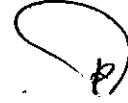


08.06.2022

Junior to counsel for the appellant present.

Lawyers are on general strike, therefore case is adjourned. To come up for preliminary hearing on 26.07.2022 before S.B.



(Rozina Rehman)
Member (J)

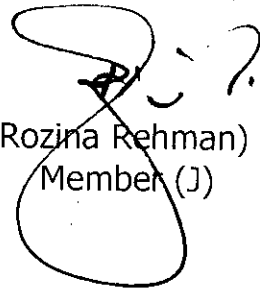
26.07.2022

Appellant present through counsel.

At the very outset learned counsel for the appellant requested for withdrawal of the instant appeal. In this respect, his statement was recorded on the margin of order sheet and signature was obtained thereon.

In view of the above, instant service appeal stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

Announced
26.07.2022



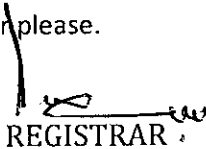



(Rozina Rehman)
Member (J)

*Note:
Madam as per
instruction of my
client/appellant
I seek the withdr-
awal of instant ap-
peal.
26/7/2022*

FORM OF ORDER SHEET

Court of _____

Case No. 7899/2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 21/12/2021 | <p>The appeal of Mr. Ihsan Ullah presented today by Mr. Noor Mohammad Khattak 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- | 10.01.2022 | <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>10/01/22</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| | 08.03.2022 | <p>Learned counsel for the appellant present and sought adjournment on the ground that he has not gone through the record. Adjourned. To come up for preliminary arguments on 08.03.2022 before the S.B.</p> <p style="text-align: right;"> (Salah-Ud-Din) Member (J)</p> |
| | 08.03.2022 | <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 08.06.2022 for the same as before.</p> <p style="text-align: right;"> Reader.</p> |

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

Case Title: **IHSAN ULLAH**

V/S

EDUCATION DEPTT:

| S# | CONTENTS | YES | NO |
|----|--|-----|----|
| 1 | This Appeal has been presented by: NOOR MOHAMMAD KHATTAK | ✓ | |
| 2 | Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents? | ✓ | |
| 3 | Whether appeal is within time? | ✓ | |
| 4 | Whether the enactment under which the appeal is filed mentioned? | ✓ | |
| 5 | Whether the enactment under which the appeal is filed is correct? | ✓ | |
| 6 | Whether affidavit is appended? | ✓ | |
| 7 | Whether affidavit is duly attested by competent Oath Commissioner? | ✓ | |
| 8 | Whether appeal/annexures are properly paged? | ✓ | |
| 9 | Whether certificate regarding filing any earlier appeal on the subject, furnished? | x | ✓ |
| 10 | Whether annexures are legible? | ✓ | |
| 11 | Whether annexures are attested? | ✓ | |
| 12 | Whether copies of annexures are readable/clear? | ✓ | |
| 13 | Whether copy of appeal is delivered to AG/DAG? | ✓ | |
| 14 | Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents? | ✓ | |
| 15 | Whether numbers of referred cases given are correct? | ✓ | |
| 16 | Whether appeal contains cutting/overwriting? | x | ✓ |
| 17 | Whether list of books has been provided at the end of the appeal? | ✓ | |
| 18 | Whether case relate to this court? | ✓ | |
| 19 | Whether requisite number of spare copies attached? | ✓ | |
| 20 | Whether complete spare copy is filed in separate file cover? | ✓ | |
| 21 | Whether addresses of parties given are complete? | ✓ | |
| 22 | Whether index filed? | ✓ | |
| 23 | Whether index is correct? | ✓ | |
| 24 | Whether Security and Process Fee deposited? On _____ | | |
| 25 | Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____ | | |
| 26 | Whether copies of comments/reply/rejoinder submitted? On _____ | | |
| 27 | Whether copies of comments/reply/rejoinder provided to opposite party? On _____ | | |

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

Name: **NOOR MOHAMMAD KHATTAK**

Signature: _____

Dated: _____

2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 7899 /2021

IHSAN ULLAH

V/S

EDUCATION DEPTT;

INDEX

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| 2 | Affidavit | | 4 |
| 3 | Stay application | | 5 |
| 4 | Notification dated 24.06.2020 | A | 6 |
| 5 | Impugned notification dated 25.11.2021 | B | 7 |
| 6 | Departmental appeal | C | 8 |
| 7 | Transfer/posting policy | D | 9-11 |
| 8 | Wakalat Nama | | 12 |

Dated: _____12.2021

APPELLANT

Through:

NOOR MOHAMMAD KHATTAK
ADVOCATE

OFFICE : TF 291-292 3rd FLOOR DEANS TRADE CENTRE
SADDAR PESHAWAR CANTT:

0345-9383141

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 7899 / 2021 Khyber Pakhtunkhwa
Service Tribunal

Mr. Ihsan Ullah, ADEO (M) (BPS-16),
O/O the District Education Officer, North Waziristan,
Under transfer to Directorate of E&SE Department, Peshawar.

8083

21-12-2021

..... **APPELLANT**

VERSUS

- 1- The Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer (M), District North Waziristan.

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 25-11-2021 WHEREBY THE APPELLANT HAS PREMATURELY BEEN TRANSFERRED FROM THE POST OF ADEO (M) O/O THE DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN WITHOUT ANY FURTHER POSTING IN UTTER VIOLATION OF TRANSFER/POSTING POLICY AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD

PRAYER:

That on acceptance of this appeal the impugned notification dated 25-11-2021 may very kindly be set aside to the extent of serial No. 3 i.e. appellant and the respondents may kindly be directed not transfer the appellant from the post of ADEO (M) North Waziristan. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:-

- 1- That appellant is the employee of the respondents department and is serving as SST (BPS-16) quite efficiently and up to the entire satisfaction of his high ups.
- 2- That during service the appellant was transferred vide notification dated 24.06.2020 and was posted as ADEO at the office of the District Education Office at District North Waziristan and submitted

Filed to-date
Registrar
21/12/2021

his arrival and started performing his duties. Copy of the notification dated 24.06.2020 is attached as annexureA.

- 3- That since his transfer followed by his post as ADEO the appellant has performed his duties with devotion and with the entire satisfaction of his superior officers.
- 4- That while performing his duties quite efficiently and whole heartedly the appellant was prematurely transferred and his services were placed at the disposal of the Director Elementary and Secondary Education Khyber Pakhtunkhwa vide impugned notification dated 25.11.2021 in utter violation of transfer and posting policy of the provincial government. Copy of the impugned notification dated 25.11.2021 is attached as annexure B.
- 5- That it is important to mention here that the appellant has not further been posted and was left in a hanging position.
- 6- That feeling aggrieved from the impugned notification dated 25.11.2021 the appellant preferred departmental appeal before the appellate authority but the same has not been decided within the statutory period. Copy of the departmental appeal is attached as annexure C.
- 7- That appellant having no other efficacious remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned notification dated 25.11.2021 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated in accordance with law and rules by the respondent department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned notification dated 25.11.2021 is violative of Clause-I and Clause-IV of transfer/posting policy of Provincial Government. Copy of the transfer/posting policy is attached as annexure D.
- D- That the impugned notification dated 25.11.2021 has been issued by the respondents in arbitrary and mala fide manner, therefore, the same is not tenable in the eye of law and liable to be struck down.
- E- That the impugned notification dated 25.11.2021 is also against the policy of the transfer and posting in the manner that vide the impugned notification the appellant was transfer from the post of ADEO but he was left in a hanging position.

F- That impugned notification dated 25.11.2021 is nothing but just to harass the appellant and to accommodate his blue eyed person.

G- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal may kindly be accepted as prayed for.

APPELLANT

Ihsan Ullah
IHSAN ULLAH

Through:

Noor Mohammad Khattak
NOOR MOHAMMAD KHATTAK,

Kamran Khan
KAMRAN KHAN

Said Khan
SAID KHAN

Umar Farooq
UMAR FAROOQ

Haider Ali
HAIDER ALI
Advocates, Peshawar

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

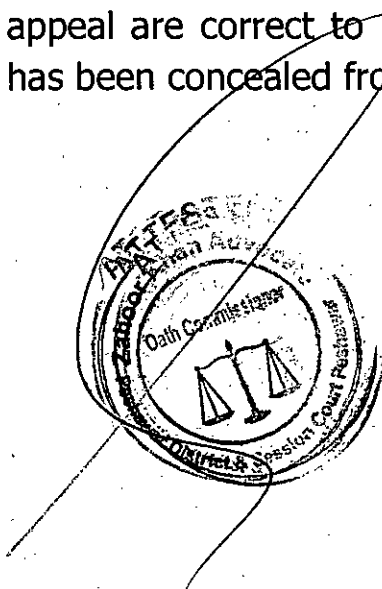
IHSAN ULLAH

VS

EDUCATION DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



Handwritten signature

DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

Handwritten signature
CERTIFICATION

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL No. _____/2021

Ihsan Ullah

VS

EDUCATION DEPT.

APPLICATION FOR SUSPENSION OF OPERATION OF
THE IMPUGNED NOTIFICATION DATED 25.11.2021
TILL THE DISPOSAL OF THE ABOVE MENTIONED
APPEAL

R/SHEWETH:

- 1- That the above mentioned appeal along with this application has been filed the appellant before this august service Tribunal in which no date has been fixed so far.
- 2- That appellant filed the above mentioned appeal against the impugned notification dated 25.11.2021 whereby the appellant has been transferred from District Education Office, North Waziristan to Directorate of E&SE Peshawar.
- 3- That all the three ingredients necessary for the stay is in favor of the appellant.
- 4- That the impugned notification dated 25.11.2021 had been issued by the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application the operation of the impugned notification dated 25.11.2021 to the extent of appellant may very kindly be suspended till the disposal of the above mentioned service appeal.

Dated: 21-12-2021

APPLICANT

Iatt

IHSAN ULLAH

THROUGH:

NOOR MOHAMMAD KHATTAK

&
HAIDER ALI
ADVOCATES

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

NOTIFICATION

Consequent upon the approval of the competent authority the following transfer/postings are hereby ordered in their own pay &BPS with immediate effect in the interest of public service:-

| S.No | Name/ designation | Posted at | Remarks |
|------|--|--|-------------|
| 01. | Mr.Noor Ullah Jan SST/ADEO at DEO office North Waziristan | SST GHS Miran Shah District North Waziristan | Vice S.No.2 |
| 02. | Mr.Insanullah SST GHS Miranshah North Waziristan | ADEO at DEO office North Waziristan | Vice S.No.1 |

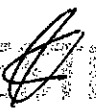
Note:-

1. Charge report should be submitted to all concerned.
2. TA/DA etc. are not allowed.
- 3.

**DIRECTOR
ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

**Endst.No.565-71/A-12/DEOs in Mergewd Districts Khyber Pakhtunkhwa.
Dated Peshawar the 24th /6/2020.**

**DEPUTY DIRECTOR (ESTAB)
MERGED DISTRICTS**


ATTN

**DIRECTORATE OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
BLOCK A OPPOSITE MPA HOSTEL CIVIL SECRETARIAT PESHAWAR**

Dated Peshawar the November 25, 2021.

NOTIFICATION

No. SO(SM)E&SED/7-1/2021/PT/G/MC:- The competent authority has pleased to order the transfer of the following officers of Elementary & Secondary Education Department in the best public interest with immediate effect:-

| S.No | Name & Designation | From | To |
|------|------------------------------|--|---|
| 01. | Said Muhammad TC(BS 17) | Deputy District Education Officer(M) North Waziristan OPS | Services placed at the disposal of Directorate of the Elementary & Secondary Education Peshawar |
| 02. | Mr. Samirullah TC(BPS 16) | ADEO (P&D) o/o DEO (M) North Waziristan | Services placed at the disposal of Directorate of the Elementary & Secondary Education Peshawar |
| 03. | Mr. Ihsanullah TC BPS 16 | ADEO o/o of DEO (M) North Waziristan | |

**SECRETARY TO KPK
E& SE DEPARTMENT**

Endst of Even No. & Date. EVEN

**HAFIZUR REHMAN SHAH
SECTION OFFICER(SCHOOLS MALE)**





**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223333**

Dated Peshawar the November, 25 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2021/PT/G/MC: The Competent Authority is pleased to order the transfer of the following Officers of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name & Designation | From | To |
|----|--------------------------------|--|--|
| 1. | Said Muhammad TC (BS-17) | Deputy District Education Officer (M) North Waziristan in OPS. | Services placed at the disposal of Directorate of E&SE Peshawar. |
| 2. | Mr. Samir Ullah, TC (BS-16) | ADEO (P&D o/o DEO (Male) North Waziristan. | Services placed at the disposal of Directorate of E&SE Peshawar. |
| 3. | Mr. Ihsan Ullah TC (BS-16) | ADEO o/o of DEO (Male) North Waziristan. | Services placed at the disposal of Directorate of E&SE Peshawar. |

Department 1

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

Endst: of even No. & Date

- Copy forwarded to the:
1. Accountant General, Khyber Pakhtunkhwa Peshawar.
 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
 3. District Education Officer (Male) North Waziristan.
 4. District Account Officers, North Waziristan.
 5. Director, EMIS E&SE Department.
 6. PS to Minister for E&SE Department.
 7. PS to Secretary E&SE Department.
 8. PA to Deputy Secretary (Admn) E&SE Department.
 9. Officers concerned.
 10. Office order file

M. Javed
24-1777
12/1/2021

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

محفوظ اور اس میں چھاپ چیف سیکرٹری صدر کتب خانہ لیٹاور

فصلیہ رپورٹ برصغیر نو تشکیلی صوبہ 25/11/2021

صفا عالی

صوبہ گجرات کے سائنس و ٹیکنالوجی (SST-B16) صوبہ

سرانجام دے رہا ہے۔ یہاں صوبہ 24/6/2020 کو پروٹوکول نمبر 565-71

سائنس کا تبادلہ بطور ADEO ڈسٹرکٹ ایجوکیشن آفس، کراچی، پاکستان

کردیا گیا۔ یہ کہ مذکورہ حکم نو تشکیلی صوبہ کے Annual

جمع کر کے اور اس میں صوبہ گجرات اور گجرات کے سائنس اور

تجربہ سرانجام دے رہا ہے کہ پروٹوکول نو تشکیلی صوبہ 25/11/2021

سائنس کا دوبارہ تبادلہ کر دیا اور سائنس کو ڈسٹرکٹ ایجوکیشن آفس

کے disposal پر رکھ دیا۔

یہ کہ پروٹوکول کے حکم نامہ صوبہ 21/11/2021 سائنس کو تعلق رکھ

دہے کے لئے سائنس کو ڈسٹرکٹ ایجوکیشن آفس (District) میں بھیجا دیا۔

گیزڈ آرڈر ہے کہ بطور ریٹائرمنٹ کے حکم نامہ نو تشکیلی

صوبہ 25/11/2021 کو تقریباً سائنس کو تعلق رکھنے والے سائنس کو

تعلق ADEO، کراچی، پاکستان پر ڈسٹرکٹ ایجوکیشن آفس میں بھیجا دیا۔

29/11/2021 صوبہ

Handwritten signature
29/11/21
ADEO - کراچی، پاکستان
T.C (BR 16)



GOVERNMENT OF NWFP
ESTABLISHMENT & ADMINISTRATION
DEPARTMENT
(Regulation Wing)

POSTING / TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) The normal tenure of posting shall be three years subject to the condition that for the officers/officials posted in unattractive areas the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government.
- v) While making postings/transfer from settled areas to FATA and vice-versa, specific approval of Governor, NWFP needs to be obtained
- vi) While making postings/transfers of officers/officials up to BS-17, from settled areas to FATA and vice-versa approval of the Chief Secretary NWFP needs to be obtained. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor NWFP shall be obtained.
- vi (a) All Officers/officials selected against Zone/FATA quota in the Provincial Services should compulsorily serve in FATA for at least eighteen months in each grade. This should start from senior most scales/grades downwards in each scale/grade of each cadre.
- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thana) of his area/residence is situated.
- viii) No posting/transfers of the officers/officials on detachment basis shall be made.
- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/transfer of the unmarried female government servants at the station of the residence of their parents.

Para-I(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No. SOR-VI (E&AD) 1-4/2008/Vol. VI, dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business, 1985, District Government Rules of Business-2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make posting/transfer subject to observance of the policy and rules. Added vide Urdu circular letter No. SOR-VI(E&AD)1-4/2003, dated 21-09-2004

xv) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement.
 DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales.

xii) In terms of Rule-17(1) and (2) read with Schedule-III of the NWFP Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

| Outside the Secretariat | | |
|-------------------------|--|--|
| 1. | Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above. | Chief Secretary in consultation with Establishment Department and Department concerned with the approval of the Chief Minister. |
| 2. | Other officers in BRS-17 and above to be posted against scheduled posts or posts normally held by the APUG, PCS(EG) and PCS(SG). | -do- |
| 3. | Heads of Attached Departments and other Officers in B-19 & above in all the Departments. | -do- |
| In the Secretariat | | |
| 1. | Secretaries | Chief Secretary with the approval of the Chief Minister. |
| 2. | Other Officers of and above the rank of Section Officers: a) Within the Same Department b) Within the Secretariat from one Department to another. | Secretary of the Department concerned Chief Secretary/Secretary Establishment. |
| 3. | Officials up to the rank of Superintendent: a) Within the same Department b) To and from an Attached Department c) Within the Secretariat from one Department to another. | Secretary of the Department concerned. Secretary of the Dept in consultation with Head of Attached Department concerned. Secretary (Establishment) |

xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:

- a) To ensure the posting of proper persons on proper posts, the Performance Evaluation Report/annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
- b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.



xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases:-

- i) Pre-mature posing/transfer or posting-transfer in violation of the provisions of this policy.
- ii) Serious and grave personal (humanitarian) grounds.

2. To streamline the postings/transfers in the District Government and to remove any irritant/confusions in this regard the provision of Rule 25 of the North West Frontier Province District Government Rules of Business 2001 read with schedule -IV thereof is referred. As per schedule-IV the posting/transferring authorities for the officers/officials shown against each areas under:-

| S. No. | Officers | Authority |
|--------|---|--|
| 1. | Posting of District Coordination Officer and Executive District Officer in a District | Provincial Government. |
| 2. | Posting of District Police Officer | Provincial Government. |
| 3. | Other Officers in BPS-17 and above posted in the District. | Provincial Government. |
| 4. | Official in BPS-16 and below | Executive District Officer in consultation with District Coordination Officer. |

3. As per Rule 25(2) of the Rules mentioned above the District Coordination Department shall consult the Government if it is proposed to:-

- a) Transfer the holder of a tenure post before the completion of his tenure or extend the period of his tenure.
- b) Require an officer to hold charge of more than one post for a period exceeding two months.

4. I am further directed to request that the above noted policy may be strictly observed /implemented.

All concerned are requested to ensure that tenures of the concerned officers/officials are invariably mentioned in summaries submitted to the Competent Authorities for Posting/Transfer.

{Authority: Letter No. SOR-VI/E&AD/1-4/2003 dated 24-6-2003}

It has been decided by the Provincial Government that posting/transfer orders of all the officers up to BS-19 except Heads of Attached Departments irrespective of grades will be notified by the concerned Administrative Departments with prior approval of the Competent Authority obtained on the Summary. The Notifications/orders should be issued as per specimen given below for guidance.

All posting/transfer orders of BS-20 and above and Heads of Attached Departments (HAD) shall be issued by the Establishment Department and the Administrative Departments shall send approved Summaries to E&A Department for issuance of Notifications.

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: _____ OF 2021

Ihsan Ullah (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)
(DEFENDANT)

I/We Ihsan Ullah
Do hereby appoint and constitute **NOOR MUHAMMAD KHATTAK Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

Alt
CLIENTS

Accepted
NOOR MUHAMMAD KHATTAK
KAMRAN KHAN
SAID KHAN
HAIDER ALI
&
KHANZAD GUL
ADVOCATES