


02.09.2022

Learned counsel for the petitioner present and requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments on restoration application before the S.B on 17.10.2022.

  
(Mian Muhammad)  
Member (E)

17<sup>th</sup> Oct., 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG for the respondents present.

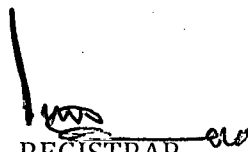

Learned counsel for the petitioner seeks adjournment in order to further prepare the brief. Adjourned. To come up for arguments on restoration application on 04.11.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

Form-A  
FORM OF ORDER SHEET

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

Restoration Application No. 379 /2022

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	30.06.2022	<p>The application for restoration of appeal No. 16409//2020 submitted today by Mr. L.Nwab Ali Noor Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	5.7.2022	<p>This restoration application is entrusted to Single Bench at Peshawar to be put up there on <u>2-9-22</u>. Original file be requisitioned. Notices to the applicant and his counsel be also issued for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

*counsel info - by  
msg to mobile phone.  
for dated orders  
11-8-22*

The restoration application of Mr. Jehan Muhammad DEO Batkhela received today i.e. on 27.06.2022 is returned to the counsel for the applicant with the remarks that four more copies/sets of the application along with annexures i.e. complete in all respect may also be submitted with the application within 15 days.

No. 2113 /S.T,  
Dt. 27/6 /2022

  
Registrar  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar.

Mr.L.Nawab Ali Noor Adv.  
High Court Peshawar.

*Respectfully Submitted,*

*Needfull done kindly put before  
the Court.*

*30/6/22*

**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR. .**

Restoration application no. IN s. Appeal NO.16409/20

1. Jehan Muhammad

.....Applicant.

**VERSUS**

1. Govt of K.P.K and others.

.....Respondents.

**Index**

S.NO.	Description	Annexure	Pages
1.	Restoration application		1-3
2.	Affidavit		3
3	Copy of the order	A	4-5
4	Waklat Nama		8

**Through**

**Applicant/Appellant**

**L.Nawab Ali Noor**  
**Advocate High Court**  
**Peshawar.**  
03469076945

**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

Restoration application no. IN s. Appeal NO.16409/20



1. Jehan Muhammad

.....Applicant.

**VERSUS**

1. Govt of K.P.K and others.

.....Respondents.

**Application with utmost respect to Restore / set seaside order dated 27.5.2021 through which the titled above S. Appeal was dismissed in default.**

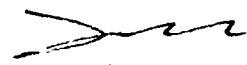
**Respectfully submitted,**

1. That cited above titled S. Appeal was fixed before this Honorable court for 27.5.2021.
2. That same was dismissed in default on 27.5.21 by this Honorable court. Copy of the order dated 27.5.21 as annexure A.
3. That applicant being aggrieved approach this Honorable court to restore on following amongst others Grounds.

- a. That applicant/appellant did appear visit the cause list but at serial no.2 case was fix of police department on same applicant approach his counsel inform about the same.
- b. That due to the open surgery operation of the counsel of appellant/applicant counsel was unable to attend this Honorable and advise his client that he will inquire after recovery of his health.
- c. That applicant due to mentioned reason and counsel of applicant due to surgery didn't appear.

- d. That petitioner valuable rights are very much attached with the case in question.
- e. That there is no bar/ nor any legal hurdle to restore the S. appeal by honorable court.
- f. That applicant /appellant non appearance was not deliberate nor intention but due mentioned reason.
- g. That law favor to decide the cases on merit rather than technicality.
- h. That superior courts plethora of judgments favor the cases to be decided on merits.

It is therefore most humbly prayed that on acceptance of this application your honor may graciously be pleased to set aside the order dated 27.5.21 may please restore the service appeal NO. 16409/20 and decide the same on merit.



**Applicants**

**Through**

**L.Nawab Ali Noor  
Advocate High Court**

**Peshawar.**

**03469076945**

**Certificate:**

Certified that no such like restoration application is before this Honorable court in above service appeal.

**L.Nawab Ali Noor  
Advocate High Court  
Peshawar.**

**AFFIDAVIT.**

I, ~~Jehin~~ Muhammad ~~\_\_\_\_\_~~ r/o village and P/O ~~\_\_\_\_\_~~ *Naushera gharochang*  
~~\_\_\_\_\_~~ Tehsil & Distt ~~\_\_\_\_\_~~ *Naushera*, do solemnly affirm and declare on oath  
that the contents of the accompanying ~~\_\_\_\_\_~~ *appal* are true and correct to  
the best of my knowledge and belief and nothing been kept  
concealed from this Honorable court.



Arx A 4



**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

S. Appeal NO OF 2020.

16409

R. A. No 109/2021

1. Jehan Muhammad DEO Elementary and Secondary Education  
Batkhela.

.....(Petitioner).

Khyber Pakhtunkhwa  
Service Tribunal

Diary No.

16856

Dated

23/12/2020

**VERSUS**

1. Govt of K.P.K Through Chief Secretary  
K.P.K Peshawar.

2. Govt of K.P.K Through Secretary of Elementary & Secondary  
Education K.P.K Peshawar.

3. Director Elementary & Secondary Education K.P.K Peshawar.

.....( Respondents).

Appeal under section-4 of the N.W.F.P , Service Tribunal Act 1974  
against the order dated 20.12.2020 , through which appellant  
appeal was not response and he was not promoted to BPS-20.


Filed to-day

Registrar

23/12/20 PRAYER:

On acceptance of this appeal the order dated 20.12.2020 of no  
response of the respondent no.1 may please be set aside and

**ATTESTED**

  
**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



Appeal No. 16409/2020  
Jehan Muhammad




27.05.2021

None present on behalf of the appellant despite repeated calls. Notices as directed on 08.02.2021 were duly issued. Copies of notices are available on the file. It would be in the interest of justice to discuss the factual position so that the dismissal of this appeal for non-prosecution should not create bar for departmental remedy regarding proforma promotion and back benefits by the appellant, if so advised. The crux of the matter in the appeal is that the appellant purportedly being on top of the seniority list was expected promotion to higher grade from BPS-19 to BPS-20 but was left with no time because of his nearness to the superannuation age. The appellant was to retire from service on 03.01.2021 but he could be able to come to this Tribunal on 23.12.2021 only about 14 days before his retirement. It seems possible that he has retired from service without consideration for promotion. Nonappearance of the appellant and his counsel seems to be the result of this appeal having become infructuous due to retirement of the appellant. With the given factual observations, this appeal is dismissed in default.

  
Chairman

ANNOUNCED

27.05.2021

**Certified to be true copy**  
  
Chairman  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 01/06/2021  
Number of Words 800  
Copying Fee 10.00  
Urgent 4.00  
Total 14.00  
Name of Copy \_\_\_\_\_  
Date of Completion of Copy 01/06/21  
Date of Delivery of Copy 01/06/21

28.03.2022

None for the appellant present.

Notices be issued to the appellant and his counsel.  
Adjourned. To come up for preliminary hearing on 01.06.2022  
before S.B.



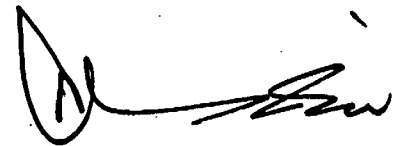
(MIAN MUHAMMAD)  
MEMBER(E)

1<sup>st</sup> June, 2022

1. None present for the appellant.

2. This appeal was dismissed in default on 27.05.2021 but restored on 25.06.2021. Today the instant appeal was called time and again but neither appellant nor his counsel put appearance. In view of the above, the appeal is dismissed in default. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 1st day of June, 2022.*



(Kalim Arshad Khan)  
Chairman

23.09.2021

None for the appellant present.


Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing before the S.B on 16.11.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

16.11.2021

None for the appellant present.

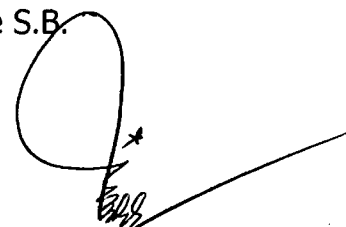
Fresh notice be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing on ~~26~~ 26.01.2022 before S.B.

  
(Mian Muhammad)  
Member(E)

26.01.2022

Clerk of learned counsel for the appellant present.




Former requests for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 28.03.2022 before S.B.

  
(Mian Muhammad)  
Member(E)

FORM OF ORDER SHEET

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

Restoration Application No. 109 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01.06.2021	<p>The Restoration Application submitted by Mr. Jehan Muhammad through Mr. L. Nawab Ali Noor Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR,</p>
2-	25.06.2021	<p>This Restoration Application be put up before S. Bench on <u>25/6/21</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Counsel for the petitioner present.</p> <p>Instant application submitted on 01.06.2021 is for restoration of Service Appeal No. 16409/2020, dismissed for non-prosecution on 27.05.2021. The application is within time, the appeal is restored to its original number. To come up for preliminary hearing on 23.09.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>

27.05.2021

None present on behalf of the appellant despite repeated calls. Notices as directed on 08.02.2021 were duly issued. Copies of notices are available on the file. It would be in the interest of justice to discuss the factual position so that the dismissal of this appeal for non-prosecution should not create bar for departmental remedy regarding proforma promotion and back benefits by the appellant, if so advised. The crux of the matter in the appeal is that the appellant purportedly being on top of the seniority list was expected promotion to higher grade from BPS-19 to BPS-20 but was left with no time because of his nearness to the superannuation age. The appellant was to retire from service on 03.01.2021 but he could be able to come to this Tribunal on 23.12.2020 only about 14 days before his retirement. It seems possible that he has retired from service without consideration for promotion. Nonappearance of the appellant and his counsel seems to be the result of this appeal having become infructuous due to retirement of the appellant. With the given factual observations, this appeal is dismissed in default.

  
Chairman

ANNOUNCED

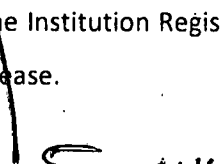


27.05.2021

Form- A

FORM OF ORDER SHEET

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

Case No.- 16409 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/12/2020	<p>The appeal of Mr. Jehan Muhammad presented today by Mr. L.Nawab Ali Noor Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/02/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	08.02.2021	<p>Nemo for appellant.</p> <p>Notice be issued to appellant/counsel for 27.05.2021 for preliminary hearing, before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>

**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

S. Appeal No. of 2020.

1. Jehan Muhammad DEO Elementary and Secondary Education  
Batkhela .

.....Appellant.

**VERSUS**

1. Govt of K.P.K Through Chief Secretary Civil Secretariat  
Peshawar and others.

.....Respondents.

**Index**

S.NO.	Description	Annexure	Pages
1.	S.Appeal		1-6
2.	Affidavit		6
4.	Copy of the seniority list	A	7
5.	Copy of relevant	B	8
6.	Copy of the application	C	9
8.	Copy of the latter dated 6.12.20	D	10
9.	Copies of the departmental appeal	E	11
12	Wakalat Nama		12

Through

Appellant

L.Nawab Ali Noor  
Advocate High Court Peshawar.  
03466076945

1

**BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR.**

16409  
S. Appeal NO OF 2020.

1. Jehan Muhammad DEO Elementary and Secondary Education  
Batkhela.

.....(Petitioner).

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16856

Dated 23/12/2020

**VERSUS**

1. Govt of K.P.K Through Chief Secretary  
Government of K.P.K Peshawar.

2. Govt of K.P.K Through Secretary of Elementary & Secondary  
Education K.P.K Peshawar.

3. Director Elementary & Secondary Education K.P.K Peshawar.

.....( Respondents).

Appeal under section-4 of the N.W.F.P , Service Tribunal Act 1974  
against the order dated 20.12.2020 , through which appellant was  
appeal was not response and he was not promoted to BPS-20.

Filed to-day

Registrar

23/12/20 PRAYER:

On acceptance of this appeal the order dated 20.12.2020 of no  
response of the respondent no.1 may please be set aside and



appellant may kind be promoted to BPS-20 from due date along with all back benefit

1. That Appellant is belong from the mentioned above addresses in heading of the petition.

2. That Appellant was appointed in the year 1999 on BPS-17 then on BPS-18 also through commission.

3. That appellant performed his duties in BPS-19 w.e.f 30.9.2006 to 23.2.2011 as principle.

4. That appellant was appointed as EDO in same scale BPS -19 w.e.f 24.2.2011 through public service commission.

5. That appellant is going to be retired from service on 3.1.2021 on superannuation basis.

6. That as per final seniority list appellant stand at the top of the officers BPS-19 Executive Distt Officer / Additional Directors Elementary and Secondary Education Department management cadre. (Copy of the seniority list is annexure A).

7. That post of Director Education BPS-20 merged areas is existing / vacant .

**Copy of the relevant is annexure B.**

8. That in this respect appellant consecutively request but the matter is there where it was.

**(Copy of the applications as annexure C).**

9. That a letter NO. SO (SM) E and SED/ 1-1/2018/ promotion BS-19 TO BS -20 Dated Peshawar the October 06, 2020 in which specifically mentioned that the working paper for the promotion of the appellant may be proceed and sent to this department for further necessary action.

**( Copies of the promotion are annexure D).**

10. That as the appellant is going to be retired on 3.1.21 and due to the technical hurdle and delaying tactics of the office of directorate appellant deprived from his due right which is against the constitution of 1973.

11. That in spite of latter dated 6.10.20 to Director till date working paper for promotion of the appellant not proceed nor the same sent to department reason best known to them.

4

12. That appellant filed departmental appeal before the concerned authority on 20.9.2020 which was no response.

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

**GROUND:**

- a. That not sending the working paper by the Director to Govt of K.P.K ( E and SE department ) and not awarding the promotion BPS-20 to appellant, respondents intentionally deprived appellant from his due right was/ is illegal , unlawful, unconstitutional act of the respondents.
- b. That awarding the same relief to others and deprived from the same benefit appellant is question of discrimination before this Honorable court.
- c. That after the specific direction of department to Director for working paper no way except to submit the working paper of the appellant not submitted is further illegality , irregularity and violation of law and rules of service.
- d. That respondents under the law duty bound to act upon the law not action as per law is further violation of law and rules of service.

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

f. That on one side responded awarded their blue eyed persons and same time appellant treated discriminately.

g. That respondents adopt the policy of pick and chose which is against the basic provision of the constitution and service law .

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


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

j. That under the law being civil servant same is the negligence of the respondents with malafide intention.

**It is therefore most humbly prayed that on acceptance of this appeal this honorable court may graciously be pleased to set aside / declare , null and void all mentioned processes and impugned order dated 20.12.20 of respondent no.1 and appellant may kindly be promote to BPS-20 from due date along with all back benefit**

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

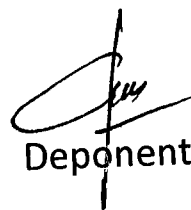
Through

  
Appellant  
L.Nawab Ali Noor  
Advocate High Court  
Peshawar.

Certificate: certified that no such like S.Appeal is before this Honorable tribunal.

**AFFIDAVIT.**

I, Jehan Muhammad DEO Elementary and Secondary Education Batkhela ,do solemnly affirm and declare on oath that the contents of the accompanying S. Appeal are true and correct to the best of my knowledge and belief and nothing been kept concealed from this Honorable Tribunal.

  
Deponent

Identified by  
L.Nawab Ali Noor Advocate

  
L.Nawab Ali Noor Advocate

Anx. A. 7

FINAL SENIORITY LIST OF OFFICERS bps-19 (EXECUTIVE DISTRICT OFFICERS/ADDITIONAL DIRECTORS) ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT MANAGEMENT CADER AS IT STOOD ON 22-02-2012.

S.No	NAME OF OFFICERS WITH DESIGNATION	DATE OF BIRTH	DOMICILE	DATE OF 1ST APPTT: IN EDU: DEPTT:	DATE OF APPTT: /PROMOTION AS EDO/ ADDL DIR	METHOD OF RECRUITMENT	REMARKS
1	Mr: Bashir Hussain Shah Additional Director (P&D)/CPO E&SE Khyber pakhtunkhwa Promotion/ retired	10.01.1957	Haripure	01.12.1975	24.02.2011	Direct Select against 60% Departmental Quota	
2	Mr: Muhammad Rafique Additional Director (Est) E&SE Khyber pakhtunkhwa Promotion/ retired	14.02.1958	Karak	09.08.1978	24.02.2011	do	
3	Mr: Feroz Hussain Shah , EDO (E&SE) D.I Khan Retired	25.10.1954	DI Khan	11.11.1975	24.02.2011	do	
4	Mr: Abdur Rashid , EDO (E&SE) Bannu Promotion /Retired	15.05.1957	DI Khan	24.06.1978	24.02.2011	do	
5	Mr: Muhammad Ibrahim, EDO (E&SE) Dir Lower Promoted/ Director	16.3.1963	Dir Lower	10.02.1988	24.02.2011	do	
6	Mr: Sultan Mehmood Mian , EDO (E&SE) Swat Retired	21.12.1955	Swat	20.12.1983	24.02.2011	do	
7	Mr: Roz Wali, EDO (E&SE) wating for posting Retired	10.04.1957	Karak	01.12.1988	24.02.2011	do	
8	Gohar Ali Khan EDO (E&SE) Peshawar Promoted /Director	01.01.1967	Peshawar	232.04.1990	24.02.2011	do	
9	Mr: Abdullah , EDO (E&SE) Shangla Retired	20.09.1956	Malakand	04.03.1984	24.02.2011	do	
10	Muhammad Riaz EDO (E&SE) Abbottabad Retired	02.05.1960	Mansehra	24.05.1988	24.02.2011	do	
11	Jehan Muhammad EDO (E&SE) Hangu	04.01.1961	Newshehra	26.10.1986	24.02.2011	do	
12	Haziq ur Rahman EDO (E&SE)Karak	06.02.1962	Karak	01.09.1985	24.02.2011	do	
13	Jaffar Mansoor Abbasi working as Prl GHS No 1 Abbottabad	15.09.1968	Abbottabad	11.02.1999	24.02.2011	do	
14	Zia ud Din EDO (E&SE) Dir Upper	01.09.1970	Lakki Marwat	01.09.2003	24.02.2011	do	
15	Atta Ullah Khan EDO (E&SE) Charsadda	18.03.1960	Lakki Marwat	16.02.1987	24.02.2011	do	
16	Mr: Ghulam Qasim Khan , EDO (E&SE) tank	10.01.1956	DI Khan	03.11.1973	24.02.2011	do	
17	Mr: Abdul Malik, EDO (E&SE) Lakki Marwat	07.01.1954	DI Khan	16.02.1977	24.02.2011	do	
18	Umar Khan EDO (E&SE) Mansehra	12.02.1962	Tank	01.10.1986	24.02.2011	do	
19	Shamas khan Additional Director (P&D) E&SE Khyber Pakhtunkhwa	23.02.1954	Swabi	25.03.1975	24.02.2011	do	
20	Abdul Salam EDO (E&SE) Swabi	01.04.1962	DI Khan	09.10.1985	24.02.2011	do	
21	Siraj Muhammad EDO (E&SE) Chitral	20.04.1960	Peshawar	29.03.1988	24.02.2011	do	
22	Nazir Khan EDO (E&SE) Kohat	06.03.1959	Karak	24.10.1989	24.02.2011	do	
23	Sahibzada Hamid Mehmood EDO (E&SE) Torgher	06.09.1965	Peshawar	03.12.1989	24.02.2011	do	

CHIEF SECRETARY  
KHYBER PAKHTUNKHWA

Dated Peshawar the , 08-05-2012

Endst: No . SO (S/M) E&SED/4-25/2012/Final Seniority List of MC (BPS-19):

Copy of the above is forwarded for information to the:-

- 1 Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2 Director of Education (FATA ) Khuber Pakhtunkhwa ,Peshawar.
- 3 Director (PITE) Khyber Pakhtunkhwa , Peshawar.
- 4 Director Curriculum & Teacher Edu: Khyber Pakhtunkhwa, A/Abad.
- 5-29 All the Executive District Officers (E&SE) in Khyber Pakhtunkhwa.
- 30-52 All Officers concerned.
- 53 PS to Secretary to Govt: of Khyber Pakhtunkhwa , (E&SE) Peshawar.

SECTION OFFICER (SCHOOLS/MALE)

*Attested to be True  
Copy*

2

Ann. B-8

NC21116(061)  
ELEMENTARY AND SECONDARY EDUCATION

092102 ADMINISTRATION

FUNCTIONAL CUM OBJECT CLASSIFICATION AND PARTICULARS OF THE SCHE	NUMBER OF POSTS		BUDGET	REVISED	BUDGET
	2019-2020	2020-2021	ESTIMATES 2019-2020	ESTIMATES 2019-2020	ESTIMATES 2020-2021
09 EDUCATION AFFAIRS AND SERVICES					
092 SECONDARY EDUCATION AFFAIRS AND SERVICES					
0921 SECONDARY EDUCATION AFFAIRS AND SERVICES					
092102 ADMINISTRATION					
PR8135 Director of Education Merged Area Peshawar					
A01 TOTAL EMPLOYEES RELATED EXPENSES.			76620000	65642000	82088000
A011 TOTAL PAY	109	109	48603000	41206000	49824000
A011-1 TOTAL PAY OF OFFICERS	53	39	33189000	26106000	27460000
A01101 Total Basic Pay of Officer	53	39	33189000	25918000	27272000
D063 Director (BPS-20)	1	1	1672000		1704000
A238 Additional Director (BPS-19)	2	2	2672000		2715000
D028 Deputy Director (BPS-18)	6	6	4983000		5104000
A079 Assistant Director (BPS-17)	7	7	4651000		4764000
B050 Budget & Account Officer (BPS-17)	2	2	1350000		1382000
C153 Computer Programmer (BPS-17)	1	1	601000		617000
S112 Statistical Officer (BPS-17)	1	1	675000		691000
S166 Superintendent (BPS-17)	3	3	2025000		2073000
A004 Account Assistant (BPS-16)	1	1	493000		504000
A057 Assistant (BPS-16)	14	14	6992000		7141000
S061 Senior Scale Stenographer (BPS-16)	1	1	566000		577000
C082 Computer Operator (BPS-15)	7		2857000		
D013 Data Processing Supervisor (BPS-15)	1		476000		
J024 Junior Scale Stenographer (BPS-14)	6		3176000		
A01102 Personal Pay				188000	188000
A011-2 TOTAL PAY OF OTHER STAFF	56	70	15414000	15100000	22364000
A01151 Total Basic Pay other Staff	56	70	15414000	15068000	22332000
C082 Computer Operator (BPS-15)		7			2922000
D013 Data Processing Supervisor (BPS-15)		1			485000
J024 Junior Scale Stenographer (BPS-14)		6			3225000

*Attached to be final copy.*

To

The Director  
Human Rights Cell  
Hicourt Khyber Pakhtunkhwa Peshawar.

Ans. C. 2

Subject:- **Delay in submission of working papers for promotion to BPS-20**

Memo:-

I have the honour to request as:-

I have been performing my duties in BPS-19 since 2006 in Elementary & Secondary Education Khyber Pakhtunkhwa.

A post of Director Education N.M.D B-20 is lying vacant.

Being standing on the top of seniority list of DEO's B-19, I have applied to the Secretary E&SED for promotion to the said post on 9<sup>th</sup> August 2020. Secretary E&SE has directed the Director E&SE to Submit working papers but still awaiting.

As my retirement date on Superannuation is 03<sup>rd</sup> Jan, 2021, So further delay in processing the case will deprive me from due right.

Therefore the department may please be directed to process my case through P.S.B to ensure my promotion well in time which is my due and admissible right as per rules.



(JEHAN MUHAMMAD)  
D.E.O (M) Malakand

Attached to be done  
copy. A





4  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Anx D-10  
Bo

No. SO(SM)E&SED/1-1/2018/Promotion BS-19 to BS-20  
Dated Peshawar the October 06, 2020

To  
The Director,  
Directorate of E&SE,  
Peshawar.


Subject: - **PROMOTION TO BS-20**

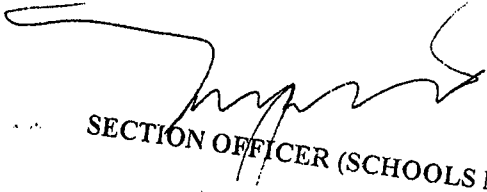
I am directed to enclose herewith copy of application submitted by Mr. Jehan Muhammad DE (M) Malakand on the subject noted above and to state that working paper for promotion of the said officer may be processed and sent to this department for further necessary action.

Encl: As Above:

Endst: Even No. & Date:  
Copy of the above is forwarded to the:

- 1. PS to Secretary E&SE Department.

  
(MUJEEB UR RAHMAN)  
SECTION OFFICER (SCHOOLS MALE)

  
SECTION OFFICER (SCHOOLS MALE)

Attached copy to be for

To

The Chief Secretary,  
Govt. of Khyber Pakhtunkhwa.

Through: PROPER CHANNAL.

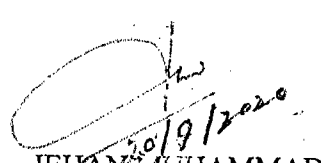
Subject: APPEAL FOR PROMOTION TO BS-20 THROUGH PSB.

Respected Sir,

I have the honour to pinpoint my request as:-

1. I had performed my duties in BS-19 w.e.f 30.09.2006 to 23.02.2011 as Principal.
2. Public Service Commission appointed me in the same scale as EDO (BS-19) w.e.f 24.02.2011.
3. I am going to be retired on 03.01.2021 on superannuation basis.
4. A post of Director Education (BS-20) Merged Areas is existing/vacant.
5. I have applied consecutively on 9<sup>th</sup> August 2020, and 6<sup>th</sup> October 2020 for promotion to the same post but still waiting for PSB.

It is requested in your great honour to manage/conduct PSB meeting within December 2020 and include my case for promotion to BS-20.

  
20/9/2020  
JEHAN MUHAMMAD  
DISTRICT EDUCATION OFFICER  
MALAKAND

Copy to:

1. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa with the request to include the case for PSB.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa to submit the working paper within time.
3. Office file.

*Attached to the  
Form copy.*

Before the Service  
Tribunal U.P.V., Peshawar

Jehan Muhammad

2 منجانب  
بنام

صا

مورخہ

مقدمہ

دعویٰ

جرم

Sout of U.P.V., through  
Chief Secretary & others

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام سروس ٹریبونل سٹیٹوٹریٹ اہل سروس علیٰ سروس ٹریبونل سٹیٹوٹریٹ اور  
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 پر حلف لیا جائے جو جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ کے لئے ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف سے یا کسی اور کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ اہلجانہ التوائے مقدمہ کے  
سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بند ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2020

دسمبر

ماہ

23

المرقوم

مقام سروس ٹریبونل سٹیٹوٹریٹ سٹیٹوٹریٹ کے لئے منظور ہے۔

Department  
Appeal

Ann. E-11

To

The Chief Secretary,  
Govt. of Khyber Pakhtunkhwa.

Through: PROPER CHANNAL.


Subject: APPEAL FOR PROMOTION TO BS-20 THROUGH PSB.

Respected Sir,

I have the honour to pinpoint my request as:-


1. I had performed my duties in BS-19 w.e.f 30.09.2006 to 23.02.2011 as Principal.
2. Public Service Commission appointed me in the same scale as EDO (BS-19) w.e.f 24.02.2011.
3. I am going to be retired on 03.01.2021 on superannuation basis.
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It is requested in your great honour to manage/conduct PSB meeting within December 2020 and include my case for promotion to BS-20.

  
20/9/2020  
JEHAN MUHAMMAD  
DISTRICT EDUCATION OFFICER  
MALAKAND

Copy to:

1. Secretary Elementary and Secondary Education Khyber Pakhtunkhwa with the request to include the case for PSB.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa to submit the working paper within time.
3. Office file.

Attached to be  
from copy.  


**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

*S.B*

No.

APPEAL No. *16409* of 20 *20*

*Jehan Muhammad*

Appellant/Petitioner

Versus


*(Court Kpk through Chief Juy Peshawar)*

RESPONDENT(S)

Notice to Appellant/Petitioner <sup>*Counsel*</sup> *L. Nawab Ali Noor*  
*Advocate High court Peshawar*  
*0346 4076945*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *27/5/2021* at *9 am*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

*Received*  
*by*  
*[Signature]*

“A”

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

SB

No.

APPEAL No. 16409 of 20 20

Jehan Muhammad

Appellant/Petitioner

Regd

Versus

Court KPST through Chief Secy Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner Jehan Muhammad  
DEO E & SE. Batakheja.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27/5/2021 at 9: am.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

[Signature]  
Registrar

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. 5.5

No.

APPEAL No. 16409 of 20 20

*Recd*

Jehan Muhammad

Appellant/Petitioner

Versus

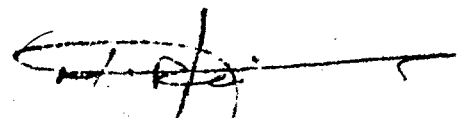
through chief Secy Pesh

RESPONDENT(S)

✓  
Notice to Appellant/Petitioner Jehan Muhammad DEO  
Elementary and Secondary Education  
Batkhehla.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 16/11/2021 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

*S.B.*

No.

APPEAL No..... of 20

*16409*

*20*

*Johan Muhammad*

Appellant/Petitioner

*Head*

Versus

*Govt. of KP through Chief Secy*

RESPONDENT(S)

Notice to Appellant/Petitioner

*Johan Muhammad DEO*

*EXSE Badkhela*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *4/1/22* at *9: am.*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

16409

20

APPEAL No..... of 20 .

Jehan Muhammad

Appellant/Petitioner

Versus

Court of KPK through Chief Justice

RESPONDENT(S)

Council L. Nawab Ali Noor

Notice to Appellant/Petitioner

Advocate High Court  
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17/11/20 at .....

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*[Handwritten signature]*  
20/11

*[Handwritten signature]*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.