


06<sup>th</sup> July, 2022

1. Nobody put appearance on behalf of the appellant till closing hours of the court. The appeal is, therefore, dismissed in default. Consign.

2. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 6<sup>th</sup> July, 2022.*



**(Kalim Arshad Khan)**  
Chairman

7355/21  
O P O L N

USA

06<sup>th</sup> July, 2022

1. Nobody put appearance on behalf of the appellant till closing hours of the court. The appeal is, therefore, dismissed in default. Consign.

2. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 6<sup>th</sup> day of July, 2022.*

**(Kalim Arshad Khan)**  
**Chairman**

Peshawar. His appeal for reinstatement in service is hereby

*Muhammad*  
(MUHAMMAD ALI KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 1554-61 /PA dated Peshawar the 10-12-2020

Copies for information and n/a to the:-

1. SSP/Operations Peshawar.
2. SDPO Hayatabad Peshawar.
3. OSI/CRC/EC-II/AS/FMC.
4. Official concerned.

*Muhammad Ali Khan*  
*12/12/20*

15.12.2021

Learned counsel for the appellant present.

Learned counsel for the appellant seeks adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing on 24.02.2022 before S.B.



(MIAN MUHAMMAD)  
MEMBER (E)

24.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 24.05.2022 for the same as before.



Reader.

24.05.2022

Learned counsel for the appellant present and seeks adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing on 06.07.2022 before S.B.

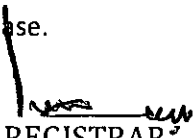




(Mian Muhammad)  
Member (E)

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7355 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge		
1	2	3		
1-	31/08/2021	<p>The appeal of Syed Sajid Ali Shah resubmitted today by Mr. Shahzada Irfan Zia 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> <p>2-</p>	22.10.2021	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>22/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Learned counsel for the appellant present.</p> <p>Learned counsel for the appellant requests for adjournment on the ground that he has not prepared the brief. To come up for preliminary hearing before the S.B on 15.12.2021.</p> <p style="text-align: right;"> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Syed Sajid Ali Shah, District Nowshera presented today i.e. on 30.08.2021 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexure G of the appeal is illegible which may be replaced by legible/better one.

No. \_\_\_\_\_/S.T,

Dt. \_\_\_\_\_/2021

REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Shahzada Irfan Zia Shah Adv. Pesh.

1. All the annexures flagged Properly, hence objection removed.
2. ~~There is not an affidavit but it is certificate which does not require attestation, hence is misperceived.~~ Affidavit is attested by oath -  
Commissioner
3. The better Copy of the Annexure-G has been attached, hence objection removed.

Re- Submitted after doing the needful.  
The case may kindly be Placed before the worthy Chairman for hearing without further delay.

*Irfan Zia*  
Advocate.  
31/8/2021

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

Case Title: Syed Sajid Ali Shah vs Province of KPK etc

S.#	Contents	Yes	No	
1.	This appeal has been presented by: <u>Shahzada Irfan Zia Adv</u>			
2.	Whether Counsel / Appellant / Respondent / Deponent 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?		✓	N/A
8.	Whether appeal/annexures are properly paged?		✓	N/A
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓		
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 A.G/D.A.G?	✓		
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 cuttings/overwriting?	✓		
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		✓	N/A
26.	Whether copies of comments/reply/rejoinder submitted? on		✓	N/A
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on		✓	N/A

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

Name:

Shahzada Irfan Zia Adv

Signature:

Irfan

Dated:

30/8/2021

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. /2021


Syed Sajid Ali Shah ..... APPELLANT

VERSUS

Province of KPK etc ..... RESPONDENTS

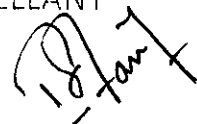
INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
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3.	Order of High Court in C.O.C	B	8-10
4.	Appointment Order	C	11
5.	Medical Certificates	D	12-14
6.	Letter of Respondent No-2	E	15
7.	Departmental Appeal	F	16
8.	Orders of change of cadre	G	17-18
9.	Orders of change of cadres	H	19-21
10.	Vakalat Nama		



APPELLANT

THROUGH:



SHAHZADA IRFAN ZIA  
ADVOCATE, PESHAWAR

21-B, Nimra centre, Faqir Abad, Peshawar.  
CELL. 0300-9345297

DATED.



2/3

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Appeal No. 7355 /2021

Syed Sajid Ali Shah s/o Syed Manzoor Ali Shah, Chowkidar, GHSS NO-I, Nowshera Kalan, District Nowshera.

Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 7507

Dated 30-8-2021

- APPELLANT
1. Province of KPK through Secretary Elementary and Secondary Education, (E&SE) Civil Secretariat, Peshawar.
  2. Director of Education (E&SE) KPK, G.T Road, Peshawar.
  3. District Education Officer (Male) Nowshera.

RESPONDENTS

APPEAL U/S 4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST  
NON ACTION OF THE RESPONDENTS ON THE DEPARTMENTAL APPEAL  
OF THE APPELLANT AND HIS REQUEST FOR CHANGE OF HIS CADRE WAS  
NOT CONSIDERED BY THE RESPONDENTS WHILE THE SAME BENEFIT WAS  
EXTENDED TO OTHER SIMILAR EMPLOYEES, HENCE THE APPELLANT  
HAS BEEN DISCRIMINATED.

RESPECTFULLY SHEWETH:

FACTS OF THE CASE

- Filed to-day  
Registrar  
30/8/2021
1. That the appellant was appointed as "Chowkidar" by the respondent No-3 vide order dated 05-01-2016, in compliance of the direction of august Peshawar High Court, Peshawar, passed in Writ Petition No-3035/ 2013 and C.O.C No-332/2015 dated 17-11-2015. ( ANNEX. A,B & C)
  2. That from day one of his initial appointment, the appellant performed his duties with full devotion and dedication and no cause of complaint was ever reported against him.
  - 3 That unfortunately the wife of the appellant fell ill and suffering from a serious disease and there is no other family member to look after the wife and kids of the appellant except him. The appellant being a "chowkidar" has to perform full day and night duty at the school due to

3

which the health of his wife is getting worst day by day, therefore, the appellant requested the respondents for change of his cadre from "chowkidar" to any other Class-IV post so that he may be able to look after his wife and small children. (ANNEX. D)


- 4 That on the request of the appellant the respondent No-2 forwarded the application of the appellant to respondent No-3 for necessary action but the request of the appellant went un heeded; therefore, the appellant filed his departmental appeal dated 22-5-2021 before the respondent No-3, which remained un responded within statutory period, hence the present appeal is being filed on the following grounds. (ANNEX. E&F)

### GROUNDS


- A. That the appellant has been discriminated as there are instances available where, in similar circumstances the department changed the cadre of the employees on their requests. Vide order dated 03-6-2013 the respondent No-3 changed the cadre of one Mr. Hafeez- ul- Amin "chowkidar" and he was posted as "Mali" on his own pay and scale: Vide order dated. 17-12-2015 the respondent No-3 changed the cadre of one Mr. Majid "Sweeper" and he was posted as "Naib Qasid" on his own pay and scale. (ANNEX. G)
- B. That vide order dated. 28-12-2017 the respondent No-3 changed the cadre of one Mr. Samin Jan "Lab Attendance" and he was posted as "Naib Qasid" instead of "Lab Attendance." The respondent No-3 also issued different orders and changed the cadre of employees on their mutual exchange of posts but the same benefit has been denied to the appellant. Vide order dated. 13-10-1990 and order dated 26-4-2017 the respondent NO-3, issued orders of mutual exchange of posts between the employees and changed their cadres. (ANNEX. H) Thus all these instances indicates that the request of the appellant for change of his cadre is not unique or novel type, but it is a usual practice in vogue in the department since long. (ANNEX.H)
- C. That Islamic Republic of Pakistan is founded on the basis of religion of islam. Efforts should be made to bring out an egalitarian society based on Islamic concept of fair-play and social justice. Public functionaries are expected to act fairly and justly in manner which should not give to any one any cause of complaint on account of discriminatory treatment or otherwise. The appellant has a genuine case of his change of cadre as he cannot look after his wife and children due to full day and night duty. In such state of affairs the respondent No-3 is under legal obligation to consider the request of the appellant on humanitarian basis like all other employees to whom he already extended the same benefit.

4

In view of the aforesaid facts and circumstances of the case it is humbly prayed that the appellant may graciously be held entitled for change of his cadre and the respondents be directed to change the cadre of the appellant from "Chowkidar" to any other Class-IV post on his own pay and scale in the interest of justice as well as on humanitarian basis.

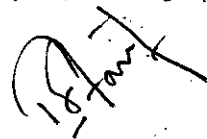
  
APPELLANT

THROUGH

  
SHAHZADA IRFAN ZIA  
ADVOCATE, PESHAWAR  
CELL. 0300-9345297

CERTIFICATE / AFFIDAVIT

Certified that no such service appeal has earlier been filed on behalf of appellant on the subject matter. *and the Contents of this appeal are true and Correct.*

  
ADVOCATE

DATED: 30-8-2021

31/8/21



(Annex: A)

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BEFORE THE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No.

5035 of 2013

Syed Sajid Ali Shah son of Syed Manzoor Ali Shah,  
resident of Qazi Abad, Kabul River District Nowshera



VERSUS

1. Province of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Department, Peshawar.
2. Director of Education (E&SE) Khyber Pakhtunkhwa Dabgari Road, Peshawar.
3. Executive District Officer/District Education Officer (Male) Elementary and Secondary Education, Nowshera....

Respondents

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

Respectfully Sheweth:

FACTS OF THE CASE:

1. That previously petitioner filed a Writ Petition bearing No. 987-P/2012 before this Honourable Court. During the hearing of writ petition the learned Additional Advocate General appeared before the Court and made a commitment before the Court that petitioner shall be considered without any discrimination on the next available vacancy, which arises for Class-IV Post in District Nowshera. On the assurance of learned Additional Advocate General, the writ petition

Attested  
187

FILED TODAY

City Registrar  
5 NOV 2013

ATTESTED

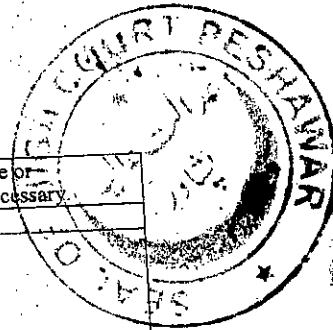
EXAMINER  
PESHAWAR HIGH COURT

20 FEB 2015

FORM "A"  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. \_\_\_\_\_



Date of order or proceedings 2.	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary 3.
12.02.2015	<p><u>WP No. 3035-P/2013.</u></p> <p><u>Present:</u> Shahzada Irfan Zia, Advocate for petitioner.</p> <p>Mr. Rab Nawaz Khan, AAG, alongwith Mr. Inayat Ullah, ASDEO, Nowshera for respondents.</p> <p>*****</p> <p><u>NISAR HUSSAIN KHAN, J.-</u> Petitioner alleged that though this Court in earlier WP No.987/2012, observed that he be considered for appointment in the next recruitment process but he was not considered despite the fact that various appointment were made on two occasions. When learned AAG and Mr. Inayatullah, ASDEO, Nowshera, representing the respondents, were confronted with the situation, latter consulted the DEO concerned and made statement at the bar that he is under instruction of DEO, Nowshera that</p>

Altaf Hussain, P.A.

Justice Nisar Hussain Khan & Justice Muhammad Daud L.Khan

ATTESTED  
EXAMINER  
Peshawar High Court  
20 FEB 2015

Attested  
18/2

Peshawar High Court  
23 FEB 2015

2

petitioner shall be appointed in the forthcoming recruitment process of Class-IV employees, to which, learned Counsel for petitioner is satisfied.

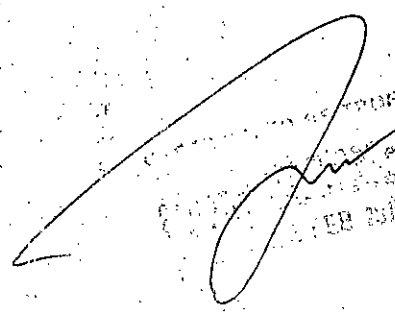
2. In light of above statement of representative of respondent's department, this petition is disposed of.

Announced.  
Dated: 12.02.2015

Sd/ Nisar Hussain Khan - O

Sd/ Muhammad Dawood Khan - J

office  
12/02/15

  
JUDICIAL OFFICE OF THE COURT  
Peshawar  
12 FEB 2015

Attested  


13473  
12/2/15

23/2/15  
23/2/15  
23/2/15

Justice Nisar Hussain Khan & Justice Muhammad Daud L Khan

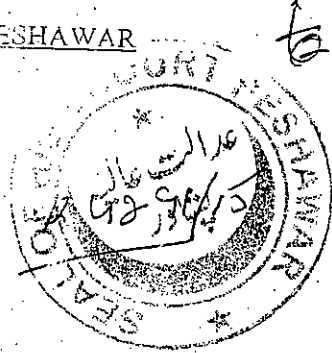
(Annex: B)

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

8

C.O.C.No. 332-P / of 2015

IN RE:  
Writ Petition No. 3035-P / of 2013



Syed Sajid Ali Shah son of  
Syed Manzoor Ali Shah, resident of  
Qazi Abad, Kabul River District Nowshera

Petitioner

VERSUS

1. Province of Khyber Pakhtunkhwa  
through Secretary Elementary and  
Secondary Education Department Peshawar.

2. Director of Education (E&SE)  
Khyber Pakhtunkhwa Dabgari Road, Peshawar.

3. Muhammad Inam Toru,  
District Education Officer (Male), Nowshera. Respondents

CONTEMPT PETITION UNDER ARTICLE 204 OF  
THE CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN, 1973 READ WITH SECTION 3 OF  
THE CONTEMPT OF COURT ORDINANCE 2003,  
AGAINST RESPONDENT NO. 3 FOR NON  
COMPLIANCE OF THE ORDER OF THIS  
HONOURABLE COURT DATED 12.02.2015.

*Attested*  
*(Signature)*

Respectfully Sheweth:-

FACTS OF THE CASE

1. That previously petitioner had filed a Writ Petition hearing No. 987-P/2012 for his appointment against any class-17 post, but during the hearing the writ petition was disposed off by the Court on the commitment of learned Additional Advocate General that petitioner

DAY  
2015

ATTESTED  
EXAMINER  
Peshawar High Court

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

22 9

Date of Order or Proceedings	Order or others Proceedings with Signature of Judge
1	2
17.11.2015	<p><u>COC No.332-P/2015 in W.P No.3035-P/2013.</u></p> <p>Present: Sahibzada Irfan Zia, Advocate, for the petitioner.</p> <p>Syed Sikandar Hayat Shah, AAG alongwith Mr. Nisar Muhammad, D.E.O Nowshera.</p> <p>*****</p> <p><u>SYED AFSAR SHAH, J.:</u> The moment, the petition is taken up for hearing, Mr. Nisar Muhammad, District Education Officer (M), Nowshera, who is also assisted by the Assistant Advocate-General, stated at the bar that since he has recently been transferred to District Nowshera, therefore, the compliance could not be made. He, however, made it clear that the petitioner shall be appointed on the post in question as directed by this Court within <u>three months</u>, positively, failing which he will be responsible.</p> <p>2. When confronted of the situation, learned counsel for the petitioner is also agreed with the above</p>

Attested  
[Signature]

ATTESTED  
EXAMINER  
Peshawar High Court  
[Signature]



proposition and this being the situation, the instant  
petition is disposed of accordingly.

Sd/- Syed A.P. Shah

Sd/- Musabbat H. Khan

J  
J  
JUDGE

J  
JUDGE

CERTIFIED TO BE TRUE COPY

Examiner  
Peshawar High Court, Peshawar  
Enacted Under Article 87 of  
the Constitution of Pakistan

28 NOV 2015

10209

Date of Presentation of Application	27-11-15
No. of Pages	6P
Applying fee	
Admission Fee	
Stamp	12-00
Date of Preparation of Copy	28-11-15
Date Given for Delivery	28-11-15
Date of Delivery of Copy	28-11-15
Received by	Sd/- Sajid Akhshar



Attested  
187



(Annex: C) 11

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA**

(Office Phone#0923-9220228, Fax#0923-9220228)

**NOTIFICATION**

In compliance with the order of the Hon: Peshawar High Court Peshawar dated 17/11/2015, issued in writ petition No.3035-P/2013 and COC No.332-P/2015, The competent authority is pleased to appoint Mr. Syed Sajid Ali Shah S/o Syed Manzoor Ali Shah R/o Qazi Abad Kabul River District Nowshera as **Chowkidar at GHSS No.1 Nowshera Kalan in BPS-03 (Rs.6535-260-14335)**. Plus usual Allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and conditions given below against the newly created vacant post in the interest of public service with immediate effect.

**TERMS & CONDITIONS**

1. He would be on probation for a period of one year extendable for another one year.
  2. He will be governed by such rules and regulations as may be issued from time to time by the Govt.
  3. His service can be terminated at any time, in case of his performance is found unsatisfactory during probation period. In case of misconduct, he shall be proceeded under the rules framed from time to time
  4. His services are liable to be terminated on one month's prior notice from either side. In case of resignation without prior notice one month pay and allowances, if any shall be forfeited in favour of Govt through challan.
  5. He should join their post within 15 days of the issuance of this order positively otherwise the appointment shall stand cancelled.
  6. The principal concerned should check their original CNIC Employees registration card etc,
  7. The appointment of overage candidates are subject to obtained age relaxation from the competent authority, they required to obtain age relaxation within one Month of the issuance of this order, otherwise his pay shall not be released prior to the obtaining of age relaxation
  8. Health & age certificate should be provided from the Medical Superintendent before taking over charge.
- Charge report should be submitted to all concerned.
9. No TA/DA etc shall be allowed to appointees for joining their duties.

(Nisar Muhammad)  
District Education Officer (Male)  
Nowshera

Attested  
18

Endstt: No. 2008-14 /DEO (M) NSR/Estab/Court Case/Apptt; of C-IV/:/Dated 05/01/2016

Copy of the above is forwarded for information & Necessary action to the:-

1. Registrar Peshawar High Court Peshawar
2. Director, Ele: & Secy: Education, Khyber Pakhtunkhwa, and Peshawar.
3. Senior District Accounts Officer, Nowshera.
4. Deputy District Education Officer (M) NSR
5. Principal GHSS No.1 NSR Kalan.
6. Superintendent Establishment Local Office & DA Establishment local office
7. Officials concerned.
8. Master file

0300-9168304

District Education Officer (Male)  
Nowshera

(Annex: D)

12

# OUTPATIENT DEPARTMENT (OPD)



**LADY READING HOSPITAL  
MEDICAL TEACHING INSTITUTION  
PESHAWAR, KP**

Appointment Time : 10:36

Amount Paid : 20

Invoice No : K02183366559

Invoice Date : 03-DEC-18 10:30:23

REG200003192752

W/O

Name : SYED SAAD

Father / Husband Name : SYED MANZOOR ALI SHAH

Female

Age : 33 Year(s)

District : Nowshera

REGULAR

Clinic : NEPHROLOGY MALE

Room No : 18

ADNAN AHMAD

Counter : MAIN OPD-FEMALE

### Complaints:

Rx

Breast feeding

Pain @ wrist  
more at Night

Reverse prayer Sign +ve

### Findings:

① CTS

No symptomatic improvement  
after 1 month of medication

### Investigations:

Adv

NCS / EMG

Sleepless

Tab Methycobal 1H1 0L ①

Tab Deltaartil

U: ③ 3P3+3

J: ③ 2+2+2

U: ③ 1+1+1

Tab 2olbi 20  
20+20 ①

### Diagnosis:

### Next Visit:

Consultant Name:

W. Alam

Signature:

Attest  
12/11

# ELECTRODIAGNOSTIC SECTION, NEUROLOGY UNIT MTI, LADY READING HOSPITAL PESHAWAR.

13

Patient Sheeba Bibi  
 ID \_\_\_\_\_  
 Age 18 y Handedness \_\_\_\_\_  
 Gender Female Physician Dr Atheeq  
 Study Date Dec 13, 2018

### Patient History

Pain numbness Left hand.

**Motor Side To Side Comparison Table**

Conduction velocities marked with (\*) have been corrected for temperature

Nerve	Stimulus	Recording	Dist (mm)		LatOn (ms)		CV (m/s)		B-P Amplitude (mV)	
			L	R	L	R	L	R	L	R
Median nerve	Wrist	APB			5.07	2.90	n/a	n/a	4.22	7.16
	B. Elbow		200	210	8.00	6.13	68.2	64.9	2.84	6.14
Ulnar nerve	Wrist	ADM			1.67	1.90	n/a	n/a	7.10	7.35
	B. Elbow		210	210	4.63	4.90	70.8	70.0	6.98	7.14

**Sensory Side To Side Comparison Table**

Conduction velocities marked with (\*) have been corrected for temperature

Nerve	Stimulus	Recording	Dist (mm)		LatOn (ms)		B-P Amplitude (µV)		CV (m/s)	
			L	R	L	R	L	R	L	R
Median nerve	Wrist	Index	110	110	2.90	2.17	20.16	32.90	37.9	50.8
Mixed med. uln sens		Median				2.38		10.77		
		Site 1			1.88		24.07			
		Ulnar				1.77		28.35		
Ulnar nerve	Wrist	5th dig.	110	110	1.50	1.60	40.55	29.15	73.3	68.8

**Wave Summary Table**

Nerve	Stimulus	Recording	Side	Wave	Lat (ms)
Median nerve	Wrist	APB	Left	All	38.00

*Attested*  
*(Signature)*

14

**Interpretation**

performed with surface electrodes.  
 The tested Left median motor nerve showed prolong distal, latency reduced amplitude and normal conduction velocity.  
 The tested Left median motor nerve showed normal distal latency, amplitude and conduction velocity.  
 The tested bilateral ulnar motor and sensory nerves showed normal latencies, amplitudes and conduction velocities.  
 The tested Left median sensory nerve showed normal latency, low normal amplitude and slow conduction velocity.  
 The tested Left median sensory nerve showed normal latency, amplitude and conduction velocity.  
 The tested right mixed median and ulnar sensory nerves showed significant difference in latencies.

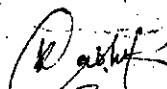
**CONCLUSION:** This NCS showed electrophysiological evidence of bilateral median neuropathy across the wrist which suggest  
 1: Moderate carpal tunnel syndrome on Left side.  
 2: Mild carpal tunnel syndrome on Right side.

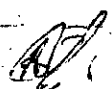
**Dr. SM Anwar Shah**  
 Assistant Professor  
 Neurology Unit LRH

**Dr Mian Ayaz ul Haq**  
 Assistant Professor,  
 Neurology, LRH, Peshawar

**Dr. Saad Ali Siddiqui**  
 Assistant Professor,  
 Neurology Unit LRH

**\*Nusrat Gul, Clinical Technologist**  
 Neurology, LRH, Peshawar  
 Email : nusrateeg@yahoo.com

  
 Dr Kashif (PGR)

  
 Dr Atiq (PGR)

  
 Dr Fawad (PGR)

Dr Mehtab (PGR)

Attested  




DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

No. \_\_\_\_\_ /F.No.392 /A-20/C-IV/Nowshera  
Dated Peshawar the 30/6/2020  
Phone: 091-9225344 Email: ddaem.ese@gmail.com

(Annex: E)

15

To: The District Education Officer,  
(Male) Nowshera.

Subject: APPEAL/APPLICATION FOR CADRE CHANGE FROM CHOWKIDAR  
TO NAIB QASID

Memo:

I am directed to refer to the subject noted above and to enclose herewith an application along with its enclosure in r/o Mr. Syed Sajid Ali Shah S/O Syed Manzoor Ali Shah Sakna Qazi Abad Kabul River Post Office Nowshera Kalah Tehsil and District Nowshera recommended by Personal Assistant to Minister for C&W Department Khyber Pakhtunkhwa vide his No. Nil dated 22/06/2020 for further necessary action.

Assistant Director (Admn)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst. No. 79526

Copy forwarded to the: -

1. Mr. Syed Sajid Ali Shah S/O Syed Manzoor Ali Shah Sakna Qazi Abad Kabul River Post Office Nowshera Kalah Tehsil and District Nowshera.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Assistant Director (Admn)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

D.O. No. 3164

27/7/20

03029168309

Attested  
187

مخبریت جناب ڈسٹرکٹ ایجوکیشن افسر ماہانہ صلح کوئٹہ

عنوان: اپیل برائے Change of Cadre

جناب گال سائل 2016 میں بطور چوکیڈار مقرر ہوئے اور اچ تدر بخوبی اپنے فرائض سرانجام دے چکے ہیں۔ بد قسمتی سے سائل کی بیوی شہید بھیم بھونگس ہیں اور سائل کے علاوہ کوئی دیگر شخص اس کی دیکو بھلا پنس کر سکتا تھا سائل کی اپیل پر اسی مانا گیا جو کہ سائل کی بیوی کو منجانبالہ میں تھی۔

مطلوبہ سائل چوکیڈار ہیں اس لیے اسے سکول میں عمارت پر ڈیوٹی دینے پڑے تھے اور سائل کی بیوی کی دیکو بھلا کرنے والا کوئی نہیں ہوتا یہ کہ فکرم ایذا میں اس سے پہلے بہت سے ملازمین کی یوسے شہید کی جاچکی تھیں جن کے ثبوت لگے ہیں۔

ہیڈا سائل التجا کرتا ہے کہ سائل کی یوسے چوکیڈار سے

شہید بھلا کرنے کی بھی کارروائی فوراً پر لگا دیا جائے تاکہ سائل اپنی بیوی بچوں کی دیکو بھلا کر سکے

الترتیب 22-5-2021

ایپل کا تعداد

سیدنا جلالی شاہ

Attested  
184

چوکیڈار = 1-1-14.55 کوئٹہ لاہور سٹریٹ 0

**BETTER COPY**

DISTRICT EDUCATION OFFICER (MALE)

NOWSHERA

TRANSFER ORDER

Consequent upon the recommendation of the concerned principal/ Head Master, the competent authority is pleased to transfer Mr. Hafeez ul Amin Chowkidar, Government High School, No-2, Nowshera Cantt to Government High School No-1, Nowshera Kalan against vacant post of Mali on his own pay and scale in the interest of public service with immediate effect with the condition that he shall perform his duties as chowkidar at Government High School, No-2, Nowshera Cantt till the availability/ appointment of other chowkidar.

Note: No TA/DA is allowed

Charge report should be submitted to all concerned.

Necessary entries should be made to this effect in his service book.

(Muhammad Saeed)

District Education Officer(Male)

Nowshera

Endst No. 2670-75/ DEO(M)NSR/EA-S/F.NO.1/Transfer of C-IV/2013. Dated 03-6-2013.

Copy of the above is forwarded for information and necessary action:

1. Director (E&SE) KPK, Peshawar.
2. Senior District Account Officer, Nowshera.
3. Principal/Head Master concerned.
4. Incharge EMIS Section, Local Office.
5. Official concerned.
6. Office Copy.

District Education Officer(Male)

Nowshera





(Annex: G) 17

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
NOWSHERA

(Office Phone#0923-9220228, Fax#0923-9220228)

**TRANSFER ORDER**

Consequent upon the recommendation of the concerned Principal / Head Master, the competent authority is pleased to Transfer Mr. Hafeez ul Amin Chowkidar Government High School, No.2 Nowshera Cantt to Government High School, No.2 Nowshera Kalan against vacant post of Mali on his own pay and scale in the interest of public service with immediate effect with the condition that he shall perform his duties as Chowkidar at Government High School, No.2 Nowshera Cantt till the availability / appointment of other Chowkidar.

Note: - No TA / DA is allowed.  
• Charge Report should be submitted to all concerned.  
Necessary entries should be made to this effect in his Service Book.

(Muhammad Saeed)  
District Education Officer (Male)  
Nowshera

Endst. No: 26-76-75 /DEO(M)NSR/EA-S/F.No.1/Transfer of C-IV/2013. Dated: 2 /06-2013

Copy of the above is forwarded for information & necessary action to the:-

- 1: Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
- 2: Senior District Accounts Officer, Nowshera.
- 3: Principal / Head Master Concerned.
- 4: In-Charge EMIS Section, Local Office.
- 5: Official concerned.
- 6: Office Copy.

Deputy District Education Officer  
(Male, Nowshera)

Attested  
18/



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (FEMALE)  
NOWSHERA

(Office Phone & Fax.#0923-9220228)

OFFICE ORDER

The competent authority is pleased to transfer Mr. Majid Sweeper GMS Saadat Abad Nowshera to GHSS No.01 Nowshera Kalan against vacant post of N/Qasid on his own pay and scale in the best interest of public service with immediate effect.  
Personal No.00721458

NOTE: No TA/DA is allowed  
Charge report should be submitted to all concerned

(Nisar Muhammad)  
District Education Officer (Male)  
Nowshera

Encl: No. 1896-99 / DEO (M) NSR/EA-S/E.No.1/V-II/Transfer/Class-S/ Dated NSR the: 17/12/2015

Copy of the above is forwarded for information & necessary action to the:-

1. Senior District Accounts Officer Nowshera
2. Deputy District Education Officer (M) Nowshera.
3. Principal/Headmaster GHSS/GMS Concerned
4. Accountant Local Office.
5. Official Concerned.

Attested  
(Signature)

District Education Officer (Female)  
Nowshera

CTC  
(Signature)

OP  
GHSS, Nowshera

(Annex: H)

19



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
NOWSHERA

(Office Phone//0923-9220228, Fax//0923-9220228)

No \_\_\_\_\_ Esta: Branch /Corrig: / dated: MSR / / 2017

CORREGENDUM ORDER.

Office order issued vide this office Endstt: No: 1294-  
98/DEO(M)/NSR/Estab: /Transfer/C-4 dated Nowshera the 26/12/2017; in the name of Mr. Samia Jan  
Lab: Attendance GHSS Nowshera Cantt: to GHSS Nowshera Kalan please read Naib Qasid instead  
of Lab: Attendance.

(FAYAZ HUSSAIN)  
DISTRICT EDUCATION OFFICER (M)  
NOWSHERA.

Endstt: No: 1483-87 /DEO(M)NSR/Estab:/Corrigendum/Dated: 28/12/ 2017.

Copy forwarded for information to the:-

- 1 Senior District Accounts Officer Nowshera.
- 2 Principal Concerned School.
- 3 District Monitoring Officer.
- 4 EMIS Local Office.
- 5 Officials Concerned.
- 6 Office Copy.

DISTRICT EDUCATION OFFICER (M)  
NOWSHERA

Attended  
18/12

122 Nov 2017 71

Date 26-4-2017

20



**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
NOWSHERA**

(Phone No. 0923-9220228 Fax# 0923-9220228)

**OFFICE ORDER**

consequent upon the mutual consideration of the following officials, Mutual transfer in respect of following class-iv are hereby ordered on their own pay and grade and pay in the best interest of public service with immediate effect.

S#	Name of official	Present Post	Adjusted on
01	Mr. Farman Ali GHSS No:1 NSR Kalan	Lab/attendant	Chowkidar
02	Mr. Tilawat Shah GHSS No:1 NSR Kalan	Chowkidar	Lab/attendant

Note: No TA/DA is allowed

Necessary entries should be made in their S/Book accordingly

Mr. Fayyaz Hussain)  
District Education Officer (Male)  
Nowshera

No & dated even

Copy for information to the

1. Senior District Accounts Officer NSR
2. Principal GHSS No:1 NSR Kalan
3. Officials concerned

District Education Officer (Male)  
Nowshera

Attended  
(18)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) NOWSHERA  
OFFICE ORDER

Mutual Exchange of posts between Mr. Jehanzeb Chowkier GPS, Kahstipull NSR Kalan and Mr. Shahkair Akhtar Khakroob GHS, No. 1 Nowshera Kalan is hereby ordered in the interest of public service with immediate effect.

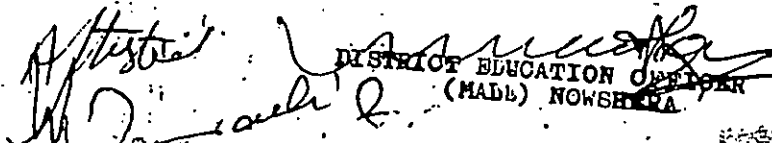
Charge report should be sent to all concerned.

(MOHAMMAD ZAFAR KHAN)  
DISTRICT EDUCATION OFFICER (M)  
-NOWSHERA

Endst No. 786-188 / Class IV Adjustment Dt Nowshera the 13/11 1990  
Copy forwarded for information and n/a to the:-

- 1. Principal GHS, No. 1 Nowshera Kalan.
- 2. M/Teacher GPS, Khastipull NSR Kalan
- 3. Pay Clerk.

M. Nawaz

*Attested*  
  
 DISTRICT EDUCATION OFFICER  
 (MALE) NOWSHERA

*Attested*  


Before the KPK Service Tribunal, Peshawar

بعدالت



Syed Sajid Ali Shah  
(Appellant) بنام  
Province of KPK etc

30-8-2021 مورخہ  
Syed Sajid Ali Shah مقدمہ  
Service Appeal - دعویٰ  
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
Shahzoda Irfan Zia کسے Peshawar  
Advocate

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی نقل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ  
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 یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائہ التوائے مقدمہ کے سبب سے وہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد ہے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Attested.

Accepted.

Irfan Zia

المرقوم 30th Aug 2021

Peshawar

بمقام

کے لئے منظور ہے۔

ساجد

17201-7182863-4

(0300-9345297)