17.06.2022 Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 19.08.2022 before S.B at Camp Court, Abbottabad.

Rs-800/-
Appellant Deposited
Security & Process Fee
20/6/22

(Rozina Rehman)
Member (J)
Camp Court, A/Abad

19.08.2022 Due to cancelation of tour to Camp Court, Abbottabad, case is adjourned to 21.10.2022 for the same as before.

Reader

21.10.2022 Nemo for parties.

Kabir Ullah Khattak, learned Additional Advocate General present.

Notice be issued to appellant/counsel and respondents for 27.12.2022 for reply/comments before S.B at Camp Court, Abbottabad.

(Rozina Rehman)
Member (J)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 308 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/03/2022	The appeal of Mr. Raja Sher Khan resubmitted today by Mr. Muhammad Riaz Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR
2-		This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put there on 18.4.22. CHAIRMAN
	18.04.2022	Junior to counsel for the appellant present. He made a request for adjournment as senior counsel for the appellant is busy in District Courts, Kohistan. Adjourned. To come up for preliminary hearing on 17.06.2022 before S.B at Camp Court, Abbottabad. (Rozina Rehman) Member(J) Camp Court, A/Abad

The appeal of Mr. Raja Sher S/O Pir Zada, SCT, GHS Jalkot, R/O Jalkot Tehsil Dassu and District Kohistan Upper received today i.e. on 07.02.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Appeal has not been flagged/marked with annexure marks.
2. Annexures of the appeal may be attested.
3. Appellant is required to file two separate service appeals against seniority and promotion of private respondent under section-4 and 6 of Service Tribunal Act/rules 1974.
4. The authority to whom departmental appeal is made/preferred has not arrayed as a necessary party.
5. Sub-rule 4 of rule 6 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondent.
6. Every memorandum of appeal shall be presented in approved file covers.
7. Copy of proper rejection order in respect of appellant dated 21/01/2021 not attached with the appeal which may be placed on it.
8. Annexure A and C attached with the appeal are illegible which may be replaced by legible/better one.
9. Nine more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 288 /S.T,

Dt. 7/2 /2022

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Riaz Adv. [redacted]

Sir,

1- The has been flagged.
2- The Annex have been attached.
3- That in the instant appeal, seniority has been impugned. However, separate appeal shall be filled as and when statitory period is elapsed.
4- Necessary party as directed has been arrayed.
5- The nessary parties has already been arrayed.
6- Done as directed.
7- Objection letter dated 21-1-2021 is placed on page

P.TO

8 & 9 : Eligible copies are attached & similarly, requisite set of appeal are attached.

The objection raised has been redressed as desired.

⇒ It is therefore, requested that the instant appeal may kindly be fixed before Tribunal.

Time is extended upto 05-03-2022.

BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Raja Sheer Khan vs Govt of KPK

S.#	Contents	Yes	No
1.	This appeal has been presented by:		
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?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
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		
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: M. Riaz advocate

Signature:

Dated: 7/2/022

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR (CAMP COURT AT ABBOTTABAD)

Service Appeal No. 308 /2022

Raja Sher Khan son of Pir Zada, SCT, GHS Jalkot, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

...APPELLANT

Through

Dated: 7-02-/2022

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR (CAMP COURT AT ABBOTTABAD)

156
07/02/2022

Service Appeal No. _____/2022

Raja Sher Khan son of Pir Zada, SCT, GHS Jalkot, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director, Elementary & Secondary Education, Directorate Peshawar.
4. District Education Officer (Male), at Dassu, District Kohistan Upper.
5. Ajam Khan son of Ahmed Jee, presently working as ASDEO Circle Harban, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.
6. Noor Ali son of Muzammil Khan, presently SST, Govt. Centennial Model High School, Dassu, Upper Kohistan, resident of Seo, Tehsil Dassu, District Kohistan Upper.

...RESPONDENTS

7/2/2022.

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 TO THE EFFECT THAT THE IMPUGNED ORDER DATED 21.01.2022 PASSED BY THE

RESPONDENT NO.3, WHEREBY, THE DEPARTMENTAL APPEAL FILED BY THE APPELLANT AGAINST THE REVISED SENIORITY LIST ISSUED BY THE RESPONDENT NO.4 WAS REJECTED IN THE LIGHT OF COMMENTS OF RESPONDENT NO.4 BEARING NO.8122 DATED 01.12.2021 IS ILLEGAL, UNLAWFUL, WITHOUT LAWFUL AUTHORITY, PERVERSE, ARBITRARY, FANCIFUL, DISCRIMINATORY, AGAINST THE RELEVANT LAW, RULES AND REGULATIONS, BASED ON MALAFIDE AND CONSEQUENTLY OF NO LEGAL EFFECTS UPON THE RIGHTS OF THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED ORDER DATED 21.01.2022 PASSED BY THE RESPONDENT NO.3 AS WELL AS IMPUGNED REVISED SENIORITY LIST ISSUED BY THE RESPONDENT NO.4 MAY GRACIOUSLY BE SET-ASIDE BEING ILLEGAL, UNLAWFUL AND WITHOUT LAWFUL AUTHORITY AND THE RESPONDENTS MAY KINDLY BE DIRECTED TO RESTORE THE SENIORITY OF THE APPELLANT BY PLACING THE NAME OF THE APPELLANT SENIOR TO THE

RESPONDENTS NO.5 AND 6. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

Respectfully Sheweth: -

1. That the appellant was firstly appointed as PST Teacher in May, 1999.

2. That in the year 2004, appellant was appointed as CT Teacher after due process of law and in this respect seniority list was also prepared.

3. That the appellant was promoted to the post of SCT on 05.12.2014 while the respondent No.5 was promoted to the post of SCT on 22.07.2015 and the respondent No.6 was promoted to the post of SCT on 12.02.2021. (Copies of the promotion order of appellant and respondents are attached as Annexure "A", "A-1" & "A-2").

4. That on 01.08.2021, final seniority list of SCTs/ CTs was prepared, wherein, the name of the appellant was reflected at serial No.6 while the

names of the respondents No.5 and 6 were at serial No.9 and 39 respectively. (Copy of the seniority list is attached as Annexure "B").

5. That vide application dated 13.08.2021, the respondent No.5 raised an objection upon the seniority list which was prepared and finalized in the year 2013 and subsequently teachers were also promoted on the basis of the same and in consequence of the above mentioned application, the seniority list has been changed surreptitiously without giving any notice to the appellant or any of the teacher included in the seniority list. (Copy of the application is attached as Annexure "C").

6. That thereafter appellant requested the respondents to provide him revised seniority list but the respondents did not provide the revised seniority list to the appellant.

7. That thereafter the appellant filed a writ peti before the Honourable Peshawar High C Abbottabad Bench against the responde providing him revised seniority list w disposed of vide order dated 15.09

direction to the respondents to consider the grievance of the appellant after providing opportunity of hearing and decide the same within a month. (Copy of order dated 15.09.2021 is annexed as Annexure "D").

8. That despite direction given by the Honourable Peshawar High Court, Abbottabad Bench the respondents' department did not provide the revised seniority list to the appellant, hence, the appellant also filed implementation application before the Honourable Peshawar High Court, Abbottabad Bench, upon which the respondents provide the impugned revised seniority list to the appellant. (Copies of implementation application and impugned revised seniority list are annexed as Annexure "E" & "F").

9. That it is pertinent to mention here that the aggregate marks calculated in the appointment order was also wrongly miscalculated by the respondents and in this respect, appellant also preferred an application/ appeal to the respondent No.2. (Copy of the application/ appeal is annexed as Annexure "G").

10. That feeling aggrieved from the impugned revised seniority list, the appellant preferred a departmental appeal to the competent authority which was rejected by the respondent No.3 vide impugned order dated 21.01.2022 in the light of comments of the respondent No.4 bearing No.8122 dated 01.12.2021. (Copies of the departmental appeal, comments and impugned order dated 21.01.2022 are annexed as Annexure "H", "I" & "J").

11. That now astonishingly the respondents' department has promoted the respondents No.5 & 6 as SST in consequence of the impugned revised seniority list vide notification dated 25.01.2022. (Copy of the notification dated 25.01.2022 is annexed as Annexure "K").

12. That the appellant being aggrieved from the impugned order dated 21.01.2022 and impugned revised seniority list, seeks the gracious indulgence of this Honourable Tribunal, inter-alia, on the following grounds: -

GROUNDS: -

a) That the impugned order dated 21.01.2022 as well as the impugned revised seniority list are illegal, unlawful, without lawful authority, arbitrary, perverse, fanciful, discriminatory, against the relevant law, rules and regulations and based on malafide, hence, liable to be set aside.

b) That since induction into service, the appellant was senior to the respondents No.5 and 6 but after issuance of impugned revised seniority list the name of the appellant was shown after the respondents No.5 and 6 without considering the relevant law, rules and regulations.

c) That the appellant was promoted to the post of SCT (BPS-16) in the year 2014 while the respondents No.5 was promoted as SCT in the year 2015 and the respondent No.6 was promoted as SCT in the year 2021 but this fact was also not considered by the

respondents while revising the impugned seniority list.

d) That the respondents have violated the Articles 25 of the Constitution of Islamic Republic of Pakistan, 1973.

e) That the provisions of Article 4 of the Constitution have been violated as they have not been dealt in accordance with law.

f) That the inaction and conduct of the respondents are against the principles of legitimate expectations and natural justice.

g) That the period w.e.f 06.10.2018 to 30.06.2018 of the respondent No.6 could not be counted for the purpose of promotion because in this regard the appeal filed by the respondent No.6 was also dismissed by this Honourable Tribunal vide order dated 17.09.2020. (Copy of order dated 17.09.2020 is annexed as Annexure "L").

h) That the respondents have promoted the respondents No.5 and 6 without completing

their stipulated time required by law for promotion, hence, the notification dated 25.01.2022 is issued malafidely and without adopting proper procedure provided by the law.

i) That the appellant has served the department with unblemished record and there is no adverse report against him.

j) That the impugned revised seniority list is based on untrue facts, hence, liable to be set-aside.

k) That neither the appellant was summoned nor any of the teacher included in the seniority list was given notice before issuing of the impugned seniority list and all the proceedings were carried out by the respondents in a sheer malafide manner on the back of the appellant, therefore, all the proceedings are nullity in the eye of law and liable to be set-aside.

l) That through the impugned revised seniority list the appellant has been deprived from his valuable rights by the respondents in a sheer

violation of the relevant law, rules and regulations.

m) That the other points will be agitated at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of the instant service appeal, the impugned order dated 21.01.2022 passed by the respondent No.3 as well as impugned revised seniority list issued by the respondent No.4 may graciously be set-aside being illegal, unlawful and without lawful authority and the respondents may kindly be directed to restore the seniority of the appellant by placing the name of the appellant senior to the respondents No.5 and 6. any other relief which this Honourable Tribunal deems fit and proper in the circumstances of the case.

...APPELLANT

Through

Dated: 7-02/2022

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

VERIFICATION: -

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

...APPELLANT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR (CAMP COURT AT ABBOTTABAD)

Service Appeal No. _____/2022

Raja Sher Khan son of Pir Zada, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Raja Sher Khan son of Pir Zada, resident of Jalkot, Tehsil Dassu, District Kohistan Upper, do hereby solemnly affirm and declare on oath that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Tribunal.

ATTESTED
Shazia Joses
NOTARY PUBLIC
Lic # 30/Hid-17
HD/A/461/2013
Advocate High Court DC Abbottabad
31/1/22

DEPONENT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR (CAMP COURT AT ABBOTTABAD)

Service Appeal No. _____/2022

Raja Sher Khan son of Pir Zada, SCT, GHS Jalkot, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

LIST OF BOOKS

1. Constitution of Islamic Republic of Pakistan, 1973.
2. All relevant service laws.
3. Other relevant case law will be cited at Bar.

...APPELLANT

Through

Dated: 7-02-/2022

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

(13) CTS (M) Konstanble

of Elementary and Secondary Education
Pakhtunkhwa Peshawar
PH No. 091-9210389, 9210932,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail mstq_ck8851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts posts, they will be posted by the District Education Officer concerned on "School based".

Total No. of CT (M) Posts duly verified by the DAO	211
1/3 share of Senior CT Posts	70
Share of promotion 10086	70
Already Promoted to the post of SCT B-16	67
Posts available for promotion	03
Vacant posts due to the promotion of 44 SCTs as SST	44
Total Posts available for promotion	47
Promoted to the post of SCT B-16	34

S. No.	Sen. No.	Name Of Teacher	Name of School	Date of Birth.	Remarks
1	27.	Shir Zada	GMS Maidan Kolai.	4/1/1969	Services placed at the disposal of DAO (M) Kohistan for further posting on school based.
2	33.	Mohammad Nazeer	GHS Kalal.	1/3/1975	do
3	34	Surbilend	GMS Bela Dubair	5/6/1977	do
4	35.	Mohammad Amleen	GMS Shilkhan Abad.	10/5/1977	do
5	36	Hazrat Shah	GMS Basha.	15/3/1978.	do
6	38	Muhammad Umar	GMS Ser Bar Palas	12/12/1959	do
7	39	Abdul Sattar	GMS Gujar Banda (P).	16/5/1962	do
8	40	Abdulah	GMS Hukum Abad	6/1/1962	do
9	41	Taj Muhammad.	GMS Shalgara	15/3/1969.	do
10	42	M. Zahir Shah	GMS Para garhi.	16/3/1969.	do
11	43.	Abdul Hakim	GMS Ghazi Abad	4/4/1969	do
12	44	Anwar Shah	GMS Razika	6/1/1969	do
13	45	Noor Badshah	GMS Damiser	10/6/1970	do
14	46.	M Hassan	GSM Jareen Ramolia.	15/5/1971	do

5/11/2011

			GMS Khowar Kandia.	1/1/1972	do
		Amir Alam	GMS Bagroo	25/1/1972	do
		Fazal Haq	GMS Ghel Ranolia	4/1/1972	do
50		Jahan Zeb	GMS Dhoop Jijal	5/4/1973	do
51		Farid Khan	GMS Summar Nala	10/5/1973	do
52		Bashir Ahmad	GMS Ranolia	20/2/1974	do
53		Noor Muhammad	GMS Peach Bela	4/6/1974	do
54		Mohammad Alam.	GMS Razika	1/2/1976	do
55		Bait Ullah	GMS Shatial	2/6/1977	do
56		Mehmood Alam	GMS Shulgara	7/1/1977	do
57		Amanullah	GMS Dal Sharakgal	3/2/1979	do
58		Mohammad Yunus	GMS Asgal	7/4/1977	do
60		Fazal Khan	GMS Shalkan Abad	3/1/1977	do
61		M. Akbar	GMS Dal Sharakot	12/3/1977	do
64		Amir Ulhaq	GMS Gabrial	4/10/1964	do
65		Kamal Khan	GMS Shamal Gali Kolai	9/1/1965	do
66		Raja Shah Khan	GHS Jalkot.	5/6/1968 6/5/1968	do
67		Rashid Ibrahim	GMS Ghel Ranolia	15/8/1968	do
68		Said Zarin	GHS Kurobair	6/6/1969	do
69		Abdullah	GMS Senga Raj Abad	1/1/1970	do

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationery period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Ses seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 20 / File No.2/Promotion Scan: CT B-16: Dated Peshawar the 5/12/2014.

Copy forwarded for information and necessary action to the: -

(15)

CTs (M) Kohistan III 3rd

District Education Officers (M) Kohistan.
District Accounts Officer Kohistan.
Official Concerned.
PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
M/File.

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

13-A

BETTER COPY

Directorate of Elementary & Secondary education
Khyber Pakhtunkhwa, Peshawar
PH No.091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_lck851@yahoo.com

Notification

Consequent upon the recommendations of the Department Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance department Endorsement No.SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following, Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) 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 with immediate effect and further they will be posted in the Government Higher Secondary/ High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts, they will be posted by the District Education Officer concerned on "School based".

Total No. of CT (M) Posts duly verified by the DAO	211
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Vacant posts due to the promotion of 44 SCTs as SST	44
Total Posts available for promotion	47
Promoted to the posts of SCT B-16	34

S.#	Sr No.	Name of Teacher	Name of School	Date of Birth	Remarks
1.	25	Sher Zada	GMS Maidan Kolai	4/1/1969	Services placed at the disposal of DEO(M) Kohistan for further posting on school based.
2.	33	Muhammad Nazeer	GMS Kayal	1/3/1975	----------do----------
3.	34	Sarbiland	GMS Bela dubair	5/6/1977	----------do----------
4.	35	Muhammad Ameen	GMS Shilkhan Abad	10/5/1977	----------do----------
5.	36	Hazrat Shah	GMS Basho	15/3/1989	----------do----------
6.	38	Muhammad Umar	GMS Ser Bar Palas	1212/1959	----------do----------
7.	39	Abdul Sattar	GMS Gujjar Banda (P)	16/5/1962	----------do----------
8.	40	Abdullah	GMS Hukum Abad	6/1/1962	----------do----------
9.	41	Taj Muhammad	GMS Shalgara	15/3/1969	----------do----------
10.	42	M. Zahir Shah	GMS Para Garhi	16/3/1969	----------do----------
11.	43	Abdul Hakim	GMS Ghazi Abad	4/4/1969	----------do----------
12.	44	Anwar Shah	GMS Razika	6/1/1969	----------do----------
13.	45	Noor Badshah	GMS Domiser	10/6/1970	----------do----------
14.	46	M. Hassan	GMS Jareen Ranolia	15/5/1971	----------do----------

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BETTER COPY

15.	47		GMS Khowar Kandia	1/1/1972	----------do----------
16.	48	M. Amir Khan	GMS Bayroo	25/1/1972	----------do----------
17.	49	Fazal Haq	GMS Ghel Ranolia	4/1/1972	----------do----------
18.	50	Jehan Zeb	GMS Dhoop Jijal	5/4/1973	----------do----------
19.	51	Farid Khan	GMS Summar Nala	10/5/1973	----------do----------
20.	52	Bashir Ahmed	GHS Ranolia	20/2/1974	----------do----------
21.	53	Noor Muhammad	GMS Peach Bela	4/6/1974	----------do----------
22.	54	Muhammad Alam	GMS Razika	1/2/1976	----------do----------
23.	55	Bait Ullah	GMS Shatial	2/6/1977	----------do----------
24.	56	Muhammad Alam	GMS Shulgara	7/1/1977	----------do----------
25.	57	Amanullah	GMS Dal Sharakot	3/2/1979	----------do----------
26.	58	Muhammad Younas	GMS Asgal	7/4/1977	----------do----------
27.	60	Fazal Khan	GMS Shalkan Abad	3/1/1977	----------do----------
28.	61	M. Akhtar	GMS Dal Sharakot	12/3/1977	----------do----------
29.	64	Amir ul Haq	GMS Gabrial	4/10/1964	----------do----------
30.	65	Kamal Khan	GMS Shamal Guli Kolai	9/1/1965	----------do----------
31.	66	Raja Sher Khan	GHS Jalkot	5/6/1968 6/5/1968	----------do----------
32.	67	Rashid Ibrahim	GMS Ghel Ranolia	15/8/1968	----------do----------
33.	68	Said Zarin	GHS Karobai	6/6/1969	----------do----------
34.	69	Abdullah	GMS Sanga Raj Abad	1/1/1970	----------do----------

Terms and conditions: -

1. They would be on probation for a period for one year extendable for another one year.
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3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. IN case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-se seniority on lower post will remained intact.
6. No TA/ DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst: No.2066-72/ File No.2/Promotion Senior CT B-16 Dated Peshawar the 11/2/2014

Copy forwarded for information and necessary action to the: -

15-A

BETTER COPY

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Kohistan Upper.
3. District Accounts Officer Kohistan.
4. Official concerned.
5. PS to the Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/ File.

Sd/-
Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.

A/16

Directorate of Elementary ... ary Education
Khyber Pakhtunkhwa ... Sharqar
PH: No: 091-9210389, 9210938
9210437, 9210957, 9210468
Fax: 091-9210936, 0800-33857
E-mail: afid_ldk861@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs 10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary/High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (M) Posts duly verified by the DAO	213
1/3 share of Senior CT Posts	70
Share of promotion 100%	70
Already Promoted to the post of SCT B-16	52
Posts available for promotion	18
Net to be Promoted to the post of SCT B-16	18
Promoted to the post of SCT B-16	11

S No	SNo	Name	Name of School	Date of Birth	Remarks
1	29	Javaid Iqbal	GMS Char Shab Khali	1/1/1974	Services placed at the disposal of DEO (M) Kohistan for further posting.
2	68	Serul Wahaj	GMS Gujar Banda (J)	9/9/1970	----------do----------
3	69	Khairun Nas	GMS Baryal	22/2/1971	----------do----------
4	70	Ajam Khan	GMS Coshali	01/05/1971	----------do----------
5	75	Mushtaq Ahmad	GMS Razika	09/02/1983	----------do----------
6	76	Noman Khan	GMS Bela Dubair	3/1/1973	----------do----------
7	77	Shams Khan	GMS Dilkandow	5/1/1974	----------do----------
8	79	Nawab Khan	GMS Parighari	4/10/1978	----------do----------
9	80	Abdul Qayyum	GMS Pari	1/1/1980	----------do----------
10	82	Mohammad Siraj ud Deen	GMS Shatial Koat	13/12/1968	----------do----------
11	83	Sadiq Hussain	GMS Summar Nala	12/5/1970	----------do----------

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rule framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.

D.S.

17

ANNEX "A-2"

Promotion to Senior Teachers of District Kohistan Upper

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUN KHAWA PESHAWAR

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No.SO(FR)/FD/ 10-22(E) 2010 dated 16.7.2012, the following CT (Male) is promoted to the posts of Senior CT, in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given blow with immediate effect, and further he will be adjusted by the District Education Officer concerned.

ITEM No.1 PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT BPS-16 ON REGULAR BASIS

Total No. Of Vacant Post Of CT	87
1/3rd Share Of SCT	29
Promotion Quota to SCT	100%
Already Promoted to SCT	23
Posts Available for Promotion to SST (G)	06
Proposed SCT for Promotion to SST(G)	01

S#	Sn #	Name	Name of School	Date of Birth	Date of Appointment as Regular CT	Qual:	Remarks
1	1	Noor Ali	GCMHS Dassu	23.02.1971	22.06.2002	MA, CT, B.Ed	Services are placed at the disposal of DEO(M) Kohistan Upper for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect

Terms and 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 services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.*
4. *Charge report should be submitted to all concerned.*
5. *His Inter-Service seniority on lower post will remain intact.*
6. *No TA/DA is allowed for joining his duty.*
7. *He will give an under taking to be recorded in his service book to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reversed.*
8. *Before handing over charge, his documents may be checked. If he has not the required relevant qualifications as per rules, he may not be handed over charge of the post*

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No 8594-99 */File No.1/Promotion SCT (BPS-16) Dated Peshawar the* 12/2/2021

District Education Officer Diary No: 911 Dated 02/2021

Copy forwarded for information and necessary action to the: -

1. *Accountant General Khyber Pakhtunkhwa Peshawar*
2. *District Education Officer (M) Kohistan Upper*
3. *District Accounts Officer Kohistan Upper*
4. *Officials Concerned*
5. *PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department*
6. *PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar*
7. *M/File*

ADEO (Est)
For necessary

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

16-A

BETTER COPY

Directorate of Elementary & Secondary education
Khyber Pakhtunkhwa, Peshawar
PH No.091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_lck851@yahoo.com

Notification

Consequent upon the recommendations of the Department Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance department Endorsement No.SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Male CTs B-15 are hereby promoted to the post of Senior CT BPS-16 (Rs.10000-800-34000) 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 with immediate effect and further they will be posted in the Government Higher Secondary/ High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts: -

Total No. of CT (M) Posts duly verified by the DAO	213
1/3-share of Senior CT Posts	70
Share of promotion 100%	70
Already promoted to the post of SCT B-16	52
Posts available for promotion	18
Net to be promoted to the post of SCT B-16	18
Promoted to the posts of SCT B-16	11

S.#	S No.	Name of Teacher	Name of School	Date of Birth	Remarks
1.	29	Javed Iqbal	GMS Char Shab Khali	1/1/1974	Services placed at the disposal of DEO(M) Kohistan for further posting.
2.	68	Serul Wahaj	GMS Gujar Banda (J)	9/9/1970	----------do----------
3.	69	Khairun Nas	GMS Baryar	22/2/1971	----------do----------
4.	70	Ajam Khan	GMS Goshali	01/05/1971	----------do----------
5.	75	Mushtaq Ahmed	GMS Gozika	09/04/1983	----------do----------
6.	76	Noman Khan	GMS Bela Dubair	3/1/1973	----------do----------
7.	77	Shams Khan	GMS Dilkandow	5/1/1974	----------do----------
8.	79	Nawab Khan	GMS Parighari	4/10/1978	----------do----------
9.	80	Abdul Qayyum	GMS Pari	1/1/1980	----------do----------
10.	82	Mohammad Siraj ud Din	GMS Shahal Koat	13/12/1968	----------do----------
11.	83	Sadiq Hussain	GMS Summar Nala	12/5/1970	----------do----------

Terms and conditions: -

1. They would be on probation for a period for one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. IN case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-se seniority on lower post will remained intact.
6. No TA/ DA is allowed for joining his duty.

17-A

BETTER COPY

Promotion of Senior Teacher of District Kohistan Upper

DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION KHYBER PAKHTUNKHWA PESHAWAR

Notification

Consequent upon the recommendation of the Department Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No.SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following, CT (Male) is promoted to the post of Senior CT, in BPS-16 (Rs.118910-1500-64000) 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 with immediate effect and further he will be adjusted by the District Education Officer concerned: -

Item No.1 **PROMOTION OF CT (BPS-15) MALE TO THE POST OF SCT BPS-16 ON REGULAR BASIS.**

Total No. of Vacant Post of CT	87
1 3rd Share of SCT	29
Promotion quota to SCT	100%
Already promoted to SCT	23
Posts available for promotion to SST (G)	06
Proposed SCT for Promotion to SST (G)	01

S.#	Sn #	Name	Name of School	Date of Birth	Date of appointment as Regular CT	Qual:	Remarks
1.	1.	Noor Ali	GGMHS Dassu	23.02.1971	22.06.2002	MA, CT, B.Ed	Services are placed at the disposal of DEO(M) Kohistan Upper for further adjustment against the post of SCT in BPS-16 on regular basis with immediate effect.

Terms and conditions: -

1. He would be on probation for a period for 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 services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. IN case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. His inter-service seniority on lower post will remained intact.
6. No TA/ DA is allowed for joining his duty.
7. He will give an undertaking to be recorded in his service book to the effect that if any over payment is made to him in light of this order will be recovered and if he is wrongly promoted he will be reversed.
8. Before handing over charge, his documents may be checked. If he has not the required relevant qualifications as per rules, he may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Endst: No.8594-99/File No.1/Promotion SCT (BPS-16) Dated Peshawar the 12.02.2021

Copy forwarded for information and necessary action to the: -

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Kohistan Upper.
3. District Accounts Officer Kohistan.
4. Official concerned.
5. PS to the Secretary to Govt. of Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/ File.

Sd/-
Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar

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BETTER COPY

18-B

DISTRICT EDUCATION OFFICER (MALE), DISTRICT KOHISTAN UPPER

FINAL SENIORITY LIST OF SCT/ CT TECHERS (M) SCHOOLS DISTRICT KOHISTAN UPPER ON 01.08.2021

S.#	Name of Teacher	Qualification		Father Name	BPS	Date of birth	Domicile	Date of First entry into Govt. Service	Date of appointment as trained teacher	Place of posting	Remarks
		Academic	Professional								
1.	M. Akram Shah	MA	SCT/B.Ed	Muhammad Tariq	16	12/10/1964	Kohistan	15/01/1983	06/04/1999	GHS Lohi	
2.	Muhammad Qaribullah	BA	SCT-2nd	Malik Noman	16	01/12/1970	Kohistan	08/02/1982	07/04/1999	GHS Shatial	
3.	Habib ur Rehman	FA	SCT-2nd	Malik Shadat	16	10/01/1972	Kohistan	06/04/1999	31/03/2002	GMS Barigoo	
4.	Muhammad Yousaf	BA	SCT	Sultan Khan	16	10/01/1973	Kohistan	06/04/1999	31/03/2002	GHS Lohi	
5.	Muhammad Younas	BA	SCT-2nd	Abdul Qadoos	16	09/04/1977	Kohistan	06/04/1999	29/01/2003	GHS Eleel	
6.	Raja Sher Khan	BA	B.Ed/CT	Malik Pirzada	16	06/05/1968	Kohistan	23/05/1992	29/05/2004	GHS Jalkot	
7.	Mushtaq Ahmed	BA	B.Ed/CT	Malik Alif Said	16	08/09/1970	Kohistan	04/06/1999	29/05/2004	GMS Jalkot	
8.	Saddiq Hussain	BA	B.Ed/CT	M. Ali	16	05/12/1970	Kohistan	12/08/1999	29/05/2004	GHS Kafar Banda	
9.	Ajam Khan	MSc/BS	M.Ed/B.Ed/CT	Ahmed Jee	16	01/05/1971	Kohistan	21/03/1990	29/05/2004	GHS Jalkot	
10.	Nowshir Wan	BA	CT/B.Ed	Zareef Khan	16	08/08/1975	Kohistan	29/05/2004	29/05/2004	GHS Dassu	
11.	Mushtaq Ahmed	BA	CT/B.Ed	Mohd. Amir	16	04/09/1983	Kohistan	29/05/2004	29/05/2004	GHS Bar Bela	
12.	M. Siraj ud Din	MA	CT/B.Ed	Madad Khan	16	13/12/1968	Kohistan	06/04/1999	06/07/2004	GHS Harban	
13.	Ghulam Jan	FA	CT	Akbar Khan	15	08/05/1977	Kohistan	06/04/1999	28/12/2004	GMS Mamokser	
14.	Muhammad Faqeer	MA	M.Ed/B.Ed/CT	M. Qadeer Khan	16	01/06/1968	Kohistan	14/05/1992	12/01/2006	GHS Chuchang	
15.	Abdul Hakeem	BA	M.Ed/CT	Abdullah Jan	16	12/12/1979	Kohistan	02/12/2006	02/12/2006	GHS Kafar Banda	
16.	Abdul Wakil	MSc/Pak	M.Ed/CT	Lal Khan	16	20/12/1973	Kohistan	02/03/1996	07/12/2006	GHS Bar Bela	
17.	Saif ur Rehman	BA	CT	Rasool Shah	15	04/01/1978	Kohistan	14/08/2007	14/08/2007	GMS Razika	
18.	Gul Nawaz	BA	CT/B.Ed	Sakhawat Shah	15	02/02/1984	Kohistan	01/06/2008	06/01/2008	GMS Peroo Bela	
19.	Muhammad Din	FA	/DE	Zour Das Khan	15	15/05/1985	Kohistan	26/04/2008	26/04/2008	GMS Barigoo	
20.	Barkat Shah	BA	CT-2nd	Zahooq	16	01/03/1986	Kohistan	24/04/2008	30/03/2010	GMS Gulab Abad	
21.	Fazal Mehmood	BA	CT	Muhammad Sharif	16	12/05/1986	Kohistan	14/08/2007	09/07/2010	GHS Teyal	
22.	Attaullah	MA	SCT/B.Ed	Sardar Khan	16	05/05/1982	Kohistan	30/08/2012	30/08/2012	GHS Shatial	
23.	Muhammad Younas	BA	CT	Khalid Khan	15	03/08/1984	Kohistan	05/11/2003	21/03/2015	GMS Saydan Dadir	
24.	Duraj Khan	BA	CT	Jehan Zeb	15	15/03/1968	Kohistan	21/08/2015	21/03/2015	GHS Seo	

19-A

BETTER COPY

25.	Qazi Shah	BA	CT	Sad Bar	15	01/06/1969	Kohistan	16.05.1992	01.09.2015	GMS Gujar Banda Jalkot	
26.	Muhammad Siraj	BA	B.Ed	Haji Shah	15	08/05/1972	Kohistan	16.05.1992	01.09.2015	GMS Summar Nala	
27.	Bakht Rehman	MA	CT	Jamdad Khan	15	02/03/1983	Kohistan	09.03.2018	09.03.2016	GMS Kuz Kamila	
28.	Ezat Malook	MA	CT	Farooz Khan	15	04/10/1989	Kohistan	10.03.2016	10.03.2016	GMS Makoki Sar	
29.	Sher Baz Khan	M.Sc	CT	Saiful Malook	15	10/05/1995	Kohistan	10.03.2016	10.03.2016	GMS Bela Jalkot	
30.	Amir Zada	BA	CT	Afsar Khan	15	04/03/1985	Kohistan	15.03.2016	15.03.2016	GMS Pari	
31.	Sir aman	MBA	CT	Khan Zada	15	01/03/1986	Kohistan	15.03.2016	15.03.2016	GMS Karang	
32.	Muhammad Nabi	MA	CT/Bed:	Naqal Shah	15	19/08/1989	Kohistan	31.03.2017	31.03.2017	GMS Mamokiser	
33.	Zia ur Rehman	BA	CT	Aqleem Khan	15	01/01/1993	Kohistan	31.03.2017	31.03.2017	GHS Jalkot	
34.	Javed Iqbal	MA Isl	CT	Hedayat Ullah	15	10/05/1993	Kohistan	31.03.2017	31.03.2017	GMS Dargah Harban	
35.	Muhammad Afzal	BBA Hon	CT	Ezhar ur Haq	15	06/02/1992	Kohistan	01.04.2017	01.04.2017	GMS Gulab Abad	
36.	Shafi ur Rehman	BA	CT	Furqan	15	11/07/1995	Kohistan	01.04.2017	01.04.2017	MK Gabrial	
37.	Ser Shah	BA	CT	Subar Khan	15	01/01/1982	Kohistan	04.04.2017	04.04.2017	GMS Goshali Jalkot	
38.	Rashid Ahmed	MA	CT	Muhammad Zaid	15	03/02/1975	Kohistan	04.08.2017	04.08.2017	GMS Dogha Seo	
39.	Noor Ali	MA/M.Sc	M.ed/Bed/CT	Haji Muzammil	16	23/02/1971	Kohistan	26.06.1997	01.07.2018	GCMHS Dassu	
40.	Fazal Rabi	BA	CT	Nomi Haq	15	20/11/1969	Kohistan	04.08.2017	untrained	GMS Dogha Seo	

Certificate

1. Certified that the seniority is final, undisputed and non-judicious.
2. Certified that all SCT/CT teachers are working in district Kohistan are included in this seniority list.

District Education Officer
(Male), Kohistan

C/(20)

[illegible]

[illegible] گزارش کیا گیا ہے [illegible]

[illegible] کے مطابق [illegible] SCT سے [illegible]

کو دوبارہ عمر کا لحاظ رکھ کر ترتیب دیا گیا جس [illegible]

کیا گیا۔ نیز [illegible] نے اسی وقت باقاعدہ تحریری درخواست بھی دی [illegible]

چونکہ اب SCT سے SST پروموشن آرڈرز کے [illegible] DAC بکم ستمبر 2021 کو [illegible]

اور سائل کو [illegible] کا حق سے محروم کیا گیا ہے

لہٰذا مستدعا ہے کہ CT/SCT [illegible] کے [illegible]

نظر ثانی کیا جائے نیز باقی اضلاع کا [illegible] پوزیشن کو بھی مدنظر رکھا جائے

تاکہ کسی حقدار کا حق ضائع نہ ہو۔

العارض

درخواست ہذا کے ساتھ

① CT آرڈرز کی فوٹو کاپی

② SCT آرڈرز کی فوٹو کاپی

منسلک ہے۔

سائل انعام خان GHS SCT جابوکے

ADEO SY

Put up on file

13-8-21

ADEO Estts Sec.

Please, [illegible]

Diary No: 8005
Dated: 13/08/21
District Education Officer (M)
Kohistan Upper

13/08/2021

Letter (20)

بحضور جناب DEO صاحب ضلع ہانگو

عنوان درستگی برائے میرٹ لسٹ CT/SCT

جناب عالی!

مودبانہ عرض گزار ہے کہ معلم سائل کا آرڈر 29/8/2004 میں CT باقاعدہ میرٹ کے مطابق ہوا تھا۔

بعد میں CT سے SCT پروموشن کے لیے میرٹ لسٹ کو دورانیہ عمر کا لحاظ رکھے بغیر ترتیب دیا گیا ہے۔ جس میں سائل CT میرٹ لسٹ کو نظر انداز کیا گیا ہے۔ نیز سائل نے اسی وقت باقاعدہ تحریری درخواست بھی DPO یکم ستمبر 2021 کو طلب کی گئی ہے۔

لہٰذا استدعا کی جاتی ہے کہ معلم CT/SCT میرٹ لسٹ پر دوبارہ نظر ثانی کی جائے نیز باقی اصلاح کے میرٹ پوزیشن کو بھی مدنظر رکھا جائے تاکہ کسی حقدار کا حق ضائع نہ ہو۔

العارض

رحم خان SCT GHS ہانگو

درخواست ہمراہ سابقہ

(1) آرڈر کاپی CT

(2) [illegible] کاپی

[redacted]

D/21

BEFORE THE PESHAWAR HIGH COURT
ABBOTTABAD BENCH ABBOTTABAD

WP No- 978/2021

1. Raja Sher Khan S/o Pir Zada R/o Jalkot, Tehsil Dassu, District Kohistan Upper.
2. Mushtaq Ahmed S/o Alif Said R/o Jalkot, Tehsil Dassu, District Kohistan Upper.

.....Petitioners

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, at Civil Secretariat Peshawar.
2. Director, Elementary & Secondary Education Department, at Civil Secretariat Peshawar.
3. Departmental Promotion Committee (DPC) at Civil Secretariat Peshawar.
4. District Education Officer (Male), at Dassu, District Kohistan Upper.
5. Arjam Khan S/o Ahmed Jee R/o Jalkot, Tehsil Dassu, District Kohistan Upper.

.....Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN

Certified to be True Co
EXAMINER
16 SEP 2021
Peshawar High Court Atd. B
Authorized Under Se: 75 Evid

May it please the Court;

No 4120
04-09-21

FACTS

1. That the petitioners are senior CT teachers and presently performing his duties in district Kohistan and were appointed in the year 1992 and 1999 as PT teachers and ...EM respectively.

FD TODAY
REGISTRAR

RE-FILED TODAY

(22)

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
15.09.2021	**W.P.No.978-A/2021.** Present: Mr. Muhammad Riaz, Advocate for the petitioners. *** **MOHAMMAD IBRAHIM KHAN, J.-** Through instant constitutional petition, the petitioners seek the following relief:- "In the wake of above, it is, therefore, very humbly prayed that the respondents No.2 & 4 may kindly be directed to provide revised seniority list before meeting of departmental promotion committee and thereafter allow the petitioners to adopt due process of law." 2. Facts of the case need no reiteration as after arguing the case at great length, learned counsel for the petitioners stated that he does not press this petition provided direction is given to the respondent No.2 to consider the grievance of the petitioners after opportunity of hearing and decide the same within a shortest possible time. 3. In view of the above, this petition is dismissed being not pressed. However, the respondent No.2 is directed to consider the grievance of the petitioners after opportunity

of hearing and decide the same within a month from the date of receipt of this order.

JUDGE

JUDGE

Aftab PS.

Hon'ble Mr. Justice Mohammad Ibrahim Khan
Hon'ble Mr. Justice Shakeel Ahmad

E/24

BEFORE THE PESHAWAR HIGH COURT
ABBOTTABAD BENCH

CM No. 35 -A/2022
IN
Writ Petition No.978-A/2021

1. Raja Sher Khan son of Pir Zada, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.
2. Mushtaq Ahmed son of Alif Said, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...PETITIONERS

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Departmental Promotion Committee (PMC), at Civil Secretariat, Peshawar.
4. District Education Officer (Male), at Dassu, District Kohistan Upper.
5. Arjam Khan son of Ahmed Jee, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.

...RESPONDENTS

Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns

No 328
17-01-22

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
17/1/22

APPLICATION SEEKING IMPLEMENTATION OF THE ORDER DATED 15.09.2021 PASSED BY THIS HONOURABLE COURT IN THE ABOVE MENTIONED WRIT PETITION.

PRAYER: ON ACCEPTANCE OF THE INSTANT APPLICATION, THE RESPONDENTS MAY GRACIOUSLY BE DIRECTED TO COMPLY/ IMPLEMENT THE ORDER DATED 15.09.2021 PASSED BY THIS HONOURABLE COURT IN THE TITLED WRIT PETITION IN ITS TRUE LETTER AND SPIRIT.

Respectfully Sheweth: -

1. That the petitioners have filed the above mentioned writ petition before this Honourable Court. (*Attested copy of the writ petition is attached as Annexure "A"*).

2. That the above mentioned writ petition was fixed for hearing on 15.09.2021 and this Honourable Court disposed of the writ petition with direction to the respondent No.2 to consider the grievance of the petitioners after giving opportunity of hearing and decide the same within a month vide judgment/ order dated 15.09.2021: (*Attested copy of order dated 15.09.2021 is attached as Annexure "B"*).

3. That thereafter petitioners approached office of the respondent No.2 and requested for implementation/ compliance of the order dated 15.09.2021 passed by this Honourable Court but the respondent No.2 has not complied with the directions of this Honourable Court despite of the fact that the judgment of this Honourable Court was also communicated to the respondent No.2 by the office.

4. That since 15.09.2021, petitioners time and again approached office of the respondent No.2 and requested for compliance of direction given by this Honourable Court but the respondent No.2 turned deaf ear.

5. That despite lapse of considerable time the respondent No.2 did not implement the order/ direction given by this Honourable Court.

6. That inspite of repeated requests by the petitioners, the respondent No.2 is reluctant to implement the directions/ order of this Honourable Court, thus, the petitioners have no other option except to file instant application.

7. That the valuable rights of the petitioners are involved.

It is, therefore, humbly prayed that on acceptance of the instant application, on acceptance of the instant application, the respondents may graciously be directed to comply/ implement the order dated 15.09.2021 passed by this Honourable Court in the titled writ petition in its true letter and spirit.

...PETITIONERS

Through

Dated: 17.01.2022

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns:

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH
17/1/22

(28)

5

BEFORE THE PESHAWAR HIGH COURT, ABBOTTABAD BENCH

CM No. 35 -A/2022
IN
Writ Petition No.978-A/2021

Raja Sher Khan son of Pir Zada, resident of Jalkot, Tehsil Dassu, District Kohistan Upper & others.

...PETITIONERS

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

IMPLEMENTATION APPLICATION

AFFIDAVIT

I, Mushtaq Ahmed son of Alif Said, resident of Jalkot, Tehsil Dassu, District Kohistan Upper, do hereby solemnly affirm and declare on oath that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

13401-1501714-9

DEPONENT

Certified to be True Copy
EXAMINER
31 JAN 2022
Peshawar High Court Atd. Bench
Authorized Under Se: 75 Evid Ordns:

288/288 Receipt No: 288

Solemn
before me on this
15 day of January 2022
S/O
Kohistan
who is personally know is me

Oath Commissioner
(Additional Registrar)
Peshawar High Court Abbottabad Bench

FILED TODAY
ADDITIONAL REGISTRAR
PESHAWAR HIGH COURT
ABBOTTABAD BENCH

ANNEX "F"

DISTRICT EDUCATION OFFICER (MALE) DISTRICT KOHISTAN UPPER

Final Seniority List of SCT/CT Teachers (M) Schools District Kohistan Upper on 01.08.2021

S No	Name of Teacher	Qualification		Father Name	BPS	Date of Birth	Domicile	Date of First entry into Govt: Service	Date of appointment as trained teacher.	Place of posting.	Remarks
		Academic	Professional								
1	M. Akram Shah	MA	CT/B.Ed	Muhammad Taqi	16	12/10/1964	Kohistan	15/1/1983	06/04/1999	GHS Lohi	Already Promoted
2	Muhammad Qaribullah	BA	CT	Malik Noman	16	01/12/1970	Kohistan	08/02/1992	07/04/1999	GHS Shatial	Already Promoted
3	Habib ur Rahman	FA	CT	Malik Shadat	15	10/01/1972	Kohistan	06/04/1999	31/03/2002	GMS Barigoo	
4	Muhammad Yousaf	BA	CT	Sultan Khan	16	10/01/1973	Kohistan	06/04/1999	31/03/2002	GHS Lohi	Already Promoted
5	Noor Ali	MA/M.Sc	M.ed/BEd/CT	Haji Muzammil	16	23/02/1971	Kohistan	26.06.1997	22/06/2002	GCMHS Dassu	Already Promoted
6	Muhammad Younas	BA	CT	Abdul Qadoos	16	09/04/1977	Kohistan	06/04/1999	29/01/2003	GHS Eleel	Already Promoted
7	Ajam Khan	MSc. BS	M.Ed/B.Ed/CT	Ahmad Jee	16	01/05/1971	Kohistan	21/3/1990	29/05/2004	GHS Jalkot.	Already Promoted
8	Saddiq Hussain	BA	B.Ed/CT	M.Ali	16	05/12/1970	Kohistan	12/08/1999	29/05/2004	GHS Kafar Banda	Already Promoted
9	Mushtaq Ahmad	BA	B.Ed/CT	Malik Alif Said	16	09/09/1970	Kohistan	04/06/1999	29/05/2004	GHS Jalkot.	Already Promoted
10.	Raja Sher Khan	BA	B.Ed/CT	Malik Pirzada	16	06/05/1968	Kohistan	23/5/1992	29/05/2004	GHS Jalkot.	Already Promoted
11	Nowshir Wan	BA	CT/B.Ed	Zareef Khan	16	08/06/1975	Kohistan	29/5/2004	29/05/2004	GHS Dassu	Already Promoted
12.	Mushtaq Ahmad	BA	CT/B.Ed	Mohd Amir	16	04/09/1983	Kohistan	29/5/2004	29/05/2004	GHS Bar Bela	Already Promoted
13	M Sirajud Deen	MA	CT/B.Ed	Madad Khan	16	13/12/1968	Kohistan	06/04/1999	06/07/2004	GHS Harban	Already Promoted
14	Ghulam Jan	FA	CT	Akbar Khan	15	08/05/1977	Kohistan	06/04/1999	28/12/2004	GMS Mamokser.	
15	Muhammad Faqeer	MA	M.Ed/B.Ed/CT	M.Qadeer Khan	16	01/06/1968	Kohistan	14/5/1992	12/01/2006	GHS Chuchang	Already Promoted.
16	Abdul Hakeem	BA	M.Ed/CT	Abdullah Jan	16	12/12/1979	Kohistan	02/12/2006	02/12/2006	GHS Kafar Banda	Already Promoted
17	Abdul Wakil	MSc/Pak	M.Ed/CT	Lal Khan	16	20/12/1973	Kohistan	23/1/1996	07/12/2006	GHS Bar Bela	Already Promoted
18	Saif-ur-Rahman	BA	CT	Rasool Shah	16	4/1/1978	Kohistan	14.08.2007	14/08/2007	GHS Kafar Banda	Already Promoted
19	Gul Nawaz	BA	CT/B.Ed	Sakhawat Khan	16	02/02/1984	Kohistan	01/06/2008	06/01/2008	GHS Peroo Bella	
20	Muhammad Din	FA	/DE	Zour Das Khan	15	15/5/1985	Kohistan	26/4/2008	26/04/2008	GMS Barigoo	
21	Barkat Shah	BA	CT-2nd	Zahooq	16	01/03/1986	Kohistan	24/4/2008	30/03/2010	GCMHS Dassu	Already Promoted
22	Fazal Mehmood	BA	CT	Muhammad Sharif	16	12/05/1986	Kohistan	14/8/2007	09/07/2010	GHS Teyal	Already Promoted.
23	Atta Ullah	MA	CT/B.Ed	Sardar Khan	16	06/05/1982	Kohistan	30.08.2012	30.08.2012	GHS Shatial	Already Promoted
24	Muhammad Younas	BA	CT	Khalid Khan	16	3/8/1984	Kohistan	05.11.2003	21/03/2015	GHS Bar Bela	Already Promoted

Asstt. Distt. Edu. Officer
Estt: (m) Kohistan

District Education Officer (M)

F/98

O/C

D/A

25	Duraj Khan	BA	CT	Jehan Zeb	16	15.03.1968	Kohistan	21.08.2015	21.08.2015	GHS [illegible]	Already Promoted
26	Qazi Shah	BA	CT	Sad Bar	16	1/6/1969	Kohistan	16.05.1992	01/09/2015	GHS [illegible]	Already Promoted
27	Muhammad Siraj	BA	B.Ed	Haji Shan	16	8/5/1972	Kohistan	16.05.1992	01/09/2015	GHS Seo.	
28	Sher Baz Khan	MSc.	CT	Saiful Malook	15	10/5/1995	Kohistan	10.03.2016	10.03.2016	GMS BELA JALKOT	
29	Bakht Rahman	MA	CT	Jamdad Khan	15	2/3/1983	Kohistan	09.03.2016	09.03.2016	GMS Kuz Kamila	
30	Amir Zada	BA	CT	Afsar Khan	15	4/3/1985	Kohistan	15.03.2016	15.03.2016	GMS Pari	
31	Ezat Malook	MA	CT	Farooz Khan	15	4/10/1989	Kohistan	10.03.2016	10.03.2016	GMS Mamoki Sar	
32	Sir Aman	MBA	CT	Khan Zada	15	1/3/1986	Kohistan	15.03.2016	15.03.2016	GMS Karang	
33	Muhammad Afzal	BBA Hon	CT	Ezhar ur haq	15	6/2/1992	Kohistan	01.04.2017	01.04.2017	GMS Gullab Abad	
34	Alam Zeb	MSc/MA	M.Ed/B.Ed/CT	Magar Shah	15	5/7/1989	Kohistan	31.03.2017	31.03.2017	GHS Jalkot.	
35	Muhammad Nabi	MA	CT/Bed:	Naqal Shah	15	19.08.1989	Kohistan	31.03.2017	31.03.2017	GMS Mamokiser	
36	Inayat Ur Rahman	BA	CT	Siral Shah	15		Kohistan	31.03.2017	31.03.2017	GMS Summar Nala	Removed from Service
37	Zia Ur Rehman	BA	CT	Aqleem Khan	15	01.01.1993	Kohistan	31.03.2017	31.03.2017	GHS Jalkot.	
38	Javed Iqbal	MA Isl	CT	Hedayat ul Lah	15	10/5/1993	Kohistan	31.03.2017	31/03/2017	GMS Dargah Harban	
39	Shafiur Rehman	BA	CT	Furqan	15	11/7/1995	Kohistan	01.04.2017	01.04.2017	MK Gabrial	
40	Ser Shah	BA	CT	Subar Khan	15	1/1/1982	Kohistan	04.04.2017	04/04/2017	GMS Goshali Jalkot	On Disable Quota
41	Rashid Ahmad	MA	CT	Muhammad Zaid	15	3/2/1975	Kohistan	04.08.2017	04.08.2017	GMS Dogha Seo	
42	Fazal Rabi	BA	CT	Nomi Haq	15	20-11-1969	Kohistan	04.08.2017	un trained	GMS Dogha Seo	

CERTIFICATE.

1. Certified that the seniority is final, uridisputed and non judicious.
2. Certified that all SCT/CT teachers are working in district Kohistan are included in this seniority list.

District Education Officer
(Male) Kohistan
District Education Officer (M
Kohistan

Asstt. Distt. Edu. Officer
Estt: (m) Kohistan

D/A

O/C

Estt: (m) Kohistan

District Education Officer
Kohistan

ANNEX "G" (34)

1-2-202

بخدمت جناب ڈائریکٹر صاحب E&SE پشاور

آداب جناب عالی۔

1۔ حالیہ مورخہ 01/09/2021 کو ہونے والی ڈی پی سی SST میں نور علی SCT کو پہلے نمبر پر رکھا گیا ہے۔ یہ کہ نور علی کی سنیارٹی کی اپیل سروس ٹریبونل نے 17-09-2020 کو خارج کی ہے اور سروس ٹریبونل کے فیصلے کے مطابق وہ 2007 تا 2018 سنیارٹی کا حق دار نہیں اور اس کی سنیارٹی مورخہ 07/01/2018 سے شمار کی جائے گی کیوں وہ ملازمت سے برخاست ہو گئے تھے۔ اور موصوف کی SCT پروموشن بھی قانون کے خلاف دی گئی۔

2۔ 2004 میں ہمارے 21 بندوں کا ایک ہی لیٹر پر فرش اپائنمنٹ ہوا تھا اور ہم سارے ان سروس تھے اور اپائنمنٹ کرتے وقت سکور کو مدنظر نہیں رکھا گیا ہے۔ اپائنمنٹ آرڈر کے مطابق سکور اور سیریل نمبر مندرجہ ذیل ہے۔

	نام	سکور	سیریل نمبر
(i)	مشتاق احمد سابق نام سیر الوھاج	15 51.80	
(ii)	انجم خان	07 48.20	
(iii)	راجا شیر خان	17 48.10	

لہذا سنیارٹی لسٹ کو ترتیب دیتے وقت سکور کو مدنظر رکھا جائے۔

3۔ اور یہ کہ 2013 میں سابقہ سنیارٹی لسٹ ترتیب دی گئی تھی اس کے مطابق راجہ شیر خان کا SCT پروموشن 05-07-2014 اور اسی طرح مشتاق احمد سابقہ نام سیر الوھاج SCT پروموشن 30/07/2015 کو ہوئی۔ اور سنیارٹی لسٹ میں مشتاق احد سابقہ نام سیر الوھاج سنیارٹی نمبر 68 اور عجم خان سنیارٹی نمبر 70 تھا جو کہ ہمارے SCT آرڈر میں موجود ہے۔ اور اسی لسٹ کے مطابق سینکڑوں اساتذہ کا SST پروموشن ہو چکا ہے اگر لسٹ غلط تھی تو ان لوگوں کا پروموشن کینسل کیا جائے اور نئے سرے سے سنیارٹی لسٹ ترتیب دی جائے۔

4۔ اب جس سنیارٹی لسٹ پر اجم خان نے اعتراض کیا ہے وہ لسٹ مرتب کرتے وقت عجم خان مرتب کنندہ کمیٹی کا ممبر تھا اور اس کے دستخط سنیارٹی لسٹ پر موجود ہیں۔ اگر لسٹ غلط تھی تو اس وقت کیوں اعتراض نہیں کیا گیا۔ کیونکہ اس وقت وہ خود ممبر تھا اسی لیے۔

5۔ اور لسٹ تبدیل کرتے وقت DEO کوہستان اپر نے کوئی نوٹس نہیں لیا۔ اور اعتراضات کے لیے لسٹ ڈسپلے بھی نہیں کی۔ ان تمام حقائق کو مدنظر رکھتے ہوئے ہم اس نتیجے پر پہنچے ہیں کہ یہ تمام کاروائی بدنیتی، بغض اور عنایت کی بنیاد پر اس لیے کی گئی کہ صاحبان کو پروموشن سے روکا جائے۔

لہذا آپ صاحبان سے گزارش کی جاتی ہے کہ سائل کے ساتھ انصاف کیا جائے۔

شکریہ!

سائل تاحیات دعا گو رہے گا۔

مورخہ: 20-09-2021

مشتاق احمد
SCT

راجہ شیر خان
SCT

ANNEX "H" 32

بخدمت جناب ڈائریکٹر صاحب E&SE پشاور

عنوان: [illegible] برائے SCT سے SST

جناب عالی!

[illegible] 21-05-1992 [illegible] PST [illegible]
[illegible] 05-0[illegible]-1999 [illegible] DM [illegible] 29-05-2004 [illegible] CT [illegible]
[illegible] Appointment [illegible] 2013 [illegible]
[illegible] DEO [illegible]
[illegible] 2013 [illegible] 12 [illegible]
[illegible] ACR [illegible]
[illegible] 2021 DPC [illegible]
[illegible] 13-08-2021 [illegible] DPC [illegible]
[illegible] 12 [illegible] DPC [illegible]
[illegible]
[illegible] SCT [illegible]
[illegible] DPC [illegible]
[illegible]
[illegible] ACR [illegible]
[illegible] 20-08-2021 [illegible]
[illegible]

جناب عالی!

[illegible] 29-05-2004 [illegible] CT [illegible]
[illegible] 05-07-2014 [illegible]
[illegible] CT سے SCT [illegible]
[illegible] SCT [illegible] 30-07-2015 [illegible]
[illegible]
[illegible] 70 [illegible]
[illegible] 68 [illegible]
[illegible] SCT اور SST [illegible]
جناب سے استدعا ہے کہ [illegible]
[illegible]
جناب کی عین نوازش ہوگی۔

العارضان
[illegible] SCT [illegible]
[illegible] SCT [illegible]

مورخہ 23-08-2021

Annex (H)

32-A

BETTER COPY

بخدمت جناب ڈائریکٹر صاحب E&SE پشاور

عنوان: **اپیل برائے پروموشن SCT سے SST۔**

آداب۔

مئودبانہ گزارش ہے کہ سائل راجہ شیر خان 21.05.1992 سے بحیثیت PST کام کر رہا تھا۔ مشتاق احمد پرانا نام سیر لوہاج 05.04.1999 سے DM کی پوسٹ پر کام کر رہا تھا اسی طرح 29.05.2004 کو ہماری CT میں 21 بندوں کا ٹیسٹ اور انٹرویو کے بعد سلیکشن کمیٹی نے ہماری Appointment آرڈر ہو گیا۔ 2013 کو ہم نے حامد محمد صاحب جو ہمارے کوہستان کے DEO تھے سنیارٹی لسٹ کے لئے درخواست دی جو کہ حامد محمود صاحب نے ڈائریکٹر صاحب رفیق خٹک صاحب کے مشاورت سے سنیارٹی لسٹ بنائی۔ جو 2013 سے اب تک اسی کے بنیاد پر سینکڑوں بندوں کا پروموشن ہو چکا ہے۔ اب 12 اگست 2021 کو DPC ہونا تھا جس میں ہم دونوں فرسٹ اور سیکنڈ نمبر پر تھے۔ اور ہمیں ACR جمع کرنے کا کہا گیا جو کہ ہم جمع کر چکے تھے۔ 12 اگست سے DPC پوسٹ پونڈ ہوئی اور یکم ستمبر کو DPC ہونا تھا۔ مورخہ 13.08.2021 کو ہمارے ایک ساتھی اجم خان SCT نے ڈی ای او کو دوبارہ سنیارٹی لسٹ پر نظر ثانی کے لئے درخواست دی۔ ڈی ای او پر کوہستان یکم ستمبر کی DPC کے لئے بناء سنیارٹی لسٹ ریوائزڈ کر دی گئی ہے جس میں سائلان تیسرے اور چھوتھے نمبر پر آتے ہیں۔ ڈی ای او کسی بھی طریقے سے ہمیں پیچھے دھکیل کر اجم خان جو کہ سابقہ سنیارٹی لسٹ میں اس کا چوتھا نمبر ہے فرسٹ پر لانا چاہتے ہیں۔ مورخہ 20.8.2021 کو صاحب نے ہمیں دستاویزات اور ACR واپس لے جانے کو کہا۔ اور ہم نے اس کو سابقہ سنیارٹی لسٹ اور نئے سنیارٹی لسٹ دینے کی درخواست کی لیکن صاحب نے جواب میں کہا کہ میں آپ کو یہ لسٹیں دینے کا پابند نہیں ہوں۔

جناب عالی!

صورتحال یہ ہے کہ مورخہ 29.05.2004 کو ہمارے تینوں بندوں کا CT آرڈر جاری ہوا حالانکہ وہ پروموشن نہیں فریش اپائنٹمنٹ ہے۔ اس طرح CT سے SCT پروموشن کے لئے راجہ شیر خان کی تاریخ 05.07.2014 کو ہوئی اسی طرح مشتاق احمد پرانا نام سیر لوہاج اور اجم خان کی SCT پروموشن 30.07.2015 کو ہوی تھی۔ سنیارٹی لسٹ میں مشتاق احمد پرانا نام سیر لوہاج سنیارٹی لسٹ نمبر 68 میں اور اجم خان سنیارٹی لسٹ نمبر 70 میں تھے۔ تمام آرڈر کی فوٹو کاپیاں لف درخواست ہیں۔

جناب سے استدعا ہے کہ سابقہ سنیارٹی لسٹ کی بنیاد پر SCT اور SST پروموشن ہمارا حق ہے پرانی سنیارٹی لسٹ چیلنج کرنا یہ ہمارے ساتھ زیادتی ہوگی۔ ہمیں ہمارا حق دیا جائے۔

جناب کی عین نوازش ہوگی۔

العارضان

راجہ شیر خان SCT جی ایچ ایس جالکوٹ — Sd/-

مشتاق احمد SCT ایچ ایس جالکوٹ — Sd/-

مورخہ 23.08.2021

ANNEX "I" (33)

OFFICE OF DISTRICT EDUCATION OFFICER (MALE) KOHISTAN

No 9122 Dated 01/12/2021

The Director,
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.

Subject: **APPEAL FOR PROMOTION SCT TO SST.**

Memo;

Reference your good office letter No.5768 /F. No. UK-10/Appeal for promotion dated Peshawar the 02/11/2021 on the subject cited above and in further reference to the judgment of honorable Peshawar High court Abbottabad Bench in writ petition No. 977/2021 dated 18/11/2021 Mursaleen S/O Arqum r/o Seo Tehsil Dassu Vs Govt of Khyber Pakhtunkhwa and writ petition No. 978/2021 dated 16/09/2021, titled Raja Sher Khan and Mushtaq Ahmad Vs Govt of Khyber Pakhtunkhwa, the following detailed comments are hereby submitted for further necessary action please.

A- **PROMOTION OF SCT TO SST**

In this cadre two teachers have been forwarded and recommended for promotion to SST to your kind office during DPC held on 01/09/2021, their particulars are as under.

S/No	Sen. No	Name of teacher	Date of Birth	Date of First Appointment	Date of app: as regular CT
01	05	Noor Ali	23/02/1971	2/06/1997	22/06/2002
02	07	Ajam Khan	01/05/1971	21/0/1990	29/05/2004

They are senior to the appellants in the following respects.

1. Mr. Noor Ali SCT was promoted to the post of CT in 2002 while the appellants have been promoted to CT on 29/05/2004.**Annexure (a)**
2. Mr. Ajam Khan SCT was promoted to the post of CT on 29/05/2004 on seniority come fitness, but in the first appointment order i.e PST and their merit position in CT order he stands senior to the appellants. **Annexure (b)**
3. **PROMOTION OF PSHT TO SST.**

S/No	Sen. No	Name of teacher	Date of Birth	Date of First Appointment	Date of app: as regular CT
01	360	Muhammad Yousaf	15.01.1971	1/05/1992	25/05/1995

In this cadre only one teacher named Mr. Muhammad Yousaf has been recommended by DPC held on 01/09/2021, he stands senior to his rival in the first appointment order of PST in merit. His merit position is 3 while that of appellant is 89 so he stands entitled for promotion. **Annexure (c)**

Endst; No. 11594 /DEO (M) KH Dated: 6-12-2021

District Education Officer
(Male) Kohistan

Copy of the above forwarded to the:-

01. PA to District Education Officer (Male) Kohistan.
02. Master File.

District Education Officer
(Male) Kohistan

ANNEX "T" (34)

بخدمت جناب ڈیپارٹمینٹل پروموشن کمیٹی سول سیکریٹریٹ پشاور

آداب جناب عالی۔

1۔ حالیہ مورخہ 01/09/2021 کو ہونے والی ڈی پی سی SST میں نور علی SCT کو پہلے نمبر پر رکھا گیا ہے۔ یہ کہ نور علی کی سنیارٹی کی اپیل سروس ٹریبونل نے 17-09-2020 کو خارج کی ہے اور سروس ٹریبونل کے فیصلے کے مطابق وہ 2007 تا 2018 سنیارٹی کا حق دار نہیں اور اس کی سنیارٹی مورخہ 07/01/2018 سے شمار کی جائے گی کیوں وہ ملازمت سے برخاست ہو گئے تھے۔ اور موصوف کی SCT پروموشن بھی قانون کے خلاف دی گئی۔

2۔ 2004 میں ہمارے 21 بندوں کا ایک ہی لیٹر پر فرش اپائنمنٹ ہوا تھا اور ہم سارے ان سروس تھے اور اپائنمنٹ کرتے وقت سکور کو مدنظر نہیں رکھا گیا ہے۔ اپائنمنٹ آرڈر کے مطابق سکور اور سیریل نمبر مندرجہ ذیل ہے۔

	نام	سکور	سیریل نمبر
(i)	مشتاق احمد سابق نام سیر الوھاج	51.80	05
(ii)	اجم خان	48.20	07
(iii)	راجا شیر خان	48.10	17

لہذا سنیارٹی لسٹ کو ترتیب دیتے وقت سکور کو مدنظر رکھا جائے۔

3۔ اور یہ کہ 2013 میں سابقہ سنیارٹی لسٹ ترتیب دی گئی تھی اس کے مطابق راجہ شیر خان کا SCT پروموشن 05-07-2014 اور اسی طرح مشتاق احمد سابقہ نام سیر الوھاج SCT پروموشن 30/07/2015 کو ہوئی۔ اور سنیارٹی لسٹ میں مشتاق احمد سابقہ نام سیر الوھاج سنیارٹی نمبر 68 اور عجم خان سنیارٹی نمبر 70 تھا جو کہ ہمارے SCT آرڈر میں موجود ہے۔ اور اسی لسٹ کے مطابق سینکڑوں اساتذہ کا SST پروموشن ہو چکا ہے اگر لسٹ غلط تھی تو ان لوگوں کا پروموشن کینسل کیا جائے اور نئے سرے سے سنیارٹی لسٹ ترتیب دی جائے۔

4۔ اب جس سنیارٹی لسٹ پر اجم خان نے اعتراض کیا ہے وہ لسٹ مرتب کرتے وقت عجم خان مرتب کنندہ کمیٹی کا ممبر تھا اور اس کے دستخط سنیارٹی لسٹ پر موجود ہیں۔ اگر لسٹ غلط تھی تو اس وقت کیوں اعتراض نہیں کیا گیا۔ کیونکہ اس وقت وہ خود ممبر تھا اسی لیے۔

5۔ اور لسٹ تبدیل کرتے وقت DEO کوہستان اپر نے کوئی نوٹس نہیں کیا۔ اور اعتراضات کے لیے لسٹ ڈسپلے بھی نہیں کی۔ ان تمام حقائق کو مدنظر رکھتے ہوئے ہم اس نتیجے پر پہنچے ہیں کہ یہ تمام کاروائی بدنیتی، بغض اور عناد کی بنیاد پر اس لیے کی گئی کہ راجہ صاحبان کو پروموشن سے روکا جائے۔

لہذا آپ صاحبان سے گزارش کی جاتی ہے کہ سائل کے ساتھ انصاف کیا جائے۔

سائل تاحیات دعا گو رہے گا۔

مورخہ 20-09-2021

مشتاق احمد
SCT

راجہ شیر خان
SCT

ANNEX - K

Promotion of SST of District Kohistan Upper

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 and Finance Department Endorsement No. SO (FR)/FD/10-22(E)2010 dated 16.7.2012, the following CT/SCT and PST/SPST/PSHT (Male) are promoted to the posts of SST (General) in BPS-16 (Rs.18910-1520-64510) respectively, plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect.

A. SST (General)

ITAM No.1 PROMOTION OF OF CT/SCT MALE TO THE POST OF SST (G) BPS.16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	05
25% Initial Recruitment of SST (G)	1.25
75% Promotion Quota of SST (G)	3.75
40% CT/ SCT Quota to SST(G)	02
Proposed CT/SCT for Promotion to SST (G)	02

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular CT	Qual:	Remarks
1.	5	Noor Ali	GCMHS Dassu	23/02/1971	22/06/2002	MA, M.Ed, B.Ed	Services are placed at the disposal of DEO (M) Kohistan Upper for adjustment against the post of SST (G) in BPS-16 on regular basis with immediate effect.
2.	7	Ajam Khan	GHS Jalkot	01/05/1971	29/05/2004	MSC, M.Ed, B.Ed	Services are placed at the disposal of DEO (M) Kohistan Upper for adjustment against the post of SST (G) in BPS-16 on regular basis with immediate effect.

ITEM No.2:- PROMOTION OF PST/SPST/PSHT MALE TO THE POST OF SST (G) BPS-16 ON REGULAR BASIS

Total No. of Vacant Post of SST(G)	5
25% Initial Recruitment of SST (G)	1.25
75% Promotion Quota of SST (G)	3.75
20%PST /SPST / PSHT Quota to SST(G)	1
Proposed PST/SPST/PSHT for Promotion to SST (G)	1

S#	Sn #	Name of Official	Name of School	Date of Birth	Date of Apptt: as Regular PST	Qual:	Remarks
1	360	Muhammad Yousaf	GPS Seo Village	15/01/1971	25/05/1995	BA/Bed	Services are placed at the disposal of DEO (M) Kohistan Upper for adjustment against the post of SST (G) in BPS-16 on regular basis with immediate effect.

Terms and Conditions:

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter Service- Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining their duty.
7. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to them in light this order will be recovered and if he is wrongly promoted he will be reversed.

8. Before handing over charge their document may be checked, their documents may be checked. If they have not the required relevant qualification as per rules, they may not be handed over charge of the post.

(Hafiz Dr. Muhammad Ibrahim)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No.8768-74/ File No.5/Promotion SST (BPS-16) Dated Peshawar the 25/01/2022

Copy forwarded for information and necessary action to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (M) Kohistan Upper
3. District Accounts Officer Kohistan Upper
4. Officials Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

Deputy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

(37)

ANNEX "L"

1

attested

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Khyber Pakhtunkhwa Service Tribunal Peshawar

Service appeal No 19 of 2019

Khyber Pakhtunkhwa Service Tribunal
Diary No. 1767
Dated 19-12-2018

Noor Ali, son of Muzammil Khan, resident of seo, Tehsil Dassu, District Kohsitan upper/ C.T Teacher posted at GMS Goshali, Tehsil Dassu, Dsitrict Kohistan Upper.

.....**Appellant**

VERSUS

1) Director Elementary and secondary Education Peshawar.

2) District Education officer (Male) Kohistan at Dassu.

.....**Respondents**

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 06.10.2018 RECORDED BY RESPONDENTS WHEREBY SERVICE/SENIORITY OF THE APPELLANT WAS NOT COUNTED W.E.F 01.02.2007 TO 30.06.2018.

Registrar
19/12/18

Re-submitted to-day and filed.
Registrar
25/1/19

ATTESTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR AT CAMP COURT ABBOTTABAD.

Appeal No. 119/2019

Date of Institution ... 19.12.2018

Date of Decision ... 17.09.2020

Noor Ali, S/O Muzammil Khan, R/O Seo, Tehsil Dassu, District Kohistan upper/C.T Teacher posted at GMS Goshali, Tehsil Dassu, District Kohistan Upper. ... (Appellant)

VERSUS

Director Elementary ad Secondary Education Peshawar and one other. ... (Respondents)

Present:

MR. ABDUL SABOOR KHAN, Advocate --- For Appellant.

MR. MUHAMMAD RIAZ KHAN PAINDAKHEL, Assistant Advocate General --- For respondents.

MR. MIAN MUHAMMAD, --- **MEMBER(Executive)**
MR. MUHAMMAD JAMAL KHAN --- **MEMBER(Judicial)**

JUDGEMENT.

MIAN MUHAMMAD, MEMBER:- The instant Service Appeal instituted before the Services Tribunal is seeking the intervening period i.e 10.02.2007 to 30.06.2018 to be counted towards seniority/service and admissible benefits. The impugned order dated 06.10.2018 has therefore been in questions and assailed in the Appeal.

02. Brief facts of the case are that this is second round of litigation on part of the appellant. In his earlier service appeal No. 1007/2017 which was decided on 24.05.2018, plea of the appellant was accepted and he was reinstated in service.

ATTESTED
EXAMINER
Khyber Pakhtukhwa Service Tribunal

However, he was not considered to have been entitled for back benefits as he had not performed duty during the period of absence and his period of absence was treated as Extra Ordinary Leave without pay. Based on the afore mentioned judgement, the respondent-department reinstated him in service and he was adjusted against the vacant post of CT GMS Goshali vide office order dated 15.08.2018. The appellant preferred departmental appeal **"through proper channel"** on 03.09.2018 requesting therein for due consideration of intervening period of extra ordinary leave without pay. When his request was communicated to District Education Officer (Male) Kohistan vide letter No.3236/F No.162/Vol:18/Appeal of PST(M) General, dated 27.09.2018, the DEO recorded **"No rule or policy allows if any then put up"** the remarks recorded by DEO on 06.10.2018 with his initial of signature on the face of letter dated 27.09.2018 is in question before us.

03. We have heard the pro and counter arguments put forth by the learned counsels for the parties and perused the available record as well as additional material/relevant court cases in support of their respective plea.

04. The learned counsel for the appellant argued that the impugned order dated 06.10.2018, though was not formally conveyed to the appellant yet they had to wait for statutory period and where-after, the instant Service Appeal stands instituted for adjudication by the Tribunal. That the appellant's period of absence which has been treated as extra ordinary leave without pay, may be counted towards his seniority, length of qualifying service and other back benefits. He contended that the impugned ~~order dated 06.10.~~2018 be set aside being illegal, void ab-initio and against the law or be modified to the extent to count his service only towards

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EXAMINER
Khyber Pakhtunkhwa
Service Tribunal

seniority and pension but without pay and he will not claim salary for the said period as his statement dated 15.08.2018 is available on file. A recent unreported judgement by august Supreme Court of Pakistan dated 27.03.2020 was also produced in Support of his arguments for beck benefits.

05. On the other hand the learned Assistant Advocate General for the respondents argued and assailed that actual facts and background of the case have not been placed before the Tribunal. He referred to the Service Appeal before the Services Tribunal quoted above and argued that subsequent to the judgement sufficient relief has been given to the appellant despite his conduct. He raised a relevant question i.e what would be the consequence in case his plea for seniority and counting of service towards pension, is considered? He replied that it would have adverse impact on the seniority of other official in the cadre who are not respondents and how would his service be counted without claiming pay for the said intervening period? It was further argued that the principle of res-judicata is applicable in the instant case because the same plea of the appellant stands addressed in his earlier service appeal No.1007/2017 decided by Khyber Pakhtunkhwa Services Tribunal on 24.05.2018 and it has been its implementation which is challenged. He also drew attention of the learned counsel for the appellant to Rule-23 of the Khyber Pakhtunkhwa Services Tribunal Rules, 1974 which stipulates that **"No Tribunal shall entertain any appeal in which the matter directly and substantially in issue has already been finally decided by a Court or Tribunal of competent jurisdiction"**. The learned counsel for appellant did neither deny nor rebutted his arguments. Moreover, he also assailed the production of august Supreme Court of Pakistan unreported judgement dated 27.03.2020 by the

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

learned counsel for appellant and termed it to have been passed in the case of sacked employees which has no relevance to the instant appeal.

06. After having taken in view the facts and circumstances of the case and arguments narrated in the preceding paras as well as material placed on record, the case does not have merits(s) for modification of the impugned order on two scores i.e (a) As the conduct of appellant was responsible for the treatment met out by him and (b) By the principle of res-judicata read with Rule-23 of the Khyber Pakhtunkhwa Services Tribunal Rules, 1974. Being devoid of merit, the instant appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
17.09.2020

(MIAN MUHAMMAD)
MEMBER(E)
Camp Court Abbottabad

(MUHAMMAD JAMAL KHAN)
MEMBER(J)

Certified to be true copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 03/9/21
Number of Words 2000
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Name of Copyist
Date of Completion of Copy 03/9/21
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OFFICE OF MUHAMMAD RIAZ

Advocate High Court, office at Abbottabad

To

1. Govt. of Khyber Pakhtunkhwa, through Secretary, Elementary & Secondary Education, Peshawar.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Assistant Director, Elementary & Secondary Education, Directorate Peshawar.
4. District Education Officer (Male), at Dassu, District Kohistan Upper.
5. Ajam Khan son of Ahmed Jee, presently working as ASDEO Circle Harban, resident of Jalkot, Tehsil Dassu, District Kohistan Upper.
6. Noor Ali son of Muzammil Khan, presently SST, Govt. Centennial Model High School, Dassu, Upper Kohistan, resident of Seo, Tehsil Dassu, District Kohistan Upper.

Subject: **NOTICE OF FILING OF SERVICE APPEAL.**

On the instructions of my client, Raja Sher Khan son of Pir Zada, SCT, GHS Jalkot, resident of Jalkot, Tehsil Dassu, District Kohistan Upper, a service appeal is being filed before the Khyber Pakhtunkhwa Service Tribunal, Peshawar. A notice/ intimation of the same is being sent to you for your information.

Dated: 7-02-/2022

(MUHAMMAD RIAZ)
Advocate High Court, Abbottabad

High Court Bar Association Abbottabad

Superintendent / Librarian
HCBA

HCBA Reg No. ____ — ____

BC No. ____ — ____

Place of Practice _____

Name of Advocate _____

S. No. 22954

HIGH COURT BAR ASSOCIATION ABBOTTABAD BENCH

وکالت نامہ

بعدالت: سپریم کورٹ مزید کھا ایبٹ آباد

عنوان: وزیر شیر بنام حکومت

منجانب: _____ نوعیت مقدمہ: _____

باعث تحریر آنکہ:

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ایبٹ آباد کے لیے

محمد رضا ایڈووکیٹ ہائی کورٹ ایبٹ آباد

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے پیروی صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل از گرفتاری و اجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختانہ پیروی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار حاصل ہوگا کہ مقدمہ مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہرجانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: ____/____/____

دن مہینہ سال

لہذا وکالت نامہ لکھ دیا ہے کہ سند رہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted