14-2-2022

save as before an 18-7-2022.

18th July, 2022

- 1. Petitioner in person present. Syed Naseer Ud Din Shah, Asst: Advocate General alongwith Mr. Saqib Shahzad, Office Assistant for respondents present.
- 2. Respondents submitted copy of notification endorsement No. 2993-98/promotion/Court Case PST/SPST to PSHST/2022 dated 30.05.2022 whereby in compliance of the judgment of the Tribunal, the grievance of the petitioner has been redressed. Since the order of the Tribunal has been complied with, therefore, the instant execution petition is disposed off in the above terms. Consign.
- 3. Pronounced in open court in Abbottabad and given under my hand and seal of the Tribunal on this 18th day of July,

2022.



(Kalim Arshad Khan) Chairman

Camp Court Abbottabd.

Office Of The District Education Officer (Male) Abbottabad

Notification

In pursuance of the Judgment of Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar at Camp Court Abbottabad dated 17-03-2021 passed in 05 connected service appeals Nos. 2231/2019, 2234/2019, 2235/2019, 2236/2019 & 2237/2019 and this office challenged the Judgment before the August Supreme Court of Pakistan and filed CP Nos. 279-P/2021, 280-P/2021, 281-P/2021 & 283-P/2021 respectively and same are subjudice before the Honorable Supreme Court of Pakistan. As the petitioners filed Execution Petitions Nos. 144/2021, 146/2021, 147/2021 & 210/2021 before the Honorable Service Tribunal at Camp Court Abbottabad and Honorable Tribunal directed the department on 20-12-2021 to implement the Judgment conditionally subject to the final outcome of the CPLA. Hence, the following Primary School Teachers & Senior Primary School Teachers are hereby provisionally promoted subject to the final outcome of the above referred CPs as they do not fulfill the requisite criteria for promotion as per Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017 dated 30-01-2018, to the post of PSHT BPS-15 (Rs.16120-1330-56020) plus usual allowances on the terms & conditions given below and are hereby further posted against vacant post of PSHT (B-15) in the schools noted against their names with immediate effect.

S.No	Name & Desig:	Name of Present School	Place of Posting	Remarks
1	Muhammad Ashfaq, PST	GPS Khanda Khoo	GPS Darra Manna circle P.K.Khan	Against Vacant Post
2	Rab Nawaz, SPST	GPS Tandara	GPS Kangrora circle P.K Khan	do
3	Muhammad Iqbal, SPST	GPS No.4 ATD	GPS Pind Ganda circle P.K.Khan	do
4	Ageel Ahmed, SPST	GPS Taroor	GPS Taroor	do

Note: Pay of S.No.1 may be fixed as SPST (BPS-14) and then as PSHT BPS-15 accordingly.

Terms & Conditions:

- 1. Their Promotion is subject to the Final outcome of the above mentioned CPs and in case of acceptance of CPs their promotion order shall stand withdrawn automatically.
- 2. On their promotion, the teacher concerned will be on probation for a period of one year in terms of section-6(2) of Khyber Pakhtunkhwa Civil Servant Act 1973 read with rule 15(1) of Civil Servant (Appointment, Promotion & Transfer) Rules 1989.

- 3. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 4. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed time to time.
- 5. Their Inter-Se-Seniority on the lower post will intact.
- 6. They will give an undertaking on Judicial Stamp Paper to be recorded in their Service Books to the effect that if any over payment is made to them shall be recovered and if the above CPs accepted they will be reversed to their previous posts.
- 7. The should join their posts within fifteen days (15) of the issuance of this order. In case of failure to join their post within 15 days, their promotion will expire automatically and no subsequent appeal will be entertained.
- 8. Necessary entries should be recorded in their service books.
- 9. Charge report should be submitted to all concerned.
- 10. Checking of verification of all documents shall be ensured by the DDO concerned.
- 11. No TA/DA is allowed.

DISTRICT EDUCATION OFFICER (MALE)
ABBOTTABAD

Endst: No. 2993-98/Promotion/Court Case PST/SPST to PSHT /2022 Dated 30-05/2022

Copy forwarded to the:

- 1 PS to Secretary Govt: of Khyber Pakhtunkhwa E&SED Peshawar
- 2 Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3 District Monitoring Officer (IMU) Abbottabad
- 4 District Comptroller of Accounts Abbottabad
- 5 Sub Divisional Education Officer (M) Abbottabad
- 6 Sub Divisional Education Officer (M) Lower Tanawal.
- 7 Sub Divisional Education Officer (M) Lora.
- 8 Assistant Programmer EMIS Local Office
- 9 Teachers concerned.

Y: DISTRICT EDUCATION OFFICER (MALE)

ABBOTTABAD

10.11.2021

Petitioner in person present. Mr. Kabirullah Khattak, Addl. AG alongwith Sohail Ahmad, Litigation Officer for the respondents present.

Reply submitted on behalf of the respondents. To come up for objection of the petitioner and arguments on 23.12.2021 before S.B at Camp Court, Abbottabad.

Charman

20.12.2021

Petitioner in person present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Alamzeb, Litigation Officer for respondents present.

Representative of the department submitted copy of the receipt to the effect that CPLA has been filed in the august Supreme Court of Pakistan against the judgment of Service Tribunal dated 17.03.2021. The department is directed either to get the Service Tribunal judgement suspended from the august Supreme Court of Pakistan or implement it conditionally subject to the outcome of CPLA. Last chance is therefore, granted to the respondent-department with the direction to come up with conditional implementation report. Adjourned. To come up for further proceedings on 14.02.2022 before S.B at camp court Abbottabad.

(Mian Muhammad) Member(E)

Camp Court Abbottabad

Form- A FORM OF ORDER SHEET

Court of		
Execution Petition No	14 / /2021	

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1*	2	3
<u> </u>	-	
1	06.08.2021	The execution petition of Mr. Muhammad Ashfaq receive
		today by post may be entered in the relevant register and put up
		the Court for proper order please.
,		100
		REGISTRAR
2-		This execution petition be put up before S. Bench at
•		Peshawar on 17/09/21
		CHAIRMAN
	17.09.2021	Nemo for the petitioner. Notices be issued
	17.00.2021	
'		petitioner as well as respondents. To come up f
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 199 /2021

IŃ

Service Appeal No. 2234/2020

Muhammad Asfaq S/O Muhammad Yousaf R/O Tehsil Lower Tanawal District Abbottabad, presently posted as PST GPS Khanda Khu Abbottabad

.....Appellant

VERSUS

Government Khyber Pakhtunkhwa, through Chief Secretary Khyber Pakhtunkhwa Peshawar & Others

.....Respondents

INDEX

Sr.No.	Described	 ;	
	Description	Page Nos	Annexures
1 	Execution Petition along with Affidavit	01 to 03	*
2	Copy of Judgment dated 17-03-2021	04 to 08	"A"
3	Copy of application dated 27-03-2021	09	"B"

Dated: 04-08-2021

Appellant (In Person)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. _

IN

Service Appeal No.2234/2019

Muhammad Asfaq S/O Muhammad Yousaf R/O Tehsil Lower Tanawal Abbottabad, presently posted as PST GPS Khanda Khu Abbottabad

..Appellan

VERSUS

- 1. Government Khyber Pakhtunkhwa, through Secretary E&SED, Khyber Pakhtunkhwa Peshawar.
- 2. Director E&SE, Khyber Pakhtunkhwa Peshawar.
- 3. District Education Officer (M) Abbottabad.
- 4. Sub Divisional Education Officer (M) Lower Tanawal Abbottabad.

..... Respondents

EXECUTION PETITION

EXECUTION PETITION SEEKING FOR IMPLEMENTATION OF JUDGMENT DATED 17/03/2021 PASSED IN SERVICE APPEAL NO. 2234/2019 BY THIS HONOURABLE TRIBUNAL KHYBER PAKHTUNKHWA AT CAMP COURT, ABBOTTABAD.

Respectfully Sheweth,

1. That petitioner filed service appeal No. 2234/2019 before the Khyber Pakhtunkhwa Service Tribunal Peshawar and same was allowed vide judgment dated 17-03-2021 passed in appeal No. 2231/2019 Titled Muhammad Iqbal & Others. (Copy of judgment dated 17-03-2021 is annexed herewith as annexure "A").

- 2. That the petitioner submitted an application on 27-03-2021 before respondent No. 3 regarding implementation of the judgment but no vain. (Copy of the application is annexed herewith as Annexure "B"
- 3. That the respondents are legally bound to implement the judgment of this Honourable Tribunal with letter & spirit but respondents are reluctant to implement the same.

It is therefore, very humbly prayed that on acceptance of instant execution petition judgment dated 17-03-2021 passed by this Honourable Tribunal may graciously be implemented in its true letter & spirit.

(Muhammad Ashfaq)
In Person

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	Execution	Petition	No/20	21
		ĺΝ		
	Service A	ppeal No.	2234/2020	!
Muhammad Asfaq S/O Muhammad Yousaf R/O Abbottabad, presently posted as PST GPS Khanda Khu			Tanawal (istrict
		•	Ар	pellant
VERSUS		1		1
Government Khyber Pakhtunkhwa, through Chief Sec Peshawar & Others	retary Kh	yber Pal	khtunkhwa	
		••••	Respo	ondents

AFFIDAVIT

I, Mr. Muhammad Ashfaq PST GPS Khanda Khu Abbottabad do hereby affirm and declare that the contents of forgoing Execution Petition are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.



DEPONENT

Any A

PESHAWAR

PESHAWAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT, ABBOTTABAD

Service Appeal No. 2231/2019

Date of Institution

26.12.2019

Date of Decision

17.03.2021

Muhammad Iqbal son of Abdul Kareem Khan, presently S.P.S.T G.P.S No.4 Tehsil & District Abbottabad.

(Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education (E&SE)Khyber Pakhtunkhwa Peshawar and three others.

(Respondents)

Muhammad Liaqat,

Advocate

.. For appellant.

Riaz Khan Paindakheil,

Assistant Advocate General

For respondents.

ROZINA REHMAN ATIQ UR REHMAN WAZIR

.. MEMBER (J)

.. MEMBER (E)

<u>JUDGMENT</u>

ROZINA REHMAN, MEMBER: This judgment is intended to dispose of 05 connected service appeals which are:

1. Service Appeal No.2231/2019

Certified to be true copy

Khyber Fakhtukhwa Service Tribunal

17/3/21

ATTESTED



- (2. Service Appeal No. 2234/2019)
- 3. Service Appeal No. 2235/2019
- Service Appeal No. 2236/2019
- Service Appeal No. 2237/2019

In view of common questions of law and facts, the above captioned appeals are being disposed of by this order.

- 2. The relevant facts leading to filing of instant appeals are that appellants were appointed P.T.C/P.S.T. as having qualification. There were duly qualified and eligible for promotion however, promotion was denied only on the strength of amendments brought about through notification dated 30.01.2018 wherein the requisite educational qualification was enhanced from Intermediate to B.A. Some of the appellants also filed Writ Petition before the august Peshawar High Court Abbottabad Bench which was treated as departmental representation and was sent to the respondents for decision which was rejected, hence, the present service appeal.
- 3. We have heard Muhammad Liaqat Advocate for appellant and Riaz Khan Paindakheil learned Assistant Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.
- 4. Muhammad Liaqat Advocate counsel appearing on behalf of appellants, inter-alia, contended that the order dated 18.12.2019 is against law and facts which is void ab-initio and without legal authority. He argued that the impugned order is against the policy as a meeting Certified to be true copy

Attested

ENAMIDER Khyber Pakhtukhwa Service Tribunal Peshawar

6

was held on 08.05.2018 wherein issue of promotion was discussed at Serial No.10 and all the D.E.Os were directed that the promotion cases of the P.S.Ts to S.P.S.Ts/P.S.H.T must be entertained according to the previous policy of promotion while new rules are to be applied for new induction/recruitment. Learned counsel further submitted that the notification dated 30.11.2018 is not applicable in the case of appellants as at the time of their appointment, no such terms & conditions were incorporated in the appointment order of the appellants, hence, notification mentioned above has no legal value in the case of appellants and they are eligible for promotion in view of notification dated 13.11.2012.

- 5. As against that learned A.A.G submitted that as per notification dated 30.11.2018, the requisite qualification for promotion is Bachelor Degree, whereas, appellants do not fulfill the requisite qualification.
- 6. From the record, it is evident that the respondents had issued a notification dated 13.11.2012, wherein, method of recruitment/promotion has been laid down for Primary School Teachers (P.S.T BPS-12) Senior Primary School Teachers (S.P.S.T BPS-14) and Primary School Head Teachers (P.S.H.T B.P.S-15). Criteria for promotion from P.S.T to S.P.S.T is on the basis of seniority-cum-fitness with at least five years service with Intermediate or equivalent qualification. Similarly, promotion from S.P.S.T to P.S.H.T is based on seniority-cum-fitness with at least ten years service with Intermediate or equivalent. Appellants were appointed as P.S.T who were holding

Attested my tag

Certified to be true copy

17/3/

almost 20-25 years of service with Intermediate qualification obtained during the year 2014-16. Record reveals that the appellants approached the Hon'ble Peshawar High Court in Writ Petition for their promotion on the strength of Promotion Policy 2012 and the High Court converted their petition into departmental appeals with directions to the respondents to consider their grievances and decide the same in accordance with law. The respondents accordingly processed their request but in the meanwhile, certain amendments were made in the promotion policy re-emerging as Promotion Policy 2018, wherein qualification for promotion was enhanced from Intermediate to Bachelor Degree, therefore, their requests were turned down as by now they were not eligible for promotion according to new policy. The appellants were qualified for promotion under the Policy of the year 2012 after obtaining the required qualification in 2014-16 but they were not promoted and their due right of promotion was violated. It is also evident from the Minutes of Meeting dated 16.05.2018 whereby respondent No.2 was conscious of the fact that promotions need to be done as per criteria laid down in 2012 Policy but somehow, the District Education Officer did not comply with such directions which resulted into miscarriage of justice.

7. In view of above, the instant appeals are accepted with direction to the respondents to consider the cases of promotion of the appellants as per guidelines contained in the Promotion Policy of 2012.

Attested

Certified to be true copy

EXAMILER Khyber Pakhtukhwa Service Probunal

Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED. 17.03.2021

(Atiq ur Rehman Wazir) Member (E)

Camp Court, Abbottabad

(Rozina Rehman) Member (J) Camp Court, Abbottabad

Certifica to be true copy

Altested

Anx (على) ضلع ايبكة بإد بخرمت جناب دسٹر كا يجو بيش آفيسر (ميل) ضلع ايبك آباد عنوان: _ درخواست حصول برموش جناب عالی! ورخواست ذی*ل عرض ہے*-مود باند کزارش ہے کہ سائل عرصہ 26سال سے محکمہ بذا میں بطور PST شیر BPS-13 يس اين فرائض سرانجام دے رہا ہے چونكدسائل كي تعليمي قابليت FA ہے اور سائل كا Senority نبر 1185 جبكه جونير ملازيين كو پرموث كرديا كيا ہے اور سائل كومجوراعدالت جانا پرا چونله آب عدالت عاليه كافيمله بهي أج كا بهت لهذا الى كى روشى بين ما كل كوجلد از جلد -SPT، BPS-14 میں پروموث کیا جائے اور سائل کو 2012 سے بقایا جات بھی دیے جا کیں۔ (الم تيرين لمتر فعيلم سكون الربيوس لشاولف سا) لهذا استدعام كرماكل كوجلدا زجلد BPS-14 يل يروموت كياجات أميد م كرماكل كى ورخواست مدرانه غور فرما كرسائل كى دا درى فرما كى جاوت-Aftested عين نوازش موگا-المرقوم:2021/ منحور منت برائمري سكول بمنذا كاده تخصيل لوهر تناول شكتا يبث آباو SHOT ON SMARTH ASTEMACO XINFINI YA

Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq......Appellant

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

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Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq.....Appellan

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

PRELIMINARY OBJECTION:-

- 1. That the instant execution petition is not maintainable in the present form.
- 2. That the petitioner is estopped by his own conduct to filed the present petition.
- 3. That the petitioner has not come to this Tribunal with clean hands.
- 4. That the petitioner has got no cause of action to file the present petition against the respondents.
- 5. That the respondents have challenged the judgment of this Honorable Tribunal passed in appeal No. 2234/2019 dated 17-03-2021 before the Honourable Supreme Court of Pakistan and <u>CPLA No. 280-P/2021</u> is subjudice before the Honourable Supreme Court of Pakistan.

Factual objections:-

- 1. That Para No. 1, of the execution petition relates to record hence, need no comment.
- 2. In response to Para No. 2, of the execution petition it is submitted that department challenged the judgment of this Honourable Tribunal dated 17-03-2021 before the August Supreme Court of Pakistan and <u>CPLA No. 282</u>

 <u>P/2021</u> is pending before the Honourable Supreme Court of Pakistan.
- 3. In reply to Para No. 3, of the execution petition it is submitted that the judgment of this Tribunal is impugned before the August Supreme Court of Pakistan and CPLA is subjudice before the Supreme Court of Pakistan.

4. That the respondents seek leave of this Honourable Tribunal to raise additional grounds during the course of arguments.

It is therefore, respectfully prayed that instant executive petition may

please be Sin Die adjourned till the final decision of CPLA.

SUB DIVISIONAL EDUCATION OFFICER (M)
LOWER TANAWAL
(Respondent No. 4)

DISTRICT EDUCATION OFFICER
ABBOTTABAD

(Respondent No. 3)

Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Shaukat, District Education Officer (M) Abbottabad, do hereby affirm and declared that contents of forgoing reply are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

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Sr.No	Description	Page Nos	Annexures
1	Reply alongwith Affidavit.	01 to 03	1

Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

Respectfully Sheweth:-

PRELIMINARY OBJECTION:-

- 1. That the instant execution petition is not maintainable in the present form.
- 2. That the petitioner is estopped by his own conduct to filed the present petition.
- 3. That the petitioner has not come to this Tribunal with clean hands.
- 4. That the petitioner has got no cause of action to file the present petition against the respondents.
- 5. That the respondents have challenged the judgment of this Honorable Tribunal passed in appeal No. 2234/2019 dated 17-03-2021 before the Honourable Supreme Court of Pakistan and <u>CPLA No. 280-P/2021</u> is subjudice before the Honourable Supreme Court of Pakistan.

Factual objections:-

- 1. That Para No. 1, of the execution petition relates to record hence, need no comment.
- 2. In response to Para No. 2, of the execution petition it is submitted that department challenged the judgment of this Honourable Tribunal dated 17-03-2021 before the August Supreme Court of Pakistan and <u>CPLA No. 280</u> P/2021 is pending before the Honourable Supreme Court of Pakistan.
- 3. In reply to Para No. 3, of the execution petition it is submitted that the judgment of this Tribunal is impugned before the August Supreme Court of Pakistan and CPLA is subjudice before the Supreme Court of Pakistan.

4. That the respondents seek leave of this Honourable Tribunal to raise additional grounds during the course of arguments.

It is therefore, respectfully prayed that instant executive petition may

please be Sin Die adjourned till the final decision of CPLA.

SUB DIVISIONAL EDUCATION OFFICER (M) **LOWER TANAWAL**

(Respondent No. 4)

DISTRICT EDU

ABBOTTABAD (Respondent No. 3)

Execution Petition No. 144/2021

IN

Service Appeal No. 2234/2019

Muhammad Ashfaq.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & OthersRespondents

JOINT REPLY ON BEHALF OF RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Shaukat, District Education Officer (M)
Abbottabad, do hereby affirm and declared that contents of forgoing reply are correct and true according to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

DEPONENT

Received a sum of Rs. 3500x5=17500/- (Rupees Seventeen thousand and five hundred only) as expenses for filing CPLA (Photo Stat, binding, Supreme Court tickets, court fee and notices to the respondents) in the Supreme Court of Pakistan in its branch registry at Peshawar in connection with the following cases.

S.A. No. 2231/2019 Muhammad Iqbal Versus Govt. of KPK

S.A. No. 2234/2019 Muhammad Ishfaq Versus Govt. of KPK 3-

S.A. No. 2235/2019 Aqeel Ahmad Versus Govt. of KPK 4-

S.A No. 2236/2019 Muhammad Javed Versus Govt. of KPK

S.A. No. 2237/2019 Rabnawaz Versus Govt. of KPK



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-921111

MOST IMMEDIATE / COURT MATTER

NO.SO (Lit-II) E&SED/1-3/SA# 2231 & 2234 to 2237/19/M. Iqbal SPST Dated Peshawar, the 07-04-2021.

To

The District Education Officer (Male), E&SE Abbottabad.

Subject:

SERVICE APPEALS NO. 2231 & 2234 TO 2237/2019

MUHAMMAD IQBAL AND OTHERS VS GOVT. OF KHYBER

PAKHTUNKHWA THROUGH SECRETARY E&SE

DEPARTMENT AND OTHERS.

I am directed to enclose herewith a copy of minutes of the meeting received from Law Department vide letter No.SO(Lit)/LD/9-5(58 to 62) E&SED / 2021/4120 dated 07.04.2021. The Scrutiny Committee decided in its meeting that "the subject case is a fit case for filing of Appeal/ CPLA before the Suprme Court of Pakistant."

It is therefore, requested that a well conversant officer of your office (not below the rank of BS-17) alongwith relevant record of the subject case may please be deputed to attend the office of Advocate General Khyber Pakhtunkhwa immediately for doing the needful under intimation to this Department and all other concerned.

Enc: as above. Endst: of even No. & date.

SECTION OFFICER (LIT:II)

Copy forwarded to:-

- 1. The Advocate General, Khyber Pakhtunkhwa, Peshawar.
- 2. The Assistant Law Officer (Lit), Law Department, w/r to his letter cited above.
- 3. PA to Deputy Secretary (Legal) E&SE Department.

SECTION OFFICER (LIT:II)

THE SUPREME COURT OF PAKISTAN (APPELLATE JURISDICTION) (ORIGINAL JURISDICTION)

CP No.-P/2021

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar & others

PETITIONER(S)

VERSUS

Rab Nawaz

RESPONDENT

I (we) Petitioner (Govt. of KPK) in the above suit/Appeal/Petition/Reference, do hereby appoint and constitute Mian Saadullah Jandoli, Advocate-on-Record, Supreme Court, for Govt. of Khyber Pakhtunkhwa the Attorney for the aforesaid appellant [or plaintiff(s) or Petitioner(s) or Respondent (s) or defendant (s) or opposite party] to commence and prosecute (or to appear and defend this action/appeal/suit/petition/reference on my/our behalf and all proceeding that may be taken in respect on any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take back documents, to accept the process of the Court, to appoint and instruct counsel, to represent the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] in the above matter and to do all things incidental to such acting for the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party]. The aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] agree (s) to ratify all acts done by the aforesaid Advocate-on-Record in pursuance of this authority

In witness whereof I/we do hereunto set my/our hand (s) this day of

Accepted

jian Saadullah Jandoli), Advocate-on-Record Supreme Court of Pakistan'
Supreme Court of Pakistan'
(Orther), advocate Central's
Sill Office Kerk attach Court Building, Peshawar.
Office Tell # 199 92 10312, 9210119

Government of ber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar SECRI

Elersentery that . Cort of Live 2.5 -

Director Elementary Khuber Olfector Education,

Secondary

Pakhtunkhwa,

Peshawar Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

District Edu

_{este}s Education

District Education Officer (Male) Abbottabad

Sub Divisional Education Officer (M) Lower Tanawal, Abbottabad.

> SIDEO(M) Lower Tanawal Abbottabad

THE SUPREME COURT OF PAKISTAN (APPELLATE JURISDICTION) (ORIGINAL JURISDICTION)

CP No.-P/2021

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar & others VERSUS

PETITIONER(S)

RESPONDENT

Muhammad Iqbal

I (we) Petitioner (Govt. of KPK) in the above suit/Appeal/Petition/Reference, do hereby appoint and constitute Mian Saadullah Jandoli, Advocate-on-Record, Supreme Court, for Govt. of Khyber Pakhtunkhwa the Attorney for the aforesaid appellant [or plaintiff(s) or Petitioner(s) or Respondent (s) or defendant (s) or opposite party] to commence and prosecute (or to appear and defend this action/appeal/suit/petition/reference on my/our behalf and all proceeding that may be taken in respect on any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take back documents, to accept the process of the Court, to appoint and instruct counsel, to represent the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] in the above matter and to do all things incidental to such acting for the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party]. The aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] agree (s) to ratify all acts done by the aforesaid Advocate-on-Record in pursuance of this authority

In witness whereof I/we do hereunto set my/our hand (s) this day of

Accepted

MAdvocate-on-Record
Supreme Court of Partition
MIAN (19th Phylogater General's
Office KPK, High Court Building, Peshawar.
Suffice Ten # 021-9240312; 9210119

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education

Department, Peshawage CRETARY they and Seconda. Thereine

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Sub Divisional Education Officer (M). Lower Tanawal, Abbottabad.

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tents of Khyker Pokistushing

THE SUPREME COURT OF PAKISTAN (APPELLATE JURISDICTION) (ORIGINAL JURISDICTION)

CP No.-P/2021

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar & others

PETITIONER(S)

VERSUS

Muhammad Ashfaq

RESPONDENT

I (we) Petitioner (Govt. of KPK) in the above suit/Appeal/Petition/Reference, do hereby appoint and constitute Mian Saadullah Jandoli, Advocate-on-Record, Supreme Court, for Govt. of Khyber Pakhtunkhwa the Attorney for the aforesaid appellant [or plaintiff(s) or Petitioner(s) or Respondent (s) or defendant (s) or opposite party] to commence and prosecute (or to appear and defend this action/appeal/suit/petition/reference on my/our behalf and all proceeding that may be taken in respect on any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take back documents, to accept the process of the Court, to appoint and instruct counsel, to represent the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] in the above matter and to do all things incidental to such acting for the aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party]. The aforesaid appellant [or plaintiff (s) or petitioner(s) or respondent (s) or defendant (s) or opposite party] agree (s) to ratify all acts done by the aforesaid Advocate-on-Record in pursuance of this authority

3.

In witness whereof I/we do hereunto set my/our hand (s) this day of

Accepted

(Nian Saaduliah Jandoli) Supreme Court of Rational (for KPK) Addocate General's Quekkpk, High Court Building, Peshawar. Office Tel. # 199129210312, 9210119 Supreme Ct K. P.K. Fer Gover of K.P.K.

Government of Khyther Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar

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Secondary Director Elementary

Khyherctor Pakhtunkhwa, Education,

Peshawar. Hamentary & Secondary Education Khyber Pakhtunkhwa Peshawar

(M), Abbottabad. District Education

> District Education Officer (Male) Abbottabad

Education Officer (M) Sub Divk Lower Tanawal, Abbottabad.

5'D E O (M) Lower Tanawal **Abbottabad**