


01.09.2022

Junior of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Reply/comments on behalf of respondents not submitted. Learned Assistant Advocate General seeks time to contact the respondents for submission of reply/comments. Adjourned. To come up for reply/comments as well as preliminary hearing on 13.10.2022 before S.B.







(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 886/2022

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---|---|
| 1 | 2 | 3 |
| 1- | 07/06/2022 | <p>The appeal of Mr. Muhammad Ibrahim resubmitted today by Mr. Bashir Khan Wazir 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- | 14-6-22 <i>Noted CH 2/8</i> 29 nd June, 2022 | <p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>22-06-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Learned counsel for the appellant present.</p> <p>Let pre-admission notice be issued to the other side for submission of reply . To come up for reply/preliminary hearing on 08.08.2022 before S.B.</p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman</p> <p>8.8.2022 <i>Due to the case Public Holiday The Case is Adjourned to 1-9-2022</i></p> <p style="text-align: right;"> Reader</p> |

The appeal of Mr. Muhammad Ibrahim son of Dilawar Khan r/o Kotka Hai Bilawar Khan Azeem Kala District Bannu received today i.e. on 27.05.2022 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- 1- Copy of impugned order is not attached with the appeal which may be placed on it.
- 2- Copy of proper rejection order of departmental appeal mentioned n para-5 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Page no.27, 28, 29, 40 & 41 of the appeal are illegible which may be replaced by legible/better one.

No. 1196 /S.T,

Dt. 30/5 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Bashir Khan Wazir Adv. Pesh.

→ page No 38 of appeal all the Junior most employees, who were promoted and who ignored the Appellant, therefore the same would be deemed impugned order.
→ at page 43 proper rejection order is being annexed. plz placed before Bench.
objections removed and resubmitted again.

~~Bashir~~
Am

7/6/2022

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

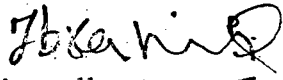
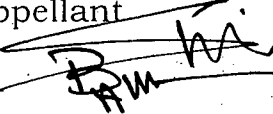
Service Appeal No 886 /2022

**Muhammad Ibrahim.....Appellant
VERSUS
Government of KPK & other Respondents**

I N D E X

| S NO | DESCRIPTION OF DOCUMENTS | ANNEX | PAGES |
|------|--|---------|-------|
| 1. | Service Appeal | - | 1-3 |
| 2. | Affidavit | - | 4 |
| 3. | Copy of the Qualification and Service Book | A | 5-26 |
| 4. | Copy of the Appointment Policy | B | 27-32 |
| 5. | Copy of Policy of Secretariat Level & Promotion orders | "C & D" | 33-41 |
| 6. | Copy of Departmental Appeal and Order dated 29.04.2022 | "E" | 42-43 |
| 7. | Copy of Writ Petition and Order | "F" | 44-50 |
| 8. | Wakalat Nama | | 51 |

Through:


Appellant


(BASHIR KHAN WAZIR)

Advocate,
High Court, Peshawar

Dated:- 24.05.2022

①

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

Service Appeal No _____/2022

Muhammad Ibrahim S/o Dilawar Khan R/o Kotka Hai Bilawar Khan Azeem
Kala District Bannu.

.....Appellant

V E R S U S

1. Government of Khyber Pakhtunkhwa, Secretary Education Peshawar.
2. District Education Officer, (Male) Bannu.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, TO TO
IMPLEMENT THE 20% PROMOTION / APPOINTMENT QUOTA ON
THE POST OF JUNIOR CLERK FROM CLASS-IV AS PER LAW
RULES AND REGULATIONS OF THE PROVINCIAL GOVERNMENT
AND APPOINTED / PROMOTED THE APPELLANT ON THE POST OF
JUNIOR CLERK BEING SENIOR MOST, WHILE JUNIOR TO THE
APPELLANT HAD BEEN PROMOTED WITH UTTER VIOLATION OF
LAW AND RULES AND THE RESPONDENTS MAY ALSO BE
DIRECTED TO PREPARE JOINT SENIORITY LIST OF CLASS-IV
EMPLOYEE AND INCLUDE THE NAME OF THE APPELLANT IN THE
JOINT SENIORITY LIST. THE APPELLANT WHILE SUBMITTED
DEPARTMENTAL APPEAL TO THE RESPONDENTS WHICH WAS
DISMISSED ON DATED 29.04.2022**

Prayer in Appeal:

On acceptance of the instant Appeal, the Respondents may kindly be directed TO IMPLEMENT THE 20% PROMOTION / APPOINTMENT QUOTA ON THE POST OF JUNIOR CLERK FROM CLASS-IV AS PER LAW RULES AND REGULATIONS OF THE PROVINCIAL GOVERNMENT AND APPOINTED / PROMOTED THE APPELLANT ON THE POST OF JUNIOR CLERK BEING SENIOR MOST, WHILE JUNIOR TO THE APPELLANT HAD BEEN PROMOTED WITH UTTER VIOLATION OF LAW AND RULES AND THE RESPONDENTS MAY ALSO BE DIRECTED TO PREPARE JOINT SENIORITY LIST OF CLASS-IV EMPLOYEE AND INCLUDE THE NAME OF THE APPELLANT IN THE JOINT SENIORITY LIST. THE APPELLANT WHILE SUBMITTED DEPARTMENTAL APPEAL TO THE RESPONDENTS WHICH WAS DISMISSED ON DATED 29.04.2022.

Respectfully Sheweth:-

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic of Pakistan, 1973.
2. That the Appellant is Class-IV employee of the Respondents department who is appointed on the post of Class-IV on 05.06.1996, having high qualification of Masters and high quality service record. (Copy of the Qualification and Service Book are attached as annexure A)
3. That according to Government Policy for appointment of Junior Clerks 20% quota is reserved from Class-IV Employees of

Daftaris and where Daftari are not available then common Seniority List of Naib Qasid etc will be appointed on the post of Junior Clerk with at least 3 year Service. **(Copy of the Appointment Policy is attached as annexure B)**

- 4. That Respondent Department neglecting the policy of appointment of Class-IV to Junior Clerk of the Education Department despite the fact that a large number of posts of Junior Clerk are lying vacant with the Respondents department and they adopted policy of the Civil Servant Employees for Promotion / Appointment Class-IV of their blue eyes and near and dear employees without Seniority list although, Seniority List mandatory for Promotion / Appointment and Respondents are under legal obligation to circulate Seniority List in January and after receiving objection from the employees then they will finalize the Seniority List and then they Appointed / Promoted employees. But the Ex-DEO Bannu before four days of his retirement without Seniority List/Merit List issued illegal promotion / Appointment of his blue eyed who are most Junior from the Appellant who are the nominee of local politician. **(Copy of Policy of Secretariat Level & Promotion orders are attached as annexure C & D)**
- 5. That the Appellant submitted various Applications and also submitted Departmental Representation for Appointment and for preparation of Seniority list for the post of Junior Clerk, which was dismissed vide impugned order dated 29.04.2022. **(Copy of Departmental Appeal and Order dated 29.04.2022 are attached as annexure E)**
- 6. That initially the Appellant filed Writ Petition No. 555-P/2020 before the Hon'ble Peshawar High Court Peshawar, in which the Hon'ble Peshawar High Court Peshawar issued directions to the Petitioner to approach this Hon'ble Tribunal vide Judgment dated 20.04.2022. **(Copy of Writ Petition and Order are attached as annexure F)**
- 7. That feeling aggrieved from the act of Respondents, the Appellant having no other adequate and efficacious remedy, approaches this Honourable Tribunal on the following grounds inter-alia:-

GROUND:-

- A) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B) That the acts of the Respondents of not following the same criteria which has been safeguarded by the law and rules, while in the instant case the respondents have not yet been considered the case of the Appellant, which is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.
- C) That the fundamental rights of the Appellant has blatantly violated by the Respondents and the Appellant has been discriminated and has been denied his due rights under the Constitution of Islamic Republic of Pakistan, 1973.

- D) That the Appellant is not treated in accordance with law, rules and Regulations.
- E) That the Appellant is appointed according to rules and on adopted procedure by the respondents and after his appointments he has never ever given an opportunity of any complaint to the respondents and performed his duties with full devotions, the Appellant being eligible for Promotion on the post of Junior Clerk being most Senior employee of the Respondents Department serving in the Respondents Department since 1996.
- F) That the Appellant has more than 24 years' Service and have vested right for Appointment on the post of Junior Clerk through Promotion.
- G) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

PRAYER:-

It is, therefore, most humbly prayed that, On acceptance of the instant Appeal, the Respondents may kindly be directed To IMPLEMENT THE 20% PROMOTION / APPOINTMENT QUOTA ON THE POST OF JUNIOR CLERK FROM CLASS-IV AS PER LAW RULES AND REGULATIONS OF THE PROVINCIAL GOVERNMENT AND APPOINTED / PROMOTED THE APPELLANT ON THE POST OF JUNIOR CLERK BEING SENIOR MOST, WHILE JUNIOR TO THE APPELLANT HAD BEEN PROMOTED WITH UTTER VIOLATION OF LAW AND RULES AND THE RESPONDENTS MAY ALSO BE DIRECTED TO PREPARE JOINT SENIORITY LIST OF CLASS-IV EMPLOYEE AND INCLUDE THE NAME OF THE APPELLANT IN THE JOINT SENIORITY LIST. THE APPELLANT WHILE SUBMITTED DEPARTMENTAL APPEAL TO THE RESPONDENTS WHICH WAS DISMISSED ON DATED 29.04.2022.

Any other relief, not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Bashir Khan

Appellant

Through:

Bashir Khan Wazir
AW

(BASHIR KHAN WAZIR)

Advocate,

High Court, Peshawar

Dated:- 24.05.2022

CERTIFICATE:

It is certified that no such like Appeal has earlier been filed before this Hon'ble Tribunal.

Bashir Khan

DEPONENT

(4)

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

Service Appeal No _____/2022

Muhammad Ibrahim.....Appellant

VERSUS

Government of KPK & other Respondents

AFFIDAVIT

I, Muhammad Ibrahim S/o Dilawar Khan R/o Kotka Hai Bilawar Khan Azeem Kala District Bannu, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Muhammad Ibrahim

DEPONENT

ANX 'A' (S)

(7)

C.F.C
A.J.

1. Name (نام) Muhammed Ibrahim

2. Nationality and Religion Muslims / Pakistan
(قومیت اور مذہب)

3. Residence village Kotla Belawan on rd Kotla
(مستقل رہائش) Muhammed Khan

4. Father's name and residence Belawan Khan
(والد کا نام اور پتہ)

5. Date of birth by Christian era as 1978 N.H. Seventy Eight
nearly as can be ascertained
(تاریخ پیدائش مطابق سن عیسوی)

6. Exact height by measurement 5-7
(قد کا مت)

7. Personal mark of identification Black mole front of
(شمارت کی نشانی) neck

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے شمارت)

Little Finger (چھٹکیا) Ring Finger (چھٹکیا کے ساتھ کی انگلی) Middle Finger (انگلی)

Fore Finger (انگلی کے شمارت) Thumb (انگلی)

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer
(تصدیق کنندہ افسر کے دستخط اور من)

Note : The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

یہ نکتہ متذکرہ ہر پانچ سال بعد تصدیق ہونا ضروری ہے اور یہ 5 سال میں ایک بار سے زیادہ لکھنا چاہئے۔
انگلیوں کے شمارت کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

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| | and whether | or officiating | state | or | substantive | substantive | pay for | emolument | terms pay | under the | ment | appoint- | Government | of the | in column 1 to 8 |
| | permanent or | temporary | if officiating | substantive | Pay in | position | Additional | Other | emolument | falling | under the | Date of | Signature of | designation of | attesting officer |
| | | | state | substantive | Pay in | position | Additional | Other | emolument | falling | under the | Date of | Signature of | designation of | attesting officer |
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Account & Dev: (Budgetary)
 Department of Education
 Ohio

Handwritten initials

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| Date of appointment | Nature of Government Service | Signature and designation of the head of the office or other appointing officer or column 1 to 8 | Date of termination or appointment | Reason of termination (such as promotion, transfer, dismissal, etc.) | Signature of the head of office or other appointing officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave and safety is debitable to another Government | Period to which Government is debitable | Reference to any records of award or punishment or of praise of Government servants |
| 96 | | | 30/11/96 | | | | | | |
| 96 | | | 30/11/96 | | | | | | |
| 96 | | | 30/11/96 | | | | | | |
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Ohio Education Department
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30-11-2001 from
 30-11-2001 from

9-5-1996 to 30/11
 9-5-1996 to 30/11

30-11-2001 from
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| Signature and designation of the Head of the Office or other Attesting officer (Annex 1 to 8) | Date of termination or appointment | Reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government پارہ ماہگے کی رخصت کے لئے اوسط تنخواہ کا تین | Signature of the Head of the office or other attesting Officer | Reference to any recorded punishment or censure, or reward or praised of the Government servants سزا یا سزا یا نایا نایا نایا نایا |
| Signature of Government servant | تاریخ اختتام ملازمت | وجہات تنساع ملازمت ترقی یا تارک یا برطرفی | دستخط افسر مجاز | رخصت کی نوعیت | Period روز | دستخط افسر مجاز | Government to which debitable گورنمنٹ سے |
| 1/2/2003 | 30/11/2003 | | [Signature] | | | Service verified from 11/2/2003 to 30/11/2003 | according to the Quitance Roll & other record of this Office. |
| 1/2/2004 | 30/11/2003 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2003 | 30/11/2003 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2006 | | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2007 | | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | Pay raised | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |
| 1/2/2005 | 30/11/2005 | | [Signature] | | | District Officer (Male) Education BANNU | Schools & Library Bannu |

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| Signature and designation of the head of the Government or other authority | | Date of appointment | Other emoluments falling under the term pay | Additional pay for officiating position | Pay in position | Appointment or (i) substantive or (ii) whether service counts for pension under rule 3-29 of C.S.R. (PB) Volume II | Whether Substantive or officiating and whether permanent or temporary | Name of Post |
| 10 | | 12/12/1996 | 12 p.m. | Rs. 2865/- | Rs. 3384/- p.m. | B-02 | B-02 | Sweeping post at P.M.S. at Ghatampur |
| 11 | | 12/07/1997 | 12 p.m. | Rs. 3465/- p.m. | Rs. 3384/- p.m. | B-02 | B-02 | Sweeping post at Ghatampur |
| 12 | | 12/08/1998 | 12 p.m. | Rs. 4335/- p.m. | Rs. 4335/- p.m. | B-02 | B-02 | Sweeping post at Ghatampur |
| 13 | | 12/18/2009 | 12 p.m. | Rs. 4335/- | Rs. 4335/- | B-02 | B-02 | Sweeping post at Ghatampur |
| 14 | | 12/17/2011 | 12 p.m. | Rs. 7280/- | Rs. 7280/- | B-02 | B-02 | Sweeping post at Ghatampur |

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| Date of appointment | Signature and designation of the Government or other attesting officer | Date of termination or appointment | Reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government | Signature of the Head of the office or other attesting Officer | Reference to any recorded punishment or censure, or reward or praised of the Government servants |
| تاریخ تقریر | دستخط و عہدہ سرکاری ملازم | تاریخ اختتام ملازمت | وجہ اختتام ملازمت | دستخط سربراہ | طبیعت و مدت رخصتی | تاریخ و مدت رخصتی کے لئے اوسط تنخواہ کا تعین | دستخط سربراہ | سزا یا تادیب یا تعریف یا کارکردگی کا ریکارڈ |
| | | | | | | Period | Government to which debitible | |
| | | | | | | دور | کون سے حکومت کے | |
| 2-26 | Head Master (a) School & Laboratory Bannu | 30/6/2007 | pay revised | | | | | 11/12/2005 |
| 2-27 | Head Master (a) School & Laboratory Bannu | 31/10/2007 | TRANSFER | | | | | |
| 2-28 | HEAD MASTER G.H.S. Bilawar Khan Bannu | 30/11/07 | | | | | | |
| 2-29 | HEAD MASTER G.H.S. Bilawar Khan Bannu | 31/11/08 | | | | | | Service verified N.F.F. 1-11-07 to 31-11-08 from the school record. |
| 2-30 | HEAD MASTER G.H.S. Bilawar Khan Bannu | 30/6/2011 | pay Rev. | | | | | |
| 2-31 | HEAD MASTER G.H.S. Bilawar Khan Bannu | 30/11/2011 | (A.M.C.) | | | | | |

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| 1 Name of Post | 2 Whether Substantive or officiating permanent or temporary | 3 (i) whether state officiating (ii) whether service appointment or counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II | 4 Pay in position | 5 Additional pay for officiating | 6 Other emolument falling under term pay | 7 Date of appointment | 8 Signature and name of the head of the Government or other authority |
|-------------------|--|---|----------------------|-------------------------------------|---|--------------------------|--|
| | | | Rs. 7450/- | | | 1-12-12 | |
| | | | Rs. 7620/- | | | 1-12-11 | |
| | | | Rs. 7450/- | | | 1-7-11 | |
| | | | Rs. 4535/- | | | 1-12-10 | |
| | | | Rs. 4435/- | | | 1-12-09 | |
| | | | Rs. 4335/- | | | 1-12-08 | |
| | | | Rs. 4235/- | | | 1-7-08 | |
| | | | Rs. 3550/- | | | 1-12-07 | |
| | | | Rs. 3465/- | | | 1-9-07 | |
| | | | Rs. 3380/- | | | 1-7-07 | |
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Principal
GHS & Koka Bhowar Khan
Bhim

Principal Engr. in B-3 on record
of S.P. No. 0019-2007

Date of appointment
Signature and name of the head of the Government or other authority

12

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| 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
|---|------------------------------------|---|--|------------------------------------|--|--|---|
| Signature and designation of the Governing officer of service | Date of termination or appointment | reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting Officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government | Signature of the Head of the office or other attesting Officer | Reference to any recorded punishment or censure, or reward or praise of the Government servants |
| | تاریخ اختتام ملازمت | وجوہات انتقال ملازمت یا برطرفی | دستخط اشرف غازی | رضعت کی نوعیت و عرصہ | ہمارا ہر ایک کی رضعت کے لئے اوسط عرصہ کاروبار Period Government to which debitable -/- کو ذمہ داری ہے | دستخط اشرف غازی | ایران کا پرنسپل کارکن کی ریکارڈ |
| M. J. Khan | | | | | | | |
| 12-9-07 | | | | | | | Service verified w.r.g 1/9/07 to 31/01/08 from Acy Roll & other office record |
| 10 | | Post up period (1.1.2007) | | | | | |
| 11 | | TRD No. 22 Dated 13-8-13 | | | | | |
| 12 | | Draw arrear of Regular Pay & allowances w.e.f 1-2-08 to 31-2-07 | | | | | |
| 13 | | Amounting to Rs. 10,997/- | | | | | |
| 14 | | 30/4/13 | | | | | |
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272

| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|-------------------|---|--|-----------------------------|--------------------------------|--|---------------------|
| Name of Post | Whether Substantive or officiating and whether permanent or temporary | If officiating state- (i) substantive or (ii) whether service counts for pension under C.S.R. (Pb.) Volume II | Pay in substantive position | Additional pay for officiating | Other emoluments falling under the term, pay limit | Date of appointment |
| | | Rs. Ps. | Rs. Ps. | Rs. Ps. | Rs. Ps. | |
| Supervisor of - 7 | | 813 1/2 | | | | 17/12/14 |
| Supervisor of - 2 | | 830 2/3 | | | | 12/12/14 |
| Supervisor of - 2 | | 632 1/2 | | | | 12/12/14 |
| Supervisor of - 2 | | 1073 1/2 | | | | 10/12/14 |
| Supervisor of - 2 | | 1095 1/2 | | | | 12/12/14 |
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Signature of the Head and District Officer
 Government of Punjab
 Provisional
 Date 17/12/14

| 8 | 9 | 10 | 11 | 12 | 12 | 13 | 14 | 15 |
|--|------------------------------------|---|--|------------------------------------|--|--|--|----|
| Signature and designation of the Head of the office or other appointing officer (Ann 1 to 8) | Date of termination or appointment | reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting Officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government | Signature of the Head of the office or other Attesting Officer | Reference to any recorded punishment or censure, or reward or praised of the Government servants | |
| | | | | | ہمارا تک کی رخصت کے لئے اوسط تجزاہ کا تین Period اور Government to which debitable گورنمنٹ ہے | | | |
| <i>M. J. Bhatti</i> | 30/11/2014 | تقاضا ملازمت | <i>Jawal Sarwar</i> | رخصت کی مدت ریسٹ | Allowed on premature Decent from BPS-1 to BPS-4 w.e.f. 1-7-2014. | <i>Jawal Sarwar</i> | | |
| <i>M. J. Bhatti</i> | 30-11-2014 | Revised | <i>Jawal Sarwar</i> | | Service Verified from 1-1-12 to 30-11-15 From Aq. Road and their office record. | <i>Jawal Sarwar</i> | | |
| <i>M. J. Bhatti</i> | 30/11/2014 | | <i>Jawal Sarwar</i> | | 45 Date: 4/2/18 with Rs. 2116/- as an arrear of - due to up to - to CPS No. 04 | <i>Jawal Sarwar</i> | | |

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| 8 | 9 | 10 | 11 | 12 | (13) | 13 | 14 | 15 |
|---|------------------------------------|---|--|--|------------------------------------|--|--|--|
| Signature and designation of the head of the Government servant | Date of termination or appointment | Reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting officer | Signature of the head of the office or other Attesting officer | Nature and duration of leave taken | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government بارہ ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین | Signature of the Head of the office or other Attesting Officer | Reference to any recorded punishment or censure, or reward or praised of the Government servants |
| | تاریخ اختتام ملازمت | وجوہات انتقال ملازمت برقی تبادلہ یا برطرفی | پختہ السراج | رخصت کی نوعیت و عرصہ | | Period: / | Government to which debitable / | مقامی دفتر یا |
| | | | | | | Service verified up to 1 ² / ₁₂ 2015 To 30 ¹¹ / ₂₀₁₆ From A/Roll S other of this school | | |
| | | | | | | Service verified up to 1 ¹² / ₂₀₁₆ To 30 ¹¹ / ₂₀₁₇ From A/Roll S other of this school | | |
| <p><i>Handwritten signature</i></p> | | | <p><i>Handwritten signature</i> A/9</p> | <p>30¹¹/₂₀₁₆</p> | | | <p><i>Handwritten signature</i> G.H.S. Kotla</p> | <p><i>Handwritten signature</i> G.H.S. Kotla Jawar Khan</p> |
| <p><i>Handwritten signature</i></p> | | | <p><i>Handwritten signature</i> A/9</p> | <p>30¹¹/₂₀₁₆</p> | | | <p><i>Handwritten signature</i> G.H.S. Kotla</p> | <p><i>Handwritten signature</i> G.H.S. Kotla Jawar Khan</p> |
| <p><i>Handwritten signature</i></p> | | | <p><i>Handwritten signature</i> A/9</p> | <p>30¹¹/₂₀₁₇</p> | | | <p><i>Handwritten signature</i> G.H.S. Kotla</p> | <p><i>Handwritten signature</i> G.H.S. Kotla Jawar Khan</p> |
| <p><i>Handwritten signature</i></p> | | | <p><i>Handwritten signature</i> A/9</p> | <p>30¹¹/₂₀₁₇</p> | | | <p><i>Handwritten signature</i> G.H.S. Kotla</p> | <p><i>Handwritten signature</i> G.H.S. Kotla Jawar Khan</p> |
| | | | | | | | <p>HEAD MASTER G.H.S. Kotla Jawar Khan</p> | |

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20

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |
|---------------|---|---|-----------------------------|--------------------------------|---|---------------------|---------------------------------|--|
| Name of Post | Whether Substantive or officiating and whether permanent or temporary | (i) state-appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (PB) Volume II | Pay in substantive position | Additional pay for officiating | Other emoluments falling under the term pay | Date of appointment | Signature of Government servant | Signature and name of the head of the station of officer in 1 to 8 |
| Superior Post | Permanent | | Rs. 18700/- | Rs. 18700/- | Rs. 18700/- | 18/12/2019 | | |
| | | | Rs. 18700/- | Rs. 18700/- | Rs. 18700/- | 18/12/2019 | | |
| | | | Rs. 17800/- | Rs. 17800/- | Rs. 17800/- | 12/12/2017 | | |

18

| 9 | 10 | 11 | 12 | 13 | 14 | 15 | |
|---|---|---|---|--|--|---|--|
| Signature of Head of the Office or other Attesting Officer | Date of termination or appointment | Reason of termination (such as promotion, transfer, dismissal etc.) | Signature of the head of the office or other Attesting officer | Nature and duration of leave taken رخصت کی نوعیت و عرصہ | Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitible to another Government چار ماہ تک کی رخصت کے لئے اوسط عرصہ کا تقسیم | Signature of the Head of the office or other attesting Officer دستخط افسر / ملازمت | Reference to any recorded punishment or censure, or reward or praised of the Government servants سزا یا جزیاء / نیک کامیابی کا ریکارڈ |
| Signature of Head of the Office or other Attesting Officer دستخط افسر / ملازمت | Date of termination or appointment تاریخ اختتام ملازمت | Reason of termination (such as promotion, transfer, dismissal etc.) وجوہات منتقلی یا ترسیل یا برطرفی | Signature of the head of the office or other Attesting officer دستخط افسر / ملازمت | | | | |
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Signature of Head of the Office

30/11/2018

HEADMASTER
GHS Blawer Khan Bannu

Handwritten signature at the bottom right of the page.

S.NO. 1239

Roll No. 8585



Board of Intermediate and Secondary Education

BANNU N-W.F.P. (PAKISTAN)
SECONDARY SCHOOL CERTIFICATE EXAMINATION
SESSION SUPPLEMENTARY 2001

THIS IS TO CERTIFY THAT MUHAMMAD IBRAHIM

Son of BILAWAR KHAN

and a student of DISTRICT BANNU.

has passed the *Secondary School Certificate Examination* of the Board of Intermediate and Secondary Education, Bannu as a Private Candidate. He obtained 442 Marks out of 850

and has been placed in Grade C Representing GOOD

The candidate passed in the following subjects:

- | | | | |
|------------|---------------------|-----------------|-----------------|
| 1. ENGLISH | 3. ISLAMIYAT | 5. MATHEMATICS | 7. ISL. STUDIES |
| 2. URDU | 4. PAKISTAN STUDIES | 6. GEN. SCIENCE | 8. ART |

Date of Birth according to admission form is TWELFTH JANUARY,
one thousand nine hundred and SEVENTY EIGHT.

(12/01/1978)

Prepared on *Thursday, February 02, 2006*

Muhammad
Asst. Secretary

This certificate is issued without alteration or erasure

SECRETARY

(15)

U.C.A.

20

21


16

C.T.C

Certificate No. IH066893

Roll No. 9386

Balochistan Board of Intermediate and Secondary Education
 Quetta



INTERMEDIATE
 Annual / ~~BY~~ / ~~Annual~~ Examination, 10 2008
 HUMANITIES GROUP

This is to Certify that Muhammad Ibrahim
 son/daughter of Bilawar Khan
 Registration No. 593/07, has duly passed the Intermediate Examination of
 the Balochistan Board of Intermediate and SECONDARY EDUCATION, Quetta,
 held in the month of May, 2008 14, as a Regular/Private
 candidate of the District Loralai
 in the subjects mentioned below:-

- | | |
|-------------------------------------|--------------------|
| 1. Urdu | 4. Islamic Studies |
| 2. English | 5. Economics |
| 3. Islamic Education & Pak. Studies | 6. Civics |

He/She has obtained 604 marks in the aggregate out of
 1100 and has been placed in the Second DIVISION.

The Examination was taken as a W/S/C by parts.


 ASSISTANT SECRETARY

Dated 01-11-2010
 Quetta, the


 SECRETARY

This Certificate is issued without alteration or erasure.

بلوچستان یونیورسٹی کوئٹہ

Serial No. 058925
 Registration No. 007/UB-1010/A(1)33772
 Roll No. 17157

058925
 1010/A(1)33772
 17157

University of Balochistan
 Quetta



FACULTY OF ARTS
 Bachelor of Arts

کلیہ فنون

Whereas MUHAMMAD TAHIM S/C
BILAWAR KHAN
 has pursued a course of study prescribed by this
 University for the Degree of Bachelor of Arts
 in the following subjects and has passed the
 requisite ~~Examination~~ Supplementary examination
 of 2010 held in MAY: 20 11 having
 been placed in the Second Division. The
 examination was taken ~~in parts~~ in parts.

It is hereby notified that he/she has
 duly been admitted to the degree of Bachelor of
 Arts in this University.

- 1- ENGLISH 4- POLITICAL SCIENCE
- 2- SOCIOLOGY 5- XXXXXXXXXXXXXXX
- 3- ISLAMIC EDU. & PAK STUDIES

(Signature)
 Vice-Chancellor

(Signature)
 Registrar

Quetta, dated the 15TH AUG: 20 11
 DATE OF ISSUE 15TH AUG: 2012

Note:- Detailed transcripts of examination results have been issued separately.

بی۔ اے
 حراہہ محمد ابرہیم ولد بیلار خان
 نے مندرجہ ذیل مضامین میں بی۔ اے کی سند کے لئے
 اس جامعہ کے منظور شدہ نصاب کی تکمیل کر لی ہے۔ اور مطلوبہ
 امتحان مئی 2010 منعقدہ مئی
2011 میں کامیاب ہو کر دوم درجہ حاصل کیا ہے۔
 امتحان میں کچھ بالا اجزا شرکت کی گئی۔

لہذا تصدیق کی جاتی ہے کہ انہیں اس جامعہ میں بی۔ اے

- ۱۔ انگریزی
- ۲۔ عربیات
- ۳۔ سیاسیات
- ۴۔ اسلامی تعلیمات و مطالعہ پاکستان
- ۵۔ XXXXXX

کونسل بتاریخ 15 اگست 2011
 تاریخ اجراء 15 دسمبر 2012
 ۱۔ امتحان کے نتیجے کی تصدیق شدہ و جاری کردہ گئی ہیں۔

(Signature)

(Signature)

22

23

Serial No. GU 38519
I

18 C.C.
[Signature]



GOMAL UNIVERSITY
DERA ISMAIL KHAN
KHYBER PUKHTUNKHWA PAKISTAN

Registration No: 888-CAB-13
Roll No: 793
Session: 2013-2014

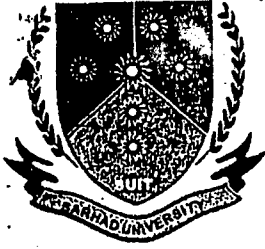
Provisional Certificate

This is certify that MUHAMMAD IBRAHIM
Son / Daughter of BILAWAR KHAN
of the Department / Institute of CENTRE OF ACADEMICS (PVT:) BANNU
has passed D.P.Ed Examination held in NOVEMBER 2014
in the subject of DIPLOMA IN PHYSICAL EDUCATION
He / She was placed in SECOND division.
Securing 427 marks out of 750

The Examination was taken as Whole

Result Declaration Date 17-12-2015

[Signature]
DEPUTY CONTROLLER OF EXAMINATIONS
GOMAL UNIVERSITY DERA ISMAIL KHAN



(24)

CFC 04

Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Serial Number SUIT-2016-PRO-7105

Date issued: 01 Oct, 2016

Provisional Certificate

This is to certify that Mr./Ms. Muhammad Ibrahim
son / daughter of Mr. Bilawar Khan
registration number SUIT-11-01-059-0506
is a regular student of the Sarhad University of Science and Information Technology,
Peshawar in the session 2011 - 2014.

Mr./Ms. Muhammad Ibrahim has according to the result notification,
issued by the University, passed the Master of Health & Physical Education - MSc.(HPE) -
Examination Annual/Supplementary held in 25 Jan - 22 Feb 2014 and secured 1st
division, obtained 1151 marks out of 1850. He/she has already been issued
a DMC by the Controller of Examinations. He/she will receive his/her degree in
relevant convocation (if desired).

Mr./Ms. Muhammad Ibrahim bears good moral character and his/her
conduct during his/her stay at the University from 12 Sep, 2011 to 15 May, 2014
has been Very Good.


Director
Distance Education

25

CFCA

S.No 5845

Reg.No 5845/BI/W

Wafa Computer Institute

Wafa Computer Institute Railway Road Bannu City



Affiliated with NWFP Board of Technical Education Peshawar

Certificate

This is to certify that MUHAMMAD IBRAHIM

Son/Daughter of RILAWAR KHAN

Has successfully completed the following courses:

- | | |
|----------------------|----------------------|
| 1. <u>E.D.P</u> | 2. <u>MS.WINDOWS</u> |
| 3. <u>MS. OFFICE</u> | 4. <u>INPAGE</u> |
| 5. <u>INTERNET</u> | 6. _____ |

The course was conducted during 15th to JULY 2006

as a Regular / Home Study Programme

This Certificate Issued at Bannu this 08/01/06 day of 10/07/06

[Signature]
COORDINATOR
Wafa Computer Institute
BANNU
Co-Ordinator

[Signature]
Principal
Wafa Computer Institute
BANNU
Principal

DOMICILE CERTIFICATE DISTRICT BANNU N.W.F.P. Pakistan

I declare that I was born of parents who are permanently domiciled in N.W.F.P. having belonged to it by birth/ settled in it.

I belong by birth to village/Motahali, Zar Khassi Killa patool Tehsil Bannu District Bannu

Signature of the applicant Date Pursuance to the declaration filed by Mr. Mubd Abraham

son (domestic/wife) Bilawan Khan domiciled in the N.W.F.P. It is hereby certified that the said Mr. Mubd Abraham is born of parents who are permanent residents of the N.W.F.P. having belonged to it by birth settled in it.

I have satisfied myself from personal inspection that the above declaration is true and correct.

This 27th day of June 2005

Deputy District Officer Revenue Bannu



HEAD MASTER BMS Koka Bannu

55776 Dated 27/6/2005

COUNTERSIGNED HEAD MASTER G.H.S Bilawan Khary DISTRICT OFFICER BEVEYUE & ESTATE COLLECTOR Bannu

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Annex B

ANX 'B'

2-3
all Dis



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

Dated Peshawar, the July 8, 2011

NOTIFICATION

NO.SOE-VIE&ADV11-3/2011. In exercise of the powers conferred by clause (b) of sub-section (7) of Section 3 of the Khyber Pakhtunkhwa Public Service Commission Ordinance, 1970 (Khyber Pakhtunkhwa Ord. No. XI of 1970), the Governor of the Khyber Pakhtunkhwa is pleased to direct that in the Khyber Pakhtunkhwa Public Service Commission Officers and Servants (Terms and Conditions of Service) Regulation, 1985, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix,

(a) for the existing entries against the serial No. 2A, in the respective columns, the following shall be substituted, namely:

| | | | | | | |
|-----|---|---|--|--|--|---|
| 2A. | Director Examination/ Recruitment (DPS-13). | Governor in consultation with the Chairman. | | | | (a) Fifty per cent (50%) by promotion, on the basis of seniority-cum-fitness, from amongst the Deputy Directors (DPS-18), who possess Bachelor's Degree from a recognized University with at least seven (7) years service as such or twelve (12) years service in DPS-17 and above; and (b) Fifty per cent (50%) by transfer of PCS/ PMS/ PAS Officers. |
|-----|---|---|--|--|--|---|

(b) after serial No. 2A, as so amended, in the respective columns, the new entries shall be inserted, namely:

| | | | | | | |
|-----|---------------------------|---|--|--|--|---|
| 2B. | Deputy Director (DPS-10). | Governor in consultation with the Chairman. | | | | By promotion, on the basis of seniority-cum-fitness, from amongst the Assistant Directors, Assistant Directors (Admn), Controllers Examination and Account Officers (DPS-17), with five (05) years service as such. Note: A joint seniority list of Assistant Directors, Assistant Director (Admn), Controllers of Examination and Accounts Officers shall be maintained for the purpose of promotion. |
|-----|---------------------------|---|--|--|--|---|

Secretary
Education Department
D.S. (A) Dary No. 2617
Date: 17-7-11

Proposed for
Ministerial
(ESD Section)
LSPK

Checked
CP
Defect

11-11-11
11-11-11

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[Handwritten signature]

existing entries against serial No. 3, in respective columns, the following shall be substituted, namely:

| | | | | | |
|----|---|--|--|--|---|
| 3. | Assistant Director/ Assistant Director (Admn) / Controller of Examination (BPS-17). | Governor in consultation with the Chairman | | | By promotion, on the basis of seniority-cum-fitness, from amongst Registrar Examination, Superintendents and Private Secretaries to the Chairman/Members having three (03) years service as such. Note: A joint seniority list of Registrar Examination, Superintendents and Private Secretaries to the Chairman/Members shall be maintained for the purpose of promotion. |
|----|---|--|--|--|---|

(d) for serial No.4(C), in respective columns, the following shall respectively be substituted, namely:

| | | | | | |
|-------|---|--|----------------|---|-------------------------|
| 4(C). | Assistant Director IT/ Programmer/ Web Administrator/ LAN Administrator (BPS-17). | Governor in consultation with the Chairman | 22 to 35 years | Second Class Masters Degree or equivalent qualification in Computer Science from a recognized University. | By initial recruitment. |
|-------|---|--|----------------|---|-------------------------|

(e) the existing entries against serial No. 6(A) shall be deleted.

(f) against serial No.8, for columns No.4, 5 and 7, in respective columns, the following shall respectively be substituted, namely:

| | | | | | |
|----------------|--|--|--|--|-------------------------|
| 10 to 30 years | (i) intermediate or equivalent qualification form a recognized Board; (ii) minimum speed of fifty (50) words per minute in English shorthand and thirty-five (35) words per minute in English typing; and (iii) knowledge of computer in using MSWord and MSExcel. | | | | By initial recruitment. |
|----------------|--|--|--|--|-------------------------|

Para 24

69

By promotion, on the basis of seniority-cum-merit, from amongst the holders of the posts of Junior Clerks (BPS-07), with two years' services as such.

| | | | | | | |
|----|------------------------|----------|--|--|--|--|
| 10 | Senior Clerk Secretary | (BPS-09) | | | | |
|----|------------------------|----------|--|--|--|--|

(f) For the existing entries against serial No. 10, in the respective columns, the following shall be substituted, namely:

| | | | | | | |
|----------|-----------------------------|----------|--|--|--|--|
| 18 to 30 | Computer Operator Secretary | (BPS-12) | | | | |
|----------|-----------------------------|----------|--|--|--|--|

(g) For the existing entries against serial No. 9(a), in the respective columns, the following shall be substituted, namely:

| | | | | | | |
|----------|------------------------|----------|--|--|--|--|
| 18 to 30 | Second Class Secretary | (BPS-14) | | | | |
|----------|------------------------|----------|--|--|--|--|

(h) For existing entries against serial No. 9(b), in the respective columns, the following shall be substituted, namely:

| | | | | | | |
|----------|------------------------|----------|--|--|--|--|
| 18 to 30 | Second Class Secretary | (BPS-14) | | | | |
|----------|------------------------|----------|--|--|--|--|

(i) For existing entries against serial No. 9(c), in the respective columns, the following shall be substituted, namely:

| | | | | | | |
|----------|------------------------|----------|--|--|--|--|
| 18 to 30 | Second Class Secretary | (BPS-14) | | | | |
|----------|------------------------|----------|--|--|--|--|

(a) Fifty per cent (50%) by promotion, on the basis of seniority-cum-merit, from amongst the Senior Clerks (BPS-09), with three (03) years' service as Senior Clerk or five (05) years service as Junior Clerk and Senior Clerk, and

(b) Fifty per cent (50%) by initial recruitment.

| | | | | | | |
|----------|------------------------|----------|--|--|--|--|
| 18 to 30 | Second Class Secretary | (BPS-14) | | | | |
|----------|------------------------|----------|--|--|--|--|

(g) For the existing entries against serial No. 9, in the respective columns, the following shall be substituted, namely:

Handwritten initials and scribbles, including a circled '69' and other illegible marks.

(Better Copy)

(i) The existing entries against serial No,11 in respective columns,the following shall respectively be substituted,Name:

| | | | | | |
|-----|-----------------------|-----------|----------------|---|--|
| 11. | Junior clerk (BPS 07) | Secretary | 18 to 30 Years | (i)Secondary Class Secondary School Certificate OR Equivalent qualification from a recognized Board & (ii) Asped of 30 words per minutes in English Typing with knowledge of MS Word | (a)Twenty per cent (20%) by promotion,of the bases of seniority cum-fitness,from amongst the DAFTARI,who passes Secondary School Certificate OR equivalent qualification from the recognized Board with at least three(03) years' service as such . Provide that if no suitable DAFTARI is available for promotion then the post shall be filled by promotion on the bases of seniority cum-fitness from amongst Naib Qasid,residence orderly, Mali,Behishti, Chowkidar & Electrician who possess the secondary school certificate or equivalent qualification from recognized Board with at least three(03)years' service as such & (b)Eighty per cent (80%) by initial recruitment. Note: The Junior Clerk appointed by promotion shall ensure Speed of thirty (30)words per minutes in English typing their promotion otherwise they shall be reverted |
|-----|-----------------------|-----------|----------------|---|--|

(ii) for the existing entries against serial No,12 in respective columns,the following shall respectively be substituted,namely

| | | | | | |
|-----|------------------|-----------|----------------|--|--|
| 12. | Daftari BPS (02) | Secretary | 18 to 30 Years | Secondary Class Secondary School Certificate OR Equivalent qualification from the recognized Board | By promotion on the bases of seniority cum-fitness from amongst the Naib Qasid, Residence orderly, Mali,Behishti ,Chowkidar, Electrician,with at least there (03) years' service as such & having qualification of secondary school certificate from a recognized Board. |
|-----|------------------|-----------|----------------|--|--|

31

(f) For the existing entries against serial No. 12, in respective columns, the following shall respectively be substituted, namely:

| | | | | | | |
|--|---------------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|
| <p>(a) Twenty per cent (20%) by promotion, on the basis of monthly-cum-finesse, from amongst the Darhats, who possess Secondary School Certificate or equivalent qualification from recognized Board with atleast three (03) years service as such, provided that if no suitable candidate is available for promotion then the posts shall be filled by promotion on the basis of seniority-cum-finesse from amongst Nab Coads, Reshencas, Mal, Beshah, Headar and Election, who possess Secondary School Certificate or equivalent qualification from recognized Board with atleast three (03) years service as such, and (b) fifty per cent (50%) by initial recruitment.</p> <p>Note: The Junior Clerks appointed by promotion shall achieve a grade of thirty (30) words per minute in English typing within six (06) months of their promotion unless they shall be reverted.</p> | <p>Class Secretary 10 to 20</p> | <p>Secondary Class</p> | <p>Secretary 10 to 20</p> | <p>Class Secretary</p> | <p>Secretary 10 to 20</p> | <p>Class Secretary</p> |
|--|---------------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|

(g) For the existing entries against serial No. 12, in respective columns, the following shall respectively be substituted, namely:

| | | | | | | |
|--|---------------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|
| <p>by promotion, on the basis of seniority-cum-finesse, from amongst the Nab Qash, Reshencas, Headar, Mal, Beshah, Chawhid, Election, and such and having qualification from a recognized Board.</p> | <p>Class Secretary 10 to 20</p> | <p>Secondary Class</p> | <p>Secretary 10 to 20</p> | <p>Class Secretary</p> | <p>Secretary 10 to 20</p> | <p>Class Secretary</p> |
|--|---------------------------------|------------------------|---------------------------|------------------------|---------------------------|------------------------|

Serials

32

Better copy ~~16~~ C.C. ~~17~~

(i) For the existing entries against serial No. 14, in the respective columns, the following shall be substituted, namely,

| | | | | | |
|----|---|-----------|----------------|-------------|----------------------------|
| 14 | Naib Qasid/Residence /Mali/Behishti/Chowkidar BPS(01) | Secretary | 18 to 30 years | Middle Pass | By initial recruitment and |
|----|---|-----------|----------------|-------------|----------------------------|

C.C.

(m) After serial No. 14, in respective columns the following new entries shall respectively by inserted in the relevant columns, namely,

| | | | | | | |
|-------|---------------------|-----------|----------------|--|---|------------------------|
| 14(A) | Electrician BPS(02) | Secretary | 18 to 30 years | Middle pass with diploma in the field of electrician | Five years practice experience of electrical work | By Initial recruitment |
|-------|---------------------|-----------|----------------|--|---|------------------------|

C.C.

Chief Secretary,
Khyber Pakhtunkhwa

Dated, Peshawar, the July 8, 2014

No. SOVE-(E&AD)/11-3/2014

Copy forwarded to,

1. All Administrative Secretaries to Govt of KPK
2. The Chairman, Public Service Commission of KPK
3. The Secretary to Governor of KPK
4. All Head of Attached Department of KPK
5. All Head of Autonomous/Semi Govt Bodes in KPK
6. All District & Session Judges in KPK
7. The Secretary Board of Revenue, Peshawar
8. The Director Anti-Corruption of KPK
9. The Secretary public service commission KPK
10. The Registrar KPK Service Tribunal Peshawar
11. All Deputy Commissioners in KPK
12. Secretary to Chief Minister of KPK
13. Manager govt Printing Press with request to furnish twenty (20) copies to this Department after in the officials' Gazette

(WARDAH LATIF)
Section Officer (E-V)

33

ANX C

26

In the following entries against serial No. 14, in the respective columns, the following new entries shall respectively be inserted in the relevant columns, namely:

| | | |
|---|-------|------------------------|
| Ordnery/Malik Dehshid Chowkidar (DPS-01) | years | By initial recruitment |
|---|-------|------------------------|

In other serial No. 14, in respective columns, the following new entries shall respectively be inserted in the relevant columns, namely:

| | | | | | |
|-------------------------------|-----------|-------------------|---|---------------------------------------|---------------------------|
| (14A) Electrician (DPS-02) | Secretary | 18 to 40 years | Middle pass with diploma in the field of electricity | Five years practical experience | By initial recruitment |
|-------------------------------|-----------|-------------------|---|---------------------------------------|---------------------------|

Chief Secretary,
Khyber Pakhtunkhwa.

Dated Peshawar, the July 8, 2011

Copy forwarded to:-

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa.
2. The Chairman, Public Service Commission, Khyber Pakhtunkhwa.
3. The Secretary to Governor, Khyber Pakhtunkhwa.
4. The Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. All Heads of Attached Departments, Khyber Pakhtunkhwa.
6. All Heads of Autonomous / Semi Autonomous Bodies in Khyber Pakhtunkhwa.
7. All District and Sessions Judges in Khyber Pakhtunkhwa.
8. The Secretary Board of Revenue, Peshawar.
9. The Director, Anti Corruption Establishment, Peshawar.
10. The Secretary, Public Service Commission, Khyber Pakhtunkhwa.
11. The Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.
12. All Deputy Commissioners in Khyber Pakhtunkhwa.
13. Manager, Govt. Printing Press with the request to furnish twenty (20) copies to this Department after publication in the official Gazette.

(WAZIRAN LATIFI)
Deputy Secretary

(By Order of the Government of Khyber Pakhtunkhwa) (School) (Equivalent) (03) (Available) (Recruitment) (From) (District) (School) (Principal) (Gazette) (Official)

Handwritten signatures and scribbles on the right side of the page.

34

Amd e (29)

CT



GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT
(ESTABLISHMENT WING)

Dated Peshawar, the 18th July, 2019

NOTIFICATION

No.SOE.IV(E&AD)/1-35/2014:-

In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Establishment and Administration Department, in consultation with the Finance Department, is hereby directs that in this Department's Notification No.SOE.IV (E&AD)/1-35/2012 dated 6th December, 2012, the following amendments shall be made, namely:

AMENDMENTS

In the APPENDIX, for Serial No.4, the following shall be substituted, namely:

| 1. | 2. | 3. | 4. | 5. |
|----|---------------|---|-----------------|---|
| 4. | Junior Clerk. | (i) FA/ F.Sc with second division or equivalent qualification from a recognized Board; and (ii) a speed of thirty (30) words per minute in typing. | 18 to 30 years. | (a) Forty per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed FAF.Sc Examination or its equivalent qualification from a recognized Board; and (b) sixty per cent by initial recruitment. Note: For the purpose of promotion, there shall be maintained a common seniority list of Daftaris, Gestetner Operators, Qasids, Naib Qasids etc. with reference to the dates of their acquiring the FA/ F.Sc qualification. |

03

35

| 1. | 2. | 3. | 4. | 5. |
|----|----|----|----|---|
| | | | | <p>Provided that-</p> <p>(i) if two or more officials have acquired the FAF.Sc qualification in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;</p> <p>(ii) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials:</p> <p>Provided further that The condition of FAF.Sc or its equivalent qualification from a recognized Board, as laid down at clause (a) shall not apply for a period of four years from the date of commencement of this Notification to the existing matriculate incumbents of the post of Daftaris, Gestether Operators, Qasids and Naib Qasids including holders of other equivalent posts for promotion to the post of Junior Clerk (BS-11).</p> |

av

CHIEF SECRETARY
KHYBER PAKHTUNKHWA

36

(25)

CF. CAJ

Endst: No. SOE-IV(E&AD)/1-35/2014, dated 18th July, 2019

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Senior Member of Board of Revenue.
3. The Principal Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa.
4. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
5. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
6. The Secretary, Khyber Pakhtunkhwa Public Service Commission.
7. Deputy Director (IT), Establishment & Administration Department with the request to upload on the official website.
8. PS to Chief Secretary Khyber Pakhtunkhwa.
9. PS to Secretary Establishment Department.
10. PS to Special Secretary (Estt), Establishment Department.
11. PS to Special Secretary (Reg), Establishment Department.
12. PA to Addl. Secretary (Estt/ Reg), Establishment Department.
13. PA to Addl. Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette with the request to provide 50 copies of Gazette.


(HAZRAT JAMAT)
SECTION OFFICER (E-IV)

37

ANK'D

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) BANNU

PROMOTION ADJUSTMENT ORDER

Copy sent upon the recommendation by the DPC/DSC Committee, Bannu District Bannu, the following Class-IV (Govt) Servants Education Department District Bannu are hereby promoted and adjusted against vacant J/Clerk post, w/e the date of taking over charge of Govt policy dated 18 July, 2019 on merit basis as per the terms & Conditions given below

| S/N | NAME & DESIGNATION | Place of posting | Adjusted as J/Clerk | REMARKS |
|-----|-----------------------|----------------------------------|--|------------------------------|
| 1 | Mirza Naveed | DE/OMH Office Bannu | GHS Murib Khel Bala Khel Bannu | Adjusted against vacant post |
| 2 | Hamidullah Ghorekhani | GPS Nawab Khan Mianah Khel Bannu | GHS Al-Hamid Wall Noor Jani Khel Bannu | Adjusted against vacant post |

TERMS & CONDITION

- 1. This (all) promotion is issued as per the approval of DPC/DSC on the basis of seniority cum fitness.
- 2. They will be on probation for a period of one year extendable for another one year.
- 3. They will be reverted at any time without assigning any reason or notice to their original post if their efficiency is found unsatisfactory.
- 4. They are directed to join their new assignment within 15 days, otherwise it will be treated as if they have refused their promotion.
- 5. Their seniority on lower post will impact as usual.
- 6. Change request should be submitted to all concerned.
- 7. No LADA is allowed.

MULLAH KHAN MINA KHEL
DISTRICT EDUC OFFICER
(MALE) BANNU

Under NO 3371-80 (Print) Class IV Staff Dated Bannu the 14/03/2020

- 1. Copy for information and necessary action to the Director of Elementary & Secondary Education, Department NWFP
- 2. Deputy DE/CS (I) Bannu
- 3. SDE (I) Bannu
- 4. District Accounts Officer Bannu
- 5. Principal/Head Master Concerned School
- 6. Official concerned for strict compliance & report.

DISTRICT EDUC OFFICER
(MALE) BANNU

Better Copy

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CTC
J

OFFICE OF DISTRICT EDUCATION OFFICER MALE BANNU

PROMOTION/ADJUSTMENT ORDER

Consequent upon the recommendation by DPC/DAC committee education department Bannu, the founding class-IV Govt. Servant Education Department hereby promoted and adjustment against vacant J/Clerk, eighth effect the taking over charge in the interest of public service, out of 40% promotion quota on basis of seniority cum fitness in the light of Govt. Policy 18 July 2019 on merit basis as per terms and condition given below.

| S No. | Name & Designation | Place of posting | Adjusted as J/Clerk | Remarks |
|-------|-----------------------------------|-------------------------------------|--|--|
| 1. | Taj Murad NQ/WC FA | DEO (M) Office Bannu | GHS Murib Khel Baka Khel Bannu | Adjusted against J/Clerk Vacant Post |
| 2 | Hamidullah Chowkidar BA/DIT | GPS Nawab Khan Mamash Khel Bannu | GHSS Al-Hamid Wali Noor Jani khel Bannu | Adjusted against J/Clerk vacant post |

TERMS AND CONDITION:

1. Their regular promotion is issued as per the approval of DPC/DAC on basis sonority cum fitness.
2. They will on probation for a period of one year extendable for another one year.
3. They will be reverted at any time without a assigning any reason or notice to their original post if there efficiency found un satisfactory.
4. They are directed to join their new assignment with 15 days otherwise it will be presumed that they are for go there promotion.
5. Their interest seniority on lower post will intact as usual.
6. Charge report should submit to all concerned.
7. No TA/DA is allowed.

Atta Ullah Mina Khel
District Education Officer
(Male Bannu)

Ends. No. 3371-80 Prom Class-IV Staff Dated Bannu the 14/03/2020
Copy for information and necessary action to the

1. Director of Elementary & Secondary Education, Department NWFP.
2. Deputy DEO(M) Bannu.
3. SDO (m) Bannu.
4. Principal/Head Master Concerned School.
5. Official concerned for with compliance & report.

District Education
(Male Bannu)

1-68

39



GOVERNMENT OF KHYBER PAKHTUNKHWA
ADMINISTRATION DEPARTMENT

No. ESAD/4(152)/2021/APCA
Dated: 16-04-2021

The Secretary to Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

Subject

APPLICATION FOR CLASS-IV PROMOTION AND THE CONDITION
OF TYPING TEST

Dear Sir,

I am directed to refer to the subject noted above and to state that as per advice of Regulation Wing, Establishment Department, no condition of typing test exists for the promotion of Class-IV employees. Therefore, instructions contained in the letter dated 26-11-2018 (copy enclosed) of Regulation Wing, Establishment Department may be followed in its letter and spirit while making promotion of Class-IV employees

Yours faithfully,

SECTION OFFICER (ADMIN)
16/4

A copy is forwarded to the:

1. Section Officer (R-IV), Establishment Department
2. PS to Secretary (Admin), Administration Department
3. PS to Additional Secretary-I, Administration Department
4. PA to Deputy Secretary (Admin), Administration Department
5. Mr. Akbar Khan Mohmand, Provincial President APCA

SECTION OFFICER (ADMIN)
16/4

SOG
Dm
16/4/21

GOVERNMENT OF KHYBER PAKHTUNKHWA
ESTABLISHMENT & ADMN: DEPARTMENT
(Regulation Wing)

40

NO. SER. E&SE/AD/2-3/2018
Dated the 25th November, 2018.

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

Subject: GUIDANCE REGARDING TYPING SKILLS:KNOWLEDGE
FOR CLASS-IV SEEKING PROMOTION TO POST OF THE
JUNIOR CLERK (BS-11) UNDER 33% RESERVED QUOTA

Dear Sir,

I am directed to refer to your letter NO. SOG (E&SE) 1-68/2018 dated 26/11/2018 on the captioned subject and to state that the amended Service Rules for Ministerial Staff of Elementary & Secondary Education Department vide notification NO. SO (PF) 4-10/SSRC/Ministerial Staff/2013 dated 2nd August 2017 (copy enclosed) are silent with regard to the condition of typing skill/knowledge. As such the condition of Typing skill/Knowledge is not applicable for Class-IV seeking promotion to the post of Junior Clerk (BS-11) against 33% reserved quota. The posts are to be filled strictly in accordance with the method of appointment, qualification and other conditions applicable to a post as laid down in the relevant Service Rules name under Rule-3 (2) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer), Rules, 1989.

Yours faithfully,

Sd/-

SECTION OFFICER (R-1)
Phone # 92108660

Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department

No. SEC/AS/ET/AS/2018
Dated Peshawar the 29-11-2018

411

To: Director,
EASE, Khyber Pakhtunkhwa,
Peshawar

REPLY TO THE OFFICE OF THE SECRETARY FOR THE
CLASSIFICATION, PROMOTION, TO THE POST OF JUNIOR
CLERK UNDER THE BSNP/1/2018.

Ref: Special to refer to your letter No. 11047/No. 43115-20-0418/Sec dated 07.11.2018 on the subject noted above and to enclose herewith a copy of letter No. 408-106450/27/2018 dated 20.11.2018 received from Section Officer (Genl) Establishment & Admn. Department, Government of Khyber Pakhtunkhwa, Peshawar, which is self-explanatory, for further necessary action.

Encl. As above.

Section Officer (General)

Encl. No & date etc.

Copy forwarded to:-

1. The Section Officer (R-I), Establishment & Admn. Department, Government of Khyber Pakhtunkhwa, Peshawar with letter cited above.
2. PA to Secretary, EASE Department.
3. PA to Additional Secretary (Rash), EASE Department.
3. PA to Deputy Secretary (Admn), EASE Department.

Section Officer (General)

Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar,
Encl. No. SEC/AS/ET/AS/2018/2018 Dated Peshawar the 29-11-2018

Copy of the above is forwarded for information and further necessary action to the

1. A/D-Act Education Officer (Male/Female) Khyber Pakhtunkhwa
2. Director of Curriculum Teacher Education Khyber Pakhtunkhwa Abbottabad.
3. Director of Education, Newly Merged Tribal District, Khyber Pakhtunkhwa Warsak Road Peshawar.
4. Director PITE Khyber Pakhtunkhwa Peshawar.
5. Section Officer (General) Elementary & Secondary Education Khyber Pakhtunkhwa with to his letter No and dated cited above.
6. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Assistant Director (Admn)
Directorate of Elementary & Secy Ed
Khyber Pakhtunkhwa Peshawar.

حکومت صواب - ڈسٹرکٹ ایجوکیشن آفیسر راجپور
42

درخواست عماد دے کے جانے پر
تاجونیر کلرک

صواب علی: سائل ذیل درخواست

1. بہار چی سائل 1996 سے

2. بہار چی سائل MA پاکستان

3. بہار چی سائل جونیئر ایگوان کو بخورفہ 20-3-14 بزرگ

اردو سائل 337 کے بلور جونیئر کلرک پروٹوٹ بیا گاہ

4. بہار چی سائل ہیں جونیئر کلرک کی اسما علی پروٹوٹ
کا صودہ ہیں

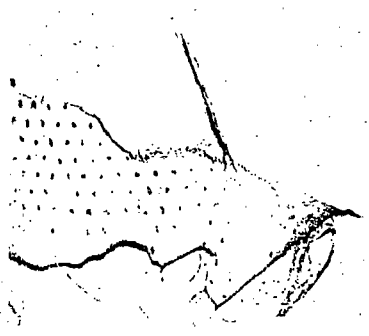
5. بہار چی سائل ہیں سے پروٹوٹ ایگوان انٹیر فائن
کم لے سے پروٹوٹ ایگوان

ایذا اسٹریڈ سے بہار چی سائل کو ہیں پروٹوٹ

دیگر جونیئر کلرک تینیا کے بیا گاہ

22-4-22


محمد ابرار ایم خان جس کی فوری درخواست چھاننی ہوگی
کوئٹہ بلور خان بیرون
Application



43

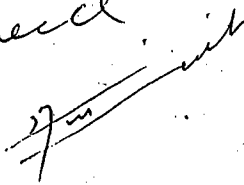
P1

The application in 2/D Mohamud Ibrahim
Khan C/4 GHS Karkh B. Lower Khan B.
is rejected on basis on merit
and time band.


27/1/2022

080007

P-1 Agreed



44

①



BEFORE THE PESHAWAR HIGH COURT BENCH BANNU

Writ Petition.....^{SSS-B}...../2020

**Muhammad Ibrahim S/O Dilawar Khan R/O Kotka Haji Bilawar Khan
Azeem Kala District Bannu.Petitioner**

VERSUS

1. Government of KPK through Secretary Education Peshawar.
2. District Education Officer (Male) Bannu.
3. TajMurad Khan junior clerk posted at GHSS MuribKhelBakaKhel Bannu.
4. Hamid Ullah Junior Clerk posted at GHSS Al-Hamid Wali Noor JaniKhel District Bannu.
5. Atta Ullah Mina Khel (Ex-DEO Education Bannu) Mohallah Mina Khel District LakkiMarwat.

..... Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.**

[Handwritten flourish]

Respectfully Sheweth,

1. That petitioner is class-IV employee of the respondent Department who is appointed on the post of Class-IV on 05/06/1996 having high qualification and high quality service record. (Copy of the ~~Qualification~~ and service book are annexed as A) *[Handwritten flourish]*
 2. That according to government policy for appointment of junior clerks 20% quota is reserved from class-IV employees of daftaris and where daftari are not available then common seniority list of NaibQasid at etc will be appointed on the post of junior clerk with at least 3 year service.(Copy of the appointment policy is annexed as B)
- That respondent department neglecting the policy of appointment of class-IV to junior clerk of the education department despite the fact that a large number post a junior clerk with the respondents department and they adopted policy of the civil secretariat employees for promotion/appointment Class-IV of their blue eyes and near and dear employee respondent No.3 & 4 without seniority

ATTESTED

[Handwritten signature]

High Court

Bannu Bench
Filed Today
15 JUN 2020
[Handwritten signature]

45

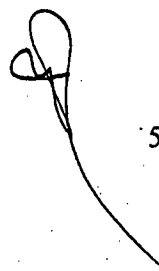
2

list although, seniority list is mandatory for promotion/appointment and respondents No.1, 2 are under legal obligation to circulate seniority list in January and after receiving objection from the employees then they will finalize the seniority list and then they appointed/promoted employees. But respondent No.5 before four days the retirement from his service without seniority list/merit list issued illegal promotion/appointment of respondent No.3 & 4 who are most junior from the petitioner who are the nominee of local politician. (Copy of the Policy of Secretariat Level & promotion order are annexed as C& D).

4. That Petitioner submitted various applications for appointment and for preparation of seniority list for the post of junior clerk but till date no response is given so having no other efficacious remedy for relief the Petitioner invokes the extra ordinary constitutional jurisdiction inter-alia on the following grounds.

GROUNDS:

1. That Petitioner is not treated according to law, rules and regulations.
2. That Petitioner is not treated according to article 4 and 25 of the constitution.
3. That petitioner has more than 24 year service and has vested right for appointments on the post of junior clerk through promotion.
4. That promotion/appointment of the respondent No.3 & 4 is against law, rules, regulation and service rules, of the Education Department hence reversible.
5. Other grounds will be taken during arguments with the permission of the court.

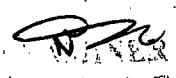


It is therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to

- a) Declare the office order of respondent No.3 & 4 dated 14/03/2020 Endst No. 3371/80 is void ab-initio illegal against law rules and regulation arbitrary fanciful and colorful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under efficiency and discipline rules 2011.
- b) To implement the 20% promotion/appointment quota on the post of junior clerk from Class-IV as per law rules and regulations of

Filed Today
15 JUN 2020
July
Additional Registrar

ATTESTED



Additional Registrar
District Court
Dhaka Bench

46

3

the provincial government and appointed/promoted petitioner on the post of junior clerk.

- c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the Petitioner.
- d) Any other relief with this honourable court may deem fit may also be granted.

M. Ibrahim
 Muhammad Ibrahim Petitioner

Through Counsel
 Masood Ur Rehman Wazir
 Advocate High Court

INTERIM RELIEF

In wake of above submission appointment/promotion of the respondents No. 3 & 4 may kindly be suspended till the final disposal of instant writ petition.

M. Ibrahim
 Muhammad Ibrahim Petitioner

Through Counsel
 Masood Ur Rehman Wazir
 Advocate High Court

Filed Today
 15 JUN 2009
Jubir
 Additional Registrar

Certificate

It is certified that no writ petition is filed on the subject matter.

LAW BOOKS

Constitution of Pakistan 1973.
Case law per needs.

Masood Ur Rehman Wazir
 Masood Ur Rehman Wazir
 Advocate High Court

TESTED Note: writ falls in the domain of D.B

Jubir
 Registrar
 High Court
 Masood Beach

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2 (4)

BEFORE THE PESHAWAR HIGH COURT BENCH BANNU

Writ Petition SPS-B/2020

Muhammad IbrahimPetitioner

VERSUS

Government of KPK and others..... Respondents

AFFIDAVIT

I, Muhammad Ibrahim S/O Dilawar Khan R/O Kotka Haji Bilawar Khan Azeem Kala District Bannu, do hereby solemnly affirms and declare on oath that the contents of the instant Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court

Muhammad Ibrahim
Deponent
11101-7348832-5

Identified by
Masood Ur Rahman Wazir
Masood Ur Rahman Wazir
Advocate High Court

No 13222
Certified that the above deponent has solemnly affirmed as before me on the day of Jun 2020 by Muhammad Ibrahim S/o Dilawar Khan R/O Bannu who was identified to me by Masood ur Rahman Wazir who is personally known to me

Masood
Bannu Bench

Filed Today
15 JUN 2020
Masood

ATTESTED

Masood
Peshawar High Court
Bannu Bench

48

5

BEFORE THE PESHAWAR HIGH COURT BENCH BANNU

Writ Petition No. 555-B/2020

MEMO OF ADDRESS OF PARTIES

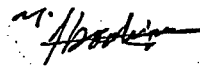
Muhammad Ibrahim S/O Dilawar Khan R/O Kotka Haji Bilawar Khan
Azeem Kala District Bannu.Petitioner

VERSUS

1. Government of KPK through Secretary Education Peshawar.
2. District Education Officer (Male) Bannu.
3. TajMurad Khan junior clerk posted at GHSS MuribKhelBakaKhel Bannu.
4. Hamid Ullah Junior Clerk posted at GHSS Al-Hamid Wali Noor JaniKhel District Bannu.
5. Atta Ullah Mina Khel (Ex-DEO Education Bannu) Mohallah Mina Khel District LakkiMarwat.

..... Respondents


Dated: 13/06/2020



Petitioner
Muhammad Ibrahim

Through Counsel


Masood Ur Rehman Wazir
Advocate High Court

Filed Today
15 JUN 2020

Additional Registrar

ATTESTED

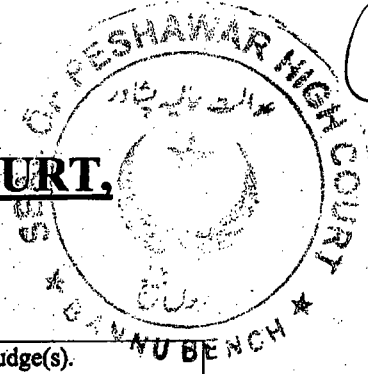


High Court
Bannu Bench

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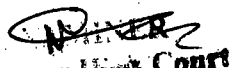
PESHAWAR HIGH COURT,
BANNU BENCH

FORM OF ORDER SHEET



| Date of Order or proceedings | Order or other proceedings with signature of Judge(s). |
|------------------------------|---|
| (1) | (2) |
| 20.04.2022 | <p><u>W.P No.555-B of 2020</u></p> <p><u>Present:</u></p> <p>Masoodur Rehman advocate for petitioner. 'Sardar Muhammad Asif Asstt: A.G for the official respondent</p> <p style="text-align: center;">***</p> <p><u>SAHIBZADA ASADULLAH, J.--</u> The petitioner approached this court by invoking its jurisdiction under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, with the prayer "<i>It is, therefore, humbly prayed that on acceptance of instant writ petition respondents may kindly be directed to:</i></p> <p style="text-align: center;">a) <i>Declare the office order of respondent No.3 & 4 dated 14.03.2020 Endst: No3371/80 as void ab-initio illegal against law rules and regulation arbitrary fanciful and colourful exercise of power without lawful authority and in effective upon the right of the petitioner and respondent No.5 may be proceeded under Efficiency and Discipline Rules 2011.</i></p> <p style="text-align: center;">b) <i>To implement the 20% promotion/ appointment quota on the post of junior clerk from Class-IV as per law rules and</i></p> |

ATTESTED


Attesting Officer
Peshawar High Court
Bannu Bench

regulations of the provincial government and appoint/promote the petitioner on the post of junior clerk.

c) Direct the respondents to prepare joint seniority list of Class-IV employee and include the name of the petitioner.

d) Any other relief with this hon'ble court may deem fit may also be granted."

2. In the comments respondents have submitted that the petitioner was duly considered for promotion, however, having failed in the typing test has become ineligible.

3. In view whereof, we find that petitioner has already been considered and have become ineligible, so his grievance, if any, can be agitated before the Service Tribunal, as bar contained under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973, hit the case of petitioner. In such eventuality, this petition is dismissed, however, the petitioner is at liberty to approach the Service Tribunal in accordance with law.

Announced: Dt: 20.04.2022 *Azam/P.S*

Sd/ Mr. Justice Ijaz Anwar, J Sd/ Mr. Justice Sahibzada Asadullah, J

CERTIFIED TO BE TRUE COPY

23 APR 2022

(D.B) Hon'ble Mr. Justice Ijaz Anwar and Hon'ble Mr. Justice Sahibzada Asadullah

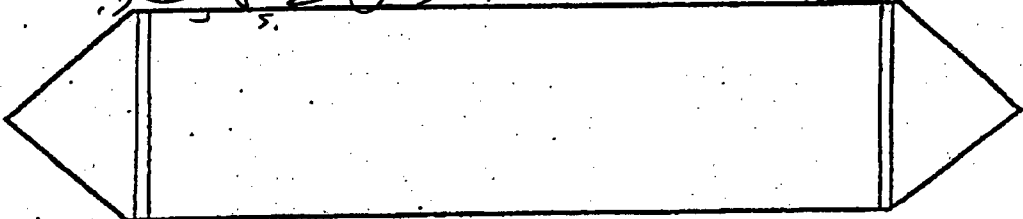
Examiner Peshawar High Court Bannu Bench Authorised Under Article 87 of Qanun-e-Shahadat Ordinance 1984

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Form with fields: S.No (7856), Date of Presentation of Application (20-4-22), No. of Pages (7), Copying For, Urgent For, Total (28), Date of, Delivery of Copy (23-4-22), Received By

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بعدالت سرویس ٹریبونل کے لیے درخواست



2022ء منجانب ایڈووکیٹ

محمد ابراہیم بنام حکومت

| | |
|-------|------------|
| موزخہ | ----- |
| مقدمہ | ----- |
| دعویٰ | سرویس ایسے |
| جرم | ----- |

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام بے جا کیلئے بے جا و بے جا مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یا بظرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لانا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانش التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted

[Handwritten signature]

الرقوم 24 ماہ صی 2022

العاب و واہ العاب

بمقام کے لئے منظور ہے۔