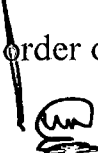


Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 1543/2022 \_\_\_\_\_


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2022	<p>The appeal of Mr. Ahmad Shah presented today by Nazia Irfan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR <i>eh</i></p>

The appeal of Mr. Ahmad Shah son of Shad Meer r/o Koki khel Abdaal Khel Ali Masjid Jamrod Khyber received today i.e. on 14.10.2022 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- 1- Law mentioned in the heading of the appeal is wrong.
- ② Copy of merit list mentioned in para- 3 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-C of the appeal is illegible which may be replaced by legible/better one.

No. 2838 /S.T,

Dt. 17/10 /2022



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Nazia Irfan Adv. Pesh.

Note: Resubmitted after removal all the objections raised by the office.

  
26/10/2022

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES**  
**TRIBUNAL, PESHAWAR.**

In ref to Appeal No: 1543 /2022

Ahmad Shah

VS

Govt of. KPK etc

**INDEX**

S.No	Description of documents	Annex	Pages
1	Appeal		1 - 5
2	Affidavit		6
3	Address of parties		7
4	Copies of academic Record	"A"	8 - 10
5	Copy of the advertisement	"B"	11 - 11-A
6	Copy of merit lists	"C"	12 - 14
7	Copy of Writ Petition	"D"	15 - 21
8	Copy of Impugned Order + Departmental appeal	"E"	22 - 27
9	Wakalat Nama		28

  
**Appellant**

**Through**

  
**NAZIA IRFAN**

ADVOCATE HIGH COURT, PESHAWAR

**TANOLI LAW ASSOCIATES**

**ADVOCATES & LEGAL CONSULTANTS**

Flat No: 02, 5<sup>th</sup> Floor, Cantt Mall, Peshawar Cantt.

①

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES**  
**TRIBUNAL, PESHAWAR.**

In ref to appeal No 1543 /2022

Ahmad Shah S/O Shad Meer R/O Koki Khel Abdaal Khel, Ali Masjid  
Jamrod, District Khyber.

.....Appellant.

**VERSUS**

1. Government of Khyber Pukhtunkhwa through its Chief Secretary,  
Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education, Khyber  
Pukhtunkhwa, Peshawar.
3. District Education officer (Male), Khyber.
4. Director elementary and Secondary Education Khyber Pukhtunkhwa,  
Peshawar.

.....Respondents.

**Appeal U/S 4 of Service Tribunal**  
**Act 1974** ~~.....~~ **against order**  
**dated 02/04/2022 passed by**  
**Respondent No: 03.**

**Prayer:**

On acceptance of instance Appeal, order dated 02/04/2022 passed by Respondent No: 03 may please be declared as illegal, unlawful, unwarranted and against the rights of the petitioner. Any act/inquiry subsequent to the appointment of the Appellant be declared as illegal and without law full authority. And the Respondent be directed to cancel the impugned order with all back benefits.

**Respectfully sheweth:**

1. That Appellant is law abiding and peaceful citizen of Pakistan and permanent resident of District Khyber, having Qualification of Bachelors of Education (hons). (Copies of the academic record are attached as annexure A)
2. That Respondent No: 03 advertised various posts of teachers including CT (IT) Lab In charge (BPS 07) by inviting applications through advertisement as per certain criteria and requirement including NTS etc. (copy of the advertisement is attached as annexure B)
3. That as per criteria laid down by the respondents in their advertisement Appellant declared a successful candidate being in the merit list at serial No: 07. (Copy of merit lists are attached as annexure "C" )
4. That subsequent thereto, in the light of department letter issued by respondent Appellant assumed the charge on September 2021.



- (3)
5. That Appellant had also applied for the post of CT (BPS 15) but the Appellant was not recommended despite merit list so the Petitioner filed a Writ Petition bearing No: 5118-P/2021 on 29-11-2021 before the Peshawar High Court Peshawar. After issuing the notices in the said Writ Petition Respondent No: 03 started harassing the Appellant through different means and finally issued impugned order dated 02/04/2022. (Copy of the writ Petition is attached as annexure "D")
  6. That Respondent No: 03 with an illegal, unlawful, unjust, contra legume and unwarranted order dated 02-04-2022 (communicated on 27/06/2022) terminated the service of the Appellant just for the reason that Appellant filed writ bearing NO: 5118-P/2021 before the Peshawar High Court Peshawar. (Copy of the impugned Order is attached as annexure E)
  7. That the impugned order was communicated on 27/06/2022 to the Petitioner and appeal/ departmental representation was filed on 11/07/2022 but till date the same has not been decided hence the present appeal.
  8. That the Respondent were requested to redress the grievance of the appellant but Proved to be futile exercise so the Appellant has got no other appropriate/ adequate Remedy except to knock the door of this hon'ble Court on the following Grounds among the others:

**GROUND:**

- a. That the act of Respondent No: 03 with regard to the impugned order dated 02-04-2022 is a classic example of discrimination illegal and unjustified of use of authority which has extremely prejudice the protected rights of the appellant.
- &

- b. That rights of the Appellant have been ***flagrantly violated*** by the respondents just to deprive the Appellant from his due rights recognized under the law governing the subject.
  
- c. That as per advertisement and formula of the respondents marks obtained in 4 years in BS were to be multiplied by 40 but the same has been overlooked and denied by the Respondent at the time of issuance of the impugned order.
  
- d. That the impugned order is counter blast of writ Petition bearing No: 5118-P/2021 filed by the Petitioner on 29/11/2021. So, the impugned order is apparently is glaring violation of basic rights of the Appellant recognized under the Law.
  
- e. That despite repeated request by the Appellant, respondents have acted in manner not warranted under the law, which has caused great prejudice to the rights of the Appellant.
  
- f. That the Appellant has neither been treated equally nor in accordance with law. Even the Law procedure regarding the termination has not been followed/ observed.
  
- g. That as per doctrine of ***locus poenitentiae***, vested and legal rights in favor of petitioner have been accrued which cannot be suppressed by denial on the part of the respondents without any legal and moral justifications.

5

It is therefore, humbly prayed that, On acceptance of instance writ petition,

On acceptance of instance Appeal, order dated 02/04/2022 passed by Respondent No: 03 may please be declared as illegal, unlawful, unwarranted and against the fundamental rights of the petitioner. Any act/inquiry subsequent to the appointment of the petitioner be declare as illegal and without law full authority. And the Respondent be directed to cancel the impugned order with all back benefits

*Any other relief which has not been specifically asked for but this Hon'able Court deems appropriate may also be awarded to meet the ends of justice.*

**Interim Relief:**

*By way of interim relief respondents No: 03 may please be restrained for making appointments on the post of CT (IT) Lab In charge (BPS 07).*

  
Appellant

Through



NAZIA IRFAN

Advocate High Court, Peshawar.

Date: 06-10-2022

**Certificate:**

Certified as per instructions/information received from the client that no Appeal of similar nature has been filed by the Appellant.

  
Counsel



(8)

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES**  
**TRIBUNAL, PESHAWAR.**

In ref to Appeal No: \_\_\_\_\_/2022

Ahmad Shah

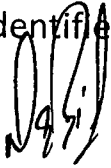
VS

Govt of KPK etc

**AFFIDAVIT**

I, Ahmad Shah S/O Shad Meer R/O Ali Masjid, Jamrod, Khyber, do here by solemnly affirm and declare on oath that the contents of this accompanying **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

Identified by



NAZIA IRFAN

ADVOCATE HIGH COURT.



Deponent

H  
13/10/2022  
Humaira Rehman Advocate  
Oath Commissioner  
Enrol. Number 3370-75

7

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES**  
**TRIBUNAL, PESHAWAR.**

In ref to Appeal No: \_\_\_\_\_/2022

Ahmad Shah

VS

Govt of KPK etc

**Addresses of parties**

Ahmad Shah S/O Shad Meer R/O Koki Khel Abdaal Khel, Ali Masjid  
Jamrod, District Khyber.

.....Appellant.

**VERSUS**

1. Government of Khyber Pukhtunkhwa through its Chief Secretary,  
Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education, Khyber  
Pukhtunkhwa, Peshawar.
3. District Education officer (Male), Khyber.
4. Director elementary and Secondary Education Khyber Pukhtunkhwa,  
Peshawar.

.....Respondents..

Through

Appellnt

NAZIA IRFAN

Advocate High Court

Serial No. 004143

# Islamia College Peshawar

Pakistan



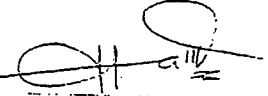
This Certifies that


Mr./ Miss AHMAD SHAH Son / Daughter of SHAD MEER

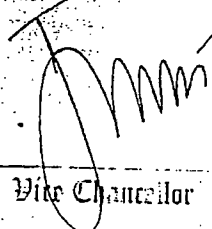
Registration No 2016/ICP-3698 Session 2016-2020

having fulfilled all the requirements is hereby admitted to the degree of  
B.ED (HONS)

and is entitled to all the rights, honours and privileges thereunto appertaining  
given this 30th day of September, 2020

  
Controller of Examinations

  
Registrar

  
Vice Chancellor



ISLAMIA COLLEGE PESHAWAR  
CONTROLLER OF EXAMINATIONS  
KHYBER PAKHTUNKHWA, PAKISTAN

9

100  
of Glory

To Whom It May Concern

It is to certify that Ahmad Shah s/d of Shad Meer was the student of  
B.ED (HONS) under Class No: BEDU-161443 and Registration No: 2016/CP-3688. The  
obtained equivalent percentage of CGPA 3.25/4.00 is 80.00%. The equivalent marks of the  
said CGPA are 3760/4700.

According to the notification provided by Higher Education Commission vide Notification  
No. 8-I/HEC/A&A/2006/552 dated 03/29/2007, BS (Hons) 4 year program is equivalent to  
Master Degree (MA/MSc).

Assistant Controller of Examinations  
Islamia College Peshawar

Asst. Controller of Examinations

1/8/3/2021



## ISLAMIA COLLEGE PESHAWAR

### Transcript

Online Key: 1174156	Name: AHMAD SHAH	Registration No: 2016/ICP-3688	
Class No: BDU-161463	Father Name: SHAD MEER	CNIC: 21202-9531102-1	
Session: 2016-20	Discipline: B.ED (HONS)	Admission Date: 8/31/2016	
Study Mode: Regular	Specialization: N/A	Duration: 4 Year(s)	



Semester	Course Code	Course Title	Grade	Value	Cr.Hr	Remarks
1st	EDU-313	Child Development	A-	3.7	3	
	EDU-311	Functional English-I	A-	3.7	3	
	EDU-316	General Methods of Teaching	B+	3.3	3	
	EDU-315	General Science	A-	3.7	3	
	EDU-312	Islamic Studies/Ethics	A	4.0	2	
	EDU-314	Urdu / Regional Languages	B+	3.3	3	
			SGPA	3.59	17	
2nd	EDU-323	Classroom Management	A-	3.7	3	
	EDU-322	Computer Literacy	A-	3.7	3	
	EDU-321	English-II (Communication Skills)	A-	3.7	3	
	EDU-324	General Mathematics	C+	2.3	3	
	EDU-326	Methods of Teaching Islamic Studies	B+	3.3	3	
	EDU-325	Pakistan Studies	B+	3.3	2	
			SGPA	3.34	17	
3rd	EDU-432	Art, Crafts and Calligraphy (Content)	B-	2.7	3	
	EDU-435	Instructional and Communication Technology (ICT) in Education (Professional)	B	3.0	2	
	EDU-431	Teaching Literacy Skills (Professional)	B+	3.3	3	
	EDU-434	Teaching of G. Science (Professional)	B+	3.3	3	
	EDU-433	Teaching of Urdu/ Regional Languages (Professional)	B+	3.3	3	
	EDU-435	Teaching Practice-I (Short Term)	B+	3.3	3	
			SGPA	3.16	17	
4th	EDU-441	Classroom Assessment	B+	3.3	3	
	EDU-444	School, Community and Teacher	B+	3.3	3	
	EDU-442	Teaching of English	B+	3.3	3	
	EDU-443	Teaching of Mathematics	B+	3.3	3	
	EDU-445	Teaching of Social Studies (Professional)	B+	3.3	3	
	EDU-446	Teaching Practice-II (Short Term)	A-	3.7	2	
			SGPA	3.19	17	
5th	EDU-553	Content Course-I (From Selected Discipline-I) English	B	2.0	3	
	EDU-554	Content Course-II (From Selected Discipline-II) Urdu	B+	3.3	3	
	EDU-555	Curriculum Development (Foundation)	B+	3.3	3	
	EDU-555	Educational Psychology (Foundation)	B+	3.3	3	
	EDU-551	English-ICT (Technical Writing & Presentation Skills)	B	3.0	3	
	EDU-552	Foundation of Education	B	3.0	3	
			SGPA	3.15	18	
6th	EDU-564	Comparative Education (Professional)	B+	3.3	3	
	EDU-561	Contemporary Issues & Trends in Education	B-	2.7	3	
	EDU-562	Content Course-I (From selected discipline-I) English	B+	3.3	3	
	EDU-563	Content Course-II (From selected discipline-II) Urdu	B+	3.3	3	
	EDU-565	Introduction to Guidance and Counseling (Professional)	B	3.0	3	
	EDU-566	Sciences-III	B-	2.7	3	
			SGPA	3.15	18	
7th	EDU-672	Content Course-III (From selected discipline-III) Urdu	A-	3.7	3	
	EDU-671	Content Course-IV (From selected discipline-IV) English	B+	3.3	3	
	EDU-673	Pedagogy-I (Methods of teachings related to specialization-I) (Teaching of English)	B	2.7	3	
	EDU-674	Pedagogy-II (Methods of teachings related to specialization-II) (Teaching of Social Studies)	B	3.0	3	
	EDU-675	Research Methods in Education	B-	2.7	3	
	EDU-676	Teaching Practice-III (Short Term)	C+	2.3	3	
			SGPA	2.95	18	
8th	EDU-685	Inclusive Education	B+	3.3	3	
	EDU-681	School Management	B+	3.3	3	
	EDU-683	Teaching Practice-IV (Long Term)	B+	3.3	6	
	EDU-682	Test Development and Evaluation	B+	3.3	3	
			SGPA	3.30	15	
	EDU-684	Research Project (Professional)	A-	3.7	3	

Cumulative Grade Point Average (CGPA): 3.25      Total Credit Hours Earned: 140      Name of College/Campus: Islamia College, Peshawar  
 Credit Hours Transferred: 0      Result Declaration Date: 30 Sep 2020      Previous Degree: HSSC

Prepared By: \_\_\_\_\_  
 Errors and omissions are subject to subsequent rectification  
 Deputy Controller of Examinations



**اشتہار برائے بھرتی**

محکمہ تعلیمی ایجنسی کے ذریعہ پیشہ ورانہ تعلیم کے ذریعہ انتظام (مردانہ اور زنانہ) سکولوں میں درج ذیل آسامیوں پر کرنے کے لیے  
 طلبہ خیر کے سکول اہل امیدواروں سے مجوزہ فارم نمبر 7112/2020 تک درخواستیں طلب ہیں درخواست فارم ETEA کی ویب سائٹ  
 (http://www.etea.edu.pk) پر دستیاب ہے۔ مزید تاریخ گزرنے کے بعد موصول ہونے والی درخواستوں اور مالی جانے والی  
 دستاویزات اور مسائل کو مد نظر رکھنا چاہئے گا اور ذی اطمینان شدہ نتائج کو تسلیم کیا جائیگا۔

1	کالی (BPS-5)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
2	ڈی ایم (BPS-15)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
3	پی ای ٹی (BPS-15)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
4	ٹی ٹی (BPS-15)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
5	ای ٹی (BPS-15)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
6	قاری/قاریہ (BPS-12)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال
7	آئی ٹی ایچ ایم (BPS-07)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x18 سال
8	پرائمری سکول ٹیچر BPS-12(PST)	(1) کسی بھی تعلیم شدہ اور ندرت سے پینڈ اور جن پبلک اسکول (11) سیشن اور تقرری کے بعد 9 ماہ کی لازمی ٹرینگ سکولوں اور اسکولوں میں درج ذیل آسامیوں پر کرنے کے لیے RITE/PITE/FITE/GCET سے حاصل کرنی ہوگی	35x19 سال

سلیکشن کر لیا جائے گا۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 (ب) تعلیمی قابلیت = 100 لبر جس کی مزید تفصیلات کی جاتی ہیں۔

تعلیمی قابلیت	کل بھرتی
ایکس ایچ ای	مائل کروہ بھرتی 20x
ایس اے ایچ ای	مائل کروہ بھرتی 20x
ایس اے ایچ ای	مائل کروہ بھرتی 20x
ایس اے ایچ ای	مائل کروہ بھرتی 20x
ایس اے ایچ ای	مائل کروہ بھرتی 05x
ایس اے ایچ ای	مائل کروہ بھرتی 05x
ایس اے ایچ ای	مائل کروہ بھرتی 05x
ایس اے ایچ ای	مائل کروہ بھرتی 05x

1. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 2. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 3. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 4. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 5. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 6. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 7. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔  
 8. ایس اے ایچ ای کی صورت میں بھرتی کی جاتی ہیں۔ اساتذہ کے سلیکشن کے لیے کثیراثر ذیل سے کل 200 بھرتی کی تفصیلات کی جاتی ہیں۔

Old Facility  
 Conspicuous  
 Face Pakistan  
 Special care of special persons  
 www.etea.edu.pk  
 11/2020

**آسامیوں پر بھرتی کی تفصیلات (مردانہ اور زنانہ) مطلع خیر**



**DISTRICT EDUCATION OFFICE**  
**DISTRICT KHYBER AT JAMRUD**  
 PHONE: 091-5820584 FAX: 091-5820584

24-9-21

**APPOINTMENT ORDER**

Consequent upon the recommendation of Departmental Selection Committee (DSC) held on 01/09/2021 in the office of District Education Officer Khyber, the recruitment/appointment of the following 09 Nos Male candidates whose test were conducted through ETEA are hereby ordered against vacant post of CT IT in BPS 07 (10990-110-29700) B.M fixed plus usual allowances as admissible with effect from the date of their taking over charge at the school/school given against their name on ad hoc and contract basis initially for One Year under the existing policy of the provincial Govt of Khyber Pakhtunkhwa in teaching cadre in the interest of public service on the terms and conditions given below:-

S. No	Halt No	Name	Father Name	Score	School Name	CNIC Number
1	56264	IHSAN ULLAH	SULTAN GUL	132.09	GHS Shalobar Dara	21201-5170971-9
2	56589	SHAH JEHAN	MUHAMMAD SADDIQUE	130.68	GHS Spin Dhand Barn	21201-510873811
3	55795	MUHAMMAD WASIM	MIRZA KHAN	130.04	GHS Kohi Sher Halder Barn	21201-242480-5
4	56557	HAIDER HAYAT AFRIDI	AMIR KHAN	128.80	GHS Alam Gudar Barn	21201-7702272-3
5	56334	SIKANDAR SHAH	LAL SHAH KHAN	122.44	GHS Painsi Lalma Mullagori	17301-6822152-1
6	55864	ZAHDOH AHMAD	MASRULLAH KHAN	121.58	GHS Shagal Jamrud	21201-8822495-5
7	55937	AHMAD SHAH	SHAD MEER	120.37	GHS Landi Kotai	21201-9531102-1
8	55760	SALEEM KHAN	EERAN GUL	120.30	GHS No. 02 Jamrud	21202-5113917-9
9	56665	TAYYAB ULLAH	HOOR HABIB	119.92	GSAAAFSS Jamrud	17301-2981844-7

**Terms & Conditions**


- Charge reports should be submitted through ASDEOs concerned within 15-days of time. Anyone who fails to submit his arrived reports within specified period then his appointment will stand as cancelled.
- Appointment of the candidates is purely made on ad hoc and contract basis initially for One year and is liable to be terminated at any time without any notice.
- Appointment of the candidates are purely on ad hoc & Contract basis which are not transferable all their regularization.
- If the candidate wishes to resign his post he will give one month prior notice or his pay for one month will be forfeited in lieu thereof.
- Their documents: Date of Birth, CNICs and domicile certificates should be checked before handing over charges of the posts and attested copies may be kept on record of the school.
- They must produce their Health and Age certificates from the District Health Officer (DHO/MS) concerned.
- They may not be handed over charges if they are below 18-years or above 35-years.
- If any technical legal flaw is pointed out, the appointment will stand as cancelled.
- They will complete nine months in service mandatory professional training at RPDC as and when scheduled.
- No salary will be drawn before the verification of all the testimonials that submitted during scrutiny of documents and merit of the candidates i.e. academic, professional degrees/DMCs, CNICs and Domiciles from the quarters concerned through District Education Officer Khyber at Jamrud. The candidates will bear all the expenditures in this connection. Certificate to this effect will be obtained from DEO Khyber for release of pay. If any document found fake or bogus, the appointment of the concerned candidate will stand cancelled and the matter will be reported to law enforcing agencies.
- Errors and omissions will be accepted within specified period.

(NISAR MUHAMMAD)  
 DISTRICT EDUCATION OFFICER  
 DISTRICT KHYBER AT JAMRUD

Encl. No. 2252-59

Dated 24/09/2021

- Copy of the above is forwarded to the:
- Director, E&S E Khyber Pakhtunkhwa at Peshawar.
  - Deputy Commissioner District Khyber at Peshawar.
  - Medical Superintendent District Khyber at Landi Kotai.
  - Principal/Head Master Concerned.
  - District Accounts Officer Khyber at Jamrud.
  - Superintendent local office.
  - ADEO Local Office/ Pay Clerk concerned.
  - Official Concerned.

  
 DISTRICT EDUCATION OFFICER  
 DISTRICT KHYBER AT JAMRUD



**LEGIBLE COPY**  
12-A

**DISTRICT EDUCATION OFFICE  
DISTRICT KHYBER AT JAMRUD**

**APPOINTMENT ORDER**

Consequent upon the recommendation of Departmental Selection Committee (DSC) held on 03.09.2021 on the effect of District Education Officer Khyber, the recruitment/appointment of the following 09 Nos Male candidates whose test were conducted through ETEA are hereby ordered against vacant post of CT IT in BPS 07 (10990-610-29290) PM fixed plus usual allowances on admissible with effect from the date of their taking over charge at the station / school given against their name on adhoc and contract basis initially for one year under the existing policy of the provincial Govt of Khyber Pakhtunkhwa in teaching cadre in the interest of Public service on the terms and conditions given below:-

S No	Roll No	Name	Father Name	Score	School Name	CNIC number
1.	56264	Ihsan Ullah	Sultan Gul	132.09	GHS Shalobar Khan	21201-5170971-9
2.	56583	Shah Jehan	Muhammad Saddique	130.68	GHSS Spin Dhand Bara	2121-5108738-1
3.	55795	Muhammad Wasim	Mirza Khan	130.04	GHS Kohi Sher HAider Bara	21201-2424480-5
4.	56557	Haider Hayat Afridi	Amir Khan	128.80	GHS Alam Godar Bara	21201-7702272-3
5.	56334	Sikandar Shah	Lal Shah Khan	122.44	GHS Painsi Lalma Mullagori	17301-6822152-1
6.	55864	Zahoor Ahmad	Nasrullah Khan	121.58	GHS Shagai Jamrud	21201-8822495-5
7.	55937	Ahmad Shah	Shad Meer	120.37	GHS Landi Kotak	21202-9531102-1
8.	55760	Saleem Khan	Eeran Gul	120.30	GHS No 2 Jamrud	21201-5114917-9
9.	56665	Tayyab Ullah	Noor Habib	119.92	GSAHSS Jamrud	17301-2981344-7

**Terms and conditions:**

1. Charge report should be submitted through ASDEOs concerned within 15 days of time. Anyone who falls to submit his arrival report within specified period then his appointment will stand as cancelled.
2. Appointment of the candidates is purely made on adhoc and contract basis initially for One year and is liable to be terminated at any time without any notice.
3. Appointment of the candidates are purely on adhoc & contract basis are not transferable till the regularization.
4. If the candidate wishes to resign his post he will give one month prior notice to his pay for one month will be forfeited of lieu thereof.
5. Their documents, date of Birth, CNICs and domicile certificates should be checked before handing over charge of the posts and attested copies may be kept on record of the school.
6. They must produce their Health and Age certificates from the District Health Officer (DHO/MS) concerned.
7. They may not be handed over charge if they are below 18 years or above 35 years.
8. If any technical legal flow is pointed out, the appointment will stand as cancelled.
9. They will complete nine month is service mandatory professional training at RPDC as and when scheduled.
10. No salary will be drawn before the verification of all the testimonials that submitted during scrutiny of documents and pass merit of the candidates I,e academic professional degrees / DMCs CNICs and Domiciles from the quarter concerned through District Education Officer Khyber at Jamrud. The candidates will bear all the expenditures in this connection of certificate to this effect will be obtained from DEO Khyber for release of pay. If any document found fake or bogus, the appointment of the concerned candidates will stand cancelled and the matter will be reported to law enforcing agencies.
11. Errors and omissions will be accepted within specified period.

**(Nisar Muhammad)  
District Education Officer  
District Khyber at Jamrud**

Endst No. 7252-59

Dated 24.09.2021

Copy of the above is forwarded in the:

1. Director E&S Khyber Pakhtunkhwa at Peshawar.
2. Deputy Commissioner District Khyber at Peshawar
3. Medical Superintendent District Khyber at Landi Kotal.
4. Principal/Head master concerned.
5. District Accounts Officer Khyber at Jamrud
6. Superintendent Local Office
7. ADEO Local Office Pay Clerk concerned.
8. Official concerned.

**ATTESTED**



WP 5118-P/2021

DISTRICT EDUCATION OFFICE  
DISTRICT KHYBER AT JAMRUD MALE  
PHONE. 091-5820584 FAX 091-5820584

**APPOINTMENT ORDER**

Consequent upon the recommendation of Departmental Selection Committee (DSC) held on 15/11/2021 in the office of District Education Officer Khyber, the recruitment/appointment of the following 68 Nos Male candidates whose test were conducted through ETEA are hereby ordered against vacant post of CT in BPS 15 (16120-1330-56020) P/M fixed plus usual allowances as admissible under the rules with effect from the date of their taking over charge at the stations/school given against their name on adhoc and contract basis initially for a period of One Year under the existing policy of the provincial Govt. of Khyber Pakhtunkhwa in teaching cadre in the interest of public service on the terms and conditions given below:-

S.No	Roll No	Name of candidates	Father Name	Total Score	School	CNIC No.
1	242245	HALEEM KHAN	AZAK MIR	145.293	GMS Abdul Latif Khan Killi Landi Kotal	21203-6742130-3
2	243436	SADDAM HUSSAIN	MUHAMMAD SALEEM	141.769	GHS Prang Dara Landi Kotal	21203-7033193-5
3	246567	NAIK MUHAMMAD KHAN	KHAN MUHAMMAD KHAN	140.726	GMS Jan Mir Killi Jamrud	21203-3640839-3
4	247136	MUHAMMAD SADEEQ	SHEN MIR	140.705	GMS Amrozai Tirah Bara	21201-7060614-9
5	244122	AZIZ KHAN	KHAIR UR REHMAN	138.743	GHS Durma Kor Landi Kotal	21203-0785089-3
6	244291	ABDUL WAHID	GUL REHMAN	137.624	GHS Jan Khan Killi Bara	17301-2768593-1
7	244259	ZAHID HUSSAIN	ABIS HUSSAIN	136.706	GMS Shaheed Mian Mullagori Jamrud	21204-6079585-1
8	246079	SAHAR GUL	NASEEB KHAN	136.209	GHS Toot Dhand Bara	21201-3953517-9
9	246064	NAIK RASOOL	SHAH JAHAN	136.002	GMS Sheen Kamar Bara	21201-2339488-5
10	243739	NAUMAN KHAN AFRIDI	MOHIB ULLAH	135.957	GHS Ghundi Jamrud	21202-1529866-1
11	247089	MUHAMMAD SAEED	QASIM KHAN	135.319	GMS Finji Dhand Bara	21201-2200764-9
12	244957	DEEDAR KHAN	STAN MUHAMMAD	135.236	GHS Shuga Jamrud	21202-4397374-3
13	245294	SAEED ULLAH	ZEWAR KHAN	135.649	GMS Azgho Mete Jamrud	21202-2450188-9
14	244393	MASEED ULLAH	NAJEED ULLAH	135.007	GHS No. 02 Jamrud	21203-8982908-1
15	247120	SABEEL KHAN	MASAL KHAN	134.425	GMS Azgho Mete Jamrud	21202-0558623-7
16	244974	MUHAMMAD ARIF	MISAR KHAN	133.874	GMS Sheen Kamar Bara	21201-4903295-5
17	245964	NAZ MUHAMMAD	SULTAN MIAN	133.853	GHS Loi Shalman Landi Kotal	21203-3138565-7
18	243070	NASEER UR RAHMAN	UMAR KHAN	133.793	GMS Shin Pokh Landi Kotal	21203-7946570-3
19	244136	AWAL SHER	KHAN ZADA	133.415	GMS Murad Dhand Jamrud	21202-7288488-1
20	240481	NOOR MUHAMMAD AFRIDI	MEWA KHAN	133.364	GMS Toot Toot Amrozai Tirah	21201-72711394-7
21	242400	ABDUL AZEEM	ZARAB KHAN	133.323	GMS Sarobi Landi Kotal	21203-7575373-3
22	245218	SAJD KHAN	MISAL GUL	133.261	GMS Toot Toot Amrozai Tirah	21201-4645670-1
23	246424	ABDUL RAZAQ	NAIK MUHAMMAD	133.206	GMS Sher Afzal Killi Jamrud	21201-1501084-5
24	246633	ABID AFRIDI	MANZOOR KHAN	132.898	GMS Mewa Khan Jamrud	21201-7295827-5
25	245935	MUHAMMAD YASEEN	MUHAMMAD AMIN	132.570	GMS Azeem Din Bara	21201-5277019-9
26	240953	HAJI AKBAR	RAMZAN ALI	132.101	GHS Mehmood Killi Landi Kotal	21203-2565073-1
27	243937	HUSSAIN AHMAD	SHAH ALAM	132.090	GHS Kam Shalman Landi Kotal	21203-0663112-5
28	242361	MUHAMMAD YASEEN KHAN	YAR MIN KHAN	131.933	GHS Jaffar Khan Bara	21201-4177450-5
29	243056	HAIDER HAYAT AFRIDI	AMIR KHAN	131.800	GHS Alam Godar Bara	21201-7702272-3
30	241670	RAHMAT ULLAH	ABDUL AHAD	131.636	GHS Toot Kamar BZK Landi Kotal	21203-3039922-1
31	241712	SULAIMAN SHAH	ZAMEER GUL	131.014	GMS Saud Ullah Jnn Killi Bara	21201-7499713-7
32	243101	TAYYAB AHMED	AMEEN GUL	130.767	GMS Jan Mir Killi Jamrud	17301-0926785-1
33	241265	FAZAL AMIN	GUL BAZ KHAN	130.724	GMS Mastek Bara	21201-5608609-1
34	243228	JOHAR KHAN	ABDUL IALIL	130.663	GMS Pakka Tara Bara	21201-7756478-5
35	243033	MUHAMMAD SHAHID	YARI GUL	130.527	GHS Alam Godar Bara	21201-7187762-3
36	241933	MUHAMMAD ASIF	MUHAMMAD TARIQ	130.424	GMS Mewa Khan Tirah Jamrud	21201-4063197-7
37	241453	KHAN SHER	GULAB SHER	130.405	GMS Sarkal Kamar Bara	21201-0935759-7
38	242348	MATEEB ULLAH	SIAL JAN	130.403	GMS Samsal Minadar Loi Shalman	21203-5159105-9
39	244055	MUHAMMAD USMAN	NAZEER AHMAD	130.373	GHS Chora Jamrud	17301-8352164-3

40	243107	MUHAMMAD AMIR AFRIDI	IBRAHIM SHAH	130.342	GMS Sarkai Kamar Dara	21201-5626004-3
41	244248	ASIM ULLAH	SAID UMER	130.248	GMS Zar Jan BZK Landi Kotal	21203-3647985-9
42	243145	SAFI ULLAH	SAMI ULLAH KHAN	130.220	GMS Nabat Sra Shaga Landi Kotal	21203-5900526-5
43	14603	FARMAN ULLAH	AZAL KHAN	130.027	GMS Murad Dhand Jamrud	21201-5912922-5
44	241715	WAKIL KHAN	NISAR MUHAMMAD	129.853	GMS Dacha Subaidar Loi Shalman	21203-0213660-7
45	241798	SALAH UD DIN	SHAMSUDDIN	129.797	GMS Tur Klici Mullagori Jamrud	21201-4904142-1
46	244639	ABDUR RAHMAN	SHARF UD DIN	129.776	GHS Janas Khan Killi Dara	21201-5527865-9
47	244441	ISHTIAQ UR REHMAN	KEMIYA GUL	129.738	GHS Chora Jamrud	21202-0849519-9
48	243007	MUJAHID KHAN	HAMEED GUL	129.654	GHS Kohi Sher Haider Dara	21201-3608575-3
49	244825	MUHAMMAD DAUD SHAH	KHAN KHEIL	129.610	GMS Khaista Gul Tirah Jamrud	21201-7130724-9
50	242870	MIRAN KHAN	HAYAT NOOR	129.366	GHS Lowra Milana Jamrud	21201-8164413-7
51	244520	FAIRMAN ULLAH JAN	GUL REHMAN	129.334	GHS Kohi Sher Haider Dara	21201-5065618-5
52	245020	FAYAZ KHAN	FIDA HUSSAIN	129.059	GHS Tood Kamar BZK Landi Kotal	43301-4668505-7
53	241586	YAR MUHAMMAD	ANAR GUL	128.995	GHS Madghali Attari Dara	21201-0275848-1
54	244260	MUHHB ULLAH	MAJAN KHAN	128.716	GHS Tood Kamar BZK Landi Kotal	21203-9275165-3
55	245148	AZEEM ULLAH	MUHAMMAD ULLAH	128.647	GHS Mehmood Kili BZK Landi Kotal	21203-7213656-7
56	242081	SANA ULLAH	SHAFIR ULLAH KHAN	128.645	GMS Lalmat Jamrud	21203-7636379-3
57	247225	REHMAT ULLAH	KHELWAT KHAN	128.571	GMS Saad Ullah Jan Dara	21201-0394310-3
58	241529	RAID GUL	RIZAN GUL	128.432	GMS Shaheed Milana Mullagori Jamrud	21204-8810034-5
59	245201	SADAM HUSSAIN	BAHAWAL KHAN	128.267	GMS Turko Kass Dara	21201-9785176-1
60	243786	ALFAT HUSSAIN	JAN BADO SHAH	128.124	GMS Mewa Khan Tirah Jamrud	21203-9935347-7
61	241775	JAVED KHAN AFRIDI	HAJI ZARWALI KHAN	127.944	GHS Loi Shalman Landi Kotal	21201-1113486-5
62	245350	HAZIAT ALI	HAZIAT JADIR	127.652	GMS Shin Pokh Landi Kotal	21203-4269885-9
63	241433	KHUG ALAM	QALANDAR SHAH	127.578	GMS Sru Garhi Dara	21201-1969960-5
64	244966	MUHAMMAD ASIM	SHAHZAD KHAN	127.560	GMS Tarkho Kas Dara	21203-6121589-3
65	241683	SYED MUHAMMAD ASIM SHAH	SYED MASOOM SHAH	127.545	GHS Shinkai Bara	17301-1077762-5
66	243459	SHAH FAISAL	MIRAJ GUL	127.502	GMSHS Pindi Cheema Tirah	21202-1827861-3

**10 % Disable quota**

S. No	Roll No	Name	Father Name	Score	School Name	CNIC Number
1	240120	MUHAMMAD HAROON SHAH	MUHAMMAD IBRAHIM	122.488	GHS Jaffar Khan Kili Dara	21201-7372072-5
2	240082	MUHAMMAD SHAKIR	DUSTAN SHAH	119.410	GHS Madghali Attari Dara	21201-4253384-9

**Terms and Conditions:-**

- Charge reports should be submitted through Principal/Headmaster concerned within 15 days of time. Anyone who fails to submit his arrival report within specified period then his appointment will stand as cancelled.
- Appointment of the candidates is purely made on ad hoc and contract basis initially for One year and is liable to be terminated at any time without any notice.
- Appointment of the candidates are purely on ad hoc & Contract basis which are not transferable till their regularization.
- If the candidate wishes to resign his post he will give one month prior notice or his pay for one month will be forfeited in lieu thereof.
- Their documents, Date of Birth, CNICs and domicile certificates should be checked before handing over charges of the posts and attested copies may be kept on record of the school.
- They must produce their Health and Age certificates from the MS concerned.
- They may not be handed over charges if they are below 19 years or above 33 years.
- If any technical/legal flaw is pointed out, the appointment will stand as cancelled.
- They will complete nine months in service mandatory professional training at RPDC as and when scheduled.
- No salary will be drawn before the verification of all the testimonials that submitted during scrutiny of documents and per merit of the candidates i.e. academic, professional degrees/DMCs, CNICs and Domiciles from the quarters concerned through District Education Officer Khyber at Jamrud. The candidates will bear all the expenditures in this connection. A certificate to this effect will be obtained from DEO Khyber for release of pay. If any document found fake or bogus, the appointment of the concerned candidate will stand cancelled and the matter will be reported to law enforcing agencies.
- Errors and omissions will be accepted within specified period.

(NISAR MUHAMMAD)  
DISTRICT EDUCATION OFFICER (Male)  
DISTRICT KHYBER AT JAMRUD  
Dated: 01/12/2021

Enstt. No. 8296-8303/68 CT Male/Khyber

- Copy of the above is forwarded to the:
- Director E & S E Khyber Pakhtunkhwa at Peshawar.
  - Deputy Commissioner District Khyber at Peshawar.
  - Medical Superintendent District Khyber at Landi Kotal.
  - Principal/Head Master Concerned.
  - District Accounts Officer Khyber at Jamrud.
  - Superintendent local office.
  - ADEO Local Office: Pay Clerk concerned.
  - Official Concerned.

(Signature)  
DISTRICT EDUCATION OFFICER (Male)  
DISTRICT KHYBER AT JAMRUD

**BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.**

In ref to W/P No 5118-P/2021



Ahmad Shah S/O Shad Meer R/O Koki Khel Abdaal Khel, Ali Masjid  
Jamrod, District Khyber.

.....Petitioner.

**VERSUS**

1. Government of Khyber Pukhtunkhwa through its Chief Secretary,  
Civil Secretariat, Peshawar.
2. Secretary Elementary and Secondary Education, Khyber  
Pukhtunkhwa, Peshawar.
3. District Education officer (Male), Khyber.
4. Director elementary and Secondary Education Khyber Pukhtunkhwa,  
Peshawar.

.....Respondents.

**Writ Petition under Article 199 of  
the Constitution of Islamic  
Republic of Pakistan 1973.**

**ATTESTED**  
EXAMINED  
Peshawar High Court

(2) (3) (16)

Prayer:

- a. On acceptance of instance writ petition, Petitioner be declared as qualified candidate for the ~~of~~ post <sup>of</sup> CT (BPS 15) being in merit list issued on 25/08/2021, and refusal of appointment by Respondents is illegal, unlawful and against the fundamental rights of the petitioner.
- b. Directions be issued to respondents to appoint the petitioner CT (BPS 15), according to their advertisement and Rules governing the subject.

Respectfully sheweth:

1. That petitioner is law abiding and peaceful citizen of Pakistan and permanent resident of District Khyber, having Qualification of Bachelors of education (hons). (Copies of the academic record are attached as annexure A)
2. That Respondent No: 03 advertised various posts of teachers including CT (BPS 15) by inviting applications through advertisement as per certain criteria and requirement including NTS etc. (copy of the advertisement is attached as annexure B)
3. That as per criteria laid down by the respondents in their advertisement petitioner qualified for the 16<sup>th</sup> position in the merit list of CT (BPS 15) but the petitioner was deprived from his due right by the respondents by not appointing/ recommending in the 2<sup>nd</sup> merit list and omitted the name of the petitioner without any legal and moral justification. (Copy of merit lists are attached as annexure C & D respectively)

ATTESTED  
EXAMINER  
Peshawar High Court

- (5) (17)  
(8)
4. That after declaring the result by the respondents the petitioner approached the authority concerned but the Petitioner was apprised about the fact that the petitioner is not eligible for the said post as per rules despite the fact that petitioner was qualified as well as me was formula was applied by the respondent and the petitioner. Apart from that the same was formula was applied by the respondent and the petitioner was recommended for the post of IT Lab BPS 7 (as the petitioner applied for two categories)
  5. That subsequent thereto, petitioner moved an application to the authority concerned but no heed was paid to the petitioner's request so the petitioner has got no other appropriate/ adequate remedy available except to invoke the constitutional jurisdiction of this Hon'ble court on the following grounds:

GROUNDS:

- a. That the petitioner has been *deprived* by the respondents without any *plausible* reason and *legal justification*.
- b. That right of petitioner has been matured after assessing the marks of the petitioner as per criteria laid down in advertisement and denial of the same is sheer violation of the fundamental rights of the Petitioner.
- c. That fundamental rights of the petitioner have been *flagrantly violated* by the respondents just to deprive the petitioner from his due rights recognized under the law governing the subject.

~~APPROVED~~  
EXAMINER  
Peshawar High Court

- d. That as per advertisement and formula of the respondents marks obtained in 4 years in BS were to be multiplied by 40 but the same has not been adopted by the respondents despite the fact that petitioner has done the bachelor 4 years program.
- e. That act of the respondents is *glaring* example of *violation* of basic rights of the petitioner recognized under the constitution of Islamic republic of Pakistan 1973.
- f. That despite repeated request by the petitioner, respondents have acted in manner not warranted under the law, which has caused great prejudice to the rights of the petitioner.
- g. That the petitioner has neither been treated equally nor in accordance with law.
- h. That the petitioner is entitled for appointment as CT (BPS 15) as per criteria laid down in advertisement.
- i. That as per doctrine of *legitimate expectancy* and *locus poenitentiae*, vested and legal rights in favor of petitioner have been accrued which cannot be suppressed by denial on the part of the respondents without any legal and moral justifications.

*It is therefore, humbly prayed that, On acceptance of instance writ petition,*

ATTESTED  
EXAMINER  
Peshawar High Court

19

8

- a. Petitioner be declared as qualified candidate for the post of CT (BPS 15) being in merit list issued on 25/08/2021, and refusal of appointment by Respondents is illegal, unlawful and against the fundamental rights of the petitioner.
- b. Directions be issued to respondents to appoint the petitioner as CT (BPS 15), according to their advertisement and Rules governing the subject.

*Any other relief which has not been specifically asked for but this Hon'able Court deems appropriate may also be awarded to meet the ends of justice.*

**Interim Relief:**

*By way of interim relief respondents No: 03 may please be restrained for making appointments on the post of CT (BPS 15).*

Petitioner

Through

Date: 29-11-2021

AMJAD HASSAN TANOLI

Advocate High Court, Peshawar

**Certificate**

Certified as per instructions/information received from the client that no other writ petition of similar nature has been filed by the petitioners.

Counsel

ATTESTED  
EXAMINER  
Peshawar High Court



12/02/21

20

13

**BEFORE THE PESHAWAR HIGH COURT, PESHAWAR.**

In ref to W/P No \_\_\_\_\_/2021

Ahmad Shah

VS

Govt of KPK etc

**AFFIDAVIT**

I, Ahmad Shah S/O Shad Meer R/O Ali Masjid, Jamrod, Khyber, do here by solemnly affirm and declare on oath that the contents of this accompanying Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable court.

Identified by

Deponent

AMJAD HASSAN TANOLI  
ADVOCATE HIGH COURT.

0331-9408689  
CNIC 21202-9531102-1

NO. 40837
Certified that the above is a true and correct copy of the original as shown to me on this day of 29 May 2021 at Jamrod by Ahmad Shah who is known to me and who is the deponent in the above captioned case.
Signature: [Signature]
Notary Public

29/11/21  
Suba  
[Signature]

CERTIFIED TO BE TRUE COPY

EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 177 of  
The Constitution of Pakistan

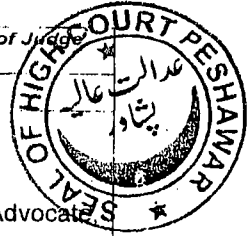
18 MAY 2022

8 21

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

Date of Order or Proceedings	Order or others Proceedings with Signature of Judge
12.01.2022	<p><b>W.P No.5118-P/2021.</b></p> <p>Present: Mr. Amjad Hassan Tanoli, Advocate for the petitioner.</p> <p>*****</p> <p>Comments be called from the respondent No.3, so as to reach this Court within a fortnight.</p> <p>JUDGE</p> <p>JUDGE</p> <p>EXAMINER Peshawar High Court, Peshawar Authorized Under Article 3.7 of the Constitution of Pakistan Order 1973</p> <p>18 MAY 2022</p>



(D.B) (Hon'ble Mr. Justice Lal Jan Khattak & Hon'ble Justice Musarrat Hilali)  
\*A.Ali\*

(22)



OFFICE OF THE DISTRICT EDUCATION OFFICER(M)  
KHYBER AT JAMRUD  
NO. \_\_\_\_\_/EDU DATED \_\_\_\_\_ 2022  
Email.DEOKHYBER7777@gmail.com

(20)

**Termination**

As per report/guidance of the Director and report submitted by Mr. Saleem Khan Principal GHS Sur Kamar, scrutiny committee, the score of Mr. Ahmad Shah in CT (IT) BPS-07 has fallen down to 107.86 and don't fall in the merit, so his appointment at S.No. 7 of the appointment order issued vide this office letter No.7252-59 dated 24/09/2021 of this hereby cancelled with immediate effect i.e 01/4/2022

*Id*  
DISTRICT EDUCATION OFFICER (M)  
KHYBER AT JAMRUD

Endst.No. 2783-87 Dated 2/4 2022

Copy forwarded for information to the

01. Director E & SE KP at Peshawar.
02. Deputy Commissioner Khyber at Peshawar.
03. DMO EMA District Khyber.
04. District Accounts Officer District Khyber.
05. Principal GHS Landi Kotal with the direction to stop his salary.
06. Official concerned.
07. Office Copy.

DISTRICT EDUCATION OFFICER (M)  
KHYBER AT JAMRUD  
*02/4/22*

TO,

The Worthy, Secretary  
Elementary & Secondary  
Education, Khyber Pukhtunkhwa,  
Peshawar.

Subject: Appeal against the order dated  
02/04/2022 communicated on 27/06/2022  
regarding termination of the applicant.

Respected Sir:

It is stated that undersigned was appointed as CT (IT) at government Higher Secondary School Landi Kotal vide order dated 24/09/2021 after fulfilling all the legal and code formalities, Moreover after appointment order I assumed the charge of the said post and served till 26/06/2022.

Apart from that I had also applied for the post of CT (BPS 15) but on refusal I filed a writ petition on 29/11/2021 bearing No: 5118-P/2021 which is still pending.

That after institution of the above said writ petition service of the applicant was terminated just as matter of personal grudge vide order dated 02/04/2022.

It is, therefore, requested that

(24)

the above said order Passed by the DEO  
(Male) may Please be declared illegal and  
unlawful.

Dated: 11/07/2022

Applicant

Sh

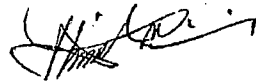
Ahmad Shah

S/o Shah Mir.

Charge Report

25

It is certified that Mr. Ahmad Shah  
CT-IT took charge as CT-IT on 27th  
September 2021 before noon at G.M.A.S.H School  
As Under Endst No. 7252-59.



PRINCIPAL  
Govt: M.AMMAR (S)  
CENT: M.H.S. LKL  
Distt: KHYBER

Charge Report

It is certified that Mr. Ahmad Shah  
CT-IT took charge as CT-IT on 27th  
September 2021 before noon at G.M.A.S.H  
School. As Under Endst No. 7252-59.



PRINCIPAL  
Govt: M.AMMAR (S)  
CENT: M.H.S. LKL  
Distt: KHYBER

- 1- Name (نام) AHMAD SHAH (26)
- 2- Nationality and Religion Pakistani, Islam  
(قومیت اور مذہب)
- 3- Residence Ali masjid Jamrud  
(مستقل رہائش)
- 4- Father's name and residence SHAD MEER, Ali masjid  
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as 03-08-1996  
nearly as can be ascertained  
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 5' 6"  
(قد و قامت)
- 7- Personal mark of identification Nil  
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)  
(مرد کی صورت میں بائیں اور دھورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger  
(چھٹا انگلی)

Ring Finger  
(پہنچا انگلی)

Middle Finger  
(انگشت میاں)


Fore Finger  
(انگشت شہادت)

Thumb  
(اٹوٹھا)

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



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






Principal  
Govt. M. Anmar (S)  
Cent. M.H. School  
T. K. L. Khyber Agency

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 no be taken after every 5 years under this rule.


اس صفحے کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔  
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (Such as promotion, transfer, dismissal)	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 next 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, reward or praised of the Government servants
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	پارہدائیکہ رخصت کے لے اوسط خواہ کا نہیں Period عرصہ	دستخط افسر مجاز	سزا یا جزیاء غیر مناسب کارکردگی کا ریکارڈ
Principal Govt. M.A. High School L.K.L. Haybe Agency					Appointed against vacant post BPS-07 (10930-110-29290)		
					PM-fixed plus usual allowance as admissible vide DEOCM		
					Fwdt No 752-59 dated 24/07/2021		
					Principal Govt. M.A. High School L.K.L. Haybe Agency		
					IL No 328 dt 14-1-22		
					S-E verified pay for in Jan 1-1-22		
					90400 - Appointment for a period of one year		
					District Officer 14/1/22		
					Arrears of Pay & allowances		
					IL No 45 dt 3-2-22		
					S.O. Pay & Allowance was 27-9-21 to 30-12-21 @ 83422		
					District Officer 14/1/22		
					District Officer 14/1/22		



50	129621	  
ایڈویکیٹ:		<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p>
بار کونسل ایسوسی ایشن نمبر: 14-4732		
رابطہ نمبر: 0342-8586723		

بعدالت جناب: سسر سٹریٹ رائٹنگل حبیب غنیمت شاہ

Appellant	مخائب:	Appeal	دعویٰ:	
 <p>الحمد للہ شاہ بنام گورنمنٹ آف پنجاب کی حکومت</p>			علت نمبر:	
			14/10/2022	مورثہ:
				جرم:
				تھانہ:
	<b>باعث تحریر آنکہ</b>			

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی کاروائی متعلقہ

آن مقام لکھنؤ کے لیے سسر سٹریٹ رائٹنگل کو وکیل 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 ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:

الحمد للہ شاہ  
مقام