



21st Sept, 2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for official respondents No. 1 to 3 and counsel for private respondent No. 4 present.

2. Learned counsel for the appellant submitted an application for withdrawal of the instant service appeal wherein he stated that grievance of the appellant has been redressed and does not want to pursue the case further. This appeal is dismissed as withdrawn in the above terms. Consign.

3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 21st day of September, 2022.*



(Faveeha Paul)
Member(Executive)


(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad



21.01.2022

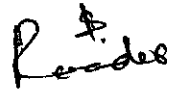
Learned counsel for the appellant present. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 to 3 present and sought time for submission of written reply/comments. None present on behalf of private respondent No. 4, therefore, he be summoned through registered post and to come up for written reply/comments on 16.02.2022 before the S.B at Camp Court Abbottabad. The operation of the impugned notification shall remain suspended till the date fixed.


(Salah-ud-Din)
Member (J)

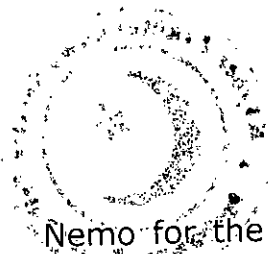
Camp Court A/Abad

16.2.22

Due to Retirement of worthy chair —
the Tribunal NON Functional to come up
for the same on Dated. 20-7-22 at camp court A-Abad


Reader

20.07.2022


Nemo for the appellant. Mr. Sohail Ahmed Zeb, Litigation Officer alongwith Mr. Noor Zaman Khattak, District Attorney for official respondents No. 1 to 3 present. Private respondent No. 4 alongwith his counsel present.

Para-wise comments on behalf of official respondents No. 1 to 3 as well as private respondent No. 4 submitted, which are placed on file. Adjourned. To come up for rejoinder, if any, as well as arguments on 21.09.2022 before the D.B at Camp Court Abbottabad.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel through registered post for the date fixed.


(Salah-Ud-Din)
Member (J)

Camp Court Abbottabad

ANNEXURE "E" (34)

RELIEVING CERTIFICATE

In compliance with the E-transfer order of Mr. Masood ur Rehman SS (Pak Studies) BPS-17 has been Transferred at GHSS Harno Aziz Abad Abbottabad against the vacant post vide No. SO(SM)E&SED/7-1/2021/PT/E-Transfer S.No 118 Dated 08-07-2021.

He is hereby relieved off from his duties on 19-07-2021 before noon and is directed to report to the office of Principal GHSS Harno Aziz Abad Abbottabad

Principal
Principal
GHSS Thakra
GHSS Thakra Manshera

*Relieving certificate
as proposed, have
verified.*

As per order


Principal

*District Edu: Office,
Manshera.*

Abad Abbottabad. He also referred to the letter No. 501 dated 19.07.202 of the Principal, GHSS Harno Aziz Abad Abbottabad addressed to the Secretary, E&SE Khyber Pakhtunkhwa Peshawar on the subject of non-availability of post of Subject Specialist (Pak-study), which reveals that the post of S.S Pak Study has already been filled at GHSS Harno Abbottabad vide order dated 09.06.2021. Copy of the said transfer order has also been annexed with Memorandum of Appeal and accordingly respondent No. 4 is shown to have been transferred from GHSS Jal Gali, Mansehra to S.S Pak-Study (BS-17) GHSS Harno Abbottabad against the vacant post. The given position if happened as stated herein before, is apt to give rise to serious question about defective functioning of E-Transfer Policy. When the vacancy of SS Pak-Study at GHSS Harno Aziz Abad was purportedly verified online on 02.07.2021, how it comes that the said post despite transfer of respondent No. 4 vide order dated 09.06.2021 was verified as vacant. In view of serious arguable point, this appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 21.01.2022 before S.B at camp court, Abbottabad.

Appellant Deposited
Security & Process Fee
07/1/22

An application for interim relief has been filed alongwith memorandum of appeal for suspension of operation of the impugned notification dated 09.06.2021 passed by respondents No. 1 & 2 in favour of respondent No. 4 till final disposal of this service appeal. Notice of the said application be also given to the respondents. The operation of the aforementioned impugned notification is suspended till date fixed.

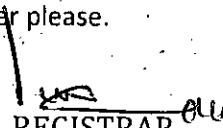


Chairman
Camp Court, A/Abad

Form- A

FORM-OF ORDER SHEET

Court of _____

Case No.- 7782/2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 24/11/2021 | <p>The appeal of Mr. Masood-ur-Rehman resubmitted today by Qazi Muhammad Azhar Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> |
| 2- | | <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put there on <u>30/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 30.12.2021 | <p>Counsel for the appellant present. Preliminary arguments have been heard.</p> <p>Learned counsel for the appellant submits that the appellant applied for his transfer under Khyber Pakhtunkhwa E&SE E-Transfer Policy with indication of two posts one at GHSS Harno Aziz Abad and the other at GHSS Bherkund on 14.06.2021. The online verification was made and copy of the same as annexed with the appeal reveals that vacancy at GHSS Harno Aziz Abad was verified on 02.07.2021. Subsequently, the appellant vide order dated 07.08.2021 bearing No. SO(SM)E&SED/7-1/2021/PT/E-Transfer was transferred and adjusted as S.S (BS-17) (Pak-Study) GHSS Harno Azizabad, Abbottabad against a vacant post. Learned counsel contends that the appellant due to his examination duty got himself relieved from his previous school i.e. GHSS Thakra on 19.07.2021 to report to the office of Principal GHSS Harno Aziz</p> |

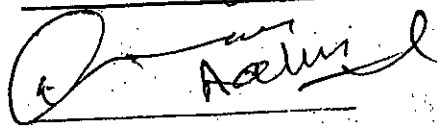
**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: MASOOD-ur-Rehman vs. Govt of KP etc

| S.# | Contents | Yes | No |
|-----|--|-------------------------------------|-------------------------------------|
| 1. | This appeal has been presented by: <u>Dazi Muid Azhar Counsel</u> ^{with client} | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. | Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. | Whether Appeal is within time? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. | Whether the enactment under which the appeal is filed mentioned? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. | Whether the enactment under which the appeal is filed is correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. | Whether affidavit is appended? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. | Whether affidavit is duly attested by competent oath commissioner? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 8. | Whether appeal/annexures are properly paged? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. | Whether certificate regarding filing any earlier appeal on the subject, furnished? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 10. | Whether annexures are legible? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. | Whether annexures are attested? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 12. | Whether copies of annexures are readable/clear? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. | Whether copy of appeal is delivered to A.G/D.A.G? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 14. | Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 15. | Whether numbers of referred cases given are correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 16. | Whether appeal contains cuttings/overwriting? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 17. | Whether list of books has been provided at the end of the appeal? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 18. | Whether case relate to this Court? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 19. | Whether requisite number of spare copies attached? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 20. | Whether complete spare copy is filed in separate file cover? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 21. | Whether addresses of parties given are complete? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 22. | Whether index filed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 23. | Whether index is correct? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 24. | Whether Security and Process Fee deposited? on | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 25. | Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on | <input type="checkbox"/> | <input type="checkbox"/> |
| 26. | Whether copies of comments/reply/rejoinder submitted? on | <input type="checkbox"/> | <input type="checkbox"/> |
| 27. | Whether copies of comments/reply/rejoinder provided to opposite party? on | <input type="checkbox"/> | <input type="checkbox"/> |

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Dazi Muid Azhar ^{Advs. Col.}

Signature: 


Dated: 24-11-2021

The appeal of Mr. Masood-ur-Rehman Subject Specialist Education Department received today i.e. on 24.11.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is not attached with the appeal.
2. Addresses of respondents no. 3 & 4 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
3. Copy of impugned order dated 09.06.2021 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
4. Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

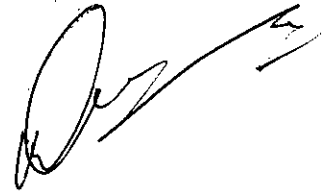
No. 2333 /S.T.

Dt. 24/11 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Qazi Muhammad Azhar Adv.
High Court Abbottabad.

Sir,
Resubmitted after doing
the need full, please the
same be put before the Bench



BEFORE THE HONOURABLE SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 7782/2021

Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O
Nawansher Janubi Tehsil & District Abbottabad.

...APPELLANT

VERSUS

- 1) Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education, Peshawar.
- 2) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Principal GHSS Harno Azizabad. (*Abbottabad*)
- 4) Mehrban Khan Subject Specialist Pak Studies GHSS Harno Azizabad (*Abbottabad*)

... RESPONDENTS

SERVICE APPEAL

INDEX

| S.# | Description | Page Nos. | Annexure |
|-----|---|-----------|----------|
| 1. | Service Appeal along with affidavit | 1-8 | |
| 2. | Application for suspension of Notification Dated 09-06-2021 | 9-10 | |
| 3. | Copy of the KPESE E-Transfer | 11 | "A" |
| 4. | Copy of the online Verification | 12 | "B" |
| 5. | Copy of the Notification No. SO(SM)E&SED/7-1/2021/PT/E-Transfer | 13-23 | "C" |
| 6. | Copy of Notification No. 1032/SSC/HSSC ANNUAL EXAM 2021/ ACE(C)/ BISE ATD | 24 | "D" |
| 7. | Copy of the Relieving Certificate | 25 | "E" |
| 8. | Copy of the letter issued by Principal GHSS Harno Azizabad | 26 | "F" |
| 9. | Copy of the Departmental Appeal | 27 | "G" |
| 10. | Wakalatnama | | |

...APPELLANT

Through

Dated: 20/11/2021


(QAZI MUHAMMAD AZHAR)

Advocate High Court, Abbottabad

BEFORE THE HONOURABLE SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 7782/2021

Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O
Nawansher Janubi Tehsil & District Abbottabad.

Khyber Pakhtunkhwa **APPELLANT**
Service Tribunal

Diary No. 7929

V E R S U S

Dated 24-11-2021

- 1) Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education, Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar.
- 2) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Principal GHSS Harno Azizabad. *Abbottabad*
- 4) Mehrban Khan Subject Specialist Pak Studies GHSS Harno Azizabad. *A.Abad*

... RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE NOTIFICATION NO. SO(SM)E&SED 7-1/2021 dated 09-06-2021 OF RESPONDENT NO. 1 & 2, IN WHICH THEY TRANSFERRED RESPONDENT NO. 4 AGAINST THE VACANT POST OF SUBJECT SPECIALIST PAKISTAN STUDIES. WHEREAS, THE RESPONDENT NO.1 ALREADY PASSED TRANSFER ORDER OF THE APPELLANT FROM THAKRA MANSEHRA TO GHSS HARNO AZIZABAD THROUGH KPESE E-TRANSFER POLICY. THE TRANSFER NOTIFICATION OF

Filed to day
24/11/2021
Registrar

Re-submitted to -day
and filed.

24/11/2021
Registrar

RESPONDENT NO.4 IN SAID SCHOOL IS AGAINST THE LAW, ILLEGAL, ABRITRARY AND AGAINST THE SETTELED POLICY OF KHYBERPAKHTUN KHWA ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT AND HENCE THE NOTIFICATION FOR POSTING OF RESPONDENT NO. 4 IS LIABLE TO BE SET ASIDE.

PRAYER:-

ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED NOTIFICATION NO. SO(SM) E&SED 7-1/2021 dated 09-06-2021 OF RESPONDENT NO. 1 & 2 IN FAVOUR OF RESPONDENT NO. 4 MAY GRACIOUSLY BE SET ASIDE BEING ILLEGAL, UNLAWFUL AGAINST THE LAW AND WITHOUT JURISDICTION AND APPELLANT MAY KINDLY BE POSTED AGAINST THE VACANT POST OF SUBJECT SPECIALIST PAKISTAN STUDIES IN GHSS HARNO AZIZABAD. ANY OTHER RELIEF WHICH THIS HONOURABLE COURT MAY DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY GRANTED.

Respectfully Sheweth,

Brief facts of the instant Service Appeal are as follow:-

1. That, the Appellant is a teacher and Subject Specialist of Pakistan Studies and serving in GHSS Thakra Mahsehra about Four years.
2. That the Govt. of Kpk announce the policy of KPESE E- Transfer in which Appellant applied on dated: 14-06-2021 for transfer from GHSS Thakra (against the vacant post of Subject Specialist Pak. Studies) to GHSS Harno Azizabad (with code no. 35960) and also applied against the vacant post in GHSS Bherkund (with code no. 36003). (*Copy of the KPESE E-Transfer is annexed as Annexure "A"*)
3. That on 02-07-2021 Repondent No. 1 & 2 Verified the vacant post of GHSS Harno Azizabad and rejected the vacant post in GHSS Bherkund . (*Copy of the online Verification is annexed as Annexure "B"*)
4. That on 08-07-2021 Respondent No. 1 & 2 issued the notification No. **SO(SM)E&SED/7-1/2021/ PT/E-Transfer** and transfer 152 teachers through E-Transfer Policy and in which the Appellant is transferred from GHSS Thakra to GHSS Harno Azizabad through serial no. 118 of above said notification against the vacant post. (*Copy of the Notification No. SO(SM)E&SED/7-1/2021/ PT/E-Transfer is Annexed as Annexure "C"*)

5. That the Board of Intermediate and Secondary Education Abbottabad through its Notification No. 1032/SSC/HSSC ANNUAL EXAM 2021/ ACE(C)/ BISE ATD appointed Appellant as a Superintendent of SSC and HSSC Annual Examination 2021. Due to that reason appellant relieved from GHSS Thakra Mansehra on Dated: 19-07-2021. *(Copy of Notification No. 1032/SSC/HSSC ANNUAL EXAM 2021/ ACE(C)/ BISE ATD is annexed as Annexure "D")*
6. That the Appellant relieved from GHSS Thakra Mansehra on 19-07-2021. *(Copy of the Relieving Certificate is annexed as Annexure "E")*
7. That after the relieving from GHSS Thakra Mansehra Appellant reported to the Principal GHSS Harno Azizabad for taking the charge/ joining but was refused by Respondent No. 3 due to the reason that there is no vacant post in said School and said post is filled through Notification No. SO(SM)E&SED 7-1/2021 dated 09-06-2021. *(Copy of the letter issued by Principal GHSS Harno Azizabad is annexed as annexure "F")*
8. That it is very interesting that on 02-07-2021 the concerned DEO office verified the vacant post GHSS Harno Azizabad **(which is already annexed as Annexure "B")** and on 09-06-2021 the post was

already filled by respondent No. 4 and the DEO Office is unaware of the fact..

9. That the Appellant on 26-07-2021 filed the departmental appeal to Respondent No. 1 Secretary Khyberpaktun Khwa Elementary and Secondary Education Department Peshawar and till date no order has been passed by the Respondent No. 1 & 2. *(Copy of the Departmental Appeal is annexed as Annexure "G")*
10. That now feeling aggrieved the Appellant seeks indulgence of this Honourable Tribunal for setting Aside the impugned Notification No. SO(SM)E&SED 7-1/2021 dated 09-06-2021 inter alia on the following grounds.

GROUND:-

- a) That the Notification passed by the Respondent No. 1 & 2 in favour of Respondent No. 4 illegal, without lawful authority, arbitrary, based on mala fide, without jurisdiction and coram non iudice and hence liable to be Set aside.
- b) That, the impugned notification in favour of Respondent no.4 is against the policy of the Govt. and is in violation of principle of natural justice and law.

12

(c) That the impugned Notification is based on mala fide, discriminatory and against the public policy.

(b) That kind attention of this Honourable Tribunal is invited to the fact that appellant relieved from GHSS Tharka unable to join the GHSS Harno Axirabad because there is no vacant post and the Appellant is aggrieved and in between post and pillar.

(c) That if seen from all four corners the Appellant is aggrieved from the Notification of respondent No. 1 & 2.

(d) That the impugned Notification in favour of Respondent No. 4 is without jurisdiction and called for interference by this Honourable Tribunal.

(e) That according to the policy any government employee can only serve 1 year in any hard area declared by the Provincial Government and the Appellant is serving in GHSS Tharka Manshera From past 4 years.

(h) That the Appeal is well within time.

(i) That other points shall be urged at the time of arguments.

- j) That there is no other alternate, efficacious remedy available hence the Instant Appeal in hand.
- k) That addresses of the parties have correctly been given in the heading of the Appeal.

It is therefore humbly prayed that, on acceptance of instant appeal, the impugned Notification no. SO(SM) E&SED 7-1/2021 dated 09-06-2021 of Respondent No. 1 & 2 in favour of Respondent no. 4 may graciously be set aside being illegal, unlawful against the law and without jurisdiction and Appellant may kindly be posted against the vacant post of subject specialist of Pakistan Studies in GHSS Harno Azizabad. Any other relief which this Honourable Tribunal may deems fit and proper in the circumstances of the case may granted.


...APPELLANT

Through:

Dated:- 20/11 /2021


(QAZI MOHAMMAD AZHAR)

Advocate High Court, Abbottabad

VERIFICATION:-

Verified that the contents of Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed therein.

Dated:- 20/11 /2021


...APPELLANT

Through:


(QAZI MOHAMMAD AZHAR)

Advocate High Court, Abbottabad

BEFORE THE HONOURABLE SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. _____ /2021

Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O
Nawansher Janubi Tehsil & District Abbottabad.

...APPELLANT

V E R S U S

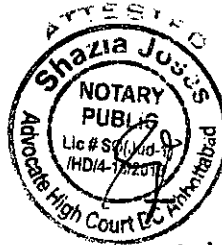
- 1) Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary Education, Peshawar.
- 2) Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 3) Principal GHSS Haro.

... RESPONDENTS

SERCIVE APPEAL

AFFIDAVIT

I, Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O Nawansher Janubi Tehsil & District Abbottabad do hereby solemnly affirm and declare on Oath that the contents of instant *Service Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.



20/11/2021

... DEPONENT

Dated:- 20/11 /2021

(QAZI MOHAMMAD AZHAR)

Advocate High Court, Abbottabad.

BEFORE THE HONOURABLE SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. /2021

Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O
 Nawansher Janubi Tehsil & District Abbottabad.

...APPELLANT

V E R S U S

Govt. of Khyber Pakhtunkhwa, Through Secretary Elementary & Secondary
 Education, Peshawar & others.

... RESPONDENTS

SERVICE APPEAL

APPLICATION FOR SUSPENSION OF OPERATION
 OF IMPUGNED NOTIFICATION NO. SO(SM)
 E&SED 7-1/2021 DATED 09-06-2021 PASSED BY
 RESPONDENT NO. 1 & 2 IN FAVOUR OF
 RESPONDENT NO. 4 MAY KINDLY BE
 SUSPENDED TILL FINAL DISPOSAL OF THIS
 SERVICE APPEAL.

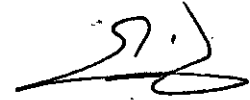
Respectfully Sheweth;-

1. That the titled Service Appeal is filed before this Honourable Tribunal, the contents of the same may kindly be treated as an integral part of this Service Appeal.
2. That the Appellant have brought a good prima facie case and balance of convenience also lies in his

favour. Moreover, there is a very likely mode of his success.

3. That if the operation of impugned Notification No. SO(SM) E&SED 7-1/2021 dated 09-06-2021 passed by Respondent No. 1 & 2 in favour Of Respondent No. 4 not suspended/ stayed the Appellant would suffer irreparable loss and purpose of filling of accompanying Service Appeal will become in fruituous.

It is therefore humbly prayed that on acceptance of the instant application, the impugned Notification No. SO(SM) E&SED 7-1/2021 dated 09-06-2021 passed by Respondent No. 1 & 2 in favour Of Respondent No. 4 may kindly be suspended, till final disposal of titled Service Appeal.



...APPELLANT

Through

Dated: 20 / 11 / 2021

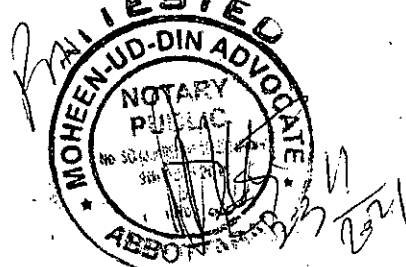
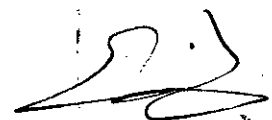


(QAZI MUHAMMAD AZHAR)

Advocate High Court, Abbottabad

AFFIDAVIT

I, Masood-ur-Rehman S/o Maqbool-ur-Rehman R/o Village Nardubba P.O Nawansher Janubi Tehsil & District Abbottabad, do hereby solemnly affirm and declare on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.


DEPONENT


ANNEXURE
A

9:39 [89]
KPESE eTransfer

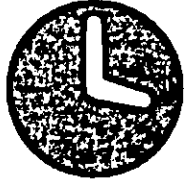
My Application(s)


Subject Specialist(Pak Study)
 14/06/2021 (In Process)
 GHSS HARNO (AZIZABAD)
 (35960)






Subject Specialist(Pak Study)
 14/06/2021 (In Process)
 GHSS BHERKUND (36003)





Attested.


Qazi Muhammad Azhar
 Advocate High Court
 Abbottabad

12

ANNEXURE
B



Note: Verification of online applications by concerned DEO office will continue till 2nd July 2021.

| SERIAL # | TEACHER NAME | POST APPLIED FOR | FROM SCHOOL | TO SCHOOL | VERIFICATION STATUS | ORDER ISSUE |
|----------|------------------|-------------------------------|-------------|-----------------------|---------------------|-------------|
| 1 | Masood ur Rehman | Subject Specialist(Pak Study) | GHSS THAKRA | GHSS HARNO (AZIZABAD) | Verified | No |
| 2 | Masood ur Rehman | Subject Specialist(Pak Study) | GHSS THAKRA | GHSS BHERKUND | Rejected | No |

Attested.

Qazi Muhammad Azhar
Advocat High Court
Abbottabad



13

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

ANNEXURE
C

NOTIFICATION

Dated Peshawar the July 08, 2021

NO.SO(SM)E&SED/7-1/2021/ PT/E-Transfer The Competent Authority is pleased to issue the posting/transfer of the following teachers recommended through E-Transfer System, in the best public interest with immediate effect:-

| S# | Name & Designation | From | To |
|----|---|---|--|
| 1 | MR. M JAVED SWATI Head Master (BS-17) | GHS SUM MANSEHRA | Head Master (BS-17) GHS SHAHALIA MANSEHRA against the vacant post. |
| 2 | MR. HUMYOON KHAN Headmaster (BS-17) | GHS KINGAR GALAI BUNNER | Head Master (BS-17) GHS JANGA MARDAN against the vacant post. |
| 3 | MR. YOUSUF KHAN Headmaster BS-17 | GHS DHERI KASHMIR DIR PAYAN | Head Master (BS-17) GHS DHERAI TALASH DIR PAYAN against the vacant post. |
| 4 | MR. HUKAM SHAH Headmaster (BS-17) | GOVT SHAHEED ZEESHAN ALI HSS ALO MARDAN | Head Master (BS-17) GHS QUTUB GARH MARDAN against the vacant post. |
| 5 | MR. AFTAB AHMAD Headmaster (BS-17) | GHS GHUNDA SHAMSHKI KARAK | Head Master (BS-17) GOVT SHAHEED HAMID ALI KHAN HIGH SCHOOL SUR DAG KARAK against the vacant post. |
| 6 | MR. AAMIR JAVED Head Master (BS-17) | GHS KHAT KILLI PRANG CHARSADEA | Head Master (BS-17) GHS NASAPA PAYAN PESHAWAR against the vacant post. |
| 7 | MR. SOHAIL AHMAD Head Master (BS-17) | GHS NO.2 ZAIDA SWABI | Head Master (BS-17) GHS FARAM KOROONA MARDAN against the vacant post. |
| 8 | MR. HAMID KHAN Head Master (BS-17) | GHS KHABAL BALA MANSEHRA | Head Master (BS-17) GHS MALOOKRA MANSEHRA against the vacant post. |
| 9 | MR. KHURRAM SHEHZAD Head Master (BS-17) | GHS MUHAMMAD ALI KALAY PESHAWAR | Head Master (BS-17) GHS SHAHI BALA PESHAWAR against the vacant post. |
| 10 | MR. RAFIQ RIAZ Head Master (BS-17) | GHS WANDA JAMAL D.I.KHAN | Head Master (BS-17) GHS SHUKRULLAH HUSSAIN MANDAN (JOJI KALA) BANNU against the vacant post. |
| 11 | MR. SYED HASSAN SHAH Head Master (BS-17) | GHS SUSOOM LOWER CHITRAL | Head Master (BS-17) GHS PARABEG LOWER CHITRAL against the vacant post. |
| 12 | MR. SHAH GUL Head Master (BS-17) | GHS NAK BAND PESHAWAR | Head Master (BS-17) GHS MASHO KHEL PESHAWAR against the vacant post. |
| 13 | MR. SHAFIQ UR REHMAN | GHS GARA MOHABAT | Head Master (BS-17) GHS |

[Handwritten signature]

Attested
[Handwritten signature]
Muhammad
Advocat High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223533

| | | | |
|----|--|---------------------------------|--|
| 14 | MR. AMAN ULLAH SHAH Head Master (BS-17) | GHS ADAMZAI LAKKI | Head Master (BS-17) GHS SYED TUGHAL KHEL BANNU against the vacant post. |
| 15 | MR. ZAKIR ULLAH Head Master (BS-17) | GHS ALLADHER SWABI | Head Master (BS-17) GHS TANO SWABI against the vacant post. |
| 16 | MR. GHULAM SARDAR Head Master (BS-17) | GHS WARGHA BANDA KARAK | Head Master (BS-17) GHS TOPI KILLA KARAK against the vacant post. |
| 17 | MR. HAMID HUSSAIN Head Master (BS-17) | GHS LUND KHAWAR 2 MARDAN | Head Master (BS-17) GHS KHAN PUR MARDAN against the vacant post. |
| 18 | MR. JAN MUHAMMAD Head Master (BS-17) | GHS SHINGLI PAYEEN BATTAGRAM | Head Master (BS-17) GHS HARYAL MANSEHRA against the vacant post. |
| 19 | MR. KHAWAJ MUHAMMAD Head Master (BS-17) | GHS RAMKOT MANSEHRA | Head Master (BS-17) GHS BAFFA KHURD MANSEHRA against the vacant post. |
| 20 | MR. RAFI ULLAH Head Master (BS-17) | GHS MANAHI NOWSHERA | Head Master (BS-17) GHS MERA GUL ABAD CHARSADEA against the vacant post. |
| 21 | MR. MUHAMMAD BADSHAH Head Master (BS-17) | GHS MANAI SWAT | Head Master (BS-17) GHS DANGRAM SWAT against the vacant post. |
| 22 | MR. RASOOL KHAN Head Master (BS-17) | GHS CHEENA CHARSADEA | Head Master (BS-17) GHS DADO KILLI CHARSADEA against the vacant post. |
| 23 | MR. IMTIAZ AHMAD Head Master (BS-17) | GHS HISAR TANG NOWSHERA | Head Master (BS-17) GHS SHaidu NO 2 NOWSHERA against the vacant post. |
| 24 | MR. GUL HAMEED KHAN Head Master (BS-17) | GHS MANJIA ABBOTTABAD | Head Master (BS-17) GHS SAREELA ABBOTTABAD against the vacant post. |
| 25 | MR. NOOR ASLAM KHAN Head Master (BS-17) | GHS LAND AHMED KHEL LAKKI | Head Master (BS-17) GHS ZANGI KHEL LAKKI against the vacant post. |
| 27 | MR. NASRAT SHAH Head Master (BS-17) | GHS SAGI BALA MOHMAND | Head Master (BS-17) GHS HALEEMZAI CHARSADEA against the vacant post. |
| 28 | MR. ABID ULLAH Head Master (BS-17) | GHS KHAWA STORI KHEL ORAKZAI | Head Master (BS-17) GHS AKHUN TALAB KHYBER against the vacant post. |
| 29 | MR. SAEED ULLAH Head Master (BS-17) | GHS PALOSEN KURRAM | Head Master (BS-17) GHS KHUJARI BABAR BANNU against the vacant post. |
| 30 | MR. ADIL Head Master (BS-17) | GHS LAHOOR ABBOTTABAD | Head Master (BS-17) GHS TOHEED ABAD ABBOTTABAD against the vacant post. |
| 31 | MR. KAMIL KHAN | GHS GANDIALY | Head Master (BS-17) GHS |

[Handwritten signature]

Attested

[Handwritten signature]
 Gazi Muhammad Azhar
 Advocate High Court
 Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

| | | | |
|----|---|-------------------------------|--|
| 32 | MR. BINYAMIN KHAN Head Master (BS-17) | GHS GARA SHAHBAZ TANK | Head Master (BS-17) GHS BABBAR KACHA D.I.KHAN against the vacant post. |
| 33 | MR. ABDUR RAUF Head Master (BS-17) | GHS WANDA KALI D.I.KHAN | Head Master (BS-17) GHS MELA MANDRA KHEL LAKKI against the vacant post. |
| 34 | MR. GUL SHARAF Head Master (BS-17) | GHS SHANAWARI NARYAB HANGU | Head Master (BS-17) GHS TAP THATI KHEL LAKKI against the vacant post. |
| 35 | MR. AMIR JUNAID SHAH I.P.E (BS-17) | GCMHSS MARGHUZ SWABI | I.P.E (BS-17) GHSS GHARI GHULAM SHAH PESHAWAR against the vacant post. |
| 36 | MR. GUL BADSHAH I.P.E (BS-17) | GHSS WARI DIR BALA | I P E (BS-17) GHS JATGRAM DIR BALA against the vacant post. |
| 37 | MR. IMRAN KHAN Librarian (BS-17) | GHSS KALKOT DIR BALA | Librarian (BS-17) GHSS NAGRI BALA ABBOTTABAD against the vacant post. |
| 38 | MR. AMAN GUL Librarian (BS-17) | GHSS DOSEHRA CHARSADDA | Librarian (BS-17) GHSS BEROTE ABBOTTABAD against the vacant post. |
| 39 | MR. SHAKEEL AHMAD Librarian (BS-17) | GHSS KHANSPUR ABBOTTABAD | Librarian (BS-17) GHSS BAGRA HARIPUR against the vacant post. |
| 40 | MR. WAHEED ULLAH KHAN Librarian (BS-17) | GHSS NO. 4 DIKHAN D.I.KHAN | Librarian (BS-17) GHSS No. 1 MANSEHRA against the vacant post. |
| 41 | MR. AMJID ALI Principal (BS-18) | GHS NARAN MANSEHRA | Principal (BS-18) GHSS MOHAR MANSEHRA |
| 42 | MR. KHAIRUL ZADA Principal (BS-18) | GHSS NOGRAM BUNNER | Principal (BS-18) GHSS ASHARAY BUNNER against the vacant post. |
| 43 | MR. BADSHAH ZAMIN Principal (BS-18) | GHS KARORA SHANGLA | Principal (BS-18) GHSS KOTKAY SHANGLA against the vacant post. |
| 44 | MR. UMER FAROOQ Principal (B-18) | GHSS BAHADAR KHEL KARAK | Principal (B-18) GHS SURGUL KOHAT against the vacant post. |
| 45 | MUHAMMAD ASHRAF KHAN Senior Subject Specialist BS-18 (Biology) | GHSS MURYALI D.I.KHAN | Senior Subject Specialist BS-18 (Biology) GHSS MAYAR MARDAN against the vacant post. |
| 46 | MR. LIAQAT ALI Senior Subject Specialist BS-18 (Biology) | GHSS SHARQI HOTI MARDAN | Senior Subject Specialist BS-18 (Biology) GHSS MAZDOOR ABAD TAKHT BHAI MARDAN against the vacant post. |
| 47 | MR. HAMIDULLAH KHAN Senior Subject Specialist BS-18 (History/Civics) | GHSS DHAKKI D.I.KHAN | Senior Subject Specialist BS-18 (History/Civics) GHSS MURYALI D.I.KHAN against the vacant post. |
| 48 | MUHAMMAD HAROON QURESHI Senior Subject Specialist BS-18 (Islamiat) | GHSS BEHALI MANSEHRA | Senior Subject Specialist BS-18 (Islamiat) GHSS BAGNOTER ABBOTTABAD against the vacant post. |

[Handwritten signature]

Attested.

[Handwritten signature]
Qazi Muhammad A
Advocat High C
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223533

| | | | |
|----|--|---------------------------------------|---|
| 49 | MUHAMMAD IBRAHIM Senior Subject Specialist BS-18 (Islamiyat) | GHSS SHEIKH JANA SWABI | Senior Subject Specialist BS-18 (Islamiyat) GHSS NARSHAK MARDAN against the vacant post. |
| 50 | MR. ANJUM SHAHZAD Senior Subject Specialist BS-18 (Maths) | GHSS GARHI HABIB ULLAH MANSEHRA | Senior Subject Specialist BS-18 (Maths) GHSS BANDI DHUNDAN ABBOTTABAD against the vacant post. |
| 51 | MR. MUHAMMAD AFZAL Senior Subject Specialist BS-18 (Pashto) | GHSS BAGH DUSHKHEL DIR PAYAN | Senior Subject Specialist BS-18 (Pashto) GHS PINGAL DIR PAYAN against the vacant post. |
| 52 | MR. JAVED KHAN Senior Subject Specialist BS-18 (Physics) | GHSS S/NAURANG LAKKI | Senior Subject Specialist BS-18 (Physics) GHSS TARNAB CHARSADDA against the vacant post. |
| 53 | MR. FAZLI WAJID Senior Subject Specialist BS-18 (Physics) | GHSS NAGRAI BUNNER | Senior Subject Specialist BS-18 (Physics) GHSS BAGHDADA MARDAN against the vacant post. |
| 54 | MR. SHAFIQUE AHMAD Subject Specialist (IT) BS- 17 | GHSS CHINGLAI BUNNER | Subject Specialist (IT) BS-17 GHSS TOTALAI BUNNER against the vacant post. |
| 55 | MR. TAQDEER ULLAH Subject Specialist (IT) BS- 17 | GHSS SARAI SALEH HARIPUR | Subject Specialist (IT) BS-17 GHSS NO. 1 PAHARPUR D.I.KHAN against the vacant post. |
| 56 | MR. QAIM HUSSAIN Subject Specialist (IT) BS- 17 | GHSS ALIZAI KURRAM | Subject Specialist (IT) BS-17 GHSS SAMIR KURRAM against the vacant post. |
| 57 | MR. ZAHID RAFIQUE Subject Specialist (IT) BS- 17 | GHSS DHODIAL MANSEHRA | Subject Specialist (IT) BS-17 GHSS BHERKUND MANSEHRA against the vacant post. |
| 58 | MR. AMJID ALI Subject Specialist BS-17 (Biology) | GHSS AMBADHER CHARSADDA | Subject Specialist BS-17 (Biology) GHSS MANGA MARDAN against the vacant post. |
| 59 | MR. SHAKIR ULLAH Subject Specialist BS-17 (Biology) | GHSS IBRAHIM ZAI HANGU | Subject Specialist BS-17 (Biology) GHSS NO.2 CANTT NOWSHERA against the vacant post. |
| 60 | MR. MUSLIM KHAN Subject Specialist BS-17 (Biology) | GHSS KOTIGRAM DIR PAYAN | Subject Specialist BS-17 (Biology) GHSS SARAI BALA DIR PAYAN against the vacant post. |
| 61 | MR. SHAHID NAWAZ Subject Specialist BS-17 (Biology) | GHSS TRAPPI MANSEHRA | Subject Specialist BS-17 (Biology) GHS SANGAR MANSEHRA against the vacant post. |
| 62 | MUHAMMAD FAYYAZ Subject Specialist BS-17 (Biology) | GHSS DOGA MANSEHRA | Subject Specialist BS-17 (Biology) GHSS HERKUND MANSEHRA against the vacant post. |
| 63 | MR. SAJJID Subject Specialist BS-17 (Chemistry) | GHSS DOBIAN SWABI | Subject Specialist BS-17 (Chemistry) GHSS KALU KHAN SWABI against the vacant post. |

[Handwritten signature]

Attested.

[Handwritten signature]
 Advocat High Court
 Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-4223533

| | | | |
|----|---|--------------------------------------|---|
| 64 | MUHAMMAD SADIQ Subject Specialist BS-17 (Chemistry) | GHSS TANGI TIMERGARA DIR PAYAN | Subject Specialist BS-17 (Chemistry) GHSS SADDU DIR PAYAN against the vacant post. |
| 65 | MR. ABDUR REHMAN Subject Specialist BS-17 (Chemistry) | GHSS IBRAHIM ZAI HANGU | Subject Specialist BS-17 (Chemistry) GHS SURGUL KOHAT against the vacant post. |
| 66 | MR. IBRAR Subject Specialist BS-17 (Chemistry) | GHSS TAJWAL ABBOTTABAD | Subject Specialist BS-17 (Chemistry) GHSS NO.1 A/ABAD ABBOTTABAD against the vacant post. |
| 67 | MR. HASSAN KHAN Subject Specialist BS-17 (Chemistry) | GHSS DHERI LIKPANI MARDAN | Subject Specialist BS-17 (Chemistry) GHSS IKRAM PUR MARDAN against the vacant post. |
| 68 | MR. JAMEEL AHMAD Subject Specialist BS-17 (Chemistry) | GHSS PAIRAN MANSEHRA | Subject Specialist BS-17 (Chemistry) GHSS BHERKUND MANSEHRA against the vacant post. |
| 69 | MR. SALEH MUHAMMAD Subject Specialist BS-17 (Chemistry) | GHSS SPIN KHAK NOWSHERA | Subject Specialist BS-17 (Chemistry) GHSS URMAR PAYAN PESHAWAR against the vacant post. |
| 70 | MR. INAM UL HAQ Subject Specialist BS-17 (Chemistry) | GHSS MUHAMMAD KHAWAJA HANGU | Subject Specialist BS-17 (Chemistry) GHSS CHANDA KHURRAM KARAK against the vacant post. |
| 71 | MR. INAMULLAH SHAH Subject Specialist BS-17 (Chemistry) | GHSS NO.2 CANTT NOWSHERA | Subject Specialist BS-17 (Chemistry) GHSS MARYAMZAI PESHAWAR against the vacant post |
| 72 | MR. KIFAYAT ULLAH Subject Specialist BS-17 (Economics) | GHSS KANDOO KHEL KARAK | Subject Specialist BS-17 (Economics) GHSS JAB HARIPUR against the vacant post |
| 73 | MR. TANVEER USMAN Subject Specialist BS-17 (Economics) | GHSS NO.2 CANTT NOWSHERA | Subject Specialist BS-17 (Economics) GHSS JABBI NOWSHERA against the vacant post |
| 74 | MUHAMMAD WAJID Subject Specialist BS-17 (Economics) | GHSS KAWAI MANSEHRA | Subject Specialist BS-17 (Economics) GHS SANGAR MANSEHRA against the vacant post |
| 75 | MR. SHAMS UL AMIN Subject Specialist BS-17 (Economics) | GHSS DAGI BANDA NOWSHERA | Subject Specialist BS-17 (Economics) GHSS SHAHEED WASIM IQBAL TARKHA NOWSHERA against the vacant post |
| 76 | MR. AMJAD HUSSAIN Subject Specialist BS-17 (Economics) | GHSS KALAYA ORAKZAI | Subject Specialist BS-17 (Economics) GHSS SAMIR KURRAM against the vacant post |
| 77 | MR. ABDULLAH Subject Specialist BS-17 | GHSS LABAT SWAT | Subject Specialist BS-17 (Economics) GHSS BAKHULA |

[Handwritten signature]

Attested.

[Handwritten signature]
Qazi Muhammad Azhar
Advocate High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

| | | | |
|----|---|--------------------------------------|---|
| 78 | MUHAMMAD ASIF Subject Specialist BS-17 (Economics) | GHSS JARED MANSEHRA | Subject Specialist BS-17 (Economics) GHSS MOHAR MANSEHRA against the vacant post |
| 79 | MUHAMMAD SAFEER Subject Specialist BS-17 (Economics) | GHSS MOHRI BED BHEN ABBOTTABAD | Subject Specialist BS-17 (Economics) GHS BODLA ABBOTTABAD |
| 80 | MR. SHABIR AHMED Subject Specialist BS-17 (Economics) | GHSS DOGA MANSEHRA | Subject Specialist BS-17 (Economics) GHSS BHERKUND MANSEHRA against the vacant post |
| 81 | MR. NAJEEB ULLAH Subject Specialist BS-17 (English) | GHSS SHAHPUR SHANGLA | Subject Specialist BS-17 (English) GHSS MIANDAM SWAT against the vacant post |
| 82 | MR. FAIZ MUHAMMAD Subject Specialist BS-17 (English) | GHSS KUZA BANDA BATTAGRAM | Subject Specialist BS-17 (English) GHSS TALOOS BATTAGRAM |
| 83 | MR. IKHTYAR AHMAD Subject Specialist BS-17 (English) | GHSS AGARAI BUNNER | Subject Specialist BS-17 (English) GHSS NAWAGAI BUNNER against the vacant post |
| 84 | MR. MUFUZAN KHAN Subject Specialist BS-17 (English) | GHSS SALABAT MANSEHRA | Subject Specialist BS-17 (English) GHSS BANDI SHUNGLI MANSEHRA against the vacant post |
| 85 | MUHAMMAD QASIM KHAN Subject Specialist BS-17 (English) | GHSS SOWARYAN MARDAN | Subject Specialist BS-17 (English) GHSS CHAMTAR MARDAN against the vacant post |
| 86 | MR. KARAM ALI Subject Specialist BS-17 (English) | GHSS ALIZAI KURRAM | Subject Specialist BS-17 (English) GHSS SAMIR KURRAM against the vacant post |
| 87 | MR. BADAR MUNIR Subject Specialist BS-17 (English) | GHSS KHANSPUR ABBOTTABAD | Subject Specialist BS-17 (English) GHSS SEER ABBOTTABAD against the vacant post |
| 88 | MR. SHAUKAT ALI KHAN Subject Specialist BS-17 (English) | GHSS KANDOO KHEL KARAK | Subject Specialist BS-17 (English) GHSS PAKHA GHULAM PESHAWAR against the vacant post |
| 89 | MR. DILAWAR KHAN Subject Specialist BS-17 (English) | GHSS JEHANGIRI KARAK | Subject Specialist BS-17 (English) GHSS MARYAMZAI PESHAWAR against the vacant post |
| 90 | MR. TANVEER AHMAD Subject Specialist BS-17 (English) | GHSS KAGHAN MANSEHRA | Subject Specialist BS-17 (English) GHS SANGAR MANSEHRA against the vacant post |
| 91 | MR. JAMIL UR REHMAN Subject Specialist BS-17 (English) | GHSS NARYAB HANGU | Subject Specialist BS-17 (English) GHSS PIR PAI NOWSHERA against the vacant |

[Handwritten signature]

Attested.

[Handwritten signature]
Quazi Muhammad Azhar
Advocate High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223533

| | | | |
|-----|--|---|--|
| 92 | MR. AZIZ ULLAH KHAN Subject Specialist BS-17 (English) | GHSS HAZARKHWANI PESHAWAR | Subject Specialist BS-17 (English) GHSS KOT KASHMIR LAKKI against the vacant post |
| 93 | MR. ZAHIR KHAN Subject Specialist BS-17 (English) | GHSS DALOLA ABBOTTABAD | Subject Specialist BS-17 (English) GHSS GHALLA DHER MARDAN against the vacant post |
| 94 | MUHAMMAD SAEED Subject Specialist (History /Civics) (BS-17) | GHSS PARHENNA MANSEHRA | Subject Specialist (History /Civics) (BS-17) GHSS BHERKUND MANSEHRA against the vacant post |
| 95 | MUHAMMAD IBRAR KHAN Subject Specialist BS-17 (English) | GOVT SHAHEED ZEESHAN SHAFIQUE HIGHER SECONDARY SCHOOL HAKARDARA KOHAT | Subject Specialist BS-17 (English) GHS SURGUL KOHAT against the vacant post |
| 96 | MR. ASHIQ MUHAMMAD Subject Specialist BS-17 (History /Civics) | GHSS KARBOGHA HANGU | Subject Specialist BS-17 (History /Civics) GHSS KIRI KHESOR D.I.KHAN against the vacant post |
| 97 | MR. SAIF ULLAH KHAN Subject Specialist BS-17 (History /Civics) | GHSS RAHMANI KHEL D.I.KHAN | Subject Specialist BS-17 (History /Civics) GHSS WANDA AMIR LAKKI against the vacant post |
| 98 | MR. JEHANGIR KHAN Subject Specialist BS-17 (History /Civics) | GHSS TANGI TIMERGARA DIR PAYAN | Subject Specialist BS-17 (History /Civics) GHSS SADDO DIR PAYAN against the vacant post |
| 99 | MR. SAMI ULLAH Subject Specialist BS-17 (History /Civics) | GHSS DARSAMAND HANGU | Subject Specialist BS-17 (History /Civics) GHSS KANDOO KHEL KARAK against the vacant post |
| 100 | MUHAMMAD HAROON Subject Specialist BS-17 (History /Civics) | GHSS DAGI BANDA NOWSHERA | Subject Specialist BS-17 (History /Civics) GHSS HARYANA BALA PESHAWAR against the vacant post |
| 101 | MR. ASFANDYAR Subject Specialist BS-17 (Islamiyat) | GHSS PIR ABAD TAKHT BHAI MARDAN | Subject Specialist BS-17 (Islamiyat) GHSS KHADI KILLI MARDAN against the vacant post |
| 102 | MR. SAMI UR RAHMAN Subject Specialist BS-17 (Islamiyat) | GHSS KOTIGRAM DIR PAYAN | Subject Specialist BS-17 (Islamiyat) GHSS ZIARAT TALASH DIR PAYAN against the vacant post |
| 103 | MR. NAVEED ALAM Subject Specialist BS-17 (Islamiyat) | GHSS JARED MANSEHRA | Subject Specialist BS-17 (Islamiyat) GHS SANGAR MANSEHRA against the vacant post |
| 104 | MR. GHUFRAN KHAN Subject Specialist BS-17 (Islamiyat) | GHSS KALAYA ORAKZAI | Subject Specialist BS-17 (Islamiyat) GHSS DARSAMAND HANGU against the vacant post |
| 105 | MR. RASHEED UL HASSAN Subject Specialist BS-17 (Islamiyat) | GHSS PARHENNA MANSEHRA | Subject Specialist BS-17 (Islamiyat) GHSS BHERKUND MANSEHRA against the vacant post |
| 106 | MR. GUL RAZ | GHSS JHAMRA | Subject Specialist BS-17 (Maths) |

[Handwritten signature]

Attested.

[Handwritten signature]
 Mr. Muhammad Azhar
 Advocate High Court
 Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. (091-9221533)

| | | | |
|-----|--|--|---|
| 107 | MR. NASEER AHMAD Subject Specialist BS-17 (Maths) | GHSS GHALLA DHER MARDAN | Subject Specialist BS-17 (Maths) GHSS BAGHICHA DHERI MARDAN |
| 108 | MR. AZMAT SHAH Subject Specialist BS-17 (Maths) | GHSS KACHA MALI KHEL D.I.KHAN | Subject Specialist BS-17 (Maths) GHSS KATH GARH D.I.KHAN against the vacant post |
| 109 | MR. RAHEEL KAMAL Subject Specialist BS-17 (Maths) | GHSS PIR SABAQ NOWSHERA | Subject Specialist BS-17 (Maths) GHSS AC CENTRE NOWSHERA against the vacant post |
| 110 | MR. ABBAS ALI Subject Specialist BS-17 (Maths) | GHSS ALIZAI KURRAM | Subject Specialist BS-17 (Maths) GHSS SAMIR KURRAM against the vacant post |
| 111 | MR. FIDA HUSSAIN SHAH Subject Specialist BS-17 (Maths) | GHSS JARED MANSEHRA | Subject Specialist BS-17 (Maths) GHS SANGAR MANSEHRA against the vacant post |
| 112 | MUHAMMAD NAFEES Subject Specialist BS-17 (Maths) | GHSS JALGALI MANSEHRA | Subject Specialist BS-17 (Maths) GHS BODLA ABBOTTABAD against the vacant post |
| 113 | MUHAMMAD JAMIL Subject Specialist BS-17 (Maths) | GHSS DEOLAI SWAT | Subject Specialist BS-17 (Maths) GHSS DHERAI SWAT against the vacant post |
| 114 | MR. FAHEEMULLAH Subject Specialist BS-17 (Maths) | GHSS GARUM CHASHMA LOWER CHITRAL | Subject Specialist BS-17 (Maths) GHSS BARANIS (U+E) LOWER CHITRAL against the vacant post |
| 115 | MR. ALAM ZEB Subject Specialist BS-17 (Maths) | GHSS MIAN KALAY DIR PAYAN | Subject Specialist BS-17 (Maths) GHSS TOTAL MALAKAND against the vacant post |
| 116 | MR. ZULFIQAR Subject Specialist BS-17 (Maths) | GHSS KAWAI MANSEHRA | Subject Specialist BS-17 (Maths) GHSS THAKOT BATTAGRAM against the vacant post |
| 117 | MUHAMMAD RAFIQ Subject Specialist BS-17 (Pak Study) | GHSS JARED MANSEHRA | Subject Specialist BS-17 (Pak Study) GHS SANGAR MANSEHRA against the vacant post |
| 118 | MR. MASOOD UR REHMAN Subject Specialist BS-17 (Pak Study) | GHSS THAKRA MANSEHRA | Subject Specialist BS-17 (Pak Study) GHSS HARNO (AZIZABAD) ABBOTTABAD against the vacant post |
| 119 | MR. SAJJAD ALI Subject Specialist BS-17 (Pak Study) | GHSS GADDAR MARDAN | Subject Specialist BS-17 (Pak Study) GHSS KHADI KILLI MARDAN against the vacant post |
| 120 | MR. IKRAM ULLAH KHAN Subject Specialist BS-17 (Pak Study) | GHSS BHANGI KHAN KHUJARI BANNU | Subject Specialist BS-17 (Pak Study) GHSS SHAHEED WASIM IQBAL TARKHA NOWSHERA against the vacant |

[Handwritten signature]

Attested

[Handwritten signature]
Oazi Muhammad Azhar
Advocat High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

21

| | | | |
|-----|--|--|--|
| 121 | MR. MIR AFZAL KHAN Subject Specialist BS-17 (Pak Study) | GHSS JHAMRA HARIPUR | Subject Specialist BS-17 (Pak Study) GHSS KAKOTRI HARIPUR against the vacant post |
| 122 | MR. ILTAF KHAN Subject Specialist BS-17 (Pak Study) | GHSS MANKI SHARIF NOWSHERA | Subject Specialist BS-17 (Pak Study) GHSS NO 1 KALAN NOWSHERA against the vacant post |
| 123 | MR. ANIS UR REHMAN Subject Specialist BS-17 (Pashto) | GHSS DHODIAL MANSEHRA | Subject Specialist BS-17 (Pashto) GHSS BEHALI MANSEHRA against the vacant post |
| 124 | IMDAD HUSSAIN Subject Specialist BS-17 (Pashto) | GHSS USTERZAI PAYAN KOHAT | Subject Specialist BS-17 (Pashto) GHSS SAMIR KURRAM against the vacant post |
| 125 | SYED LUQMAN SHAH Subject Specialist BS-17 (Pashto) | GHSS PAIMAL SHARIF BATTAGRAM | Subject Specialist BS-17 (Pashto) GHSS PESHORA BATTAGRAM against the vacant post |
| 126 | MR. RIZWAN ULLAH Subject Specialist BS-17 (Pashto) | GHSS LAL QILLA DIR PAYAN | Subject Specialist BS-17 (Pashto) GHSS RABBAT DIR PAYAN against the vacant post |
| 127 | MR. AMIN ULLAH Subject Specialist BS-17 (Pashto) | GHSS AKHGRAM DIR BALA | Subject Specialist BS-17 (Pashto) GHSS WARI DIR BALA against the vacant post |
| 128 | MR. MUBARAK ZAIB KHAN Subject Specialist BS-17 (Pashto) | GHSS NEHAG DIR BALA | Subject Specialist BS-17 (Pashto) GHS JATGRAM DIR BALA against the vacant post |
| 129 | MR. TARIQ GUL Subject Specialist BS-17 (Pashto) | GOVT. SHAHEED SHAHOOD ALAM HIGHER SECONDARY SCHOOL NISATTA CHARSADDA | Subject Specialist BS-17 (Pashto) GCMHSS NO.2 PESHAWAR CITY against the vacant post |
| 130 | MR. UMAR QIYAZ KHAN Subject Specialist BS-17 (Pashto) | GHSS BAHADAR KHEL KARAK | Subject Specialist BS-17 (Pashto) GHSS BHANGI KHAN KHUJARI BANNU against the vacant post |
| 131 | MR. NOOR SAID Subject Specialist BS-17 (Physics) | GHSS MANERI PAYAN SWABI | Subject Specialist BS-17 (Physics) GHSS GULOO DEHRI SWABI against the vacant post |
| 132 | MIAN ABDUR RASHID Subject Specialist BS-17 (Physics) | GHSS KAGHAN MANSEHRA | Subject Specialist BS-17 (Physics) GHS SANGAR MANSEHRA against the vacant post |
| 133 | MUHAMMAD ZAHID Subject Specialist BS-17 (Physics) | GHSS LANGRIAL ABBOTTABAD | Subject Specialist BS-17 (Physics) GHS BODLA ABBOTTABAD against the vacant post |
| 134 | MUHAMMAD IDRESS Subject Specialist BS-17 (Physics) | GHSS JABBORI MANSEHRA | Subject Specialist BS-17 (Physics) GHSS BHERKUND MANSEHRA against the vacant post |

Attested

Muhammad Achar
Advocat High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

| | | | |
|-----|---|---|--|
| 135 | MUHAMMAD NAWAZ SHAH Subject Specialist BS-17 (Physics) | GHSS BUTYAL SHANGLA | Subject Specialist BS-17 (Physics) GHSS THAKOT BATTAGRAM against the vacant post |
| 136 | MR. KAMRAN AHMAD Subject Specialist BS-17 (Statistics) | GHSS CHUNDA KHURAM KARAK | Subject Specialist BS-17 (Statistics) GHSS SHAH SALIM KARAK against the vacant post |
| 137 | MR. HAROON KHAN Subject Specialist BS-17 (Statistics) | GHSS SHAHEED SHER SHAH DAK ISMAIL KHEL NOWSHERA | Subject Specialist BS-17 (Statistics) GHSS KURVI NOWSHERA against the vacant post |
| 138 | MR. RIZWAN ULLAH Subject Specialist BS-17 (Statistics) | GHSS YARIK D.I.KHAN | Subject Specialist BS-17 (Statistics) GHSS NARI PANOS KARAK against the vacant post |
| 139 | MR SHAH ZEB Subject Specialist BS-17 (Statistics) | GHSS CHANAI SWABI | Subject Specialist BS-17 (Statistics) GHSS MARYAMZAI PESHAWAR against the vacant post |
| 140 | MUHAMMAD BILAL Subject Specialist BS-17 (Statistics) | GHSS PIR SABAQ NOWSHERA | Subject Specialist BS-17 (Statistics) GHSS SHAHEED WASIM IQBAL TARKHA NOWSHERA against the vacant post |
| 141 | MR. ABDUR RAUF Subject Specialist BS-17 (Urdu) | GHSS NOGRAM BUNNER | Subject Specialist BS-17 (Urdu) GHSS TOTALAI BUNNER against the vacant post |
| 142 | ABDUL RASHID Subject Specialist BS-17 (Urdu) | GHSS GOMAL BAZAR TANK | Subject Specialist BS-17 (Urdu) GHSS NO. 4 D.I.KHAN against the vacant post |
| 143 | FIDA MUHAMMAD Subject Specialist BS-17 (Urdu) | GHSS S.N.KHAN HARIPUR | Subject Specialist BS-17 (Urdu) GHSS JATTI PIND HARIPUR against the vacant post |
| 144 | MR. KIFAYAT ULLAH Subject Specialist BS-17 (Urdu) | GHSS GADDAR MARDAN | Subject Specialist BS-17 (Urdu) GOVT SADEEQ ULLAH SHAHEED HIGHER SECONDARY SCHOOL JAMAL GHARI MARDAN against the vacant post |
| 145 | MR. ABDUS SALAM Subject Specialist BS-17 (Urdu) | GHSS IKRAM PUR MARDAN | Subject Specialist BS-17 (Urdu) GHSS GUJAR GARHI MARDAN against the vacant post |
| 146 | MUHAMMAD HASSAN Subject Specialist BS-17 (Urdu) | GHSS BAGH DUSHKHEL DIR PAYAN | Subject Specialist BS-17 (Urdu) GHS PINGAL DIR PAYAN against the vacant post |
| 148 | MR. SHAFIQ UR REHMAN Subject Specialist BS-17 (Urdu) | GHSS DALOLA ABBOTTABAD | Subject Specialist BS-17 (Urdu) GHS BODLA ABBOTTABAD against the vacant post |
| 149 | MR. MUSHTAQ ALI Subject Specialist BS-17 (Urdu) | GHSS SAROBI GARHI ORAKZAI | Subject Specialist BS-17 (Urdu) GHSS CHAMTAR MARDAN against the vacant post |

Attested.
Muhammad Azhar
Advocat High Court
Abbottabad



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

| | | | |
|-----|---|----------------------------|---|
| 150 | MR. JEHANDAR SHAH Subject Specialist BS-17 (Urdu) | GHSS MALAKAND DIR PAYAN | Subject Specialist BS-17 (Urdu) GHSS KHAZANA DIR PAYAN against the vacant post |
| 151 | MR. MUHABAT SHAH Vice Principal (BS-18) | GHSS WARI DIR BALA | Vice Principal (BS-18) GHSS MALAKAND DIR PAYAN against the vacant post |
| 152 | M SAEED KHAN Vice Principal (BS-18) | GHSS BATTAL MANSEHRA | Vice Principal (BS-18) GHSS DHODIAL MANSEHRA against the vacant post |

2. No TA/DA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

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

Attested.

Oazi Muhammad Azhar
Advocat High Court
Abbottabad

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD

No. 1032/SSC/HSSC ANNUAL EXAM 2021/ACE(C)/BISE/ATD

Dated: 15-06-2021

STAFF NO: S-15552

Reg No:

ANNEXURE D

Name: MASOOD UR REHMAN

District: MANSEHRA

Address: GHSS THAKRA

Desig: SS

Mobile No. 03219821262

Subject: APPOINTMENT AS SUPERINTENDENT IN SSC & HSSC ANNUAL EXAMINATION 2021.

I am directed to inform that you have been appointed as a SUPERINTENDENT for the Subject examination commencing w.e.f Saturday, July 10, 2021. Moreover the second phase of the Subject Examination will commence w.e.f Tuesday, July 27, 2021.

You are directed to reach the below mentioned Examination Centre ONE DAY before i.e. July 09, 2021 & July 26, 2021 for making necessary arrangements, (especially regarding precautionary measures of COVID-19 SOP's)

Note: You will be paid for two preparatory days Viz. 09/07/2021 & 26/07/2021 for this Examination.

| CENTRE NAME | CENTRE NO. (SSC) | CENTRE NO. (HSSC) |
|---------------------------------------|------------------|-------------------|
| AIMS SCHOOL AND COLLEGE Oghi MANSEHRA | 404 | 714 |

You must attend the Workshop to be held on June 29, 2021 at 10:00AM for Collection of Superintendent Documents and Centre Advance. In case of non-participation the duty shall stand cancelled.

ضروری ہدایات دئے گئے

- 1۔ تمام سپرنٹنڈنٹس اپنا Covid-19 Vaccination Certificate اور گھرانے والے دن مہیا کریں اور گھرانے کے عمل کا Covid-19 Vaccination Certificate اپنے پاس
- 2۔ عمل یقین دہانی کر لیں کہ ہال میں کیمروں تک کام کر رہا ہے۔
- 3۔ اگر آپ کا کوئی قریبی رشتہ دار (بیٹا، بیٹی، بہن، بھائی، شوہر ویوی) ایمرٹک وائٹرس سالانہ امتحان 2021 میں شامل ہیں تو پھر آپ ڈیوٹی کے اہل نہیں ہیں۔ اگر آپ کے اپنے سکول کے طلباء و طالبات اسی سینٹر میں امتحان دے رہے ہیں تو پھر آپ ڈیوٹی سنبھال کر دیا جاسکتے ہیں۔
- 4۔ موجودہ حالات کے پیش نظر آپ ہال میں Seating arrangement لیتے اور چیز کے مطابق کریں۔
- 5۔ امتحانی ہال میں موبائل فون تمام سٹاف Silent Mode پر رکھیں ماسوائے سپرنٹنڈنٹ کے۔
- 6۔ مٹر کے تمام عملے کے لئے ضروری ہے کہ وہ اپنا عملی شناختی کارڈ واپس اپنے پاس رکھیں۔
- 7۔ امتحانی عملے کو ڈیوٹی کے دنوں (جن میں انہوں نے ڈیوٹی کی ہوگی) کے حساب سے طے شدہ اعزاز دیا جائے گا۔
- 8۔ امیدواروں سے نرمی اور شفقت سے پیش آئیں اور ہال میں عمل خالصتاً کا ماحول قائم رکھیں۔

Confirm your acceptance/availability in this office through text message by Typing (Staff No=Accept or Refused) and send to 0313-5870907, 0300-9398483, 0310-5603696, 0310-5064321 or Contact at Landline Number 0992-392799 by 28.06.2021 positively. If the acceptance is not received within due time, duty shall stand cancelled.

Assistant Controller Conduct
BISE Abbottabad
0992-392799

-sd-
Controller of Examinations
BISE Abbottabad
0992-392013

DUTY ACCEPTANCE

(Must be returned to Conduct Section before 28-06-2021)

To

The Assistant Controller of Examinations (Conduct) BISE Abbottabad

I acknowledge the receipt of your letter No: 1032/15552/SSC/HSSC ANNUAL EXAM 2021/ACE(C)/BISE/ATD Dated: June 15, 2021, and to inform that I am willing to perform Duty as SUPERINTENDENT for SSC/HSSC Annual Examination 2021, at Centre No: 404, AIMS SCHOOL AND COLLEGE Oghi MANSEHRA. I solemnly declare that none of my "Close Relative" is appearing in the above Examination and appointment will be kept CONFIDENTIAL.

میں اقرار کرتا کرتی ہوں کہ میرا کوئی بیٹا، بیٹی، بھائی، بہن، شوہر ویوی ایمرٹک وائٹرس سالانہ امتحان 2021 میں شامل نہیں ہیں اور میں

Name: MASOOD UR REHMAN

Desig: SS

Institution: GHSS THAKRA

PTCL No.

Mobile No.

Signature

Attested
Muhammad Ashar
Assistant Controller
Abbottabad

25

ANNEXURE
"E"

RELIEVING CERTIFICATE

In compliance with the E-transfer order of Mr. Masood ur Rehman SS (Pak Studies) BPS-17 has been Transferred at GHSS Harno Aziz Abad Abbottabad against the vacant post vide No. SO(SM)E&SED/7-1/2021/PT/E-Transfer S.No 118 Dated 08-07-2021.

He is hereby relieved off from his duties on 19-07-2021 before noon and is directed to report to the office of Principal GHSS Harno Aziz Abad Abbottabad


Principal, **Principal**
GHSS Thakra Manshra, **GHSS Thakra**
Manshra

Attested.


Qazi Muhammad Azhar
Advocat High Court
Abbottabad

26

ANNEXURE
"F"

OFFICE OF THE PRINCIPAL GHSS HARNO, ABBOTTABAD

NO: 501

Dated: 19/07/2021

To,

The Secretary,

E&SE KP, Peshawar.

Subject: 'Non Availability of Post of Subject Specialist (Pak-Study)'

Memo,

The Post of Subject Specialist (Pak-Study) is already filled at GHSS Harno, Abbottabad Vide SO(SM) E&SED/7-1/2020/Posting/Transfer/General; Dated Peshawar the 09-06-2021, and at present there is no vacant Post of Subject Specialist at this institute.

[Handwritten Signature]

PRINCIPAL

GHSS HARNO

ABBOTTABAD

Principal

GHSS Harno Azizabad
Abbottabad

Attested

[Handwritten Signature]
Qazi Muhammad Azhar
Advocate High Court
Abbottabad



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

Dated Peshawar the June 09, 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General: The Competent Authority is pleased to order the transfer of the following teachers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name with designation | From | TO |
|-----|---|---|---|
| 5. | Mr. Ajab Noor Khan SS English (BS-17) | IIM (BS-17) GHS Almomin Jani Khel Bannu | SS Pashtu (BS-17) GHSS No. 2 Peshawar Cantt against vacant post. |
| 6. | Mr. Mehrban Khan SS Pak Study (BS-17) | GHSS Jal Gali Manshra | SS Pak Study (BS-17) GHSS Harno Abbottabad against vacant post. |
| 7. | Mr. Shafiullah SS Economics (BS-17) | GHSS Rabat Dir Lower | SS Economics (BS-17) GHSS Manyal Dir Lower. V.S#4 |
| 8. | Mr. Muhammad Rafiq SS Economics (BS-17) | GHSS Manyal Dir Lower | SS Economics (BS-17) GHSS Zaimdara Dir Lower against vacant post. |
| 9. | Mr. Muhammad Zeeshan IPE (BS-17) | GHSS Nogram Buner | SS Urdu (BS-17) GHSS Ramak D.I.Khan against vacant post. |
| 10. | Mr. Taj Ahmad IPE (BS-17) | GHSS Drosh Chitral lower | IPE (BS-17) GHSS Baranis Chitral Lower against vacant post. |
| 11. | Mr. Muhammad Irfan SS Biology (BS-17) | GHSS Lar D.I.Khan | SS Biology (BS-17) GHSS Behari Colony D.I.Khan against vacant post. |
| 12. | Mr. Raham Zaman Khan SS Urdu (BS-17) | GHSS Bahadur Khel Karak | SS Urdu (BS-17) GHSS Comprehensive Bannu against vacant post. |
| 13. | Mr. Shams-ur-Rehman Principal (BS-18) | GHSS Daraka Aziz Khan Lakki Marwat | Principal (BS-18) GHS Tiler Khel Lakki Marwat against vacant post. |

2. No TA/DA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

11. Accountant General, Khyber Pakhtunkhwa Peshawar.
12. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
13. Director, DPD Khyber Pakhtunkhwa, Peshawar.
14. District Education Officers (M), Concerned.
15. District Accounts Officers, Concerned.
16. PS to Minister for E&SE Department.
17. PS to Secretary E&SE Department.
18. PS to Special Secretary E&SE Department.
19. PA to Additional Secretary (Estb) E&SE Department.
20. Officers concerned.


 (HAFAZ UR REHMAN SHAH)
 SECTION OFFICER (SCHOOLS MALE)

ANNEXURE "G"

To

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

Subj. Appeal

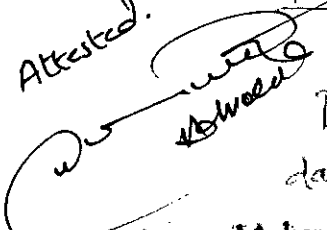
Respected Sir,

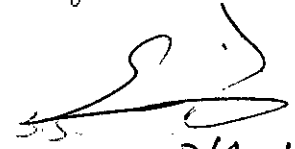
with great reverence it is stated that I am serving in G.H.S.S. Thakra Manshera on S.S. Pak-studies post since 30-5-2017. I am resident of district Abbottabad. I applied through E transfer system for vacant post of S.S. Pak Studies in G.H.S.S. Harro Azizabad on 14-6-2021. My application was processed and on 2nd July 2021 my applied post no 35960 was ^{declared} verified by concern officer.

Furthermore on 8th July 2021, transfer order no. 50(SM)E&SED/7-1/2021/PT/E-transfer issued Com No 118, I also transferred from G.H.S.S. Thakro (Man) to G.H.S.S. Harro Azizabad on vacant post.

On very next day I reported to Principal G.H.S.S. Harro Azizabad for charge/joining but refused with remarks "Post is not vacant" and said post is filled through order No 50(SM)E&SED 7-1/2021 dated 9th June, 2021.

Now it is humbly requested/appealed to your honour ^{accepting} to adjust me in G.H.S.S. Harro Azizabad to E-transfer order dated 8-7-2021, which is totally on merit.

Attested.

Qazi Muhammad Azhar
Advocate High Court
Abbottabad

Masood ur Rehman S.S.
Pak Studies G.H.S.S. Thakra
Manshera

26/7/21

وکالت نامہ

28

کورٹ فیس

قیمتی

Before the Honorable service Tribunal ^{www} بعدالت

Masood-Ur-Rehman : نام Govt KPIK

APPELLANT : منجانب

دعویٰ یا جرم Service Appeal باعث تحریر آنکہ

قاضی لاء چیمبر

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجوہی مقام

قاضی محمد اظہر ایڈوکیٹ ہائی کورٹ Abbottabad کو بدیں شرط وکیل مقرر کیا ہے کہ ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے پر وکیل موصوف کو اطلاع دے کر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا برو تعطیل بیرونی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا برو پکھری کے اوقات کے آگے پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرواختہ صاحب مشل کردہ بذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل گرانٹی دائر کرنے نیز ہر قسم درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم کا بیان دینے اور سپرد و نمائندگی درامتی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخ ڈگری ایک طرف درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا جنگی علیحدہ بیرونی اختیار نامہ کرنے کا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کو واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دی ہے کہ سندر ہے۔

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

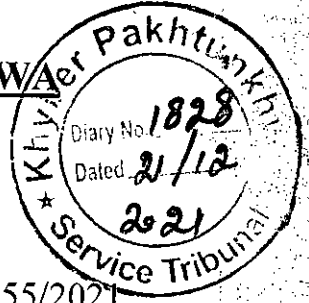
Accepted
&
Attested

مورخہ 20-11-2021

العبد العبد العبد العبد

Advocate
Muhammad Azhar
Advocate High Court
Abbottabad

**BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, K.P PESHAWAR**



Service Appeal No. 7855/2021

*Put up to the worthy chair - on
with relevant app - l*

Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection
Assistant Independent Monitoring Unit District Abbottabad.

...APPELLANT

VERSUS

Govt. of KPK & others.

...RESPONDENTS

*Fix in Jan, 2022
for CC Attd A 21/12/2021*

APPLICATION FOR EARLY HEARING OF THE
CAPTIONED SERVICE APPEAL OF THE
APPELLANT AS THE MATTER RELATES TO THE
ILLEGAL TRANSFER OF THE APPELLANT.

Respectfully Sheweth;

1. That the Service Appeal No. 7855/2021 of the appellant is pending adjudication before this Honourable Tribunal and the next date of hearing is fixed by this Honourable Tribunal on 14/03/2022.
2. That the appellant has illegally been transferred from District Abbottabad to District Torghar. The appointment of the appellant is domicile based i.e. District Abbottabad. Hence, the appellant cannot be transferred from District Abbottabad to District Torghar.

3. That valuable rights of the appellant is involved. Besides, the matter regarding grant of status quo against the impugned transfer order dated 16/11/2021 is yet to be decided by this Honourable Tribunal.

In view of the above it is prayed that the captioned appeal may graciously be ordered to be fixed for hearing on an early date.



....APPELLANT

Through

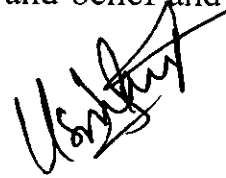
Dated: _____/2021



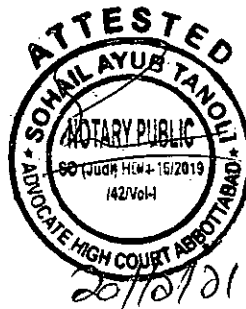
(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection Assistant Independent Monitoring Unit District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT



BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, K.P PESHAWAR

Service Appeal No. 7855/2021

Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection
Assistant Independent Monitoring Unit District Abbottabad.

...APPELLANT

VERSUS

Govt. of KPK & others.

...RESPONDENTS

APPLICATION

INDEX

| <i>S.#</i> | <i>Description</i> | <i>Page No.</i> | <i>Annexure</i> |
|------------|---------------------------------|-----------------|-----------------|
| 1. | Application alongwith affidavit | 1 to 2 | |

Dated: _____/2021

Through

(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

...APPELLANT

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, K.P PESHAWAR

Service Appeal No. 7855/2021

Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection
Assistant Independent Monitoring Unit District Abbottabad.

...APPELLANT

VERSUS

Govt. of KPK & others.

...RESPONDENTS

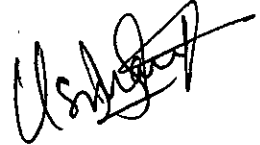
APPLICATION FOR EARLY HEARING OF THE
CAPTIONED SERVICE APPEAL OF THE
APPELLANT AS THE MATTER RELATES TO THE
ILLEGAL TRANSFER OF THE APPELLANT.

Respectfully Sheweth;

1. That the Service Appeal No. 7855/2021 of the appellant is pending adjudication before this Honourable Tribunal and the next date of hearing is fixed by this Honourable Tribunal on 14/03/2022.
2. That the appellant has illegally been transferred from District Abbottabad to District Torghar. The appointment of the appellant is domicile based i.e. District Abbottabad. Hence, the appellant cannot be transferred from District Abbottabad to District Torghar.

3. That valuable rights of the appellant is involved. Besides, the matter regarding grant of status quo against the impugned transfer order dated 16/11/2021 is yet to be decided by this Honourable Tribunal.

In view of the above it is prayed that the captioned appeal may graciously be ordered to be fixed for hearing on an early date.



....APPELLANT

Through

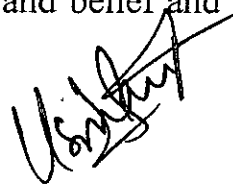
Dated: _____/2021



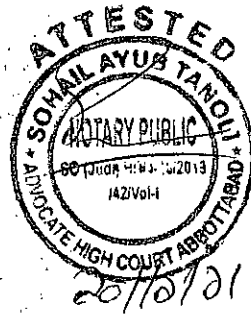
(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection Assistant Independent Monitoring Unit District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT



BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, K.P PESHAWAR

Service Appeal No. 7855/2021

Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection
Assistant Independent Monitoring Unit District Abbottabad.

...APPELLANT

VERSUS

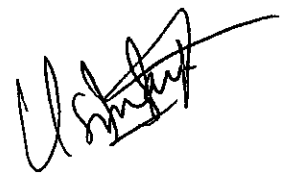
Govt. of KPK & others.

...RESPONDENTS

APPLICATION

INDEX

| S.# | Description | Page No. | Annexure |
|------------|---------------------------------|-----------------|-----------------|
| 1. | Application alongwith affidavit | 1 to 2 | |



....APPELLANT

Dated: _____/2021

Through


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, K.P PESHAWAR

Service Appeal No. 7855/2021

Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection
Assistant Independent Monitoring Unit District Abbottabad.

...APPELLANT

VERSUS

Govt. of KPK & others.

...RESPONDENTS

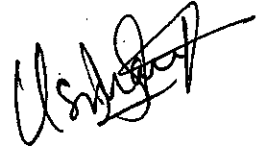
APPLICATION FOR EARLY HEARING OF THE
CAPTIONED SERVICE APPEAL OF THE
APPELLANT AS THE MATTER RELATES TO THE
ILLEGAL TRANSFER OF THE APPELLANT.

Respectfully Sheweth;

1. That the Service Appeal No. 7855/2021 of the appellant is pending adjudication before this Honourable Tribunal and the next date of hearing is fixed by this Honourable Tribunal on 1⁴/03/2022.
2. That the appellant has illegally been transferred from District Abbottabad to District Torghar. The appointment of the appellant is domicile based i.e. District Abbottabad. Hence, the appellant cannot be transferred from District Abbottabad to District Torghar.

3. That valuable rights of the appellant is involved. Besides, the matter regarding grant of status quo against the impugned transfer order dated 16/11/2021 is yet to be decided by this Honourable Tribunal.

In view of the above it is prayed that the captioned appeal may graciously be ordered to be fixed for hearing on an early date.



....APPELLANT

Through

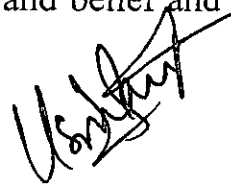
Dated: _____/2021



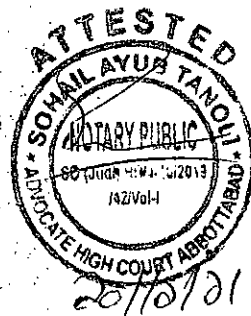
(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

AFFIDAVIT:-

I, Usman Malik son of Bashir Hussain Malik, Monitoring & Data Collection Assistant Independent Monitoring Unit District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT



- 1 -

BEFORE THE SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7782/2021

Masood ur Rehman

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&S Education
Peshawar and others.

...RESPONDENTS

REPLY/ WRITTEN STATEMENT ON BEHALF OF
RESPONDENT NO.4

INDEX

| S.# | Description | Page # | Annexures |
|------------|---|---------------|------------------|
| 1. | Written reply alongwith affidavit | 1 to 9. | |
| 2. | Copies of application and order | | "A" & "B" |
| 3. | Copy of Certificate of charge report | | "C" |
| 4. | Copy of Medical treatment of respondent No.4 | | "D" |
| 5. | Copy of order | | "E" |
| 6. | Wakalatnama | | |


...RESPONDENT NO. 4

Dated: 20/7 /2022

Through;


(KHALID RABBANI)

Advocate High Court Abbottabad

- 1 -

BEFORE THE SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7782/2021

Masood ur Rehman

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through Secretary E&S Education
Peshawar and others.

...RESPONDENTS

REPLY/ WRITTEN STATEMENT ON BEHALF OF
RESPONDENT NO.4

Respectfully Sheweth:-

Written reply to the factually incorrect and legally untenable
points of petitioner are as:-

PRELIMINARY OBJECTIONS:-

1. Petitioner has got not cause of action to file the instant
appeal.

25

ANNEXURE
"E" E

RELIEVING CERTIFICATE

In compliance with the E-transfer order of Mr. Masood ur Rehman SS (Pak Studies) BPS-17 has been Transferred at GHSS Harno Aziz Abad Abbottabad against the vacant post vide No. SO(SM)E&SED/7-1/2021/PT/E-Transfer S.No 118 Dated 08-07-2021.

He is hereby relieved off from his duties on 19-07-2021 before noon and is directed to report to the office of Principal GHSS Harno Aziz Abad Abbottabad

Principal, **Principal**
GHSS Thakra Manshra **GHSS Thakra**
Manshra

Attested.

Qazi Muhammad Azhar
Advocat High Court
Abbottabad

2. Petitioner has not come to this Honourable Tribunal with clean hands.
3. Appeal of the petitioner is incompetent in its present form. Hence liable to be dismissed summarily.
4. Appeal of the appellant is based on malafide, in fact brother of petitioner Mr. Maroof Khan is serving in education department as SDO with the help of whom petitioner managed to get the order of this Honourable Tribunal by concealing the legal and factual grounds in connivance with other staff.
5. That respondent No.4 served in education department, remain posted at different schools in KPK including remote areas, performed his duties upto satisfaction of his seniors with honor and diligent and is at the verge of retirement, superannuation.
6. That respondent No.4 was posted at GHSS Jal Gali Mansehra which is a hard area and served there about 4 years.
7. That petitioner is aged and ill due to ill health and age applied for the transfer after passing about 4 years service

at hill area to respondent No.1 & 2 who remain kind enough and transferred respondent No.4 from GHSS Jal Gali Mansehra to GHSS Harno Abbottabad against vacant post on 09/04/2021 alongwith other about 40 persons on the application of respondent No.4, the Principal Govt. Higher Secondary School Harno Abbottabad remarked no objection as the post was vacant since 15/03/2021. Copy of application and order is attached as Annexure "A" & "B".

8. That respondent No.4 relieved the charge and have taken charge at new school. Certificate of charge report is annexed as Annexure "C".
9. That present petitioner by keeping in dark respondent No.4 filed the instant appeal and manage to conceal the notices of service of this Honourable Tribunal through his brother serving in education department in connivance with other staff of college.
10. That respondent No.4 is facing different diseases, at old age and now a days is unable to perform duties at far-flung and hard area due to ailing conditions for which Doctor/ Medical specialist has already suggested with

bed rest. Copy of Medical treatment of respondent No.4 is annexed as Annexure "D".

11. That it is astonish to mention here, in-pursuance to the order of this Honourable Tribunal dated 30/12/2021 and the instant appeal respondent No.1 cancelled/withdrawn the transfer order of respondent No.4 on 09/05/2022 just after 09 months of tenure of respondent No.4 at newly posted station vide order No. SO(SM) E&SED/7-1/2020/ posting/ transfer/ general. Copy of order is attached as Annexure "E".

FACTUAL OBJECTIONS:-

1. Para No.1 is subject to proof hence need no reply.
2. In reply to Para No.2 it is stated that respondent No.4 requested for transfer/ adjustment from GHSS Jal Gali District Mansehra to GHSS Harno District Abbottabad against vacant post of SS (Pak Studies) on dated 10/03/2021 i.e. Prior to the petitioner, in response to the application Principal GHSS Harno Abbottabad verified that the post is vacant against which respondent No.4 was transferred the process mention in the Para was

prepared and Managed to designed with the help of brother of petitioner who is serving in the same department.

3. Para No.4 is denied the process mentioned in para is false and bogus and if the place of posting of respondent No.4 was found vacant even then respondent No.4 could not be declared as the mismanagement, not upto date the computerizing record is default of department not of the respondent No. 4. Hence department having itself transferred respondent No.4 at the vacant post could not be allowed to take benefit on its on lapses, they could not back out saying that transfer was irregular.
4. In reply to Para No.4 it is stated that on the date mention respondent No.4 was working at the station mentioned in Para.
5. Para No.5 does not relate to the answering respondent, need no reply.
6. Para No.6 does not relate to the answering respondent, need no reply.

7. Para No.7 is admitted correct upto the extent that respondent No.4 was transferred to GHSS Harno Abbottabad through notification dated 09/06/2021.
8. In reply to Para No.8 it is submitted that the mistake/wrong found of the department the answering respondent cannot be declared responsible of the wrong/clerical mistakes of the department.
9. Para No.9 is subject to proof appeal of the appellant in present form is bad, hence not maintainable.
10. In reply to Para No.10 it is stated that respondent No.4 is also aggrieved of the order of the respondent No.1 dated 09/05/2022 against which seeks indulgence of this Honourable Tribunal for setting aside the notification No. SO(SM) E&SED/7-1/2020/ posting/ transfer/ general and consequently the order of posting/ transfer of petitioner at the place of respondent No. 4 may kindly be declared as null and void.

GROUNDS:-

- a. Vehemently denied, notification passed by respondent No. 2 & 3 of respondent No.4 is legal, with lawful authority based on merits and law, liable to the maintain/upheld.
- b. Wrong hence denied-in toto.
- c. Denied impugned notification is based on bonafide.
- d. Denied being factually incorrect and legally untainable.
- e. Denied being factually incorrect and legally untainable.
- f. Denied been factually incorrect and legally untainable.
- g. In reply to grounds G it is stated that the station from where respondent No.4 was transferred is hard area where respondent No.4 served about 4 years.

- h. Legal need no reply.
- i. Legal at the discretion of the court.
- j. Legal need no reply.
- k. Legal need no reply, Prayer of the appellant/
petitioner is wrong hence denied.

It is therefore humbly prayed that the appeal of appellant may kindly be dismissed with cost and order of this Honourable Tribunal dated 30/12/2021 may kindly be withdrawn resultantly the respondent No.1 and 2 may Kindly be directed to withdraw/ cancel the order notification No. SO(SM) E&SED/7-1/2020/ posting/ transfer/ general dated 09/06/2020 and order/ notification of transfer of respondent No.4 No. SO(SM) E&SED/7-1/2020/ posting/ transfer/ general dated 09/06/2020 be restored.

Dated: 20/7/2022

Through;


...RESPONDENT NO. 4


(KHALID RABBANI)
Advocate High Court Abbottabad

-9-

BEFORE THE SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 7782/2021

Masood ur Rehman

...APPELLANT

VERSUS

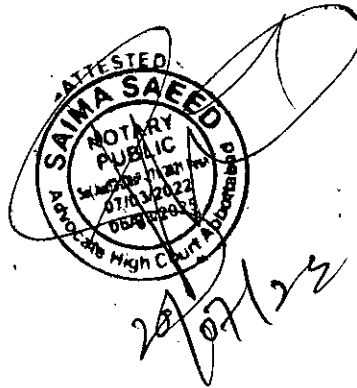
Government of Khyber Pakhtunkhwa through Secretary E&S Education
Peshawar and others.

...RESPONDENTS

REPLY/ WRITTEN STATEMENT ON BEHALF OF
RESPONDENT NO.4

AFFIDAVIT

I, Mehbrban Khan son of Sham Dad Khan (Late), resident of Bait Gali,
Post Office Darband, Tehsil & District Haripur, do hereby solemnly
affirm and declare that the contents of foregoing comments are true and
correct to the best of my knowledge and belief and nothing has been
concealed from this Honourable Court.




....DEPONENT

To

The Secretary,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar

Through: Proper Channel

Subject: REQUEST FOR TRANSFER / ADJUSTMENT FROM GHSS JAL GALI MANSEHRA DISTT MANSEHRA TO GHSS HARNO DISTT ABBOTTABAD AGAINST VACANT POST OF SS (PAK STUDY)

Sir,

With due veneration and profound regards it is requested that I have been working as SS (Pak Study) at GHSS Jal Gali Mansehra since 2018. Now I have come to know through reliable sources that a post of SS (Pak Study) is Laying Vacant at GHSS Harno Abbottabad.

It is requested that I may please be transferred from GHSS Jal Gali Mansehra to GHSS Harno Abbottabad against the vacant post of SS (Pak Study).

I hope you will consider my request sympathetically and give me a chance to serve at GHSS Harno Abbottabad against vacant post SS (Pak Study).

I shall remain thankful to you.

Yours Sincerely,

Mehrban Khan

MEHRBAN KHAN
SS (Pak Study)
GHSS Jal Gali Mansehra
Date: 10/03/2021

No objection with the remarks that recall of SS (Pak - 84) is lying on 15th of March 2021. Since the superannuation of Mr. Javed Iqbal
The Principal
PRINCIPAL
Govt. Higher Secondary
School Harno Abd.



-11- ANNEXURE "B"

GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the June 09, 2021

NOTIFICATION

NO.SO(SMIE&SED)/7-1/2020/Posting/Transfer/General The Competent Authority is pleased to order the transfer of the following teachers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| Sl# | Name with designation | From | TO |
|-----|---|--|---|
| 5. | Mr. Ajab Noor Khan SS English (BS-17) | HM (BS-17) GHS Almomia Jani Khel Bannu | SS Pashtu (BS-17) GHSS No. 2 Peshawar Cantt against vacant post. |
| 6. | Mr. Mehrban Khan SS Pak Study (BS-17) | GHSS Jal Gali Mansehra | SS Pak Study (BS-17) GHSS Harno Abbottabad against vacant post. |
| 7. | Mr. Shafiqullah SS Economics (BS-17) | GHSS Rabat Dir Lower | SS Economics (BS-17) GHSS Manyal Dir Lower. V, S#4 |
| 8. | Mr. Muhammad Rafiq SS Economics (BS-17) | GHSS Manyal Dir Lower | SS Economics (BS-17) GHSS Zaimidara Dir Lower against vacant post. |
| 9. | Mr. Muhammad Zeeshan IPE (BS-17) | GHSS Nogram Buner | SS Urdu (BS-17) GHSS Ramak D.I.Khan against vacant post. |
| 10. | Mr. Taj Ahmad IPE (BS-17) | GHSS Drosh Chitral Lower | IPE (BS-17) GHSS Baranis Chitral Lower against vacant post. |
| 11. | Mr. Muhammad Irfan SS Biology (BS-17) | GHSS Lar D.I.Khan | SS Biology (BS-17) GHSS Behari Colony D.I.Khan against vacant post. |
| 12. | Mr. Raham Zaman Khan SS Urdu (BS-17) | GHSS Bahadur Khel Karak | SS Urdu (BS-17) GHSS Comprehensive Bannu against vacant post. |
| 13. | Mr. Shams-ur-Rehman Principal (BS-18) | GHSS Daraka Aziz Khan Lakki Marwat | Principal (BS-18) GHS Titer Khel Lakki Marwat against vacant post. |

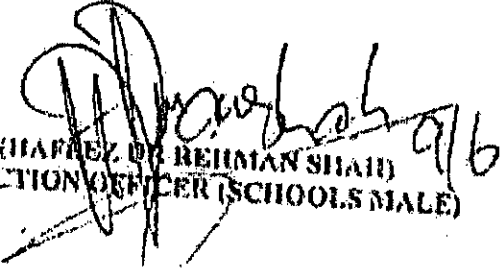
2. No TADA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

11. Accountant General, Khyber Pakhtunkhwa Peshawar.
12. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
13. Director, DPD Khyber Pakhtunkhwa, Peshawar.
14. District Education Officers (M), Concerned.
15. District Accounts Officers, Concerned.
16. PS to Minister for E&SE Department.
17. PS to Secretary E&SE Department.
18. PS to Special Secretary E&SE Department.
19. PA to Additional Secretary (Esib) E&SE Department.
20. Officers concerned.


(SHAMS-UR-REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

-12-

ANNEXURE
"C"

CERTIFICATE OF TRANSFER OF CHARGE REPORT

Certified that we have on the Fore noon / After Noon of this day on 12-06-2021 /FN.AN respectively made over & received charge of the office of the Principal Govt: Higher Secondary School Harno Abbottabad with reference to the Secretary to Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Department No. SO(SM)E&SED/7-1/2020/Posting/Transfer/General Dated Peshawar the 09-06-2021

2. Particulars of cash & important secret & confidential documents handed over are noted on the reverse.

STATION : GHSS: Harno A/Abad.

Dated 12-06-2021(FN).

Signature of relieved

Government Servant Post Vacant

Designation SS(Pak Study) BPS-17

Signature of relieving

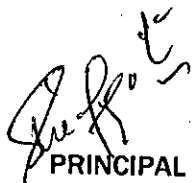
Government Servant Mehrban Khan

Designation SS(Pak Study) BPS-17

Endst: No. 980-851 Dated Harno the 12/06/2021

Copy of the above is forwarded to the:-

1. Secretary to Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
2. Director Elementary & Secondary Education KPK Peshawar.
3. District Education Officer (M) Abbottabad.
4. District Account Officer Abbottabad.
5. Officer Concerned.
6. Office file.


PRINCIPAL
GOVT; HIGHER SECONDARY
SCHOOL HARNO A'ABAD.
Principal
GHSS Harno Azizabad
Abbottabad

MBBS, FCPS, FRCP (Glasgow)
Professor of Medicine
Ayub Medical College, Abbottabad

Date 17 Feb 2022

Name Meharban

572/M Address ADP

- Gen Bury / by shehn + T Bury / Painful
- chut / Nausea, cough, fever, Bly
- sleepless Dr. Bury was
- on Betnelan - many yrs

800 160/100

ADP

Cashiered []

At 10.23 (2022)
S. Lincard

1) To Colchicine 0.5
dl 2

2) by Calcium
dl 2

3) by Sulfonamide
dl 2

4) by Ibuprofen 1500
dl 2

5) by Uvicin
dl 2

6) by Mefenamic
dl 2

At
Complete Bed
Rest for two weeks
[Signature]

[Signature]

کلینک: وادی، منگل

Clinic 1: Valley Medical Complex

Main Mansehra Road, Mirpur, Abbottabad
Ph#: 0992-414518

کلینک: سامی، جہڑات، جہڑ

Clinic 2: Sami Medical Complex

Main Mansehra Road, Opp. Brothers CNG Near
Kala Pul, Abbottabad. Ph#: 0992-406677 0317-5756565

-14-



Results You Can Trust
کوکو ۲۰۲۲ء میں سرگرم ہوئے ہیں۔

Diagnostic Laboratory سمیع ڈائیگنوسٹک لیبارٹری

Sami Medical Centre, Near Kalapul, Opp: Brother CNG Mansehra Road, Abbottabad.
Tel: 0992-406676, 0302-5563637

Patient ID: **295**
Patient Name: **Mr Mehrban**
Age/Sex: 57Y/ Male
Referred By: Prof Dr Attique ur Rehman

Sample Date: May 17, 2022,
Reg. Date: 17/05/2022 7:51:12 PM
Report Date: 17/05/2022 7:51:12 PM

CHEMISTRY

| TEST | RESULT | UNIT | NORMAL RANGE |
|-----------|--------|-------|--------------|
| Uric Acid | 10.23 | mg/dl | 2.5 - 6.5 |

Consultant Pathologist
Prof. Dr. Abdus Salam Khan
MBBS, M.Phil, Ph.D

Consultant Microbiologist
Dr. Maryam Riaz (Asso. Prof)
MBBS, M.Phil

Sr. Lecturer, Pathology
Dr. Ibadullah Khan
MBBS

Facility for all routine lab tests | Accuracy and Quality assured

In case of any Discrepancy, Please contact: 0302-5563637

DR. ATTIQUE UR REHMAN JEHANGIRI

MBBS, FCPS, FRCP (Glasgow)
Professor of Medicine
Ayub Medical College, Abbottabad

Date 14/04/2022

Name Meharban

57/1M

Address

AFD

ay 90/60

- Vertigo - Had a fall

- C/o BPs / Bone pain - Run over whole back

- C/o Chest - Anger from day after day
Dizziness App -

on Betnelan for many yrs.

Chest pain

AFD

AFD

④ to Chemical

ob 2 - 2 D

④ Ep out D ④

ob 1 1/2 - 2 D

④ to Subcut

ob 2 - 2 D

• ④ to Baudro 100g

④ to 100g

ob 4 - 3 ④ ind ④

④ to 100g

④ to 100g

④ Ep to Card 100g

④ to 100g

④ to Subcut Enta

ob 15 - 2 D

AFD

کلینک: پیر منگل

Clinic 1: Valley Medical Complex

Main Mansehra Road, Mirpur, Abbottabad
Ph#: 0992-414518

کلینک: بدو، جمہرات، جوہ

Clinic 2: Sami Medical Complex

Main Mansehra Road, Opp. Brothers CNG Near
Kala Pul, Abbottabad. Ph#: 0992-406677. 0317-5750505



Book No.

S.No. 37

HTN ⊖

Adm (5)

X-ray
RT foot

X-ray
head
skull
PNS

e/c:-

• Hx of sudden
fall

• Trauma to
head & feet (Right
side)

• swelling

Bop 90/60 mmHg

pulse 107 bpm

Temp 98 F

Spo2 92/m

BP 98/68

Rx 12

Inj valite 1 (1M) stat

Inj PT 1 (1M) stat

Inj R/L JODCC
12 stat

Adm

X-ray

(RP) foot & ankle - AP
100 } distal

(199)

02/04/22

Ortho Notes

09-04-2022

History of fall - 1 day

O/E

- Red + swollen (R) foot distal to metatarsals.
- swelling + Tenderness five

- Temp ↑ on (R) five foot Pain to line

Adv Dr. Inj - Xorbact 1 gm x 1/2 x B.D
علاج و حقن كورباكت 1 جم x 1/2 x B.D

- CBC

• Tab - T amoflex P ✓
① + ①

- ESR

- CRP

• Tab - Myexam Somp ✓
① + ①

- RBS

95/05 MS

BD 9/4/2022

Dr. Tariq
PG 08W
9/4/2022

1kg. All Salafie sound
used
MS
MO/08W

-17-

MEDICAL TEACHING INSTITUTION ABBOTTABAD

Medical Teaching Institution Abbottabad
F-10, Abbottabad Cantt. (P.O. Box No. 1000)
Abbottabad, Pakistan. Phone: 099-999-1111

INVOICE_RECEIPT_FEE

Order No 220345549 Inv Date: 09-APR-22 06:58 PM
 Inv No K04220861236 Access code
 Patient Type . ACUTE EMERGEN
 MRNO. ACE22065194 Meharban Khan
 Sr Item Description Qty Rate Amount
 1 XRAY SKULL AP 1 60 60
 2 XRAY FOOT 1 60 60
 Cash 120.00

MEDICAL TEACHING INSTITUTION ABBOTTABAD

Medical Teaching Institution Abbottabad
F-10, Abbottabad Cantt. (P.O. Box No. 1000)
Abbottabad, Pakistan. Phone: 099-999-1111

Order No 220345605 Inv Date: 09-APR-22 07:55 PM
 Inv No K04220861467 Access code
 Patient Type . ACUTE EMERGEN
 MRNO. ACE22065194 Meharban Khan
 Sr Item Description Qty Rate Amount
 1 XRAY SKULL AP 1 60 60
 2 XRAY PROSTATE (AP) 1 370 370
 3 CBC & Manual Differential
 (3 Parts) Includes: 1 150 150
 Cash 580.00



Haematology Report

MRNO : K04-ACE22065194
Name : MEHARBAN KHAN
Age/Sex : 55 Year(s)/Male
Phone :
Address : , ABBOTTABAD - PAKISTAN

Ordered By : Sohail Iqbal
In-house Consultant :
Report Destination :
Requested : 09-APR-2022 19:51:50
Specimen Received : 09-APR-2022 20:03:15
Reported : 09-APR-2022 21:11:50

CBC

| TEST(s) | NORMAL | UNIT(s) | K04HEM22048328 |
|---------|-------------|------------------|-------------------------|
| | | | 09-APR-2022 21:11:50 |
| WBC | 4 - 11 | x10.e 3/ μ l | 8.7 |
| RBC | 4 - 6 | x10.e 6/ μ l | 4.71 |
| HGB | 11.5 - 17.5 | g/dL | 14.6 |
| HCT | 36 - 54 | % | 39.1 |
| MCV | 76 - 96 | fL | 83 |
| MCH | 27 - 33 | pg | 31 |
| MCHC | 33 - 35 | g/dL | 37.3 |
| %RDW-CV | 11.5 - 14.5 | % | 12.2 |
| PLT | 150 - 400 | x10.e 3/ μ l | 215 |
| MPV | 7.2 - 11 | fL | 8.5 |
| %Neut | 40 - 75 | % | 47.4 |
| %LYMP | 20 - 45 | % | 45.8 |
| %MONO | 2 - 10 | % | 6.8 |
| #NEUT | 1.9 - 8 | x10.e 3/ μ l | 4.1 |
| #LYMP | 0.9 - 5.2 | x10.e 3/ μ l | 4 |
| #MONO | 0.16 - 1 | x10.e 3/ μ l | 0.6 |

Note : Lab values should always be correlated with clinical picture.
Normal Range(s) and Unit(s) shown are for most recent results.

Muhammad Zahoor
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR. NAEEMA AFZAL
M.Phil (Chemical Path) &
Ph.D (Endocrinology),
Professor & Chairperson

DR. MUHAMMAD IDRESS
FCPS Medicine, FCPS
Clinical Haematology,
Associate Prof.

DR. SHABANA NAZ
FCPS (Histopathology),
Associate Prof.

DR. SHAGUFTA NAEEM
FCPS (Histopathology),
Associate Prof.

DR. FIAZ AHMAD
M.Phil (Histopathology),
Assistant Prof.

DR. ANILA RIYAZ
FCPS (Histopathology),
Assistant Prof

DR. ROMANA IRSHAD
M.Phil (Haematology),
Associate Prof.

DR. JAMILA FARID
M.Phil (Microbiology),
Associate Prof.

DR. AMMAR BIN SAAD
FCPS, M.Phil (Haematology),
Assistant Prof.

DR. MUHAMMAD BASHARAT
M.phil (Chemical Path),
Assistant Prof.

DR. AJMAL HUSSAIN
Diploma Clinical Pathology

DR. AMNA KHALID
M.phil (Haematology)

MEDICAL TEACHING INSTITUTION ABBOTTABAD

Ayub Teaching Hospital. Phone: 0992-9311162, Fax: 0992-380328
Email: info@ath.gov.pk, Website: www.ath.gov.pk

- 19 -



VIEW: 09-Apr-2022 23:21:37

Clinical Chemistry Report

Page 1 of 1

MRNO : K04-ACE22065194

Name : MEHARBAN KHAN

Age/Sex : 55 Year(s)/Male

Phone :

Address : , ABBOTTABAD - PAKISTAN

Ordered By : Sohail Iqbal

In-house Consultant :

Report Destination :

Requested : 09-APR-2022 19:54:50

Specimen Received : 09-APR-2022 20:03:15

Reported : 09-APR-2022 21:35:51

Chemistry - I

| TEST(s) | NORMAL | UNIT(s) | K04RCH22048245 09-APR-2022 21:35:51 |
|------------------|----------|---------|---|
| GLUCOSE (RANDOM) | 70 - 140 | mg/dL | 122 |

Note : Lab values should always be correlated with clinical picture.
Normal Range(s) and Unit(s) shown are for most recent results.

Muhammad Zahoor
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR. NAEEMA AFZAL
M.Phil (Chemical Path) &
Ph.D (Endocrinology),
Professor & Chairperson

DR. MUHAMMAD IDRESS
FCPS Medicine, FCPS
Clinical Haematology,
Associate Prof.

DR. SHABANA NAZ
FCPS (Histopathology),
Associate Prof.

DR. SHAGUFTA NAEEM
FCPS (Histopathology),
Associate Prof.

DR. FIAZ AHMAD
M.Phil (Histopathology),
Assistant Prof.

DR. ANILA RIYAZ
FCPS (Histopathology),
Assistant Prof.

DR. ROMANA IRSHAD
M.Phil (Haematology),
Associate Prof.

DR. JAMILA FARID
M.Phil (Microbiology),
Associate Prof.

DR. AMMAR BIN SAAD
FCPS, M.Phil (Haematology),
Assistant Prof.

DR. MUHAMMAD BASHARAT
M.phil (Chemical Path),
Assistant Prof.

DR. AJMAL HUSSAIN
Diploma Clinical Pathology

DR. AMNA KHALID
M.phil (Haematology)



- 20 -

VIEW: 09-Apr-2022 23:21:36

Clinical Chemistry Report

Page 1 of 1

Dept. Ref# : K04RCH22048245
 MRNO : K04-ACE22065194
 Name : MEHARBAN KHAN
 Age/Sex : 55 Year(s)/Male
 Phone :
 Address : ABBOTTABAD - PAKISTAN

Ordered By : Sohail Iqbal
 In-house Consultant :
 Requested : 09-APR-2022 19:54:50
 Specimen Received : 09-APR-2022 20:03:15
 Reported : 09-APR-2022 21:35:56

Rheumatology Panel

SPECIMEN : SERUM

| TEST(s) | RESULT(s) UNITS | REFERENCE RANGE |
|--------------------|-----------------|-----------------|
| C-Reactive Protein | 14.2 mg/L | < 5.0 |

COMMENTS:

C-Reactive Protein In Patients' Sera Has Been Found In Association With Acute Infections, Necrotic Conditions And A Variety Of Inflammatory Disorders. There Is A Strong Correlation Between Serum Levels Of Crp And The Onset Of The Inflammatory Process. Monitoring Of The Crp Levels In Patients' Sera Indicates The Effectiveness And The Assessment Of The Patient Recovery.

However, A Diagnosis Should Not Be Made On The Results Of A Single Test But On A Correlation Of Clinical Details And Other Laboratory Findings.

Muhammad Zahoor
 Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR. NAEEMA AFZAL
 M.Phil (Chemical Path) &
 Ph.D (Endocrinology),
 Professor & Chairperson

DR. MUHAMMAD IDRESS
 FCPS Medicine, FCPS
 Clinical Haematology,
 Associate Prof.

DR. SHABANA NAZ
 FCPS (Histopathology),
 Associate Prof.

DR. SHAGUFTA NAEEM
 FCPS (Histopathology),
 Associate Prof.

DR. FIAZ AHMAD
 M.Phil (Histopathology),
 Assistant Prof.

DR. ANILA RIYAZ
 FCPS (Histopathology),
 Assistant Prof.

DR. ROMANA IRSHAD
 M.Phil (Haematology),
 Associate Prof.

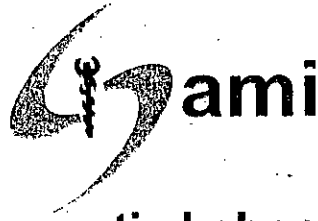
DR. JAMILA FARID
 M.Phil (Microbiology),
 Associate Prof.

DR. AMMAR BIN SAAD
 FCPS, M.Phil (Haematology),
 Assistant Prof.

DR. MUHAMMAD BASHARAT
 M.phil (Chemical Path),
 Assistant Prof.

DR. AJMAL HUSSAIN
 Diploma Clinical Pathology,
 Sr. BRO

DR. AMNA KHALID
 M.phil (Haematology),
 Assistant Prof.



Results You Can Trust

یہ کمپنی ہے جس کی رپورٹس آپ کو سچے اور درست نتائج فراہم کرتی ہیں۔

20-A

Diagnostic Laboratory سمیع ڈائیگنوسٹک لیبارٹری

Sami Medical Centre, Near Kalapul, Opp: Brother CNG Mansehra Road, Abbottabad.
Tel: 0992-406676, 0302-5563637

Patient ID: 295
Patient Name: Mr Mehrban
Age/Sex: 57Y/ Male
Referred By: Prof Dr Attique ur Rehman

Sample Date: May 17, 2022,
Reg. Date: 17/05/2022 7:51:12 PM
Report Date: 17/05/2022 7:51:12 PM

CHEMISTRY

TEST

Uric Acid

RESULT

10.23

UNIT

mg/dl

NORMAL RANGE

2.5 - 6.5

Consultant Pathologist
Prof. Dr. Abdus Salam Khan
MBBS, M.Phil, Ph.D

Consultant Microbiologist
Dr. Maryam Riaz (Asso. Prof)
MBBS, M.Phil

Sr. Lecturer, Pathology
Dr. Ibadullah Khan
MBBS

Facility for all routine lab tests | Accuracy and Quality assured

In case of any Discrepancy, Please contact: 0302-5563637

DEFINITION

ANNEXURE "E"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

-21-



Dated Peshawar the May 09, 2022

NOTIFICATION

NO.SO(SM) E&SED/7-1/2020/Posting/Transfer/General: In pursuance of the Khyber Pakhtunkhwa Service Tribunal Order Sheet dated 30-12-2021 in Service Appeal No. 7782/2021, the posting/transfer Notification of even number dated 09-06-2021 to the extent at S.No.02 in respect of Mr. Mehraban Khan SS (Pak Study) BS-17 GHSS Harno Abbottabad is hereby cancelled/withdrawn till the date fixed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar.
4. District Education Officer (Male) Abbottabad.
5. District Accounts Officers, Abbottabad
6. Director, EMIS E&SE Department.
7. Principal concerned.
8. Section Officer (Lit-II) E&SE Department.
9. PS to Minister for E&SE Department.
10. PS to Secretary E&SE Department.
11. PA to Deputy Secretary (Admn) E&SE Department.
12. Mr. Mehraban Khan SS (Pak Study) BS-17 GHSS Harno Abbottabad.
13. Office order file.

Zainab
09-05-22
(SYEDA ZAINAB NAQVI)
SECTION OFFICER (SCHOOLS MALE)

S.No. 172261

Name of Advocate خالد زبانی

DBA NO. 314 TBA NO.

BC No. 10-2532



R.s.200/=

وکالت نامہ

SIBI SALMA
Finance Secretary
District Bar Association
Abbottabad

بعدالت: صاحب سروس سٹریٹنگ سروسز
عنوان: مسعود امرجان بنام گورنمنٹ
منجانب: ریسٹریٹر ٹریڈنگ ٹریڈ نوٹس مقدمہ 778/21
باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تفسیر مقدمہ بمقام اسٹریٹنگ سروسز کے لیے
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے
جانے مقدمہ مکمل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ
سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے
علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا چھپے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ
سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پہنچنے پر مظہر کو کوئی نقصان نہ ہوگا۔ اگر کسی کو اس کے ذمہ دار یا اس کے واسطے
کسی معاوضہ کے ادا کرنے یا محتاجی کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو مل سزاخستہ پرداختہ صاحب موصوف
مشکل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراء سے ڈگری و نظر ثانی اپیل مگرانی و ہرقم
درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہرقم کا کوئی وصول کرنے اور رسید دینے اور داخل کرنے
اور ہرقم کے بیان دینے اور اس پر نمائندگی وراثتی نامہ و فیصلہ بر حلف کرانے اور قبول دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات
از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا تفریق یا گرفتاری و اجراء سے ڈگری بھی صاحب
موصوف کو بشرط ادا جنگی علیحدہ محتاج نہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے
کسی جزوی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں
وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف
کاتق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ
کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔ مورخہ: 20/02/2020 دن 20/02/2020 سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی
Attested & signed

Handwritten signature

مصدقہ خان
مسعود امرجان
داستان قضیہ

Handwritten signature

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 7782/2022

Masood ur Rehman..... Petitioner

VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, Muhammad Faizan Zeb, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

DEPONENT



Muhammad Faizan Zeb
Mr. Muhammad Faizan Zeb
Section Officer (Lit-II)

IDENTIFIED BY

ADDITIONAL ADVOCATE GENERAL,
KHYBER PAKHTUNKHWA, PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

S.A.#7782/2022.

Masood ur Rehman.....Appellant.

VERSUS

Chief Secretary, Govt: of Khyber Pakhtunkhwa & others.....**Respondents.**

INDEX

| S.No | Description of Documents | Annex | Pages |
|------|--------------------------|----------|-------|
| 1. | Para-wise comments/reply | | 1-2 |
| 2. | Annexure | A, B & C | 3-9 |
| 3. | Affidavit | | 10 |

Muhammad Faizan Feb
Section Officer (Lit-II)
E&SE Department

original

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A.#7782/2021

Masood Ur Rehman..... Appellant

VERSUS

Secretary of Elementary & Secondary Education, KPK Peshawar & Others.
.....Respondents

PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS 01, 02 & 03.

Respectfully Sheweth:

The Respondents submit as under:-

Preliminary Objections:-

1. The appellant has got no cause of action/locus standi to file the instant appeal.
2. The appellant has concealed the material facts from this Hon'able Service Tribunal, hence is liable to be dismissed on this score.
3. The appellant has filed the instant appeal with malafide intension just to pressurize the Respondents.
4. The instant appeal is against the prevailing law & rules.
5. The appellant is estopped by his own conduct to file the instant appeal.
6. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
7. That the Notification dated 09-06-2021 is legally competent and in accordance with law, hence liable to be remain in field.
8. That the Appellant has not preferred departmental appeal, hence the instant appeal is liable to be dismissed with cost.
9. That the Appeal is bad for mis-joinder & mis-joinder of necessary & proper parties.
10. The appeal of the appellant is not competent in its present form, hence liable to be set aside.

Reply on FACTS.

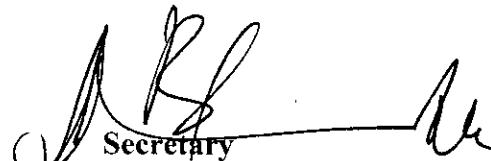
1. Para-01 pertains to the service record of the appellant.
2. Para-02 of the appeal pertains to record.
3. That in reply of Para-03 of the appeal it is submitted that explanation in the matter has already been called from DEO (Male) Abbottabad (copy of explanation letter is **Annex-A**).
4. In reply of Para-4 of the appeal, it is stated that inadvertently vacant post at GHSS Harnau Aziz Abad was verified, whereas the same was already filled through the posting of Respondent No. 4 vide order dated 09.06.2021 (**Annex-B**).
5. Para-05 of the appeal needs no reply.
6. That Para-06 pertains to the record of the appellant.
7. That respondent No. 4, Mr. Mehrban Khan was transferred from GHSS Jal Gali Mansehra to SS Pak Study BS-17 GHSS Harno Abbottabad against vacant post vide notification dated 09.06.2021. It is pertinent to mention here that respondent No. 4 was transferred to GHSS Harnau Aziz abad before the e-transfer policy notification (copy of notification dated 10.06.2021 is attached as **Annex-C**).
8. That in reply to Para-08 of the appeal, it is submitted that vacant post at GHSS Harnau Aziz Abad was inadvertently verified as vacant by the DEO (M) Abbottabad for which explanation has already been called from him.

- 9 Para-9 of the appeal is incorrect, misleading and against the record as no departmental appeal has been preferred by the appellant, hence the instant appeal is liable to be set aside with cost.
- 10 That in reply of Para-10 of the appeal, it is submitted that the appellant is neither an aggrieved person nor he has any right to knock the door of this Hon'able Tribunal as he has not preferred appeal to the department, furthermore notification dated 09.06.2021 is in accordance with law and rule in vague.

GROUNDS:

- A. Incorrect, hence denied. The Notification dated 09.06.2021 is legally competent and is liable to be remained in field.
 - B. Incorrect, hence denied. The Notification dated 09.06.2021 is legally competent and is liable to be remained in field.
 - C. Incorrect, hence denied. The Notification dated 09.06.2021 is legally competent and is liable to be remained in field. Detail reply is given below.
 - D. Incorrect, as the appellant has neither preferred departmental appeal nor he has informed the authority regarding the said fact.
- E-F That in reply to Ground-E & F, it is submitted that notification dated 09.06.2021 is in accordance with law and rules in vague, furthermore the appellant has by pass the law as filed the instant service appeal without exhausting the remedy of departmental appeal, hence on this point alone the appeal of the appellant is liable to be set aside.
- G That Para-G of the Ground of the appeal pertains to the service record, however, the appellant has not filed a single application to the department regarding the said fact.
 - H. Para-H of the appeal is misleading as the appellant has not avail the remedy of departmental appeal and approached this hon'able tribunal which is against the law on subject matter.
 - I. Para-I the respondents also reserved the rights to raise additional grounds at the time of arguments with prior permission of this Hon'able Tribunal.
 - J. That Para - J is incorrect as no departmental appeal has been preferred
 - K. Para-K pertains to record.

In view of the above made submissions, it is therefore, most humbly prayed that this Hon'able Tribunal may be pleased to dismiss the appeal with cost in favour of the Respondents.



**Secretary
Elementary & Secondary Education Department
(For Respondent No. 01 to 3)**

(3)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

(A)

No. SO(MC)E&SED/4-17/2021/Inquiry
Dated Peshawar the March 08th 2022

To

District Education Officer (Male),
Abbottabad.

→ EOM
9-3-2022

Subject:

EXPLANATION / DISPLEASURE REGARDING PROVISION OF FALSE INFORMATION.

I am directed to refer to the subject noted above and to convey the displeasure of the Secretary E&SE Department Khyber Pakhtunkhwa over provision of false information regarding post availability of Subject Specialist Pak Study (BS-17) at GHSS Harno Abbottabad; however, the said post was filled. Due to your this act of negligence, the posting/transfer case ultimately turned into litigation which has created an embarrassing situation to this Department.

2- Foregoing in view, you are directed to explain your position as to why disciplinary proceeding shall not be initiated against you under E&D Rules, 2011 for provision of false information to the department.

3- Your reply should reach to this Department within 24-hours positively, failing which it will be presumed that you have nothing for defense and disciplinary action under the rules ibid, shall be initiated against you.

o/c

J. Junaid Shah
8/3/22

(JUNAID SHAH)
SECTION OFFICER (Management Cadre)

Cc to the: -

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

o/c

J. Junaid Shah
9/3/22

SECTION OFFICER (Management Cadre)



(4) (B)
Annexure F 26A

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

Dated Peshawar the June 09, 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2020/Posting/Transfer/General: The Competent Authority is pleased to order the transfer of the following teachers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name with designation | From | TO |
|-----|---|---|---|
| 5. | Mr. Ajab Noor Khan SS English (BS-17) | IIM (BS-17) GHS Almomin Jani Khel Bannu | SS Pashu (BS-17) GHS No. 2 Peshawar Cantt against vacant post. |
| 6. | Mr. Mehrban Khan SS Pak Study (BS-17) | GHSS Jal Gali Mansehra | SS Pak Study (BS-17) GHSS Harno Abbottabad against vacant post. |
| 7. | Mr. Shafiqullah SS Economics (BS-17) | GHSS Rabat Dir Lower | SS Economics (BS-17) GHSS Manyal Dir Lower. V.S#4 |
| 8. | Mr. Muhammad Rafiq SS Economics (BS-17) | GHSS Manyal Dir Lower | SS Economics (BS-17) GHSS Zaimdara Dir Lower against vacant post. |
| 9. | Mr. Muhammad Zeeshan IPE (BS-17) | GHSS Nogram Buner | SS Urdu (BS-17) GHSS Ramak D.I.Khan against vacant post. |
| 10. | Mr. Taj Ahmad IPE (BS-17) | GHSS Drosh Chitral lower | IPE (BS-17) GHSS Baranis Chitral Lower against vacant post. |
| 11. | Mr. Muhammad Irfan SS Biology (BS-17) | GHSS Lar D.I.Khan | SS Biology (BS-17) GHSS Behari Colony D.I.Khan against vacant post. |
| 12. | Mr. Raham Zaman Khan SS Urdu (BS-17) | GHSS Bahadur Khel Karak | SS Urdu (BS-17) GHS Comprehensive Bannu against vacant post. |
| 13. | Mr. Shams-ur-Rehman Principal (BS-18) | GHSS Daraka Aziz Khan Lakki Marwat | Principal (BS-18) GHS Titer Khel Lakki Marwat against vacant post. |

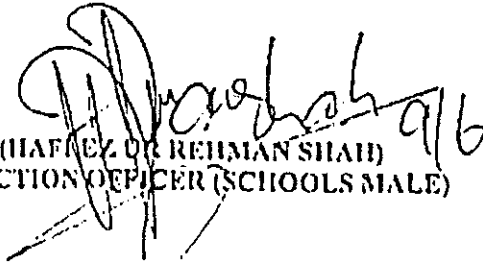
2. No TA/DA is allowed.

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

11. Accountant General, Khyber Pakhtunkhwa Peshawar.
12. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
13. Director, DPD Khyber Pakhtunkhwa, Peshawar.
14. District Education Officers (M), Concerned.
15. District Accounts Officers, Concerned.
16. PS to Minister for E&SE Department.
17. PS to Secretary E&SE Department.
18. PS to Special Secretary E&SE Department.
19. PA to Additional Secretary (Estb) E&SE Department.
20. Officers concerned.


(HAFAEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

5

Dated Peshawar the June 10, 2021

NOTIFICATION

No.SO(SM) E&SED/7-1/2020/PT/General: In order to facilitate the Teaching Cadre Employees and to Streamline and standardized/ automate the Process of posting / transfer, the Competent Authority is pleased to approve the E-Posting/Transfer policy for the Employees of the Teaching Cadre (BS-12 to BS-18) of E&SE Department Khyber Pakhtunkhwa with immediate effect, in the best public interest.

**E-TRANSFER POLICY OF TEACHING CADRE (BS-12 to 18) IN E&SE DEPARTMENT
KHYBER PAKHTUNKHWA**

- i. The introduction of e-Transfer policy for Teaching Cadre shall supersede all previous e-posting/transfer policies in the E&SE Department.
- ii. This policy covers transfers related to intra district transfers of district cadre post and inter district transfers of Provincial cadre posts.
- iii. Transfers on Complaint (Administrative Ground), Mutual basis, inter district and transfer for Operationalization of Newly Established schools, newly created posts will be exempted from the present policy.
- iv. Transfers shall be made at least once a year, preferably at the end of academic year.
- v. The vacant positions will be uploaded by the District Education Officers for all teaching cadres (BS-12 to BS-18).
- vi. The Education Monitoring Authority will provide requisite data as per format provided by the Director EMIS.
- vii. Each Competent Authority shall visit the Dashboard of e-Transfer app, check and verify all the particulars of the applicants.
- viii. The teachers appointed on Contract/Adhoc basis shall remain non transferable until regularized.
- ix. The Teachers in Schools having 2-teachers are not allowed in the e-transfer policy for transfer.
- x. Inter district transfer against senior positions (100% District promotion Quota) i.e. SCT, SDM, SPET, SAT, STT, S-Qari, SPST and PSHT are not allowed neither manually nor through e-transfer.
- xi. Transfer shall be made only against the vacant posts.
- xii. Teachers bearing Minimum tenure of two years on the present post in the present school will be eligible for e-posting/transfer.
- xiii. In case of same score of two or more candidates, merit will be 1st on Seniority, then by Date of Birth and if there is tie, then on first come first get basis.
- xiv. Subsequently Transfer orders generated by e-Transfer App will be issued.
- xv. Each Competent Authority shall constitute a Grievance Redressal Cell headed by a BPS-18 or above officer which will resolve the grievances and determine the merit position of the applicants within a week positively.

2. The indicators as per Form (A, B, C & D) will be considered for posting/transfer as per detail given below:

Form-A: Posting/Transfer of Teachers up to BPS 16 except SST (Total marks 65)

- i. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

6

- ii. Tenure in the Present Schools against the Present Posts - 10 marks
 - a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 4 marks
 - c. Tenure from 3 to 5 years - 7 marks
 - d. Tenure more than 5 years - 10 marks
- iii. STR (Total number of Students in the school / Total number of Teachers) - 10 marks (EMA data Source)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 5 marks
 - c. STR at the present school is less than desired school - 10 marks
- iv. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC/Standing Medical Board disability certificate.
- v. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- vi. Spouse - 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

Form-B: Posting/Transfers of SSTs (Total Marks - 85)

- i. Distance of present school to the desired school (in KM) - 20 marks
 - a. Within 5 KM - 0 marks
 - b. Within 10 KM - 5 marks
 - c. Within 15 KM - 10 marks
 - d. Within 20 KM - 15 marks
 - e. Greater than 20 KM - 20 marks
- ii. Tenure in the Present Schools against the Present Posts - 10 marks
 - a. Normal tenure of 2 years - 0 marks
 - b. Tenure from 2 to 3 years - 4 marks
 - c. Tenure from 3 to 5 years - 7 marks
 - d. Tenure more than 5 years - 10 marks
- iii. Students Teachers Ratio (STR) - 10 marks (EMA data Source)
 - i. For SST teacher in High/Higher Secondary School STR is equal to (Total Number of Students in Class 9 & 10 / Number of SST)
 - ii. For SST teacher in Primary/Middle School STR is equal to (Total Number of Students in the school / Total Number of teachers)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level - 5 marks
 - c. STR at the present school is less than desired school - 10 marks
- iv. Disability - 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC/Standing Medical Board disability certificate.
- v. Domicile - 05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

3

7

Spouse – 10 marks

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

vii. Latest Annual SSC Result (of the subjects taught by the teacher) working in High/Higher Secondary Schools – 20 Marks

- 90% or above – 20 marks
- 80% to 90% - 15 marks
- 70% to 80% - 10 marks
- 60% to 70% - 5 marks
- Below 60% - 0 marks.

OR

For SSTs (General) working in Middle/Primary Schools – 20 Marks
Overall Students Attendance Rate Percentage as per EMA data

- 90% or above – 20 marks
- 80% to 90% - 15 marks
- 70% to 80% - 10 marks
- 60% to 70% - 5 marks
- Below 60% - 0 marks.

Form-C Posting/Transfers of Subject Specialists (SSS/SS) (Total Marks – 85)

i. Distance of present school to the desired school (in KM) – 20 marks

- Within 5 KM – 0 marks
- Within 10 KM – 5 marks
- Within 15 KM – 10 marks
- Within 20 KM – 15 marks
- Greater than 20 KM – 20 marks

ii. Tenure in the Present Schools against the Present Posts - 10 marks

- Normal tenure of 2 years – 0 marks
- Tenure from 2 to 3 years – 4 marks
- Tenure from 3 to 5 years – 7 marks
- Tenure more than 5 years – 10 marks

iii. Number of Students in Class-11 & 12 - 10 marks

- Number of Students at present school is greater than the Desired school – 0 marks
- Number of Students at present and the desired school are equal or at the same level – 5 marks
- Number of Students at the present school is less than desired school – 10 marks

iv. Disability – 10 marks

10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate

v. Domicile -05 marks

05 marks will be awarded to those when the desired school is in his/her district of domicile

vi. Spouse – 10 marks

10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.

vii. Latest Annual HSSC Result (of the subjects taught by the teacher) – 20 Marks



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

2

- b. 80% to 90% - 15 marks
- c. 70% to 80% - 10 marks
- d. 60% to 70% - 5 marks
- e. Below 60% - 0 marks.

Form-D: Posting/Transfers of Principals/Head Masters of High/Higher Secondary Schools (Total Marks – 105)

- i. Distance of present school to the desired school (in KM) – 20 marks
 - a. Within 5 KM – 0 marks
 - b. Within 10 KM – 5 marks
 - c. Within 15 KM – 10 marks
 - d. Within 20 KM – 15 marks
 - e. Greater than 20 KM – 20 marks
- ii. Tenure in the Present Schools against the Present Posts - 10 marks
 - a. Normal tenure of 2 years – 0 marks
 - b. Tenure from 2 to 3 years – 4 marks
 - c. Tenure from 3 to 5 years – 7 marks
 - d. Tenure more than 5 years – 10 marks
- iii. STR (Total number of Students in the school / Total number of Teachers) - 10 marks (EMA data Source)
 - a. STR at present school is greater than the Desired school - 0 marks
 - b. STR at present and the desired school are equal or at the same level – 5 marks
 - c. STR at the present school is less than desired school – 10 marks
- iv. Disability – 10 marks
10 marks will only be awarded only to those with Physical Disability. Proof required will be Special person CNIC + Standing Medical Board disability certificate
- v. Domicile -05 marks
05 marks will be awarded to those when the desired school is in his/her district of domicile
- vi. Spouse – 10 marks
10 marks will be awarded to those whose spouse is posted in the district where the desired school is situated and the desired district is the domiciled district of the applicant.
- vii. Latest Annual SSC/HSSC Result of the School – 20 Marks
 - a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.
- viii. Overall Students Attendance Rate Percentage as EMA data – 20 Marks
 - a. 90% or above – 20 marks
 - b. 80% to 90% - 15 marks
 - c. 70% to 80% - 10 marks
 - d. 60% to 70% - 5 marks
 - e. Below 60% - 0 marks.



5

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

(9)

Endst: Even No. & Date:

Copy of the above is forwarded to the:

1. Principal Secretary to Governor Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
3. All Administrative Secretaries to Govt. of Khyber Pakhtunkhwa.
4. Accountant General, Khyber Pakhtunkhwa Peshawar.
5. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
6. The Director, Curriculum and Teacher Education, Khyber Pakhtunkhwa Abbottabad.
7. The Director, Directorate of Professional Development, Peshawar.
8. The Director Education Sector Reforms Unit, E&SE Department Khyber Pakhtunkhwa, Peshawar.
9. PSO to Chief Secretary, Khyber Pakhtunkhwa.
10. All District Education Officers (Male/Female), Khyber Pakhtunkhwa.
11. All District Account Officers (Male/Female), Khyber Pakhtunkhwa.
12. All Section Officers, E&SE Department Khyber Pakhtunkhwa, Peshawar.
13. Incharge EMIS, E&SE Department for uploading at official website.
14. PS to Secretary E&SE Department.
15. PS to Special Secretary E&SE Department.
16. PA to Additional Secretary E&SE Department.
17. PA to Deputy Secretary E&SE Department.


HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 7782/2022

Masood ur Rehman..... Petitioner

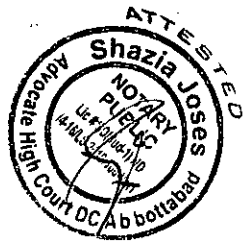
VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, Muhammad Faizan Zeb, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

DEPONENT



19/7/22

Muhammad Faizan Zeb
Mr. Muhammad Faizan Zeb
Section Officer (Lit-II)

IDENTIFIED BY

ADDITIONAL ADVOCATE GENERAL,
KHYBER PAKHTUNKHWA, PESHAWAR.

Before The Khyber Pakhtunkhwa Service Tribunal
Peshawar.

Masood ur-Rehman Vs. Govt. of KPK & others

Appeal

Application for withdrawal of Appeal NO. 7782

Respectfully Sheweth.

- 1) That the above titled case is pending before this Honorable Court and is fixed for today i.e. 21-09-2022.
- 2) That the department withdrawn their Notification No. SO(SM)F&SED/7-1/2020/Posting/Transfer/General. And the petitioner is posted on the said post.
- 3) That the purpose of filing of this Appeal become infructuous after withdrawal of Notification from the department.
- 4) That - the petitioner is posted on the said post.
- 5) That the petitioner want to withdraw the Above titled case

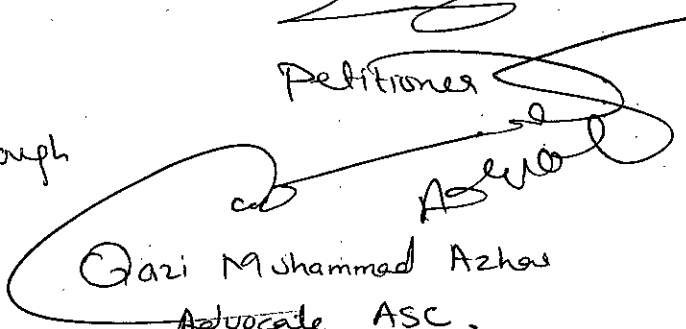
It is therefore humbly prayed to accept the Application and the case may be withdrawn

Dated: 21-09-2022



Petitioner

Through


Gazi Muhammad Azhar
Advocate ASC.



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

سور الريحن
NOTIFICATION

Dated Peshawar the May 09, 2022

NO.SO(SM) E&SED/7-1/2020/Posting/Transfer/General: In pursuance of the Khyber Pakhtunkhwa Service Tribunal Order Sheet dated 30-12-2021 in Service Appeal No. 7782/2021, the posting/transfer Notification of even number dated 09-06-2021 to the extent at S.No.02 in respect of Mr. Mehraban Khan SS (Pak Study) BS-17 GHSS Harno Abbottabad is hereby cancelled/withdrawn till the date fixed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Registrar, Khyber Pakhtunkhwa Service Tribunal Peshawar.
4. District Education Officer (Male) Abbottabad.
5. District Accounts Officers, Abbottabad
6. Director, EMIS E&SE Department.
7. Principal concerned.
8. Section Officer (Lit-II) E&SE Department.
9. PS to Minister for E&SE Department.
10. PS to Secretary E&SE Department.
11. PA to Deputy Secretary (Admn) E&SE Department.
12. Mr. Mehraban Khan SS (Pak Study) BS-17 GHSS Harno Abbottabad.
13. Office order file.

R
9/5/22

Zainab
09-05-22

(SYEDA ZAINAB NAQVI)
SECTION OFFICER (SCHOOLS MALE)

o/c

9/5

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

7B

Appeal No. *7782* of 20 *21*

M. A. Saad Khan - Peshawar Appellant/Petitioner
Versus

Through Sayyid Ehsanullah Respondent

Respondent No. *3*

Notice to: *Principal G.H.S.S. Harra Azibabad
Peshawar*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *21-1-2022* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this *10/1/2022*

Day of *Jan* 20*22*

at Camp Court Peshawar

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

513

Appeal No.....7782..... of 20 21

.....*M. Saad ul Rehman*.....Appellant/Petitioner
Versus

.....*Munir Saqib Khan*.....Respondent
Respondent No.....1.....

Notice to: —

*Mehroban Khan, Subject Specialist
Pak Studies GHS Harnazirabad
Peshawar*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....*21/1/2022*.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this.....*10/1/22*.....

Day of.....*Jan*.....20 22

at Camp Court A Road

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.