET (BS-16) GHS Takht Bhai Mardan	IPE (BS-17) GHSS Mian Kali Dir Lower	A.V.P
70.	Malak Taj	SPET (BS-16) GHSS Kot Jai D.I.Khan.GHS Parkho Dheri Mardan	IPE (BS-17) GHSS Fatima Mardan	A.V.P
71.	Amjad Ali	SPET (BS-16) GHSS Chamtar Mardan	IPE (BS-17) GHSS Nehgdara Dir Upper	A.V.P
72.	Naseer ud Din	SPET (BS-16) GHS Jarooba Nowshara	IPE (BS-17) GHSS Khairbad Dir Lower	A.V.P
73.	Faqir Hussain	SPET (BS-16) GHS Turangzai Charsadda	IPE (BS-17) GHSS Chuprial Swat	A.V.P
74.	Zafar Ullah	SPET (BS-16) GHSS Tari .Jahha Nowshara	IPE (BS-17) GHSS Adamzai Nowshara	A.V.P

75.	Tehseen Ullah	SPET (BS-16) GHS Jogi Wara Peshawar	IPE (BS-17) GHSS Haryan Bala Peshawar	A.V.P
76.	Inam Ullah	SPET (BS-16) GHS Manakrao Peshawar	IPE (BS-17) GHSS Kalam Swat	A.V.P
77.	Janis Khan	SPET (BS-16) GCMHS No.04 Peshawar Cantt	IPE (BS-17) GHSS Barawal Swat	A.V.P
CONSEQUENTIAL TRANSFER/ADJUSTMENT				
78.	Wasim Shahzad	IPE (BS-) GHSS Rehanpur Dir Lower	SIPE (BS-18) GHSS Salima Sikandar Khel Bala Bannu in (OPS)	A.V.P

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director, DPD Khyber Pakhtunkhwa.
4. Director, DCTE Abbottabad.
5. District Education Officer (Male), Concerned.
6. District Accounts Officer, Concerned.
7. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
9. PA to Additional Secretary (Estab) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.

(NAVEED/ULLAH SHAH)
SECTION OFFICER (SCHOOLS MALE)

SECRETARY DAWN
NO. 1274
Dated 30/5/2022

30/5/2022

تاریخ: 0313-5943815

جنرل ڈائری

IPF

المان

مقامی

جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں
جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں
جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

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جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

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جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں
جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں
جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

جانچنا

جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

خدمت خراب ہے۔ اس بارے میں جنرل ڈائری سے تعلق رکھنے والے تمام ایجنسیوں پر اسی بارے میں

30-5-22

19

H

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM. No. _____ /2022

Habib Ullah

versus

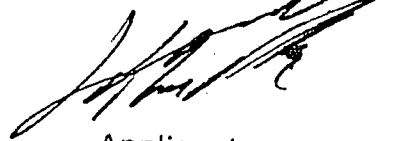
Secretary & Others

**APPLICATION FOR SUSPENSION OF OFFICE ORDER
DATED 27-05-2022 TILL THE DECISION OF THE CASE:**

Respectfully Sheweth:

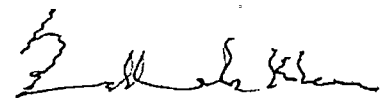
1. That applicant filed the subject Appeal before this hon'ble Tribunal today.
2. That no reason in order of transfer is given but the same was made in the interest of R. No. 03 and not in the interest of General Public.
3. That the impugned order is motivated through political influence and not of a normal one.
4. That prima facie case exists, balance of convenience lies in favor of applicant and is hopeful of the success of the appeal.
5. That facts and grounds of the appeal be treated as integral part of this application for grant of Interim relief.

It is, therefore, requested that order dated 27-05-2022 be suspended till the decision of the case. And apart from the same, no adverse action be taken against applicant till the final disposal of the case.



Applicant

Through



(Saadullah Khan Marwat)

Advocate

21-A Nasir Mension,

Shoba Bazar, Peshawar.

Ph: 0300-5872676

Dated: 26-09-2022

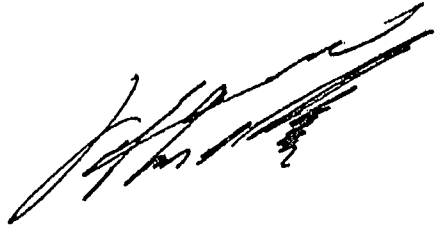
21
—**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

C.M. No. _____ /2022

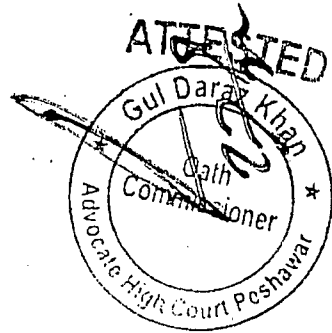
Habib Ullah .. versus Secretary & Others

AFFIDAVIT

I, Habib Ullah, Applicant, do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.



DEPONENT



کے لئے جس کا یہ ہے کہ اس کے لئے جو اس کے لئے ہے اور

مستجاب ایسا ہے

حسب فی کلمہ جاری بنام

دعویٰ

یا حسرتی

© ————— ©

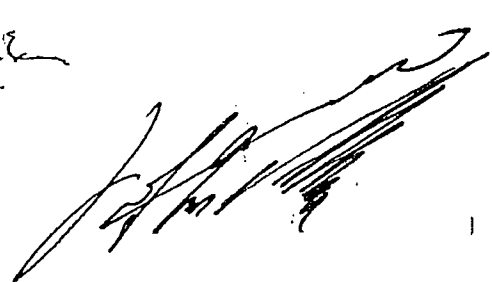
بیت پر مذکور جو عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام پشاور
کیسے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
تو اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
یہ ہے جواب دہی اور اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
مہتمم کی طرف سے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
اور اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
اور اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
قبول ہو گا اور اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
تو اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
پیرہو یا اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے

26-09-22

التعبید

ورباب بیگ انکمال
ایڈووکیٹ

مسٹر ایڈووکیٹ
ایڈووکیٹ



ایڈووکیٹ