10.08.2022 ecurity a Process Fee Learned counsel for the appellant present and submitted an application for submission of security and process fee. Application allowed with direction to submit security and process fee within 3 days, thereafter notices be issued to respondents for submission of written reply/comments. To come up for written reply/comments on 06.10.2022 before S.B.

(Fareeha Paul) Member (E)

O6.10.2022 Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments have not been submitted. Learned AAG requested for further time. Request is accepted. To come up for written reply/comments on 28.11.2022 before S.B.

(Mian Muhammad) Member (E) Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned: To come up for preliminary hearing on 23.02,2022 before \$.B.

(MIAN MUHAMMAD) MEMBER (E)

24.02.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 23.05.2022 for the same before D.B.

Reader

23<sup>rd</sup> May, 2022

Counsel for the appellant present and seeks adjournment in order to properly assist the court. Adjourned.

To come up for preliminary hearing on 06.07.2022 before S.B.,

at there

(Kalim Arshad Khan) Chairman

06<sup>th</sup> July, 2022 Learned counsel for the appellant present.

Learned counsel says that appeals against the same order, filed by other appellants have already been admitted and are fixed for 10.08.2022. Therefore, this appeal is also admitted to full hearing, subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee within 10 days. Respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 10.08.2022 before S.B.

(Kalim Arshad Khan) Chairman

### Form- A

### FORM OF ORDER SHEET

Court of	 •	
-		

	Case No	7/92 /2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/08/2021	The appeal resubmitted today by Mr. L. Nawab Ali Noor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
·		REGISTRAR,
2-		This case is entrusted to S. Bench for preliminary hearing to be put
		up there on 11-10-21
		CHATAMAN
	·	
	11.10.2021	Clerk of learned counsel for the appellant present.
		Clerk of learned counsel for the appellant seeks adjournment due to General Strike of the Peshawar Bar Association.
		Adjourned. To come up for preliminary hearing before the S.B on 14.12.2021.
		* Bug
		(MIAN MUHAMMÃD) MEMBER (E)
İ		

7/92/2021

## BEFORE THE SERVICE TRABUNIL K.P.K PESHAWAR.

- S. Appeal NO of 2021.
- 1.Sami Ullah S/O Muhammad Dervish R/O Kolal Dheri P/O Bashigram Tehsil Lal Qila Distt Dir Lower.

.....(Appellant).

### **VERSUS**

### Index

	Description	Annexure	Pages
S.NO	Description		1-5
1.	Appeal and affidavit		
2.	Stay application		6
	(A) (A) (A) (A)	- 11	
4	Notification dated 24.7.14	<i>July</i>	10
-A	Notification dated 24.7.18	·	11-13
- <del>" </del>	Departmental Appeal	E.	14-13
6	Waklat Nama		12

Through

Appellant

L. Nawab Ali Noor

Advocate High Court

Peshawar. 03469076945

## BEFORE THE SERVICE TRABUNIL K.P.K PESHAWAR.

- S. Appeal No. of 2021.
- 1.Sami Ullah S/O Muhammad Dervish R/O Kolal Dheri P/O Bashigram Tehsil Lal Qila Distt Dir Lower.

.....Appellant

### **VERSUS**

- 1.Govt of K.P.K through Chief Secretary Civil Secretariat Peshawar.
- 2. Secretary Elementary and Secondary education K.P.K Civil Secretariat, Peshawar.
- 3.Director Elementary and Secondary education K.P.K Civil Secretariat, Peshawar.

.....Respondents

APPEAL UNDER SECTION – 4 OF THE KHYBER PUKHTOONKHWA SERVICE TRABUNAL ACT 1974 AGASINST THE IMPUGNED SERVICE RULES NOTIFICATION DATED 24.7.2014 WHEREBY NOT INCLUDING THE COMPUTER SCIENCE SUBJECT/ DEGREE HOLDER IN THE CRTERIA OF ELIGABILITY FOR THE PROMOTION OF PST,IT TO THE POST OF SST BPS -16 SAME IS AGAINST THE SERVICE RULES NOTIFIED IN THE NOTIFICATION DATED 24.4.2018 TO THE EXTENT OF SERIAL NO .2 COLUMN NO.5 OF THE TABLE WHEREBY NO QUOTQ HAS BEEN ALLOCATED FOR APPELLANT CADER AS PST IT AND SAME TIME AWARDED TO ALL OTHERS AND TAKING ANY ACTION ON THE DEPARTMENTALAPPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINTY DAYS.

### PRAYERS:

On acceptance of this service appeal this honorable court may graciously be pleased to set aside / declare, null and void /amended / modified the impugned service rules / notification dated 24.7.2014 to the extent of the S.NO. 1 B Column NO. 3 the table by including / inserting/ amending / Modifying service rules as well as service rules 24.2.2018 also may kindly be / inserting/ amending / Modifying to the extent of S.NO. 2 column no. 5 and may please allocate promotion quota for appellant as PST IT for the promotion to the post of SST IT BPS-16 with all back benefit

It is further requested to consider the appellant for promotion for the post of SST IT BPS-16 with all back benefit from 2014 i.e from the date of notification benefit granted to others.

May also awarded the relief of 7 years duration of service also.

## RESPECTFULLY SUBMITTED,

- 1. That appellant is civil servant doing their job in education department as PST.
- 2. That appellant is highly educated hiring master decree holder in their relevant computer science subject along With PST/CT, BED/MED decrees etc.
- 3. That it is to be noted by your honor that following six cadres of SST (BPS-16) are there in which the appellant cadre is PST (IT) which is only and lonely cadre of the appellant whom ignored, deprived from the promotion rights.
- 4. That It is further to be noted that till date even for the appellant cadre as PST .IT, even rules of promotion are complete silent which is further question mark before this honorable court?
- 5. That so much so may visit the notification dated 24.7.14 in which for

category a,b,c,d qualification for which properly promotion rules are there and they are awarded the same from the date of notification while on other side appellant with qualification / degree of Computer science, Math A, Math B along with others subject ignored reason best known to them. Copy of the notification 24.7.14 as annexure

- 6. That It is further to be noted that till date even for the petitioners cadre ,whose subject is computer science at bachelor level even rules of promotion are complete silent which is further question mark before this honorable court?
- 7. That so much so may visit the notifications dated 24.7.14, 24.4.2018 very interesting to see that in 24.7.2014 where cadre is there but subject subject ignore while 24.4.2018 subject of computer is there but cadre ignore which is great joke and pure question of discrimination before this Honorable court.

8. That appellant filed departmental appeal before the competent authority but same is with no response within the statutory period.

Copy of the Departmental appeal as annexure

That appellant aggrieved from the same having others no adequate remedy approach this Honorable court on following amongst others

### GROUNDS:

aaaaa. That awarding the promotion, seniority back benefit to others while deprived the appellant cadre was/is illegal, unlawful, unconstitutional act of the respondents hence need modified, amend, and set aside the same up to the asking relief.

bbbbb. That awarding the same relief to rest of five categories and deprived from the same benefit appellant and his cadres is question of

5

4.

dddd. That under what law and circumstances only appellant appellant cadre deprived from promotion while rest of all are benefited through same notification and awarded relief with back benefit reason best known to them.

eeeee. That under the constitution appellant has the same rights like others civil servant but same not extend equally which is injustice.

fffff. That act of the respondent to pick and chose is not justified at any cost which is against the basic provision of the constitution, law service rules.

ggggg. That action on the part of respondents amount to misuse of power and approach beyond from the jurisdiction under the law mentioned for.

hhhhh. That superior court repeatedly delivered judgment in respect ART.4, 25 etc and present case respondents violated the same also.

It is therefore most humbly prayed that on acceptance of this service appeal your honor may graciously be to set aside / declare, null and void /amended / modified the notification dated 24.7.2014 to the extent of the S.NO. 1B column NO. 3 of the table by including / inserting/ amending / Modifying service rules as well as service rules | 24.2.2018 also may kindly be / extent of S.NO. 2 column no. 5 and may please allocate promotion quota for the appellant /appellant cadre.

It is further requested to consider the appellant for promotion for the post of SST IT BPS-16 with all back benefit from 2014 date of notification.

May also awarded the relief of 7 years duration of service also.

May please awarded any other relief for which appellant entitled not specifically mentioned deem appropriate may also awarded.

Dated:

Appellant

Through

L.Nawab Ali Noor

Advocate High Court

Peshawar.

Certificate: certified that no such like service appeal filed before this

Honorable tribunal.

L.Nawab Ali Noor

Peshawar.

### AFFIDAVIT.

I Sami Ullah S/O Muhammad Darwesh KoLal Dheri P/O Beshigram Lal Qila Dir Lower , do 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 been kept concealed from this Honorable tribunal.

Deponent

S. Appeal No. of 2020.

100

1.Sami Ullah S/O Muhammad Darwesh KoLal Dheri P/O Beshigram Lal Qila Dir Lower. Appellant.

### **VERSUS**

# Application for stay over the appointment of SST till decision. RESPECTFULLY SUBMITTED.

- 1. That above titled service appeal is pending before this honorable court for adjudication, and no date of hearing has been fixed so for.
- 2. That service appeal is read as an integral part of this application.
- 3. That appellant have a good prima facie and arguable case, balance of convince lies in their favor if temporary injunction not granted will suffer irreparable loss and injury.

Under the above circumstances, humbly prayed that respondent may kindly be restrained from further any promotion till final decision of the instant service appeal

Applicant/Appeliant

Through

L. Nawab Ali Noor Adv. High Court Peshawar.

### AFFIDAVIT.

I, Sami Ullah S/O Muhammad Darwesh Kollal Dheri P/O Beshigram Lal Qila Dir Lower , do 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 been kept concealed from this Honorable tribunal.

Deponent.





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

Peshawar, dated the 24th July, 2014.

### **NOTIFICATION**

No.SO(PE)4-5/SSRC/Meeting/2013/Teaching Cadre: 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 Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notifications No.SO(G)S&LD/1-28/2003/Vol-II dated, 09-04-2004, Notification No.SO(G)S&L/1-69/06/Vol-1/DPE/LIB dated, 13-11-2007, and Notification No.SO(PE) 4-5/SSRC/Meeting/2012/Teaching Cadre, dated, 13.11.2012, the following further amendments shall be made namely:

### **AMENDMENTS**

In the Appendix,-

Serial No. 1 shall be renumbered as 1B and before Serial No. 1B, as so renumbered, the following new entries shall be

(i) Sérial No. 1	shall be retititiveled as 22 and 23		ļ	
inserted in I	espective columns, namely:	1	<u>_</u>	5
"1 Subject Speci (BPS-17)	i. At least second class Master's Degree or four years BS Degree in the relevant subject; and ii. Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualification from C		of sul Te ser me	Fifty per cent by promotion, on the basis seniority-cum-fitness, for the relevant bject from amongst the Secondary School achers (BPS-16), with at least five years vice as such and having qualification entioned in column No. 3.
	recognized University.		relec	cant subject the post falling in their notion quota shall be filled by initial
			pron	monon quota stati de jatea eg

against Serial No. 1B, as so renumbered, for like existing entries, the following Shall be substituted, in respective columns,

		3/2/6				
1 "1B.		3	4		5	
and Jin pos with a single of the single of t	Teacher (BPS-16)	At least second class Bachelor Degree's from a recognized University on need basis from the following groups with two subject a) (Chemistry, Botany or Zoology), Or (Physics, Maths "A" or "B" or Statistics) Or (Humanities and other equivalent groups at degree level with English as compulsory subject; and Bachelor of Education or Master of Education (Industrial Art or Business Education) or MA Education or equivalent qualifications from a recognized University.	21 to 35 years.	(a) forty per ce Certified Tea five years s Teacher and having que column No.3:  Provide candidate is Senior Certified then the post on the basis from amongs at least five having qua column No. 3;	prity-cum-fitnered in the followard in t	ess, from the wing manner:  gst the Senior ), with at least nior Certified Teacher and rentioned in  no suitable om amongst or promotion of promotion, promotion, proum-fitness, achers, with as such and entioned in
λου (1) (20) (1) (1) (20) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	( Lugil 1 ) governo	( tien was	WU	fivit years st	iters(BPS-1 ), Prvlčė as Seni Drawing N	with at least or Drawing .  Aasters and
Cax(11) 180	Unt	Mulev for (3)				•

AX B.D.

Don

Provided that if no suitable candidate is available from amongst Senior Theology Teachers for promotion than the post shall be filled by promotion or the basis of seniority-cum-fitness, from amongst Theology Teachers with at least five years service as such and hiving qualification mentioned in column No. 3:

(c) three per cent from amongst the Senior Corix (BPS-16), with at least five years service as Senior Qari and Qari and having qualification mentioned in column No.1:

Provided that if no suitable candidate is available from amongst the Senior Caris then the post shall be filled by promotion, on the basis of seniority-aum-fitness, from Qaris with at least five years service as such and having qualification mentioned in column No. 3;

(f) Iwenty per cent from amongst the Primary School Head Teachers (BPS-16), with at least seven years service as Frimary School Head Teachers and Senior Primary School Teachers and Primary School Teachers and having qualification mentioned in column No. 3:

Provided that if no suitable candidate is ovailable from amongst

Allow Colly

pr. B. 65 (2)

					· · · · · · · · · · · · · · · · · · ·		
	· .						Primary School Head Teachers for
			•				promotion then the post shall be filled by
·					"		promotion, on the basis of seniority-cum-
/	•						fitness, from amongst Senior Primary
					,·		School Teachers with at least seven years
	•					.	service as Senior Primary School
		·   · · ·	•				Teachers and Primary School Teachers
				,			and having qualification mentioned in
1		1.			,	·	column No.3:
					,		Provided further that if no suitable
1					'		candidate is available from amongst
1							Senior Primary School Teachers for
- <b>1</b>		-					promotion then the post shall be filled
ı		.					from amongst Primary School Teachers
<b></b>			j. 14		and the same of the same of the	i	with at least seven-years service as such
Ħ	•						and having qualification mentioned in
Ī	•	_			•		column No. 3; and
1	•			And the state of			ii) twenty Five percent by initial
						'	recruitment.
3					• • • • • •		Note:
H							If_no-suitable-candidate-is-available-in
-							the relevant cadre of the above teachers,
叠		, .			والمعارض وال		the post falling in their promotion quota
			1	7			shall be filled by initial recruitment
••						1 11	Posts of General SST and SSTs-1 Science
			+		*	"	and SST-2 Science shall be filled by
						1	promotion or initial recruitment, each on
٠.			· · · · · · · · · · · · · · · · · · ·				need busis separately.".
						<u> </u>	- Intelle
<i>t</i>		.,					MAN
•	•	:			*		· A · · · · · · · · · · · · · · · · · ·
			• .		and the second s		/ V

extraordimary GOVERNMENT



REGISTERED NO. P.

GAZETTE



## KHYBER PAKHTUNKEWA

Published by Authority

PESHAWAR, TUESDAY, 24th APRIL, 2018.

## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

### NOTIFICATION

Peshawar, dated: 24th April 2017

No.SO(G7/E&SE/1-85/1,T/2017:- 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, and in supersession of the notification issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment & Administration Department and Finance Department hereby lays down the method of recruitment, qualification and other condit ons specified in column No. 2 to 5 of the Appendix to the Notification which shall be applicable to the posts of information Technology Teaching Cadre (Male/Female) in the Elementary and Secondary Education Department as specified in column No.2 of the said

### APPENDIX:

كسرور امد له مركستك			and the same of th
	Minimum qualification for appointment	Age	Method of recruitment
Nomenclature of the	by initial recruitment transfer .		5
S.No post	01 111111	4	a) Fifty percent by promotion on
. /	V. At least Second Class Master's Degree	21-35	the basis of seniority-cum-fitness
Subject Specialist-	At least Second Class Information		the basis of schools secondary
	in Computer Science or Information		from amongst the Secondary
Information	Technology or Bachelol Specificos	12	School Teacher-IT with at least
Technology (SS-IT)	Computer Science Commission	,12	five years service; and
32 (131°S-17)	Honours 4 years) or equivalent		, indian
	qualification from a recognition	l .	b) Fifty percent by initial
	University: and	i	recruitment:
		1.	1
1 Subject	ii. Bachelor Degree in Education (B.Ed) or	1	Provided that if no suitable
1/ 1/ 500/0	advivalent quantification		candidate is available for
W C.	recognized University.	1	1 initial l
		4	1 biomonour
1 17 /1800	Note: A candidate did not have the		recruitment
psill of an			
	the same within three years from the date	<sup>3</sup>	
	of his/her appointment.		
	of his/het appoint	6	
	( )	112 1	International Contractions
./ \$	and specific is	July 1	Herbo Cow Colland
ممير الرياب	5 D = 1 . All man 1/2	<b>γ</b> ΄ Λ	the Carl 1/1
		/N	VI . II I . VI
	(GD)	7	

fir. 6-(14)





1542 KHWBER PAKHTUNKHWA GOVERNMENT GAZETTE, EXTRAORDINARY, 24th. APRIL, 2018

	1042 KINGEL	R PAKHTUNKHWA GOVERNMENT GAZETT	E, EXTRAO	RDINARY, 24h. APRIL, 2018
2.	Secondary School Teacher-Information Technology (SST-IT) (BPS-1 i)	i. At least Second Class Master's Degree in Computer Science or Information Technology or Bachelor's Degree in Computer Science (BCS/BSCS Honours 4 years) or Bachelor's Degree with a subject of Computer Science or equivalent Qualification from a recognized University; and	21-35	a). Fifty percent by promotion on the basis of seniority-cumfitness from amongst the Certified Teacher-IT with five years service as such and having the qualification prescribed for the post of Secondary School Teacher-IT.
	•	ii. Bachelor Degree in Education (B.Ed) or cquivalent qualification from a recognized University.		b). Fifty percent by initial recruitment.
		Note: A candidate did not have the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.		Provided that if no suitable candidate is available for promotion, then by initial recruitment.
	Certified Teacher Internation Technology (CT-IT) (BPS-12)	i. At least 2nd Division Intermediate School Certificate or equivalent qualification from a recognized Institution or Board with one year Diploma in Information Technology Computer Science from any recognized institution; and	18-35	By initial recruitment,
( p	pa'15	ii. Certified Teacher Certificate (CT) or Associate Degree in Education (ADE) from any recognized institution/ University		
		Note: A candidate did not have, the qualification under clause (ii), shall acquire the same within three years from the date of his/her appointment.		

SECRETARY TO GOVERNMENT OF KILYBER PAKIITUNKHWA ELEMENTARY & SEOCNDARY EDUCATION DEPARTMENT

Printed and published by the Manager, Staty. & Ptg. Deptt., Khyber Pakhlunkhwa, Peshawa:

elto

Misser, Peshawar.

Alboration

41

G/ /

. |

Aux-1. C. (5)



t		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			. :	
	AT .		•		一个 (三)	••
	f. ·		· 2		5208	
	·		. Ur day for	Age	Method of recruitment	
	Nomenclature of the post	1	num Qualification for a	Limit		
		reciu	itment or by transfer.	21-35	a). Fifty percent by promotion on	
	Subject Specialist-Information	[ i.)	Master Degree in Computer Science/IT at		the busis of seniors, the	
	Technology (ES-17) (B-17)	ļ .	lung in and Division or			•.
	Government Higher	•	equivalent qualification		Secondary Schilling years' service AND	
1 2/19	Seaundary Echools/ Govt. comprehensive High Schools		from any recognized University.		Calual Teacher	· · · · · ·
(9) 11	and other equivalent posts in				(Seigner)	
	the Teaching Endre.	ii.)	Buchelor Degree of		i maine decire in	
! ! !	• .	1	Education (B.Ed) at least in 2nd Division		or equivalent qualification with 05 years' experience	•
,			from any recognized		U5 years conference was the	Name of the last o
			The state of the s	-	b). Fifty percent ny nimes	•
THE RESERVE OF THE PARTY OF THE	A STATE OF THE PERSON OF THE P	1 .			recruitment.	
1	1:		e .	1 .	Note: If an suitable candidate is	٠.
		-			Note: If an submite constant in the available for promotion in the initial	
					Leolovinii Citore timo	
		. }	•		recruitment.	
					Their seniority may be clubbed with SS and amendment may be with SS and amendment may be	
		•		:	with SS and antendervice rules.	• •
;			- 12 ways swith th	121-3	5 n). Fifty percent by promotion on the basis of seniority-cum-	
· · · · · · · · · · · · · · · · · · ·	Secondary Se noof Teacher	(i).	Dachelor Degree with the subject of Computer		the basis of sentency	
<u>.</u>	Information 7 schoology	1	culouse at least in 2"	1	1 bits for charge with	·
	(SSD(1) (B-16)		Division requivalent Qualification from any	X	(05) years service having the qualification prescribed for the	
6651	Cort. High A igher Second	אנזה	recognized Institution.	/	post of 17 Tencher.	}
$(\mathcal{I},\mathcal{I})$	Schools	1			L. Initial	1
		/ iii	). Bachelor Degree of Education (B. Ed) at lea	si )	b). If thy percont by	
	·		: and thision from any		recruitment.	
			recognized Institution.		Note: If no suitable candidate is	
		ļ	<u> </u>		nvallable for promotion in the relevant cadre than by initial	
			•		I magnitusent.	-
			ntermediate or equivalent	18-		
	Minior Teaches Information		- Constigut from any			
	Technology (1:-17) (0-12) Govt. High/Higher Second	'l.	meanized institution with			ووردن ا
;T1			one-year Diploma m			
	Schools	١.	any recognized institution.	but		مد ا
			Conflict Teacher		in the second	
,		- ':	Certificate/Diploma or equivalent qualification fro	om		1
1		• \	any recognized institution.			10
. 68 8 64	7				• • • • • • • • • • • • • • • • • • • •	<i>p</i>
	•	:	1		P	W.

The committee members discussed the proposed almendments in the service roles structify and the service roles structify.

TO, THE SECRETRY EDUCATION KHYBER PUKHTOON

DEPARTMENTAL APPEAL NO OF 2021. KHWA.

DEPARTMENTAL APPEAL AGASINST THE IMPUGNED SERVICE RULES NOTIFICATION DATED 24.7.2014 WHEREBY NOI INCLUDING THE COMPUTER SCIENCE SUBJECT/ DEGREE HOLDER IN THE CRTERIA OF ELIGABILITY EOR THE PROMOTION OF PST,S TO THE POST OF SST 3PS-16 SAME IS AGAINST THE SERVICE RULES NOTIFIED IN THE NOTIFICATION DATED 24.4.2018 TO THE EXTENT OF SERIAL NO .2 COLUMN NO.5 OF THE TABLE WHEREBY NO QUOTQ HAS BEEN ALLOCATED FOR APPELLANT / APPELLANT CADER AS PST\*IT\* AND SAME TIME AWARDED TO ALL OTHERS.

RESPECTFULLY SUBMITTED, 1. That with great respect it is stated that I am performing my duty as PST BPS-12. That I am highly educated master decree holder in relevant computer science subject along With PST/ CT, BED / MED decrees etc. I done my duty with full devotion and never raised any objection from the student or any other side. it is to be noted by your honor that following six cadres of SST (BPS-15) are there in which my cadre is PST (IT) which is the only and lonely cadre whom ,ignored, deprived from the promotion rights. That my cadre PST IT, even rules of promotion are complete silent which is further question mark before your honor? That notification dated 24.7.14 in which specifically mentioned the promotion on base of strength of service which is 7 years as well as 75% quota on basis of seniority cum

bedieve orle vem appropriate may also awarded. May please awarded any other relief for which me erritled not

May also awarded the relief to me of 7 years duration of service of SST \*IT\* BPS-16 with all back benefit from 2014. If further requested to consider me for promotion for the post cadre. Instance and to the spellant, appellant cadre. salves for the appellant associate of the cadre. with the extent of S.NO.2 column no.5 and monding Modifying to the extent of S.NO.2 column no.9 and Well as service rules 24,2,2018 also may kindly be / inserting! and the by including inserting amending Modifying zervice tales as 24.7.2014 to the extent of the S.NO. IB Colmn NO.: of the declare, null and void /amended / modified the notification dated service appeal your honor may graciously be pleased to set aside It is therefore most humbly prayed that on acceptarce of this

psT. IT my cadre computer science not mentioned in rules fer which is great discrimination. That entire five category except beliting si resi elidw noitomoriq edit tot belititled for the promotion while is shifted of the same qualification while cn was not awarded promotion. That if I am entitled for I nent full all mentioned required above even then I

Al Gxuf

Before The 5.T 1. p. W. Peshaway

Appellant is Same allah Govt of ICPICs. Through Chief دعوى 7. Scoretory & OThers

باعث تحريرا نكه

مقدمه مندرج عنوان بالامين الى طرف سے داسطے بيروي وجواب دى وكل كاروائي متعلقة آن عام مور سرمير الما مور على المرا لور على المرا المو لله على تورث المالا مقرر کرکے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کار دائی کا کامل اختیار ہوگا۔ نیز و کی منا حکم کورامنی نامه کرنے وتقرر دال کا کا جائے ہے۔ پر حلف دیتے جواب دہی اورا قبال دعویٰ اور بصورت ومرى كري كري اجراءاوروصولى جيك وروليدار كاللي دعوى اورورخواست برسم كي تقديق زرایں پروستخط کرانے کا اختیار ہوگا۔ نیزصورت عدم پیروی یاد کری ایطرف یا اپیل کی برامد گی اورمنسوخی نیزوائرکرنے انیل مگرانی ونظرهانی و پیروی کرنے کا مخار موگا۔از المراکات ضرورت مقدمد مذكور ككل ياجزوى كاروائى كواسط اوروكيل يامخارتا نونى كواسيع بمراه يااليد بجائ تقرر کا ختیار ہوگا۔اورصاحب مقرر شدہ کو بھی وہی جملہ ندکورہ بااختیارات حاصل ہوں کے

اوراس کاساخت پرداخته منظور وقبول موگادوران مقدمه میں جوخرچه مرجاندالتوائے مقدمه کے سبب سے دہوگا۔ کوئی تاریخ بیشی مقام دورہ پر ہو یا حدسے باہر موتو وکیل صاحب پابند موں

مے۔ کہ بیروی مذکور کریں۔ البذاو کا لت نامہ لکھدیا کہ سندر ہے۔

Delan ist I KAR find of while (les

,20