

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 407/2017

Date of institution 25.04.2017

Saleem Khan S/o Noor Ali, Lab Attendant (BPS-02) Govt. Higher Secondary
School, Chalanai, Mohmand Agency

VERSUS

District Education Officer Mohmand at Ghalanai District Mohmand and two others

ORDER

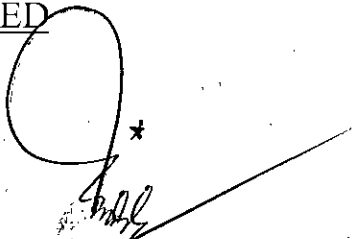
18.10.2022

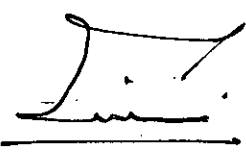
Messrs Fazal Shah Mohmand & Noor Muhammad Khattak
Advocates for the appellant present. Mr. Behramand Khan, Assistant
Director alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant
Advocate General for the respondents present.

At the very outset, learned counsel for the appellant stated at the
bar that the appellant would be satisfied if direction is issued to the
respondents to consider him in accordance with relevant rules and law
for promotion to the post of Junior Clerk in the upcoming meeting of
DPC. Respondents shall consider the appellant for promotion to the
concerned post in the forth coming meeting of DPC in accordance with
relevant rules and law. Disposed of accordingly. Parties are left to bear
their own costs. File be consigned to the record room.

ANNOUNCED

18.10.2022


(MIAN MUHAMMAD)
MEMBER (EXECUTIV)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

14.07.2022

Clerk to learned counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General for the respondents present.

The case was earlier fixed for 01.08.2022, but on the own application of the appellant for early hearing it was fixed for 14.07.2022 today. Today the learned counsel for the appellant was stated to be busy in other bench, it is, therefore, adjourned to 15.07.2022 for arguments before D.B.

(Fareeha Paul)
Member (E)

(Kalim Arshad Khan)
Chairman

15.07.2022

Appellant present in person. Mr. Kabir Ullah Khattak; Additional Advocate General for the respondents present.

Appellant seeks adjournment. Since it was accelerated on the request of the appellant, but he could not produce his counsel today, therefore, the appeal is adjourned to a date on its turn. To come up for arguments on 18.10.2022 before D.B.

(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

The mentioned address of the respondent was incorrect, due to which notice was not issued to the respondents

26th May, 2022

Counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

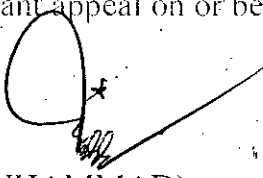
Learned counsel for the appellant seeks time to further prepare the brief. Adjourned. To come up for arguments on 16.06.2022 before D.B.

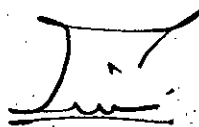

(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

16.06.2022

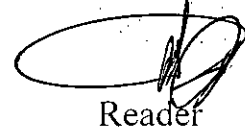
Appellant alongwith his counsel present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought time for preparation ^{for} arguments. Adjourned. To come up for arguments on 01.08.2022 before the D.B. The appellant is directed to provide Member copy of the instant appeal on or before the next date.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

14.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 29.03.2022 for the same as before.



Reader

29-3-2022

Proper DB not available the case is adjourned to come up for the same as before on 28-4-22

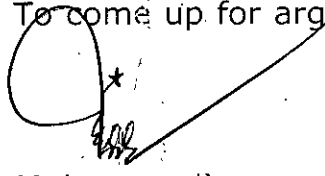


Reader


28.04.2022

Messrs Noor Muhammad Khattak and Fazal Shah Mohmand, Advocates for the appellant present. Mr. Muhammad Rasheed, District Attorney for the respondents present.

Mr. Noor Muhammad Khattak, Advocate submitted fresh Wakalatnama on behalf of the appellant with the request that time may be granted to him to make preparation for arguments. Adjourned. To come up for arguments on 26.05.2022 before the D.B.



(Mian Muhammad)
Member (E)




(Salah-ud-Din)
Member (J)

07.09.2021

Clerk of Mr. Kamran Khan, Advocate, present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of Mr. kamran Khan, Advocate, stated that the bar that Mr. Kamran Khan, Advocate, has been engaged as counsel for the appellant in the instant appeal, however, he is busy in the august Peshawar High Court, Bannu Bench today, therefore, an adjournment may be granted for submission of Wakalat Nama on behalf of the appellant. Adjourned: To come up for submission of Wakalat Nama on behalf of the appellant as well as arguments before the D.B on 16.12.2021.

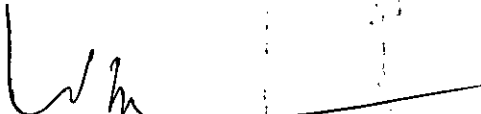

(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

16.12.2021

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment for arguments. Adjourned. To come up for arguments on 14.02.2022 before the D.B.


(Atiq-ur-Rehman Wazir)
Member (E)

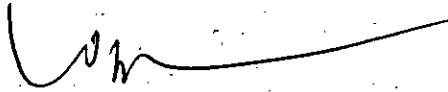

(Salah-ud-Din)
Member (J)

30.11.2020

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is not available. Adjourned. To come up for arguments on 10.02.2021 before D.B.



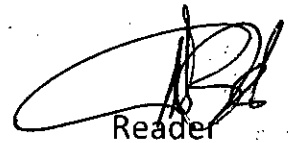
(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

10.02.2021

Due to Pandemic of Covid-19, the case is adjourned to 06.05.2021 for the same.



Reader

06.05.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 07.09.2021 for the same as before.

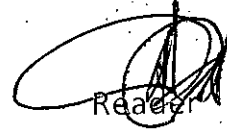


Reader

14-5 .2020

06/8 2020

Due to COVID19, the case is adjourned to
for the same as before.



Reader

06.08.2020

Due to summer vacation case to come up for the same on
07.10.2020 before D.B.



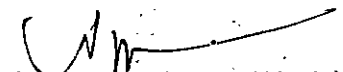
Reader

07.10.2020


Appellant alongwith counsel present.

Mr. Kabir Ullah Khattak learned Additional Advocate General
for respondents present.

Application was filed on behalf of appellant for placing
additional documents on file, which application is accepted
and all the additional documents are placed on file. Copy
whereof was provided to learned AAG. To come up for
arguments on 30.11.2020 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

13.01.2020

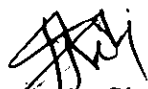
Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 11.02.2020 before D.B.


Member


Member

11.02.2020

Mr. Shahzullah Yousafzai, Advocate present and submitted Wakalat Nama in favor of appellant. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Being freshly engaged learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 16.03.2020 before D.B.



(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

16.03.2020

Clerk to counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Due to general strike on the call of Peshawar Bar Council, the instant case is adjourned. To come up for arguments on 14.05.2020 before D.B.


(MAIN MUHAMMAD)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

Service Appeal No. 407/2017

03.09.2019

Appellant in person and Mr. Javed, Focal Person Litigation
alongwith Mr. Usman Ghani, District Attorney for the respondents present.

Representative of the respondents states that written reply is in
process of completion and requests for adjournment.

Adjourned to 01.10.2019 for submission of requisite
reply/comments.

CHAIRMAN



01.10.2019

Appellant in person and Addl. AG alongwith Javed
Focal Person on behalf of respondent No. 1 present and
furnished comments on behalf of the said respondent.

Fresh notices be issued to respondents No. 2 & 3 for
submission of reply/comments by way of last chance on
28.10.2019 before S.B.

Chairman



28.10.2019

Counsel for the appellant and Addl. AG for the
respondents present.

Comments on behalf of respondent No. 1 have already
been furnished. Respondents No. 2 & 3 have not furnished the
requisite reply/comments despite last opportunity. The matter is,
therefore, posted for arguments before D.B on 13.01.2020. The
appellant may furnish rejoinder to the comments of respondent
No. 1, within a fortnight, if so advised.

Chairman




18.04.2019

Appellant in person present. Written reply to amended appeal not submitted. Javid Khan AD present and seeks time to furnish reply on amended appeal. Granted. To come up for further proceedings/reply to amended appeal on 12.06.2019 before S.B.


Member

12.06.2019

Appellant in person present. Addl: AG alongwith Mr. Daud Jan, Supdt for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned but as a last chance. Case to come up for written reply/comments on 09.07.2019 before S.B.

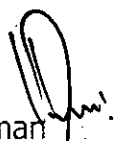

(Ahmad Hassan)
Member

09.07.2019

Appellant in person and Addl: AG for respondents present.

It appears that the respondents in amended appeal were not issued notices, therefore, office is directed to issue requisite notices in accordance with memorandum of amended appeal.

Adjourned to 03.09.2019 for written reply before S.B.


Clerk

17.12.2018

Appellant in person and Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Daud Jan Superintendent present. Appellant seeks adjournment to furnish amended appeal. Adjourn. To come up for further proceedings on 23.01.2019 before S.B


Member

23.01.2019

Appellant in person present. Daud Jan Superintendent representative of respondent department present. Appellant submitted amended appeal copy of which is handed over to the representative of the respondent department. Adjournment requested. Adjourn. To come up for reply to amended appeal/further proceedings on 20.03.2019 before S.B.

20.03.2019

Clerk to counsel for the ~~appellant~~ and Mr. Kabirullah Khattak learned Addl; AG for the respondents present. Written reply not submitted. Learned AAG request for time to submit written reply/comments. Last opportunity is granted. ~~Due to general strike of the bar, the case is~~ adjourned. To come up for written reply/comments on 18.04.2019 before S.B


(Hussain Shah)
Member

13.09.2018

Mr. Fazal Shah Mohmand, Advocate counsel for the appellant present. Mr. Daud Jan, Supdt alongwith Mr. Kabirullah Khattak, Add: AG for respondents present. Learned counsel for the appellant made a request for adjournment to amend the memo of appeal. Case to come up for further proceedings on 08.11.2018 before S.B.


Chairman

18.10.2018

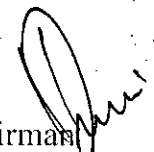
Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Daud Jan Superintendent for the respondents present. Representative of the respondents seeks time to file written reply/comments. Granted. To come up for written reply/comments on 22.11.2018 before S.B


Member

22.11.2018

Nemo for appellant. Addl. AG for the respondents present.

Once again a request was made by the learned AAG as he has not been contacted by the representative of the respondents to prepare and file the requisite reply. Adjourned to 17.12.2018 for written reply/comments before S.B.


Chairman

10.05.2018

The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 04.07.2018.


Reader

04.07.2018

Junior counsel for the appellant and Mr. Sardar Shaukat Hayat, Addl: AG present. Syed Daud Jan, Superintendent (Representative) of the respondent department is also absent. Therefore, fresh notices be issued to the representative of the respondents department to attend the court positively. Written reply not submitted despite extension of last opportunity and cost of Rs. 1000/-. Another last opportunity is extended subject to payment of further cost of Rs. 2000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost of Rs. 2000/- on 02.08.2018 before S.B.


Member

02.08.2018

Neither the appellant nor his counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. To come up for further proceedings on 13.09.2018 before S.B.


Chairman

06.03.2018

Clerk of the counsel for appellant present. Mr. Riaz Painda Khel, Assistant AG for the respondent present. Written reply not submitted. Learned Assistant AG requested for further time adjournment. Request accepted. To come up for written reply/comments on 20.03.2018 before S.B.


(Gul Zeb Khan)
Member

20.03.2018

Appellant absent. Clerk of the counsel present on behalf of appellant alongwith Mr. Syed Daud Jan, Superintendent for the respondent present. Written reply not submitted. Requested for adjournment. Adjourned. Last opportunity is granted. To come up for written reply and comments on 02.04.2018 before S.B.


Member

02.04.2018

Clerk of the counsel for appellant and Additional: AG present. None present on behalf of respondent department. Therefore, notices be issued to the respondent department to attend the court positively. Written reply not submitted despite last opportunities. Requested for further adjournment. Last opportunity is further extended subject to payment of cost of Rs. 1000/- which shall be borne by respondents from their own pockets. To come up for written reply/comments on 10.05.2018 before S.B.


(Ahmad Hassan)
Member


05.01.2018

Learned counsel for the appellant present. Preliminary arguments heard and case file perused.

Learned counsel for the appellant argued that the appellant was appointed as Lab Attendant (B-2) posted to GHS, Ghalanai Mohmand Agency and since then is performing his duties with honesty and full devotion and to the entire satisfaction of the superior officers. That the appellant has passed intermediate and is eligible for promotion as Junior Clerk on the basis of his qualification and length of service. That the appellant, time and again, approached respondents for his promotion as Junior Clerk but of no use. That thereafter, the appellant filed W.P No. 1051/2013 and 2537-P/2013 which were declared ~~coram~~ non-judice. Further argued that junior (Shah Hussain and Iqbal Hussain) have been promoted while the appellant is treated differently. That the omissions and commission of the respondents of not promoting the appellant as Junior Clerk in reserved quota is against the law, facts and principles of justice.

Points raised need consideration. Admitted for regular hearing subject to all legal objections including limitation. The appellant is also directed to deposit security and process fee within (10) days, whereafter notice be issued to the respondents department for written reply/comments on 19.02.2018 before S.B.

Appellant Deposited
Security & Process Fee


(Gul Zeb Khan)
Member (Executive)

19.02.2018

Clerk of the counsel for appellant and Assistant AG alongwith Syed Daud Jan, Supdt for the respondents present. Written reply not submitted. Learned Assistant AG requested for further time adjournment. Request accepted. To come up for written reply/comments on 06.03.2018 before S.B.


(Gul Zeb Khan)
Member

16/10/2017

Appellant in person present & AAAG for the respondents present. Appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 07.11.2017.


(GUL ZEB KHAN)
MEMBER

16/10/2017
07.11.2017

Appellant present and AAAG for the respondents present and Mr. Ziaullah, DDA for respondents present and seeks adjournment. Adjourned. To come up for preliminary hearing on 05.12.2017



(AHMAD HASSAN)
MEMBER

16/10/2017
05.12.2017

Appellant present and AAAG for the respondents present. Adjourned. To come up for preliminary hearing on 27.12.2017. None present on behalf of appellant. Notice be issued to the appellant and his counsel for attendance. To come up for preliminary hearing on 27.12.2017 before S.B.


16/10/2017

Appellant present and AAAG for the respondents present. Adjourned. To come up for preliminary hearing on 27.12.2017. None present on behalf of appellant. Notice be issued to the appellant and his counsel for attendance. To come up for preliminary hearing on 27.12.2017 before S.B.


(Gul Zeb Khan)
Member (E)

27.12.2017

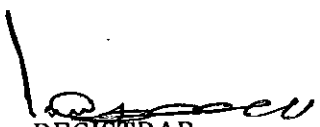

Appellant in person present and requested for adjournment due to non availability of his counsel. Adjourned. To come up for preliminary hearing on 05.01.2018 before S.B.


(Gul Zeb Khan)
Member (E)

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 407/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28/04/2017	<p>The appeal of Mr. Saleem Khan resubmitted today by Mr. Fazal Shah Mohmand Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/5/17</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	3/5/17	

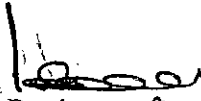
15.05.2017

Counsel for the appellant present and requested for adjournment. Adjourned. To come up for preliminary hearing on 30.05.2017 before S.B.


(Ahmad Hassan)
Member

30.05.2017

Clerk to counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 05.07.2017 before S.B.


Registrar

05.07.2017



Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that the appellant was working as Lab Attendant (BPS-02) in GHS Ghalanai Mohmand Agency. Having passed intermediate he was eligible for promotion as Junior Clerk on the basis of method of requirement laid down in the relevant service rules. He approached the respondents to consider his case for promotion as Junior clerk but to no avail. There-after he filed writ petition no. 1051-P/2013 and writ petition no. 2537-P/13 which were rejected for want of jurisdiction. Juniors to the appellant namely Shah Hussain and Iqbal Hussain have been promoted while the appellant was ignored. When learned counsel confronted on the point of determining limitation in this case and exact date on which departmental appeal was filed by the appellant, he failed to give a plausible explanation. Let pre-admission notice be issued to the AAG to assist the Tribunal on the point of limitation as well as maintainability. To come up for further preliminary hearing on 02.08.2017 before S.B.


(Ahmad Hassan)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 407/2017


S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28/04/2017	<p>The appeal of Mr. Saleem Khan resubmitted today by Mr. Fazal Shah Mohmand Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2- 3/5/17</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>15/5/17</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: center;">(30)</p>

The appeal of Mr. Saleem Khan son of Noor Ali Lab Attendant GHSS Ghalanai Mohmand Agency received today on 25.04.2017 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of impugned order is not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it.

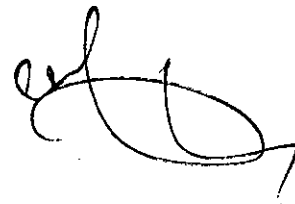
No. 978 /S.T,

Dt. 25/4 /2017


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Fazal Shah Mohmand Adv. Pesh.

Sir, Re-submitted pls after necessary
Completion, departmental appeal is filed
as Annexure ^{Page 11/A} which is not responded so
the appellate order is not available so
appeal may kindly be placed before the
Tribunal for hearing.


Adv

28-4-17

1

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 407 /2017

Khyber Pakhtukhwa
Service Tribunal

Diary No. 417

Dated 25-4-2017

Saleem Khan S/O Noor Ali, Lab Attendant (BPS-2) Govt. Higher
Secondary School, Ghalanai, Mohmand Agency.Appellant

VERSUS

1. Agency Education Officer Mohmand Agency at Ghalanai,
Mohmand Agency.
2. Director Education FATA, FATA Secretariat, Warsak Road,
Peshawar.
3. Secretary Education FATA, FATA Secretariate, Warsakd
Raod, Peshawar.
4. Additional Chief Secretary FATA, FATA Secretariat,
Warsak Road, PeshawarRespondents

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT
1974 FOR PROMOTION OF THE APPELLANT FROM
LAB ATTENDANT TO JUNIOR CLERK.**

PRAYER:-

That on acceptance of this appeal, respondents may kindly
be directed to promote the appellant from Lab Attendant to
Junior Clerk.

Filed to-day

Registrar

Respectfully Submitted:-

1. That the appellant was appointed as Lab Attendant BPS-2
posted to Govt. High School, Ghalanai Mohmand Agency
and since then is performing his duties with honesty and

**Re-submitted to-day
and filed.**

Registrar

28/4/17

2

full devotion and to the entire satisfaction of the superior officers.

2. That the appellant has passed his intermediate is eligible for promotion as Junior Clerk on the basis of his qualification and length of service, but the respondents maliciously not promoting the appellant, as 33% quota has been reserved for promoting the Class-IV employees into Junior Clerks.
3. That the appellant time and again approached respondents for his promotion as Junior Clerk but of no use. **(Copies of application are enclosed as Annexure "A")**.
4. That thereafter, the appellant filed W. P. No. 1051-P/2013 and then filed W. P. No. 2537-P/2013 wherein directions were issued for the promotion of the appellant but of no use where after, the appellant filed COC No. 182-P/2016 and finally the appellant was granted permission to approach proper forum vide order dated 02.12.2016. **(Copy of order dated 02.12.2016 is attached as Annexure "B")**.
5. That the omissions and commission of the respondents of not promoting the appellant as Junior Clerk in reserved quota is against the law, facts and principles of justice on grounds inter alia as follows:

3
GROUND:-

- A. That the omissions and commissions of the respondents are illegal and void ab initio.
- B. That as per law and rules governing the matter, the appellant is perfectly fit and eligible to be promoted as Junior Clerk.
- C. That even junior to the appellant have been promoted while the appellant is treated differently Shah Hussain and Iqbal Hussain appointed as Class-IV in the year 2007 have been promoted as Junior Clerks vide order dated 29.04.2014 but the appellant is not promoted. **(Copies enclosed as Annexure "C")**
- D. That the appellant is having the requisite qualification and length of service for promotion to the post of Junior Clerk.
- E. That the appellant is not treated according to law and rules and he is maliciously deprived of the promotion as Junior Clerk in the reserved quota of Class-IV employees. **(Copies of letters enclosed as Annexure "D")**.
- F. That many posts of Junior Clerks are lying vacant against which the appellant could be promoted.

4

G. That the appellant is having more than 12 years of service with unblemished service record.

It is, therefore, prayed that appeal of the appellant may kindly be accepted as prayed for.

Any other relief not specifically asked for and deemed appropriate in the circumstances of the case may also be granted in favor of the appellant.

Dated:- 22-04-2017


Appellant

Through


Fazal Shah Mohmand
Advocate, Peshawar.


AFFIDAVIT:-

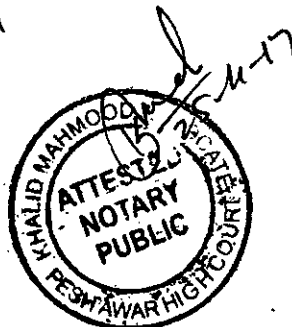
I, Saleem Khan S/O Noor Ali Lab Attendant Govt. High Schook, Ghalanai, Muhmand Agency, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by



Fazal Shah Mohmand
Advocate Peshawar


DEPONENT



مکتبہ اہل سنت اور جماعت اسلامی پاکستان
ANNEXXURE B

13

مکتبہ اہل سنت اور جماعت اسلامی پاکستان

(A)

ص - عالی

(5)

مکتبہ اہل سنت اور جماعت اسلامی پاکستان
مکتبہ اہل سنت اور جماعت اسلامی پاکستان
مکتبہ اہل سنت اور جماعت اسلامی پاکستان

مکتبہ اہل سنت اور جماعت اسلامی پاکستان
مکتبہ اہل سنت اور جماعت اسلامی پاکستان

مکتبہ اہل سنت اور جماعت اسلامی پاکستان
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مکتبہ اہل سنت اور جماعت اسلامی پاکستان

مکتبہ اہل سنت اور جماعت اسلامی پاکستان

Dr. Edu. M. I. P.
120. Kook mto

Additional Member Secretary
FAIA Secretariat
Peshawar.

ATTESTED

6) خدمت کے لیے ایڈیشنل چیف کلرک ڈپٹی ٹائٹلڈ
معمول : درخواست کے لیے تقرری مقرر

صاف عالی

موجودہ نگرانی ہے کہ مسائل قوم متحدہ حکومتی
مہمہ رہنمائی سے تعلق رکھتا ہے۔ مسائل کو سفر
ذرائع سے معلوم کر کے یہ ایک زیر سایہ مقرر
کی نوکریاں مقرر ہیں۔
مسائل نے FA کا امتحان پاس کیا ہے۔
اب نوجوان صحت مند ہے۔
اس لیے نگرانی درخواست اتھارٹی کی جا رہی ہے
کہ مسائل کی ترقی بحیثیت مقرر کر کے
شکوہ فرمائیں۔
عین نگرانی ہوگی۔

ایمان علی
ایمان علی

ATTESTED

ATTESTED
CO



ATTACHMENT

(75)

(11)

(7)

OFFICE OF THE AGENCY EDUCATION OFFICER
 MOHMAND AGENCY AT GHALLANA
 P.NO.0924290180 FAX:0924290180
 NO: 729 / Dated Ghallana the 19/12/2012

To

The Director of Education
 FATA, K.P.K. Peshawar.

Subject: / VISIT ABROAD.
 Memo:

Enclosed please find here with an application in respect of Mr. Salim Khan S/O Noor Ali for further necessary action please, with the remarks that he is on the staff strength of GHSS Ghallana Mohmand Agency as Lab/Attd. BPS 02.

*As per
 He is a young cadre
 of age and all his
 his service matters
 should be dealt
 The MEO concerned
 need to refer the case
 to this office*

[Signature]
 Agency Education Officer,
 Mohmand Agency at Ghallana.
 Agency Education Officer,
 Mohmand Agency at Ghallana.

*As directed
 20/12/12
 [Signature]
 20/12/12
 [Signature]
 [Signature]*

ATTESTED

A letter received from
 Mr. Engr. Shankatullah Federal Minister
 Ministry of States & Frontier Regions
 Govt of Pakistan Islamabad, in favour of
 Mr. Saleem Khan Lab. Attendant (B-02)
 GHS, Ghallanai Mohmand Agency, regarding
 "Promotion As LDC/Jc Against promotion
 quota reserved for class-IV Employees"

163 - The Minister above strongly
 recommended this case & asks for perusal

164 - Hence, Submitted for perusal
 order pl.

165 - A/O in receipt
 DDC/S.A.


 13/11/12

Reference para 162/N

The issue of promotion of class IV
 J/c's has been, time and again,
 taken up with high ups. The last
 attempt ended on query "who will
 be appointed/promoted authority of

ATTESTED

Simple reply to Mr. Salim
that Mr. Salim
will be considered in due course
of time as per rules/policies in vogue

(65)

(8)
(9)

300-970-0
2-51-920-1
2-51-920-3
@yal po.c

Attd DE,
for G. #165 (A) or CBs may be
approved. S.C.
14/11/12

167 DE

for G. #165 (A) is agreed
S.C.
14/11/12

(1100 DE)

ATTESTED

MOST IMMEDIATE / OUT TODAY



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

NO.S.O (DARC)-E&SED- Saleem Khan
Dated Peshawar the 29-09-2022

To,

The District Education Officer (M)
Mohmand.

**SUBJECT: IMPLEMENTATION OF JUDGMENT PASSED BY THE PESHAWAR
HIGH COURT PESHAWAR DATED 20-03-2014 IN COC NO. 8-P/2014
IN W.P NOS. 2537-P/2013 FILED BY SALEEM KHAN.**

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Saleem Khan Lab Attendant along with copy of Judgment of Peshawar High Court Peshawar dated 05-07-2013, and minutes of the GRC Meeting held on 23-05-2022, for further necessary action at your end under intimation to this department within two days positively.

Being Court matter the matter may be treated as most urgent.

Section Officer (DARC)

Encls: as above. 1

Endst.NO & date as above.

Copy forwarded to:-

1. Director E& SE Peshawar.
2. PS to Secretary E&SED.
3. P.A to AS (General) E&SED.
4. P.A to DS (Legal) E&SED.

Section Officer (DARC)



GOVERNMENT OF KHYBER PAKHTUNKHWA

Elementary and Secondary Education Department

NO. SO(DARC)/E&SED/MISC/2022
Dated Peshawar the 23-06-2022

To

1. The Additional Registrar Peshawar High Court Peshawar.
2. The Additional Registrar Abbottabad Bench.
3. The Additional Registrar Bannu Bench.
4. The Additional Registrar D.I Khan Bench.
5. The Additional Registrar Swat Bench.
6. The Chief Planning Officer E&SE Department.
7. The Deputy Secretary (Budget), E&SE Department.
8. The Section Officer (Inquiry) E&SED.
9. The Director E&SE, Peshawar.
10. The Director DCTE Abbottabad.
11. The Director Professional Development (DPD), Peshawar.
12. The District Education Officers (Female) Haripur, Nowshera, Tank, Swabi, D.I.K & Peshawar.
13. The District Education Officers (Male) Abbottabad, Nowshera, Mohmand, Malakand, Tank, SWTD at Tank, Swabi, Mansehra, Lakki Marwat & D.I.K.
14. The Principal, Regional Professional Development (RPD) (M/F) D.I Khan.
15. The Principal, Regional Professional Development (RPD) (M) Bannu.

SUBJECT: MINUTES OF THE GRIEVANCES REDRESSAL (GRC) COMMITTEE MEETING HELD ON 23-05-2022

I am directed to refer to the subject noted above and to enclose herewith Minutes of the Grievances Redressal Committee (GRC) Meeting held on 23/05/2022 under the Chairmanship of Additional Secretary (General) E&SE Department in the Committee Room for information and further necessary action.

Section officer (DARC)

Encl: As Above

Endst.NO & date as above.

Copy forwarded to:-

1. Section Officer (Litigatoin-1 & IV) E&SED.
2. P.S to Secretary E&SED.
3. P.A to Special Secretary-1, E&SED
4. P.A to Additional Secretary (General), E&SED.
5. P.A to Deputy Secretary (Legal-II) E&SED.
6. P.A to Deputy Secretary (Admin) E&SED.
7. Appellants / Petitioners concerned.

Section officer (DARC)

SUBJECT: MINUTES OF THE GRC MEETING REGARDING WRIT PETITIONS / DEPARTMENTAL APPEALS

HELD ON 23-05-2022

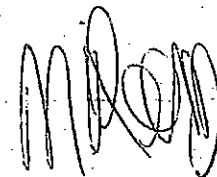
Meeting of the Grievance Redressal Committee (GRC) was held on 23-05-2022 under the Chairmanship of Additional Secretary (G) Elementary & Secondary Education Department to discuss the subject Writ Petitions / Departmental Appeals. The petitioners were also heard personally to address their grievances as per Law/Rules/policy. The following attended the meeting: -

1. Mr. Abdul Akram
2. Mr. Rahmat Ali Wazir
3. Mr. Muhammad Javed
4. Mr. Muhammad Raqiaz Khan
5. Mr. Khalid Mateen
6. Mr. Muhammad Salim Khan
7. Mr. Gulzar Muhammad
8. Miss Farzana Sardar
9. Mr. Shah Jehan
10. Mr. Muhammad Shoukat
11. Mr. Zahoor Khan
12. Miss Sofia Tabbasum
13. Hidayat Ullah
14. Mr. Gul Faraz
15. Mr. Muhammad Ali
16. Miss. Jamila Tahira
17. Muhammad Sharif
18. Dr. Muhammad Imran Shah
19. Mehmood Azam
20. Mr Shoaib Akhtar
21. Mr. Zakir Hussain
22. Mr. Jahangir Akhtar
23. Mr. Noor Badshah
24. Mr. Sami Ullah

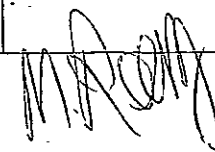
Additional Secretary (General) E&SE Department.
Deputy Secretary (Admn) E&SE Department.
Deputy Secretary (Legal-II) E&SE Department.
SO (DARC) E&SE Department Peshawar.
SO (Litigation-I), E&SE Department.
SO (Litigation-IV) E&SE Department.
Assistant Director, Directorate of E&SE KP.
District Education Officer (Female) D.I. Khan.
District Education Officer (Male) Nowshera
District Education Officer (Male) Abbottabad.
District Education Officer (Male) Lakki Marwat.
District Education Officer (Female) Swabi.
Deputy District Education Officer Malakand.
Deputy District Education Officer (M) Tank.
Principal RPDC (M) Dera Ismail Khan.
Principal RPDC (F) D.I Khan.
Principal RPDC (M) Bannu.
SSS, working as Litigation Officer for DEO (F/M) D.I Khan
ADEO (Litigation) DEO(M/F) Tank.
ADEO (Lit) DEO(M) Nowshera.
ADEO (M) Tank.
Litigation Officer DEO (F) Haripur.
Litigation Officer DEO (M) Mohmand.
DPE / Officer In-charge Litigation DCTE Abbottabad

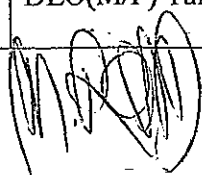
Chairman
Member
Member
Member
Member
Representative of Director E&SE.

District Education Officers (DEOs) concerned /
Director Curriculum & Teacher Education (DCTE) /
Director Professional Development (DPD) /
Their Representatives / Litigation Officers
also attended the meeting to assist the Committee
for disposal of Appeals / Writ Petitions.

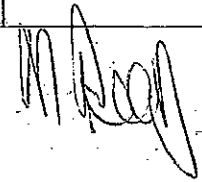


AGENDA NO.	NAME OF THE PETITIONER/APPELLANT AND CLAIM ETC.	DECISION TAKEN BY COMMITTEE	RESPONSIBILITY/ ACTION TO BE TAKEN
01	Ms. Sumaira Saghir w/o Chunzeb r/o village Pharihala Tehsil and District Haripur has requested that she may be appointed as Class-IV in District Haripur against 10% quota reserved for female in light of Peshawar High Court Abbottabad Bench Order Sheet passed on 02.03.2022 in COC No.142-A/2021. Through this petition, the petitioner seeks initiation of Contempt of Court proceedings against respondents for not implementing the judgment/order of the Court dated 02.06.2021. The Hon'ble Court directed the respondents to strictly adhere to the law and rules while making appointments of Class-IV on 10% quota reserved for females.	<p>The District Education Officer (F) Haripur intimated that Ms. Sumaira Saghir did not submit Employment Exchange Card while they appoint Class-IV, through Employment Exchange list. She is also overage and the date of birth is different in school certificate and CNIC. She filed COC No:142-A/2021 in Peshawar High Court Abbottabad Bench and Order Sheet passed on 02.03.2022. For appointment of Class-IV employees educational qualification is not required. The respondent already observed 10% female quota. The court accepted that DEO (F) observed the 10% female quota. Total appointment of Class-IV 309 and quota exist 29 persons (female) while DEO (F) Haripur appointed 44 (females).</p> <p>DECISION: The Chair directed the DEO (F) Haripur to adjust the petitioner against 10% quota reserved for females as Class-IV under applicable rules. Also provide a list of appointees/ waiting list of 10% quota observed for females since 2019 to 2022 and Petitioner complete documents including Employment Exchange Card list along with DSC minutes to ascertain the factual position that why the Petitioner was not appointed?</p>	District Education Officer (F) Haripur
02	Mr. Liaqat Ali was appointed as Chowkidar at GGPS Asori Bala Tehsil and District Nowshera and was retired on 30.06.2020 on attaining the age of superannuation. The petitioner son, Mr. Ahmad Ali has requested DEO(F) Nowshera, that he may be appointed as Class-IV on reserved employees son quota but the authority reluctant to appoint him. Thus, he approached the PHC Peshawar for justice/appointment. The Court stated that as his name is placed at S.No.86 for appointment as Class-IV	<p>The Chair inquired from J/C representing District Education Officer (F) Nowshera. The Chair expressed his concern over the negligence of DEO being Competent Authority who was represented by Junior Clerk.</p> <p>DECISION: The Chair directed that displeasure may be conveyed to the DEO (F) Nowshera. The Chair also directed the representative to furnish appointees Notification & waiting list of retired son quota since 2020 till date along with Petitioner complete documents, to ascertain the factual position that why the Petitioner was not</p>	District Education Officer (F) Nowshera

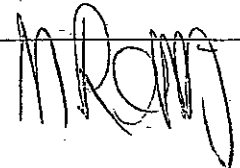


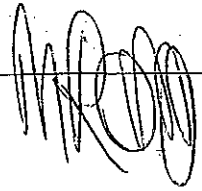
	on employee's son's quota thus disposed of the petition on 03.03.2022 in terms that respondent shall consider him for appointment on his own turn (W.P.No.2918-P/2021).	appointed? The instant case is differed to next meeting of GRC. The Petitioner may also be informed for personal hearing/attendance.	
03	Mr. Muhammad Aslam, Chowkidar at RITE (M) D.I. Khan was retired dated 31.12.2011 on superannuation. His son Mr. Waqas Aslam has requested Director PITE/Principal RITE (M) D.I. Khan, that he may be appointed on any post commensurate with his qualifications as Class-IV/Clerk/Store keeper etc. on employee's son quota. Respondent No.7 Mr. Tahir Abbas, the son of Saeeda Caller, who was retired after the father of petitioner, has been appointed as Naib Qasid in 2015 by Respondent No.5 and the petitioner has been deprived from appointment. Thus, he approached the PHC D.I.K. Bench for justice. The Court disposed of WP No.701-D/2021 on 03.02.2022 in terms of same judgment as in the Writ Petition No.739-D/2019, titled Nawab Khan Vs. Govt. of Khyber Pakhtunkhwa & others.	DECISION. The chair proposed to conduct inquiry into the fact that junior candidates were appointed reflects from waiting list of retired Employees son quota . He also directed that if any irregularity committed by the Competent Authority shall be proceeded in light of E&D rules, 2011. Director Professional Development KPK may inquire and submit the report within 15 days: The Appeal / Case differed to next meeting.	Director Professional Development/ Director DCTE/ RITE (M) D.I Khan
04	Mr. Abdul Rafiq Class-IV employee r/o village Azmi Tehsil and District Tank was retired on 17.04.2013 on Medical Ground. His son Mr. Qutab ud Din has requested the respondents time and again to appoint him on Class-IV post against 100% reserved quota in accordance with the provisions of sub rule 4 Rule 10 of KP Civil Servants (APT) Rules, 1989. The respondents are not making appointment of the petitioner. Thus, he invoked the constitutional jurisdiction of this Honorable Court. The PHC D.I. Khan. Bench disposed of WP No.85-D/2020 with CM No.112-D/2021 on 03.02.2022 on the same judgment as in the Writ Petition No.1154-D/2019 Titled Akbar Ali Khan Vs. Govt. of Khyber Pakhtunkhwa & others.	Denied appointment. Because children of the permanently incapacitated employees were granted quota under Rule 10(4) vide Notification 19.04.2016, which has no retrospective effect in light of the judgment of the Supreme Court of Pakistan in Civil Appeal No. 410/2020 dated 02-06-2021. DECISION: The appeal / case regretted.	DEO (M/F) Tank.
05	Mr. Muhammad Ishaq Khan r/o Sorarh Kari Haider Tehsil and District Tank was retired as TT GMS Shuzā Sub	Representative of DEO concerned informed that the petitioner has been appointed on 07-04-2021.	DEO(M/F) Tank. 

	<p>Division Jandola on 07.11.2018 on Medical Ground. His son Mr. Asif Zaib has requested the respondents time and again to appoint him in BPS-11 or 10 post commensurate with his qualification against 100% reserved quota in accordance with the provisions of sub rule-4 Rule 10 of KP Civil Servants (APT) Rules,1989. The respondents are not making appointment of the petitioner. Thus, he invoked the constitutional jurisdiction of this Honorable Court. The PHC D.I. Khan Bench disposed of WP No.546-D/2020 with CM No.602-D/2020 on 03.02.2022 on the same judgment as in the Writ Petition No.1154-D/2019 Titled Akbar Ali Khan Vs. Govt. of Khyber Pakhtunkhwa & others.</p>	<p>DECISION: Appeal disposed-of</p>	
06	<p>Mr. Arbistan r/o village Umar Adda Tehsil and District Tank was retired on 23.06.1993 as TT on Medical Ground. His son Mr. Rahim Ullah has requested the respondents time and again to appoint him as Class-IV on the post commensurate with his qualification against 100% reserved quota in accordance with the provisions of sub rule 4 Rule 10 of KP Civil Servants (APT) Rules, 1989. The respondents are not making appointment of the petitioner. Thus, he invoked the constitutional jurisdiction of this Honorable Court. The PHC D.I. Khan Bench disposed of WP No.477-D/2021 with CM No.796-D/2021 on 09.11.2021 on the same judgment as in the Writ Petition No.163-D/2021 Titled Nisar Anwar Vs. Provincial Police Officer& others announced on 20.01.2022.</p>	<p>Denied appointment. Because children of the permanently incapacitated employees were granted quota under Rule 10(4) vide Notification 19.04.2016, which has no retrospective effect in light of the judgment of the Supreme Court of Pakistan in Civil Appeal No. 410/2020 dated 02-06-2021. DECISION: The Appeal is regretted.</p>	DEO(M/F) Tank.
07	<p>Mr. Pervaz Akhtar r/o Muhallah Dr. Haudin Qutab Colony Tehsil and District Tank was died on 19.06.2001 as PST. His wife Mst. Gul Nazir has requested the respondents time and again to appoint her as Class-IV on the deceased widow quota against 100% reserved quota in accordance with the provisions of sub rule 4 Rule 10 of KP Civil</p>	<p>The Litigation Officer of DEO (M/F) Tank informed the committee that the petitioner Mst. Gul Nazir has married therefore; she is no more widow. Thus she is not entitled for appointment. Miss. Iqra-La-Raib D/O Pervez Akhtar has also requested that she may be appointed on deceased quota being her legal right.</p>	DEO (M/F) Tank.



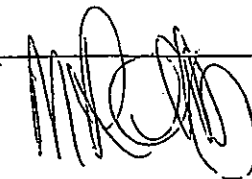
	Servants (APT) Rules, 1989. The respondents are not making appointment of the petitioner. Thus, she invoked the constitutional jurisdiction of this Honorable Court. The PHC D.I. Khan Bench disposed of WP No.882-D/2020 on the same judgment as in the Writ Petition No:739-D/2019, titled Nawab Khan Vs. Govt. of Khyber Pakhtunkhwa & others.	DECISION: The Legal heir of the deceased may nominate one candidate on affidavit for appointment against deceased quota.	
08	Mr. Hakeem Khan Class-IV GPS No.1 Darakki Tehsil and District Tank was retired on 21-3-2005 after attaining the age of superannuation and later on passed away. His son Muhammad Farooq Khan has requested the respondents time and again to appoint him as Class-IV on the employees son quota against 25% reserved quota in accordance with the provisions of sub rule 4 Rule 10 of KP Civil Servants (APT) Rules, 1989. He was appointed by the then EDO Tank (Bakhtullah Shah) on 11/8/2017 as Naib Qasid at GHS Umar Khel Tank. The headmaster of the school refused to take arrival report of the petitioner. He was once again appointed Chowkidar by EDO Tank (Abdul Salam) on 25/7/2019 at GPS Aman Abad Mullazai Tank but the headmaster of the same school refused to take arrival report of the petitioner and deprived him of appointment. Now the respondents are not making appointment of the petitioner, therefore, the petitioner is thus left with no other remedy except to invoke the constitutional jurisdiction of this Honorable Court. The PHC D.I. Khan Bench disposed of WP No.491-D/2021 with CM No.809-D/2021 on 03.02.2022 on the same judgment as in the Writ Petition No.739-D/2019, titled Nawab Khan Vs. Govt. of Khyber Pakhtunkhwa & others.	The petitioner was appointed twice but the headmasters concerned did not accept his arrival reports. DECISION: The Chair directed that DEO concerned may facilitate the Petitioner to join his duty as per rules / policy. OR Adjust the Petitioner against clear vacancy.	DEO (M) Tank.
09	Mr. Sher Muhammad s/o Tilla Muhammad r/o Village Nar Sahibabad Maidad Khel, Tehsil Serai Naurang District Lakki Marwat, COC No.93-B/2020 regarding his	Mr. Sher Muhammad son of Tilla Muhammad seeks appointment on 25% retired employee son quota at RITE / RPDC (M) Bannu. The father of the Petitioner retired from the post of Mali on 25-05-2014,	Director Professional Development/ Director DCTE/ RITE (M) Bannu

	appointment as Class-IV against employees son quota. The instant COC Petition is disposed of by PHC Bannu Bench on 27-1-2022 and remanded the case for decision of GRC.	but his number in seniority list is 2 nd and Mr. Kifayat Ullah son of Mr. Fateh Sher who retired on 01-07-2000, his position in seniority list of RITE/RPDC (M) Bannu is at 1st. The principal of respective RITE/RPDC is appointing authority for the class-IV employees in his/her institute. DECISION: The Chair directed that Director PD and Principal RITE/RPDC (M) Bannu may process recruitment of the petitioners/appellants on his own turn.	
10	Mr. Saif ur Rahman PSHT BPS-15 GPS Bhanday Wali Tehsil Parova D.I. Khan was retired on 08-10-2018 through Medical Board. His son Mr. Sheheryar Khan has requested for appointment as Junior Clerk/Class-IV post commensurate with his qualification against 100% reserved quota for retired employees in accordance with the provisions of Rule 10(4) of KP Civil Servants (APT) Rules, 1989. The concerned is not making appointment of the appellant. Thus, he approached E&SED for redressal of his grievances.	The DEO Concerned informed that the petitioner will be appointed as soon as a vacant post is available strictly on his own turn. DECISION: The DEO is directed to submit compliance report under Rule 10(4) of KP Civil Servants (APT) Rules, 1989.	DEO(M) D.I Khan
11	Mr. Ali Rahmat a Class-IV of GMS Kamra Agra District Malakand was retired in 2015 after the age of 60 years. The petitioner son, Mr. Altaf Hussain has requested DEO(M) Malakand that he may be appointed as Class-IV on employees son quota but the authority reluctant to appoint him. Thus, he approached E&SED for appointment against 25% quota reserved for the sons of retired employees, in accordance with the provisions of Rule 10 (4) of KP Civil Servants (APT) Rules, 1989.	Father of the Petitioner Ali Rehmat retired from service as class-IV on 19-12-2015. The DEO concerned has appointed 15 applicants @25% on retired employees son quota up to 02-11-2015 while the Petitioner father is retired on 19-12-2015. DECISION: The DEO (M) Malakand confirmed that the Petitioner is entitled and will be appointed against the prescribed quota of Class-IV on his own turn.	DEO(M) Malakand.
12.	Mr. Nisar Ali PSHT GPS Payao Zar Battani Lakki Marwat seeking justice against the major penalty of "Compulsory Retirement". During absence period the	The appellant Mr. Nisar Ali was working against the post of PSHT in GPS Payao Zar Bettani Lakki Marwat since 24-07-2004. The DEO Lakki Marwat issued show cause notice to the appellant without	Section-Officer (Inquiry) E&SED. 

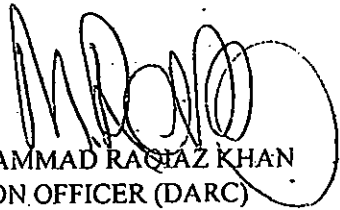
	<p>appellant was going through severe illness and haven't done any irregularity by the appellant throughout service. Thus, the appellant approached the Secretary E&SED for his reinstatement order.</p>	<p>mentioning date with the allegation of Willful Absence from Duty, Mis-Conduct & Inefficiency. He imposed major penalty of "Compulsory Retirement" without mentioning the absence period vide Notification dated 06-10-2021. The appellant replied to the show cause notice. The record shows that the appellant was going through surgical procedure on 09-03-2021 and doctor recommended him for 30 days bed rest from the day of procedure.</p> <p>DECISION:</p> <p>The DEO without observing the codal formalities, imposed major penalty of compulsory retirement. The Committee decided that Section Officer (Inquiry) may conduct fact finding inquiry and recommendation be submitted to the Competent Authority for appropriate action under relevant rules and policy</p>	
13.	<p>The appellant Bushra Begum Hassan Khel sub division Peshawar seeking promotion from CT to SCT, Inquiry on the direction of DEO sub division Hassan Khel Peshawar has already been conducted in the said matter, but the authority is not considering her promotion.</p>	<p>The DEO (F) Pesh brief the case to the Committee and stated that previously promotion orders from CT to SCT were issued, on complaint and inquiry was conducted and on the recommendation of the Inquiry Officer two junior candidates from the appellant, were promoted to SCT. Their orders were withdrawn. After that no DPC has been conducted due to non-availability of the record in the sub-division Hassan Khel Office.</p> <p>DECISION:</p> <p>The Chair directed that Director E&SE KP/DEO(F) Peshawar may convene a DPC meeting within one month and promote the eligible candidates after observing all codal formalities as the appellant had already been ignored in the previous DPC being top on the merit list.</p>	<p>Director E&SE KP/ DEO(F) Peshawar</p>
14.	<p>The Petitioner Mr. Muhammad Idrees resident of District Nowshera seeks appointment on the post of Qari (BPS-12) against 02% quota reserved for disable with effect from 10-07-2021 along with all other candidates who were appointed on open merit, with all back and consequential benefits (W.P.No.828-2022).</p>	<p>DEO (M) Nowshera intimated that 11 post of Qaris advertised in the year 2020 and they were appointed on merit. The quota of disable has been observed. Detailed of Qari / Senior Qari sanctioned posts in DEO (M) Nowshera is as under:</p> <ol style="list-style-type: none"> 1. Total sanctioned seats-----99. 2. Qari seats out of total-----70. 3. Senior Qari out of total-----29. 4. Available vacant seats-----09. 	<p>Director E&SE KP/ DEO(M) Nowshera</p> 

		<p>5. Filled working disable-----01.</p> <p>DECISION: The Chair directed that 2% disable quota must be observed as per rules & policy / sanctioned posts as clarified by Apex Court.</p>	
15.	The Petitioner Mr. Malik Dilawar Khan resident of District Mohmad seeks upgradation of GPS Dara Zahir Khan being physically fit for upgradation instead of GPS Mari Kor Writ Petition No. 747-P/2022 by Malik Dilawar Khan.	<p>The DEO (M) Mohmand informed that both GPS Mari Kor and GPS Zahir Khan were considered for up-gradation. The DEO concerned visited both the schools to evaluate the criteria for up-gradation and give recommendation for up-gradation in the larger public interest. It is also added that up-gradation of school procedure and total number of schools are distributed among the members of National-& Provincial Assemblies. Mr. Nisar Mohmand recommended GPS Mari Kor and MNA Sajid Khan recommended GPS Dara Zahir Khan for up-gradation to middle status in the fund of Mohmand Dam.</p> <p>DECISION: The Chair directed that this case may be sent to CPO / D.S Budget of E&SED for necessary action / disposal to resolve the pending issue immediately.</p>	CPO / DS Budget E&SE Deptt;
16.	The Petitioner Mr. Naqeeb Ullah resident of Mohalla Sirajkhel Tehsil Paharpur District Dera Ismail Khan seeks appointment as per qualification of Petitioner against quota reserved for the children of deceased employees being most eligible and deserving candidate (W.P.No.158-D/2022).	<p>The DEO(M) apprised the Committee that there is conflict upon nomination of son/daughter of the deceased for appointment on the quota. The real heir will be appointed as soon as unanimous candidate is nominated by the deceased family.</p> <p>DECISION: The Chair directed that the petitioner may approach the DEO (M) D.I.K with unanimous decision upon one nominee for appointment.</p>	DEO(M) DI Khan.
17.	The Petitioner Mr. Saad Ahmad resident of District Swabi seeks appointment in this Department under the quota reserved for the retired employees son's quota as a Class-IV (W.P.No.2610-P/2022).	<p>The DEO(M) Swabi informed that the Petitioner Mr. Saad Ahmad is at S.No.175 of the Merit/Waiting List for the retired employees sons quota. Among 17-candidates have been appointed up to 03-09-2012. Now he is at S.No.158. He is entitled for appointment and will be appointed on his turn on merit.</p> <p>DECISION: The Petitioner will be appointed on his own turn on merit.</p>	DEO(M) Swabi.


18.	The Petitioner Amna Bibi resident of District D.I Khan seeks appointment as a Class-IV being wife of a civil servant, who died during service (W.P.No.25-D/2022).	The DEO(F) DI Khan confirmed that the Petitioner Ms. Amna Bibi resident of District D.I Khan seeks appointment as a Class-IV being wife of a civil servant, who died during service. She is receiving pension and entitled for appointment on deceased son/wife quota. DECISION: The Chair directed to implement the quota as per law/rules/policy and submit compliance report.	DEO(F) D.I Khan.
ADDITIONAL AGENDA			
I)	Writ Petition No. 731-B/21. Mr. Syed Awais Ali Shah seeks appointment on retired son quota; the Petitioner father was a Primary School Teacher who retired on medical/incapacitated ground in 1987 under administrative control of DEO (M) Lakki Marwat.	The DEO (M) Lakki Marwat left the meeting without discussing this case. DECISION: The Chair directed that DEO may resolve the pending issue and report may be submitted to GRC immediately,	DEO (M) Lakki Marwat
II)	Writ Petition NO. 750-B/17. Mr Kifayat Ullah Khan Versus Govt of KP & Others prayed for appointment on Retired Son Quota for the post of Class-IV in RPDC Ghoriwala District Bannu.	Mr. Sher Muhammad son of Tilla Muhammad seeks appointment on 25% retired employee son quota at RITE/RPDC (M) Bannu. The father of the Petitioner retired from the post of Mali on 25-05-2014, but his number in seniority list is 2 nd and Mr. Kifayat Ullah son of Mr. Fateh Sher who retired on 01-07-2000, his position in seniority list of RITE/RPDC (M) Bannu is at 1st. The principal of respective RITE/RPDC is appointing authority for the class-IV employees in his/her institute. DECISION: The Chair directed that Director PD and Principal RITE/RPDC (M) Bannu may process recruitment of the petitioners/appellants as per direction of Peshawar High Court, Bannu Bench and report to GRC.	Director Professional Development/ Director DCTE/ RITE (M)Bannu.
III)	The Appellant namely Salim Khan Lab Attendant of DEO (M) Mohmand filed CoC No. 8-P in Writ Petition No. 1051 & 2537/13 against the Department for promotion with the prayer that "the junior colleagues of the appellant is already been promoted by the Competent Authority".	The representative/Law Officer of DEO (M) Mohmand informed that Mr. Salim Khan Lab Attendant was considered for promotion in light of the direction of Honorable Peshawar High Court but he was low in merit. Now his position is at Sr. No. 03 in seniority list of Class-IV Employees. He is entitled on the old seniority list where his other colleagues have been promoted to Junior Clerk. He added that the DEO office is collecting data of vacant posts of junior clerks for promotion from the Class-IV Employees for placing before DSC/DPC for consideration.	DEO (M) Mohmand.



		<p>DECISION: - The Chair directed that the Petitioner may be promoted/placed before the DPC within a weeks' time.</p>	
IV)	The Petitioner namely Usman of DEO (M) Malakand at Batkhela filed Writ Petition No. 220-M/2022 for appointment on Class-IV post. The instant Writ Petition decided by the PHC, Mingora Bench and convert the Petition to Departmental Representation on 08-03-2022.	<p>The concerned DEO briefed the Chair that the Petitioner father namely Muhammad Faqir retired from services on premature ground i.e. 44 years of service. As per the APT rules 1989, a child of Class-IV Employee is entitled for appointment under retired employees children @ 25% quota, who gets retired on superannuation.</p> <p>DECISION: The Petitioner is not entitled for appointment against the said quota as his father prematurely retired.</p>	DEO (M) Malakand
V)	The Petitioner namely Muhammad Saqib with Writ Petition No. 1237-A/20 prayed for appointment against 25% quota reserved for retired Class-IV employees on superannuation DEO (M) Abbottabad).	<p>The District Education Officer (M) Abbottabad informed that the Petitioner will be appointment against 25% quota reserved for retired Class-IV employees on superannuation.</p> <p>DECISION: The Chair directed he may be appointed on his turn/ merit as per rules / policy in light of court orders.</p>	District Education Officer (M) Abbottabad
VI)	The Petitioner namely Qayyum Nawaz with Writ Petition No. 479-D/19 of DEO (M) D.I.K with connected Writ Petition No. 419-M/19 prayed for appointment against 25% quota reserved for retired Class-IV employees on superannuation DEO (M) D.I.K.	<p>The District Education Officer (M) D.I.Khan informed that the Petitioner will be appointment against 25% quota reserved for retired Class-IV employees on superannuation.</p> <p>DECISION: The Chair directed he may be appointed on his turn/ merit as per rules / policy in light of court orders.</p>	DEO(M) DI Khan.
VII)	The Petitioner namely Muhammad Bilal with Writ Petition No. 22-D/22 with C.M No. 204-D/2022 prayed for appointment against deceased son quota. DEO (M)Tank.	<p>The DEO (M)Tank informed that the Petitioner will be appointment against 100% quota reserved for retired on Medical Board ground.</p> <p>DECISION: - The Chair directed he may be appointed on his turn/ merit as per rules / policy in light of court orders.</p>	DEO (M)Tank



MR. MUHAMMAD RAZIAZ KHAN
SECTION OFFICER (DARC)
E&SE DEPARTMENT



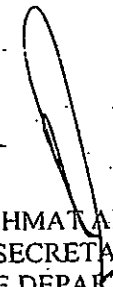
MR. KHALID MATEEN
SECTION OFFICER (LITIGATION-I)
E&SE DEPARTMENT



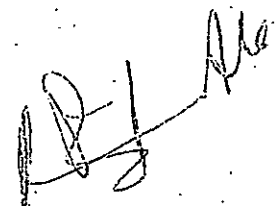
MR. MUHAMMAD SALEEM KHAN
SECTION OFFICER (LITIGATION-IV)
E&SE DEPARTMENT



MR. MOHAMMAD JAVED
DEPUTY SECRETARY (LEGAL-II)
E&SE DEPARTMENT;



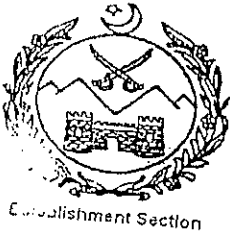
MR. RAHMAT ALI WAZIR
DEPUTY SECRETARY (ADMN)
E&SE DEPARTMENT;



MR. ABDUL AKRAM
ADDITIONAL SECRETARY (GENERAL)
E&SE DEPARTMENT
GOVT. OF KHYBER PAKHTUNKHWA

10

Confidential



FATA SECRETARIAT
(ADMINISTRATION, INFRASTRUCTURE & COORDINATION DEPARTMENT)
WARSAK ROAD PESHAWAR

No.FS/E/100-96(Vol-12)/11466
Dated 22/09/2016

Director Education (FATA)

Subject:- APPLICATION FOR PROMOTION FROM LAB ATTENDANT TO THE POST OF JUNIOR CLERK.

I am directed to enclose herewith a copy of application submitted by Mr. Salim Khan Lab Attendant (BS-02) Govt. Higher Secondary School Ghallana Mohmand Agency on the subject matter. The following documents received from the Directorate are returned herewith:-

Sl. No	Documents attached
1.	Service Book in original duly filled from Page-3 to Page-7.
2.	Personal File (24 Pages)
3.	Notification dated 28-01-2013 containing Recruitment Rules (04 Pages)
4.	Jugement of Peshawar High Court Peshawar dated 05-07-2013 in Writ Petition No. 1051-P/2013 (03 Pages)
5.	Jugement of Peshawar High Court Peshawar dated 04-10-2013 in Writ Petition No. 2537-P/2013 (02 Pages)
6.	Jugement of Peshawar High Court Peshawar dated 20-03-2014 in COC No-8/ (02 Pages).

The same are forwarded with the request that since appointment and promotions of Agency Cadre Staff (BS-01 to BS-15) are carried out on Agency Level/ Directorate, therefore it is requested that the Departmental Appeal may kindly be disposed of under the Rules, Policy and the Jugements of the Peshawar High Court Peshawar.

Encls: (As above)

[Signature]
Section Officer (Estab)

[Signature]

[Signature]

DD (Asst. Secy)

E4

Small

19/9/16

15/9/16

ATTESTED
[Signature]



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
 No-SO(PE)E&SED/4-10/2013
 Dated Peshawar the 15-05-2013

11
 33
 29

5/15/13
 Faisal
 MIA
 Khyber Agency

To,

The Section Officer (Edu:FATA),
 FATA Secretariat, Education Department
 Warsak Road Peshawar.

Subject: - PROMOTION OF CLASS-IV TO JUNIOR CLERK POST

I am directed to refer to your letter NO.SO(FATA)Edu/Promotion/C-IV/941 Dated 8-5-2013 on the subject noted above and to state that the cases of officials/teachers in BPS-1 TO BPS-15 have been declared Agency Cadre posts in light of your Secretariat Notification No.FS/E/100-19(Vol-28)6981 dated 3-8-2009(copy enclosed), which may be handled at your own level instead of referring to this department.

The instant case may be disposed of in light of this Department's Notification NO.SO(PE)4-10/SSRC/Ministerial Staff/2013 dated 28-1-2013 (copy enclosed) at the earliest.

Encl: As Above:

15/5/2013
 (HINA SAEED)
 SECTION OFFICER (PRIMARY)

Best Incl
I want promotion of C
case on my table
in 48 hours

25 May 2013

ATTESTED

Attested
Maqsood

29

To

The Additional Chief Secretary,
FATA Secretariat W/Road, Peshawar

Subject:-

APPROVAL FOR THE PROMOTION
APPLICANTS AS PER THE DIRECTI
HON'ABLE COURT, PESHAWAR IN
1051/2013 ORDER 20-03-2014 COC No
PETITION NO. 2537-P/2013.

R/Sir,

11/A
Put upon
file
Secy 55
Dr (Education) 14/11

The appellant submits as under:-

1. That the applicant filed a writ petition titled as "Saleem KhanVS.....Addl: Chief Secretary FATA and others' before the Hon'able High Court, Peshawar for the promotion of the applicant from laboratory Attendant (BS-02) to Junior Clerk as some posts of LDCs (J/Clerk) are lying vacant in your Department and the applicant is entitled for the promotion as LDC against one to the vacant post Quota reserved fro Class-IV employees.
2. That the writ petition was accepted by the Hon'able High Court, in which the applicant was directed to visit the office of the respondent No.4 i.e Agency Education Officer, Mohmand agency at Ghallani in order to get his relief. (Copy of the order dated 05-07-2013 of Hon'abe High Court is attached herewith)
3. That now the applicant approached the concerned office for the redresser of his grievance and that the same may be redressed accordingly if the applicant was promoted form Bs-02 to BS-07 as junior Clerk as per the direction issued by the Hon'able High Court in the present writ petition.
4. It is also pertinent to note that the undersigned have also submitted various applications to ACS, FATA for justice whereupon he has recorded the following remarks:-

"Pl, report by 10-10-2014 positively"

"Pl, examine & dispose it off"

It is very humbly prayed that on acceptance of this application, the Respondent No.3 Director Education FATA and No. 4 Agency Education Officer Mohmand agency may kindly be directed to promote the Applicant form Laboratory Attendant (BS-02) to Junior Clerk as per decision of High Court. The applicant would be very thankful and obliged.

SSD No. 1002
17/11/16
7976
20-10-16

20-10-16
A.C.S. (FATA)
N/SSD

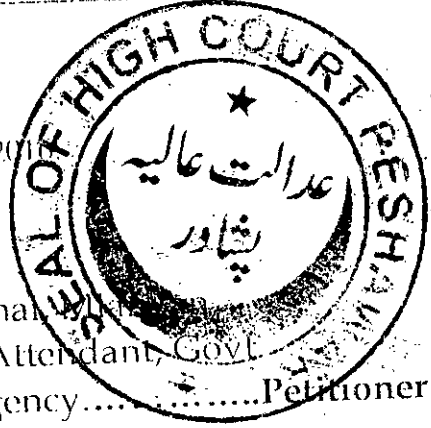
Yours Obediently,
Saleem Khan
(Saleem Khan)
Lab: Attendant
GHSS, Ghallani Mohmand Agency.

Attested
DB
17/11

(12) B

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR

Misc Application for COC No. 182 P /2014
In W.P. No.2537-P/2013.



Salim Khan S/o Noor Ali, r/o Ghalanai
Halcemzai, Mohmand Agency. Lab Attendant, Govt.
High School Ghalanai, Mohmand Agency.....Petitioner

V E R S U S

1. Saeed Gul, Agency Education Officer, Ghalanai,
Mohmand Agency.
2. Hameed Ullah Jan, Director Education FATA,
Warsak Road, Peshawar.....Respondents

Application for initiating contempt of court proceedings
against the Respondents for disobeying orders of this
Honourable Court vide order and judgment dated 20-3-2014 in
the above titled writ petition passed by Hon'ble Chief Justice
of Peshawar High Court.

Respectfully sheweth:

The petitioner submits the following:

A. That the above titled writ petition was allowed by this
Hon'ble Court on 04.10.2013. Copy of the order is attached as
Annexure "A".

B. That petitioner filed COC No.8/2014 in writ petition
No.2537-P/2013 for implementation of the order of the
Hon'ble Court. Copy of COC No.8/2014 is attached
Annexure "B".

FILED TODAY

Deputy Registrar

14 APR 2016

ATTESTED

**EXAMINER
Peshawar High Court**

09 DEC 2016

(2)

13

- C. That the Honourable Chief Justice Peshawar High Court issued directions to learned Additional A.G. Mr. Waqar Ahmad Khan to look into the matter personally and inform the concerned authority in clear terms to decide the application of the petitioner one way or other strictly in accordance with law as early as possible but not later than one month, failing which we will have no option but to initiate the proceedings under the relevant law. Copy of order dated 20.3.2014 is attached as Annexure "C".
- D. That the petitioner approached respondents No.1 and 2 for implementation of judgment of this Hon'ble Court but in vain.
- E. That the petitioner contacted the respondents for the implementation of the order of this Hon'ble Court and produced the judgment of the Court and they have disobeyed the order and obstruct the process of the Court which constitutes the contempt of Court under Article 204 of the Constitution of Pakistan 1973.
- F. That the Hon'ble Court also issued notice to Mr. Waqar Ahmad Khan, Additional A.G. and directions were issued to look into the matter personally and to decide the matter one way or other within one month vide order dated 20.3.2014 but no progress is seen in the above subject-matter in this regard.
- G. That the fundamental rights of the petitioner are involved which are infringed by the respondents No.1 and 2 intentionally disobeying the order of this Hon'ble Court and the respondents have clearly committed the contempt of Court.

FILED TODAY

Deputy Registrar

14 APR 2016

ATTESTED

EXAMINER
Peshawar High Court

09 DEC 2016

(2)

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It is therefore, humbly prayed that on acceptance of this application the contempt of Court proceedings may kindly be initiated against respondents No.1 and 2 and may be punished in accordance with law.

Petitioner
Muhammad Salim

Through:

(Muhammad Iqbal Khan Mohmand)
Advocate, Supreme Court of Pakistan.

Dated: 12.04.2016.

CERTIFICATE

Certified on instructions of my client that instant application drafted by the undersigned which is true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

ADVOCATE

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973.
2. Any other law book according to need.

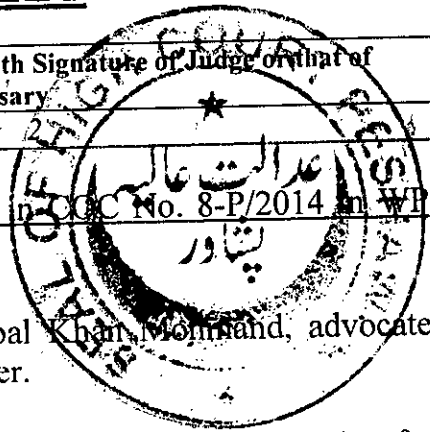
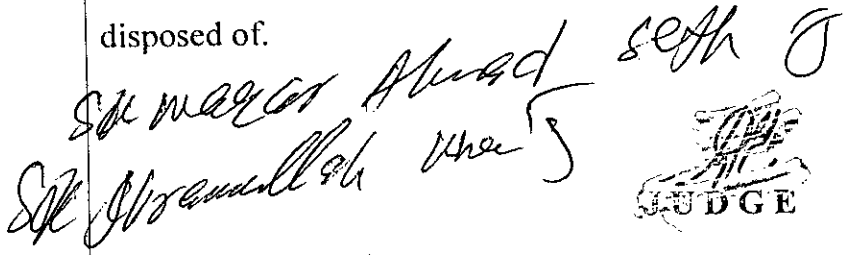



ADVOCATE

14 APR 2016

ATTESTED
EXAMINER
Peshawar High Court
00 DEC 2016

PESHAWAR HIGH COURT PESHAWAR
ORDER SHEET

15

Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2.12.2016.	<p align="center">  </p> <p>COC No. 182-P/2016 N in COC No. 8-P/2014 in WH No. 2537-P/2013 D.</p> <p>Present: Mr. M. Iqbal Khan Monmand, advocate for petitioner.</p> <p>Mr. Rab Nawaz Khan AAG for respondents.</p> <p align="center">*****</p> <p><u>WAQAR AHMAD SETH, J:-</u> Learned AAG while referring to <u>page-9 annexure-C</u> of the comments stated at the bar that the judgment of this Court has been complied with by considering the application of petitioner for promotion, but was refused for the reasons given therein. Learned counsel for petitioner when confronted he stated that petitioner has not been communicated any order regarding his consideration / refusal, requested for permission to approach the proper forum. Order accordingly. Show cause notices issued to respondents are hereby recalled. COC disposed of.</p> <p align="right">     </p>

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorized Under Article 87 of
The Constitution of Pakistan Order 1947

09 DEC 2016



OFFICE OF THE AGENCY EDUCATION
OFFICER
AT GHALLANAI MOHMAND AGENCY

Phone.0924290180 Fax.0924290180

No. _____
Dated Ghallanai the _____ / _____ /2014

(C)
~~127~~
16

SUBJECT:- PROMOTION OF CLASS-IV TO J/CLERK POST.

MEMO,

Consequent upon directions of the competent authority Vide No.8349-63/dated 04/06/2013, and Reminder (I) Vide No.8686-98 dated 11/06/2013,Reminder (II) Vide No.1668-82 dated 21/02/2014 and Reminder No.(III) Vide No.6265 dated 28/04/2014 and on the recommendation of departmental selection committee following class-iv in the school of Mohmand Agency are hereby promoted to junior clerk/ lab asstt; posts, and their adjustment is hereby made in the school mentioned against their name in PS No.07 @ Rs.5900-320-16400), plus usual allowances as admissible under the rules, in the interest of public service, w.e.t the date of taking over charges.

Note:- Selection of the promoted candidate has been made on the basis of their clear record regarding date of birth entries in S/Book, NIC, SSC Certificate, and experience in type writing, while there was great variations in the date of birth of the remaining candidates with very less speed in typewriting.

However this promotion order will remain open for any kind of appeal /objection if any, and will be cancelled if was found against the rules and policy of the Govt;

No.	Name	Promoted as	Place of Posting	Remarks
1	Mr Muntaz Khan S/o Saudkhasool Chow:GHS.S/Khawara	Junior Clerk	GGHS,Shaban Sali Tehsil E/Ghund.	Newly created post.
2	Mr Iqbal Hussain S/o Umar Khan GGMS Umar Khan	-do-	GHS,Sagi Bala. Tehsil Sali.	-do-
3	Shah Hussain S/o Islam Jan Chow:GGHS Mian Mandi	Lab.Asstt;	GHS Sagi Bala Tehsil Sali.	He is Re-deployed to GGHS Mian Mandi for the performance of duties as j/clerk.

TERMS AND CONDITIONS

1. They are entitled to avail all kinds of benefits specified for Govt servants, including CP Fund Except pension, gratuity and GP fund.
2. The verification of the documents will be made through DDO concerned, If any certificate proves as fake/bogus at any stage, his promotion will be considered as cancelled.
3. No payment will be made till the verification of his all documents from the institutions concerned.
4. If they wish to resign the post, they will have to give one month prior notice or pay to the one month will be forfeited in lieu thereof.
5. Charge Report should be submitted to all concerned.

(SAID MOHAMMAD)
Agency Education Officer
Mohmand Agency at Ghallanai.

Order No. 193-99 /Dated 29-4-2014.

Copy of the above is forwarded to the:

1. Director of Education FATA,K.P.K,Peshawar.
2. Political Agent Mohmand Agency
3. Agency Accounts Officer, Mohmand Agency at Ghallanai.
4. Agency Surgon Mohmand Agency at Ghallanai.
5. Candidates Concerned.

(Signature)
Agency Education Officer
Mohmand Agency at Ghallanai.

ATTESTED

(Signature)

(Handwritten mark)

(Handwritten mark)

17

To

All AEOs in FATA and FRs

Subject: Promotion of Class IV Employees to Junior Clerks B-& posts

I am directed to refer to above noted subject and to intimate that according to E&SE Deptt notification No. SO(PE)/4-10/SSR/Ministerial Staff/2013, dated 28th January 2013, there is 33% quota of the Class IV employees in Junior Clerks B-7, to be filled on promotion and seniority cum fitness.

Therefore, the competent authority has desired that all such promotion cases may be materialized under the existing rules and policy in your respective agency and intimate the progress to this office within a week time.

(Handwritten signature)

(Abbas Khan)
Deputy Director (A&F)
Directorate of Education FATA

Copy forwarded to:

- 1. PS to Secretary Education. FATA;
- 2. PA to Director Education FATA.

Attested (Handwritten signature)

Deputy Director (A&F)

ATTESTED

Secretary Edm (FATA)

28/5/13 Additional Director (Estab:)



NOTE FOR SECRETARY EDUCATION

18

Subject:- PROMOTION OF CLASS-IV EMPLOYEES TO JUNIOR CLERK B-7 POSTS

1. The Union of Class-Iv Employees, Education Department of District Peshawar has submitted a joint application alongwith connected paper for their promotion vide F/A and requested for their promotion of 33% quota out of total post of Class-IV to the post of Junior Clerk.
2. In this regard, this Directorate has already moved a summary to Secretary Administration & Coordination FATA, but the Secretary Administration & coordination has ordered to keep pending the case for time being vide F/B.
3. After that this Directorate once again moved a summary to Secretary Social Sectors Departments FATA on the noted subject for seeking guidance as to whether their promotion be made by this Directorate OR their cases be conveyed to Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar but the reply was vague at F/C . In this regard this Directorate has issued a letter to the section officer, (Education) for seeking guidance from Law & order Department FATA Secretariat as whether their promotion be made by this Directorate OR their cases be conveyed to Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar vide F/D.
4. Now the section officer (Primary) Elementary & Secondary Education Department Khyber Pakhtunkhwa has sent a letter & stated that the case may be handled through Director Education FATA & disposed of the case as per Notification No. SO (PE)/4-10/MS/2013 dated 28.1.2013 at F/E and F/F respectively.
5. Therefore, it is, suggested that this Directorate may be allowed to make the promotion of Class-IV on the basis of existing rules & policy in vogue at F/G.
6. The promotion of Class-IV to Junior Clerk in this Directorate be made by Departmental Promotion Committee of this office, comprising of :

I. Dy: Director F&A	Chairman,
ii. Asstt: Director Establishment	Member
III. Superintendent/Administration Officer	.member,

Handwritten signature

While, those in Agencies /FRs be promoted by concerned Agency Education Officers

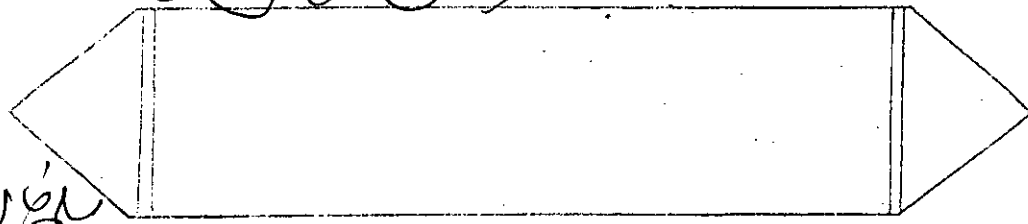
7. Para-5/N & Para 6/N are submitted for approval please

Handwritten signature
 Additional Director (Estab:)

Secretary Edm (FATA)

ATTESTED P.T.O
Handwritten signature

بعد الت صاب سروس سروس اور



دعویٰ
مقدمہ
مورخہ

مورخہ
مقدمہ
دعویٰ
جرم

باعت تحریراً نکتہ

کے لئے منظور ہے۔

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی کے اختتام کے لئے فضل شاہ محمد الطولک کے نام پر درخواست کی گئی ہے۔

آن مقام کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقریر نامتہ فیصلہ بر حلف دینے جو اب وہی اور قبائل دعویٰ اور ابسورت ڈگری کرنے اجراء اور وصولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی نہ کر کریں۔ لہذا وکالت نامہ لکھنیا کہ مندر ہے۔

فضل شاہ محمد الطولک

Signature

المرقوم _____ ۱۰ _____

کے لئے منظور ہے۔
Attested
Acceptance (Adv)
مقام



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Peshawar, dated the 28th January, 2013

NOTIFICATION

No.SO(PE)/4-10/SSRC/Ministerial Staff/2013:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989, and in supersession of all rules issued in this behalf to the extent of the Elementary and Secondary Education Department the (E&SE Department) in consultation with the Establishment Department and Finance Department hereby lays down the method of recruitment, qualifications and other conditions specified in Column 3 to 5 of the Appendix to this Notification which shall be applicable to the posts borne on the ministerial establishment in the Elementary and Secondary Education Department specified in Column No.2 of the said Appendix.

APPENDIX

S. NO	NOMENCLATURE	MINIMUM QUALIFICATION AND EXPERIENCE FOR INITIAL APPOINTMENT OR BY TRANSFER	AGE LIMIT	METHOD OF RECRUITMENT (EXISTING)
1	2	3	4	5
1.	Deputy Director (Finance and Accounts) / Deputy Director (Administration) (BPS-18)	-	-	By promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors (Finance and Accounts) & Assistant Directors (Administration) with at least five years service as such.
2.	Assistant Director (Finance and Accounts) / Assistant Director (Administration) (BPS-17)	-	-	By promotion on the basis of seniority cum fitness from amongst the Budget and Accounts Officers with at least two years service as such.
3.	Budget and Accounts Officer. (BPS-16)	-	-	By promotion on the basis of seniority cum fitness from amongst the Superintendents with at least two years service as such.
4.	Superintendent. (BPS-16)	-	-	By promotion on the basis of seniority cum fitness amongst the holders of the posts of Assistants and Senior Scale Stenographers with at least five years service as such.
5.	Senior Scale	(i) At least Second Class Bachelor's Degree or equivalent	20 to 30	By promotion on the basis of seniority cum

	Stenographers (BPS-16)	<p>qualification from a recognized University;</p> <p>(ii) Speed of Seventy words per minute in shorthand in English and Forty Five words per minute in typing; and</p> <p>(iii) Knowledge of Computer in using MS words and MS Excel.</p>	Years	fitness from amongst the Junior Scale Stenographers (BPS-14) with at least five years service as such.
6.	Assistant (BPS-14)	At least Second Class Bachelor's Degree from a recognized University	20 to 30 Years	<p>(a) Seventy five per cent by promotion, on the basis of seniority-cum-fitness from amongst the Senior Clerks with at least five years service as such; and</p> <p>(b) Twenty five per cent by initial recruitment</p>
7.	Junior Scale Stenographers (BPS-14)	<p>(i) Intermediate or equivalent qualifications from a recognized Board;</p> <p>(ii) Speed of Fifty words per minute in shorthand in English and Thirty Five words per minute in typing; and</p> <p>(iii) Knowledge of Computer in using MS words and MS Excel.</p>	18 to 30 Years	By Initial recruitment
8.	Senior Clerks (BPS-09)			By promotion on the basis of seniority-cum-fitness from amongst the Junior Clerks, Assistant Store Keepers and Laboratory Assistants with at least two years service as such.
9.	Junior Clerk/Assistant Store Keeper/ Laboratory Assistant (BPS-07)	<p>(i) For Junior Clerk / Assistant Store Keepers having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board and a speed of twenty five words per minute in typing ;</p> <p>(ii) For Laboratory Assistants having at least Second Division in Secondary School Certificate or equivalent qualifications from a recognized Board with Science.</p>	18 to 30 Years	<p>(a) Thirty Three per cent by promotion, on the basis of seniority-cum-fitness from amongst the Daftaries, G/Operators, Qasids and Naib Qasids including other equivalent posts in the attached department /offices/institutions with at least <u>Two years</u> service as such and having qualification mentioned in column No. 3.</p> <p>(b) Sixty Seven per cent by initial recruitment</p> <p>Note: - For the purpose of promotion, there shall be maintained a joint seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc including other equivalent posts in the attached department /offices/institutions with reference to the dates of their regular appointment or acquiring Secondary School Certificate whichever is later.</p>

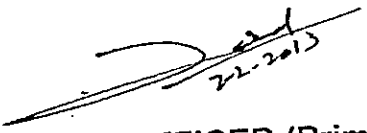
10.	Driver (BPS-04)	Having valid Driving License and preferably Literate.	18 to 32 Years	By Initial recruitment
11.	Naib Qasid /Chowkidar/ Behshti/Cook/Bearer/ Shop Attendant/ Laboratory Attendant etc	Preferably Literate	18 to 30 Years	By Initial recruitment

**SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Endst : of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (S&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
14. All District Account Officer in Khyber Pakhtunkhwa.
15. All Agency Education Officer in FATA
16. All Agency Account Officer in FATA
17. PS to Governor Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
19. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.

20. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
21. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.
22. Master file


22-2013
SECTION OFFICER (Primary)

OFFICE OF THE PRINCIPAL GHSS GHALLANAI MOHMAND AT GHALLANAI?

APPOINTMENT

With reference to the Directive of worthy Political Agent Mohmands at Ghallanai vide his office order No.1200/A dated 25/2/2005. One Mr Salim Khan S/O Noor Ali Khan r/o Malimzai M/Agency is hereby appointed as laboratory Attendent(C/IV) in EPS No.1 No.(1870-55-3520) against vacant ~~post~~ mentioned post at Higher ~~Secondary~~ ~~School~~ portion of this school from the date of taking over charge.

TERMS & CONDITION.

1. His appointment is made purely on CONTRACT BASIS for the period of three years.
2. He should produced Age & health certificate from Agency Surgeon concerned.
3. He is liable to be terminated any time without giving any notice of showing any reason.

(MR IMAM GUL)
PRINCIPAL

GHSS GHALLANAI M/AGENCY.

Endot: No. 438-40/dated 1/3 2005.

Copy for information to the:-

1. Political Agent Mohmands at Ghallanai w/r to his quoted above No. and date.
2. Agency Education Officer Mohmand at Ghallanai.
3. Director of Education(PATA) R.W.F.P. Peshawar.
4. Agency Accounts Officer Mohmand at Ghallanai.
5. Accountant of this school office.
6. Candidate concerned.


PRINCIPAL

GHSS GHALLANAI M/AGENCY.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL No.407/2017

Saleem Khan S/O Noor Ali, Lab: Attendant GHSS Ghallani District
Mohmand

..... (APPELLANT)

Versus

1. District Education Officer, Mohmand
2. Director Elementary and Secondary Education Govt of KP,
Peshawar
3. Secretary Elementary and Secondary Education Govt. of KP,
Peshawar

.....RESPONDENTS

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S.No	Description of documents	Annexure	Pages
1	Para wise comments	...	1-5
2	Copy of the application	A	6-7
3	Copy of the letter	B	8
4	Copy of the DMC	C	9
5	Copy of the letter	D	10
6	attendance sheet	E	11
7	Copy of the policy/law	F	12-18

Respondent No. 1

District Education Officer

Mohmand

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL No.407/2017

Saleem Khan S/O Noor Ali, Lab: Attendant GHSS Ghallani District
Mohmand

..... **(APPELLANT)**

Versus

1. District Education Officer, Mohmand
2. Director Elementary and Secondary Education Govt of KP,
Peshawar
3. Secretary Elementary and Secondary Education Govt. of KP,
Peshawar

..... **RESPONDENTS**

COMMENTS ON BEHALF OF RESPONDENT NO.1

Respectfully sheweth:

Preliminary Objection:

1. That the Appellant has got no cause of action to file the instant Appeal.
2. That the Appellant has concealed all the material facts from this Hon'ble Tribunal
3. That the Appellant has not come to this Tribunal with clean hands.

- ②
4. That the Appellant is estopped by his own conduct to bring the instant Appeal

ON FACTS

1. No comments.
2. No comments.
3. Incorrect, hence denied. The appellant submitted an application on Date; 21.08.2019, to consider him for promotion to junior clerk. **(Copy of the application is attached as annexure A)**. The respondent Vide Endst No.2766-67 dated: 11-09-2019 asked the appellant to submit documents including his first Appointment order letter, academic certificate and professional certificates, service book and a copy of CNIC. **(Copy of the letter is attached as annexure B)**. But it is pertinent to mentioned that in response to the above mention letter the Appellant submitted only his Secondary School Certificate (Matriculation) DMC. **(Copy of the DMC is attached as annexure C)**. It is also noteworthy that the appellant got 325 Marks out of 850 having Grade E which is 3rd Division. After that the respondent Vides letter Endst; No. 2962 dated: 24-09-2019, asked the Appellant to appear for the test of Junior clerk. But the appellant was absent and did not appear in the test. **(Copy of the letter is attached as annexure D and copy of the attendance sheet is attached as annexure E)**. Hence, the appellant is not eligible to be promoted to the post of Junior clerk as

(3)

he did not follow the required codal formalities and procedure.

4. As elucidated in Para 3 above.
5. This Para of the appeal is correct to the extent that Writ petitions and COC were filed by the appellant but the appellant did not approach to the respondent department neither he submit any application along with his documents for promotion but the appellant seems interested to be promoted without following any criterion and procedure which is itself a violation of law. It is pertinent to mentioned that the Government has a proper criterion/policy for the promotion of Class IV employee to junior clerk. **(Copy of the policy/law is attached as annexure F).**
6. Incorrect. Hence denied. The omission and commission of the respondent are in accordance with law on the following grounds:

GROUND

- A. Incorrect, hence denied. That the omission and commission of the respondents are in accordance with law.
- B. Incorrect, hence denied. The appellant fail to comply in accordance with law and with the service rules/policy, hence is not eligible to be promoted to the post of Junior clerk.

C. Incorrect hence denied. The referred name in the appeal were the candidates who along with other candidates appeared in the test and after fulfilling all the legal formalities and procedure, the qualified candidates were promoted to the post of junior clerk while on the other hand the appellant did not appear in the test resultantly he was not promoted.

See Para 3 on facts above.

D. Incorrect hence denied. The appellant has Third Division in SSC which is not fulfilling the required criterion for promotion to junior clerk.

E. Incorrect. Hence denied. The appellant was treated in accordance with law and while doing so no right of the appellant was violated. However, it is pertinent to mentioned that the appellant did not fulfill the required criteria therefore he is not eligible to be promoted.

F. That being bound by law, the respondent department always stick to act in accordance with law. There is a proper procedure to fill the vacant post on promotion.


G. No comments

H. That the respondent seeks permission of this honorable tribunal to present some other grounds at the time of hearing of the instant appeal.

5


Pray

In light of the above facts, it is humbly prayed that the appeal in hand may very kindly be dismissed with cost.


Respondent No. 1
District Education Officer
Mohmand

AFFIDAVIT

I hereby solemnly affirm and declare on oath that the contents of Para wise comments submitted by the respondent No 1 are correct to the best of my knowledge and belief and nothing has been concealed.


Respondent No. 1
District Education Officer
Mohmand

"A"

6

بھطور جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحب ضلع مہمند

عنوان:- درخواست برادر پروموشن لیب انڈنٹ سے
جونیئر کلرک محکمہ ایجوکیشن ضلع مہمند

جناب عالی اسائل حسب ذیل عرض رساں ہے۔

1- یہ کہ ساائل واقع موضع میانگانہ غلٹی ضلع مہمند کا مقامی باشندہ ہے اور ساائل نے سال 1996ء میں میٹرک پاس کیا
ہوا ہے اور بعد میں بی اے تک تعلیم حاصل کی۔

2- یہ کہ ساائل مورخہ 25/02/2005 میں محکمہ ایجوکیشن میں بحیثیت لیب انڈنٹ جی ایچ ایس ایس غلٹی میں
تعیینات ہوا۔ اور ساائل نے اپنی پروموشن کیلئے سال 2007ء سے مسلسل محکمہ مذکورہ بالا کو درخواستیں دیتا چلا آ رہا
ہے۔ بلکہ ساائل نے محکمہ مذکورہ کے قواعد و ضوابط اور رولز اور پالیسی اسٹیٹمنٹ ڈویژن سے نقاط و دفعات کی روشنی
میں محکمہ ایجوکیشن کو مختلف درخواستیں پیش خدمت کر چکا ہے۔

3- یہ کہ ساائل کی درخواستوں پر سا حال کسی بھی قسم کا کوئی عمل در آمد وغیرہ نہ ہو سکا۔ اور سن ساائل کو مذکورہ مسلسل نظر انداز
کرتا چلا آتا ہے کہ محکمہ مذکورہ کے اعلیٰ افسران نے بھی ایگززبابت سن ساائل پروموشن جاری کئے جس میں واضح طور پر
تحریر شدہ ہے کہ سن ساائل پروموشن کا حقدار ہے۔

4- یہ کہ ساائل کی تعیناتی کے عرصہ میں یعنی سال 07-2006ء میں محکمہ مذکورہ کی جانب سے نئے کلاس
فور چوکید اور غیرہ (مسلمان ممتاز خان۔ شاہ حسین۔ اقبال حسین۔ عزیز" لیبارٹری اسٹنٹ" پیچنگ سٹاف کے
زمرہ میں آتا ہے کسی عزیز کو بھی جونیئر کلرک کی پوسٹ پر ایڈجسٹ کیا گیا علاوہ ان میں مزید تین اشخاص بھی یکے
کارج میں کلاس فور پر موٹ ہو چکے ہیں) تعینات/بھرتی شدہ افراد کی پروموشن/ترقی بھی ہو چکی ہیں لیکن سن ساائل
تا حال بدستور اپنی سابقہ پوسٹ پر اپنے فرائض منصبی بطریق احسن سرانجام دیتا چلا آ رہا ہے۔

5- یہ کہ من سائل کا جو مقدمہ بعدالت عالیہ پشاور ہائی کورٹ میں چلا آ رہا تھا اس پر بھی واضح طور پر محکمہ مذکورہ کو احکامات جاری کئے گئے ہیں۔

6- یہ کہ نئے تعینات شدہ افراد جو کہ من سائل سے انتہائی جوئیر ہیں انہیں محکمہ مذکورہ نے مسلسل ترقی دی اور من سائل کو نظر انداز کیا جو کہ محکمہ مذکورہ کی جانب سے من سائل کے ساتھ سراسر نا انصافی ہے۔

لہذا استدعا کی جاتی ہے کہ مذکورہ بالا حقائق اور واقعات کے تناظر میں من سائل کی درخواست پر ہمدردانہ غور کرتے ہوئے من سائل کو پروموشن کرنے کے احکامات صادر فرمایا جائے۔ چونکہ من سائل نئے بھرتی شدہ افراد میں سب سے سینئر ہے اور اعلیٰ افسران نے من سائل کی پروموشن کے احکامات بھی جاری کئے ہوئے ہیں۔

المرقوم 21/08/2019

سائل:- مسٹر سلیم خان ولد نور علی۔ (لیب آڈٹنٹ)

جی ایچ ایس ایس غلٹی ضلع مہمند۔

شناختی کارڈ نمبر 1-1184501-21402

موبائل نمبر 0303-5040154

نوٹ:- درخواست ہذا کے ہمراہ پروموشن کاغذات/عدالتی احکامات لف ہذا ہیں۔

(B)

(P)

OFFICE OF THE DISTRICT EDUCATION OFFICER
 MOHMAND TRIBAL DISTRICT GHALLANAI
 PHONE NO: 0924-290180, FAX NO: 0924-290180
 NO. _____ DATED: _____ /2013

The Principal,
 GHSS Ghallana District Mohmand

Subject: Submission of Documents

With reference to the captioned subject above and to state that one Mr. Saleem Khan has submitted an application for enlisting his name for promotion.

In this regard it is stated that direct the applicant to submit the following documents as the earliest (within one week) to proceed into the matter.

- 1. Last Appointment Order
- 2. Academic Certificates and Professional Certificates
- 3. Service Book
- 4. CNIC Copy.

[Handwritten signature]
 Ed

[Handwritten signature]
 District Education Officer,
 Mohmand Tribal District

11/9/13

2766-67-14/19/13

Copy to: Mr. Saleem Khan (ab) Alimiyat GHSS Ghallana with the direction to submit the requisite documents

Attended
[Handwritten signature]

GG./98 No. 0454

DUPLICATE

9

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)

Session 19 96 (Annual/Supplementary)

Name Saleem Khan

Father's Name Noor Ali Khan

Roll No. 68642

SUBJECT	Total Number of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
1. English	150	50	/
2. Urdu	150	49	
3. Islamiyat Comp:	75	36	
4. Pakistan Studies	75	40	
5. Gen. Mathematics	100	33	
6. General Science	100	33	
7. <u>Pa</u>	100	42	
8. <u>Pa</u>	100	42	
Total	850	325-E	Three Hundred & Twenty Five only

This Certificate is issued errors and omission excepted.

Prepared by: [Signature]

Checked by: _____

Date 22-01-2016

Controller of Examinations
Board of Intermediate & Secondary Education
Peshawar

[Signature]
26/9/16
Assistant District
Peshawar



"D"

10

OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT AT GHALLANAI
PHONE NO: 0924-290180 FAX NO: 0924-290180

To:

Mr. Saleem
Lab Attendant at Ghallanai
Mohmand Tribal District

Subject: Test for the position of Junior Clerk

Please note that you have been directed to attend the test for the subject mentioned above in accordance with the following schedule:

Date: September 26, 2019

Time: 10:30 AM

Venue: Office of the District Education Officer Mohmand Tribal District at Ghallanai

Kindly confirm your availability and it would be good to reach the venue 15 minutes earlier

District Education Officer
Mohmand Tribal District Ghallanai

Enclosure: 2962 attached

Copy forwarded to:

- 1. The Principal GHSS Ghallanai Mohmand Tribal District

District Education Officer
Mohmand Tribal District Ghallanai

25-9-2019

26/9/2019

Mohmand Tribal District
Education Office


OFFICE OF THE DISTRICT EDUCATION OFFICE MOHMAND TRIBAL DISTRICT


TEST TIME 10:00 AM TO 3:00 PM

DATED 26 / 09 / 2019

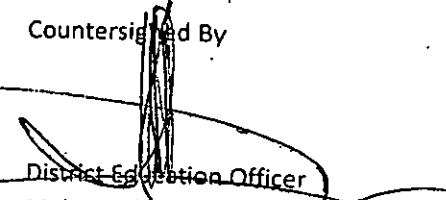
ATTENDANCE SHEET OF THE TYPING TEST

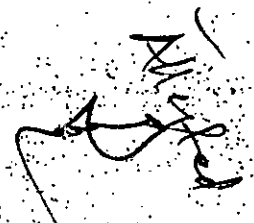
S.No	Name	Desig	Department/School	Contact Number	Signature
1	Saleem Khan	Lab Attend	GHSS Ghallanai	—	Absent


 Abdul Sattar
 Head Master
 GHS Qamar Din


 Arshan Ali
 Computer Operator
 DEO Office Mohmand

Countersigned By


 District Education Officer
 Mohmand Tribal District



“E”

11



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ESTABLISHMENT AND ADMINISTRATION DEPARTMENT
(ESTABLISHMENT WING)

NOTIFICATION

Peshawar, dated the 6th December 2012.

No SOE.IV(E&AD)/1-35/2012:- In pursuance of the provisions contained in sub-rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of all previous rules, issued in this behalf, the Establishment and Administration Department, in consultation with the Finance Department, hereby lays down the method of recruitment, qualifications and other conditions specified in column 3 to 5 of the Appendix to this Notification, which shall be applicable to posts in the Khyber Pakhtunkhwa Civil Secretariat, specified in column 2 of the said Appendix.

APPENDIX

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
1.	Superintendent.			By promotion, on the basis of seniority-cum-fitness, from amongst the holders of the post of Assistant with atleast five years service as such.

12

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
2.	Assistant.	Second Class Bachelor's Degree from a recognized University.	20 to 32 years.	(a) Seventy-five per cent by promotion, on the basis of seniority-cum-fitness, from amongst Senior Clerks with atleast five years service as Junior and Senior Clerk. (b) twenty-five per cent by initial recruitment.
3.	Senior Clerk.	-	-	By promotion, on the basis of seniority-cum-fitness, from amongst the Junior Clerk with atleast two years service as such.
4.	Junior Clerk.	(i) Matriculation with second division or equivalent qualification from a recognized Board; and (ii) a speed of 30 words per minute in typing.	18 to 30 years	(a) Thirty-three per cent by promotion, on the basis of seniority-cum-fitness, from amongst Daftaris, Gestetner Operators, Qasids and Naib Qasids including holders of other equivalent posts in the Secretariat with two years service as such, who have passed S.S.C Examination; and (b) sixty-seven per cent by initial recruitment. <u>Note:</u> For the purpose of promotion, there shall be maintained a common seniority list of Daftaries, Gestetner Operators, Qasids, Naib Qasids etc., with reference to the dates of their acquiring the Secondary School Certificate.

13

S.No.	Nomenclature of posts.	Minimum qualification for appointment by initial recruitment.	Age limit.	Method of recruitment.
1.	2.	3.	4.	5.
				<p>Provided that-</p> <p>(a) if two or more officials have acquired the Secondary School Certificate in the same session, the inter se seniority in the lower post shall be maintained for the purpose of determining seniority in the higher post;</p> <p>(b) where a senior official does not possess the requisite qualification at the time of filling up a vacancy, the official next junior to him possessing the requisite qualification shall be promoted in preference to the senior official or officials.</p>

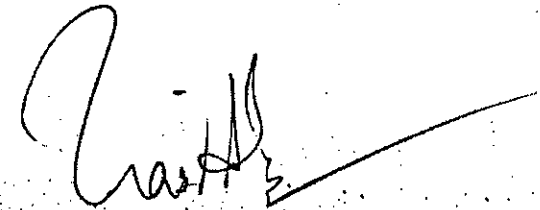
CHIEF SECRETARY
GOVERNMENT OF THE KHYBER PAKHTUNKHWA.

15

Endst: No. SOE-IV(E&AD)/1-35/2012, dated 6th December, 2012

Copy forwarded for information and necessary action to: -

1. All Administrative Secretaries to Government of Khyber Pakhtunkhwa, Civil Secretariat, Khyber Pakhtunkhwa, Peshawar.
2. The Addl: Chief Secretary (FATA), Khyber Pakhtunkhwa.
3. The Chairman, Khyber Pakhtunkhwa Public Service Commission.
4. The Senior Member of Board of Revenue.
5. Secretary to Governor, Governor's Secretariat, Khyber Pakhtunkhwa
6. The Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
7. The Secretary Provincial Assembly, Khyber Pakhtunkhwa.
8. The Chairman to Khyber Pakhtunkhwa Service Tribunal Peshawar.
9. The Private Secretary to Chief Secretary Khyber Pakhtunkhwa.
10. The Private Secretary to Secretary Establishment Department,
11. The P.A to Special Secretary (Estt), Establishment Department.
12. The P.A to Addl: Secretary (Estt/ Reg), Establishment Department.
13. The PA to Addl: Secretary (HRD Wing) Establishment Department.
14. All the Deputy Secretaries in Establishment Department.
15. All Section Officers, Establishment Department, Khyber Pakhtunkhwa Peshawar.
16. The Manager Government Printing Press for publication in the Extra Ordinary Gazette.



(NASIR AMAN)
SECTION OFFICER (E.IV)

15

VAKALATNAMA

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

_____ OF 2020

Salim Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt
GOVT: OF KP & OTHERS

(RESPONDENT)
(DEFENDANT)

I/We Salim Khan

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

Dated. 11/12/2019 20



CLIENT



ACCEPTED
SHAHZULLAH YOUSAFZAI
(BC-14-4933)
15705-2835070-1
ADVOCATES

OFFICE:

Flat No.3, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Mobile No.0302-8578851

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No: 407/2017

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1019

Dated 18-9-18

Saleem KhanVersus.....AEO & others

APPLICATION UNDER ORDER VI RULE XVII OF THE
CIVIL PROCEDURE CODE, 1908 FOR AMENDMENT OF
TITLED APPEAL.

Respectfully Sheweth,

1. That the above mentioned Appeal is pending adjudication before this Honourable court which is fixed for ~~18/11/18~~ 8/11/18
2. That the titled Appeal was filed before the merger of FATA in Khyber Pakhtunkhwa, hence the appellant impleaded the respondents hailing from FATA, while now, after the merger of FATA into Khyber Pakhtunkhwa, the respondents and their designations have been changed, hence amendment in appeal to the extent of impleading (1) District Education Officer District Mohmand as Respondent No. 1 (2) Director E&SE KPK Peshawar as Respondent No. 2 of and (3) Secretary Education Department KPK as respondent No. 3 instead of present respondents is necessary.

Put up to the court with
relevant appeal.

18/9/18

Qadri

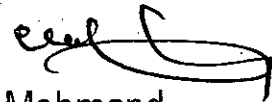
3. That the amendment in the instant Appeal is very necessary for a just and fair adjudication, and this Honourable Tribunal have ample power to allow the Appellant to amend the instant Appeal.

It is, therefore, humbly prayed that on acceptance of this application, the Appellant may kindly be allowed to amend the Appeal for the fair and just decision.

Dated:- 18/09/2018

Through:-

Appellant



Fazal Shah Mohmand.
Advocate Supreme Court.

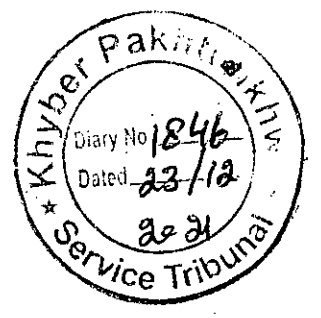
AFFIDAVIT:-

*It is, stated on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.*



DEPONENT

Peshawar
Dated: 23-12-21



Put me with... daily chain-cu

To
23/12/21

Respected

Chairman,
Service Tribunal Pesh.
Khyber Pakhtunkhwa

NFA

04/01/2022

Subject:

Early Hearing of Three Service Appeals
Inter-related with the same Department/LG

Dear Sir,

With due respect, it is prayed that the one, Syed Shehishah, has filed three service appeals which are inter-connected in terms and against the one department, LG, KP. The date fixed is quite distant vice-vis the one S.A. No 153/17 which needs attention. The date fixed is 16-02-2022.

Sir,

In the above case, in one of the service appeal No 1443/18, the learned bench of this Tribunal directed that such cases may be clubbed together for decision. The order was issued in July 2020. The cases are

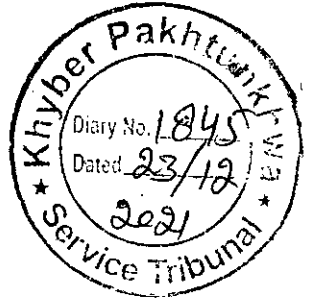
S. No	Appeal No	Next date
1.	153/17	16-02-2022
2.	1443/18	16-02-22
3.	12,170/20	16-02-22

Keeping in view the above, it is prayed that an early date may be fixed with ten days to meet the ends of justice.

Thanking sincerely,
S. Numan Ali Shah
Advocate, Service Tribunal/KP

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

S.A.No. 407 /2017



Saleem Khan.....Applicant/Appellant.

Govt and others.....Respondents.

put up to the worthy chair - on with appeal.

APPLICATION FOR EARLY HEARING OF THE TITLED SERVICE APPEAL.

Respectfully Sheweth;

1. That the above titled service appeal is pending adjudication before this August Tribunal, fixed for 14-02-2022 in **D.B.**
2. That the case ^{is} ~~is~~ an old one and the appellant is low paid Class IV employee besides vacant posts of junior Clerk are available and respondents are going fill the same.
3. That fixing an early date is in interest of justice and there is no hurdle in fixing an early date in the above titled appeal, besides if any early date is not fixed in the titled appeal, the service appeal would lose its purpose and would become infructuous.

NFA
[Signature]
19/1/2022

IT IS THEREFORE, PRAYED, THAT ON ACCEPTANCE OF THIS APPLICATION, THE ABOVE TITLED SERVICE APPEAL MAY KINDLY BE FIXED FOR AN EARLY DATE.

[Signature]

DATED: 23-12-2022

APPELLANT/APPLICANT

THROUGH,

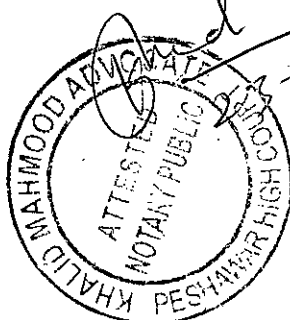
[Signature]

**FAZAL SHAH MOHMAND
ADVOCATE SUPREME COURT**

AFFIDIVAT

I, **Saleem Khan (Appellant)**, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

[Signature]
DEPONENT



VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO: 407 OF 2022 ²⁰¹⁷

Saleem Khan (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt. (RESPONDENT)
(DEFENDANT)

I/We Saleem Khan

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

Dated. ___/___/2022



CLIENTS

ACCEPTED

NOOR MUHAMMAD KHATTAK

UMER FAROOQ MOHMAND

KAMRAN KHAN

MOHAMMAD MAAZ MADNI


HAIDER ALI
ADVOCATES

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number	407/17			
Case Title	Saleem Khan -Vs- D.E.O & Others			
Date of Institution	2017.			
Bench	SB		DB	✓
Case Status	Fresh		Pending	✓
Stage	Notice		Reply	Argument ✓
Urgency to clearly stated.	That the appellant has a strong case in his favour and the case has been adjourned so many times due to the act of the respondents and appellant suffers alot.			
Nature of the relief sought.	//			
Next date of hearing	01-08-2022			
Alleged Target Date	Next Week . 30-6-22			
Counsel for	Petitioner ✓	Respondent	In person	✓


Signature of counsel/party

14/7/22

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2022

In

Service Appeal No. 407/2017



Saleem Khan

.....Appellant

V E R S U S

DEO & others

.....Respondents

**APPLICATION FOR EARLY HEARING
THE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending adjudication before this Honourable Court and is fixed for 01-08-2022.
2. That the appellant has a strong case in his favour, and the case has been adjourned so many times due to the act of the respondents and due to which, the appellant suffers a lot and requests through the instant application that the instant appeal may kindly be fixed at an early date.
3. That there is no legal bar in accepting the instant application rather it will serve the ends of justice.

It is, therefore, most humbly prayed that the Application, the titled case may kindly be fixed at an early date, in the best interest of justice.

Through Applicant



Date: 23/06/2022

Fazal Shah Mohmand
Advocate
Supreme Court of Pakistan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for Early Hearing are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2022

In

Service Appeal No. 407/2017

Saleem Khan

.....Appellant

V E R S U S

DEO & others

.....Respondents

**APPLICATION FOR EARLY HEARING
THE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending adjudication before this Honourable Court and is fixed for 01-08-2022.
2. That the appellant has a strong case in his favour, and the case has been adjourned so many times due to the act of the respondents and due to which, the appellant suffers a lot and requests through the instant application that the instant appeal may kindly be fixed at an early date.
3. That there is no legal bar in accepting the instant application rather it will serve the ends of justice.

It is, therefore, most humbly prayed that the Application, the titled case may kindly be fixed at an early date, in the best interest of justice.

Through

Applicant



Date: 23/06/2022

Fazal Shah Mohmand
Advocate
Supreme Court of Pakistan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for Early Hearing are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2022

In

Service Appeal No. 407/2017

Saleem Khan

.....Appellant

VERSUS

DEO & others

.....Respondents

**APPLICATION FOR EARLY HEARING
THE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending adjudication before this Honourable Court and is fixed for 01-08-2022.
2. That the appellant has a strong case in his favour, and the case has been adjourned so many times due to the act of the respondents and due to which, the appellant suffers a lot and requests through the instant application that the instant appeal may kindly be fixed at an early date.
3. That there is no legal bar in accepting the instant application rather it will serve the ends of justice.

It is, therefore, most humbly prayed that the Application, the titled case may kindly be fixed at an early date, in the best interest of justice.

Through Applicant

Date: 23/06/2022


Fazal Shah Mohmand
Advocate
Supreme Court of Pakistan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for Early Hearing are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing 411 -p/2022

In case No. 407/17 -p/2022

Saleem Khan Vs DEO

Presented by Fazal Shah Mohammad on behalf of petitioner. Entered in the relevant register.

Put up alongwith main case

REGISTRAR

Last date fixed	<u>16-6-22</u>
Reason(S) for last adjournment, if any by the Branch Incharge.	<u>due to respondent requested for adjournment.</u>
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

Be fixed in the second week of July 2022

Reader

24/6/2022

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

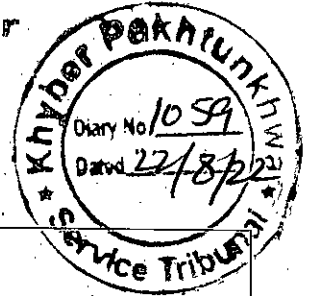
PROFORMA FOR EARLY HEARING

FORM 'A'

JUDICIAL BRANCH

SCANNED
KPST
Peshawar

To be filled by the counsel



Case Number	Service Appeal No. 407/2017					
Case Title	Saleem Khan ... <i>Versus</i> ... DEO					
Date of Institution	<u>2017</u>					
Bench	SB		DB	√		
Case Status	Fresh		Pending	√		
Stage	Notice	√	Motion		PAN	
Urgency to be clearly stated	<u>That the appellant has strong case in his favour, and the case has been adjourned so many time due to the act of the respondent and due to which, the appellant suffer a lot and request through the instant application, that the instant appeal may kindly be fixed at an early date.</u>					
Nature of the relief sought	<u>Early fixation of the case.</u>					
Next date of hearing	<u>18-Oct-2022</u>					
Alleged target date	<u>Coming week.</u>					
Counsel for	Petitioner	√	Respondent		In person	

Signature of Counsel/party :-

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/2022-

In case No. 407 _____ -p/2017-

Saleem Khan Vs D.E.O & Others

Presented by Fazal Shah Mohmand on behalf of Appellant. Entered in the relevant register.

Put up alongwith main case _____

REGISTRAR

Last date fixed	
Reason(S) for last adjournment, if any by the Branch Incharge.	
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

Being an old case be fixed in the 2nd week of September.
i.e. - 12-09-2022

Reader

26/8/2022

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2022

In

Service Appeal No. 407/2017

**SCANNED
KPST
Peshawar**

Saleem KhanAppellant

VERSUS

DEO & othersRespondents

**APPLICATION FOR EARLY HEARING
THE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending adjudication before this Honourable Court and is fixed for 18-10-2022.
2. That the appellant has a strong case in his favour, and the case has been adjourned so many times due to the act of the respondents and due to which, the appellant suffers a lot and requests through the instant application that the instant appeal may kindly be fixed at an early date.
3. That there is no legal bar in accepting the instant application rather it will serve the ends of justice.

It is, therefore, most humbly prayed that the Application, the titled case may kindly be fixed at an early date, in the best interest of justice.



Applicant

Through



Date: 26/07/2022

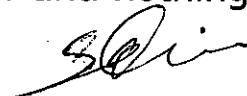
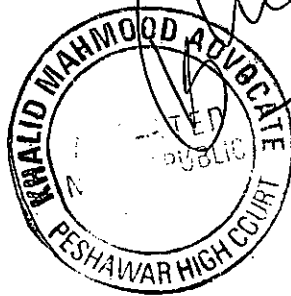
Fazal Shah Mohmand

Advocate

Supreme Court of Pakistan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for Early Hearing are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

PROFORMA FOR EARLY HEARING


FORM 'A'

JUDICIAL BRANCH

To be filled by the counsel

Case Number	Service Appeal No. 407/2017					
Case Title	Saleem Khan ... Versus... DEO					
Date of Institution	<u>2017</u>					
Bench	SB		DB	√		
Case Status	Fresh		Pending	√		
Stage	Notice	√	Motion		PAN	
Urgency to be clearly stated	<u>That the appellant has strong case in his favour, and the case has been adjourned so many time due to the act of the respondent and due to which, the appellant suffer a lot and request through the instant application, that the instant appeal may kindly be fixed at an early date.</u>					
Nature of the relief sought	<u>Early fixation of the case.</u>					
Next date of hearing	<u>18-Oct-2022</u>					
Alleged target date	<u>Coming week.</u>					
Counsel for	Petitioner	√	Respondent		In person	

Signature of Counsel/party :-



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/2022-

In case No. 407 _____ -p/2017

Saleem Khan Vs D.E.O & others

Presented by Fazal Shah Mohmand on behalf of Appellant. Entered in the relevant register.

Put up along with main case _____

REGISTRAR

Last date fixed	
Reason(S) for last adjournment, if any by the Branch Incharge.	
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

C.M No. _____/2022

In

Service Appeal No. 407/2017

Saleem KhanAppellant

V E R S U S

DEO & othersRespondents

**APPLICATION FOR EARLY HEARING
THE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending adjudication before this Honourable Court and is fixed for 18-10-2022.
2. That the appellant has a strong case in his favour, and the case has been adjourned so many times due to the act of the respondents and due to which, the appellant suffers a lot and requests through the instant application that the instant appeal may kindly be fixed at an early date.
3. That there is no legal bar in accepting the instant application rather it will serve the ends of justice.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**



C. M. No _____/2022

In

Service Appeal No 407/2017

Saleem Khan.....Petitioner/Appellant

V E R S U S

DEO & others.....Respondents

APPLICATION FOR EARLY HEARING OF THE TITLED CASE.

Respectfully submitted:-

1. That the above titled Service Appeal is pending before this honorable Tribunal wherein next date of hearing is fixed for 18.10.2022.
2. That the titled case is ripe for arguments and has been adjourned time and again and the subject case is an old one and by now respondents are going to fill the vacant posts of Junior Clerks, detail of which has been placed on record by the appellant which necessitated the applicant to file instant application.
3. That the valuable rights of the applicant are at stake and if the case of the applicant is not fixed for early date, he would suffer irreparable loss.
4. That if the case is not fixed, the very purpose of his appeal would be lost resulting in multiplicity of litigation.

It is therefore prayed, that on acceptance of this application, the above titled case may please be fixed for early date.

Dated:-11-04-2021

Applicant/Appellant

Through

**Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C. M. No. _____/2022

In

Service Appeal No 407/2017

Saleem Khan.....**Petitioner/Appellant**

V E R S U S

DEO & others.....**Respondents**

AFFIDAVIT

I, Saleem Khan S/O Noor Ali, Lab Attendant (BPS-02), R/O Miangaan Ghallanai District Mohmand, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

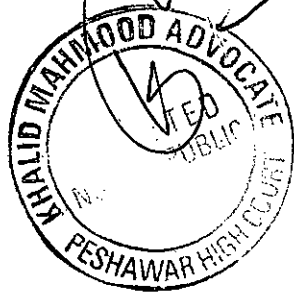
Saleem Khan

Identified by

DEPONENT

Fazal Shah Mohmand

**Fazal Shah Mohmand
Advocate Peshawar**



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

C. M. No _____/2022

In

Service Appeal No 407/2017

Saleem Khan.....**Petitioner/Appellant**

V E R S U S

DEO & others.....**Respondents**

Application for restraining respondents from filling one post of Junior Clerk, till the final disposal of titled Service Appeal

Respectfully submitted:-

1. That the titled Service Appeal is pending adjudication before this honorable Tribunal wherein next date of hearing is fixed for 18.10.2022.
2. That the titled appeal has been filed by the applicant for his promotion as Junior Clerk as juniors to him have been promoted besides presently 15 vacant posts of Junior Clerk are available which respondents are going to fill.
3. That as juniors the applicant have already been promoted while now more juniors to him are going to be promoted which necessitated the petitioner to file instant application.
4. That the applicant has got a good prima facie case and is sanguine of its success.
5. That the balance of convenience lies in his favor and if the respondents are not restrained from make promotions, the applicant would suffer an irreparable loss.

It is therefore prayed that on acceptance of this application, the respondents may kindly be directed not to fill one post of Junior Clerk, till the final disposal of instant appeal.

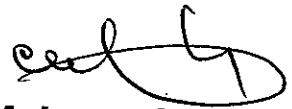
Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.



Dated:-16-09-2022

Appellant

Through



Fazal Shah Mohmand

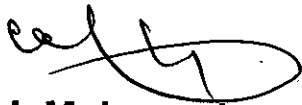
Advocate,

Supreme Court of Pakistan

AFFIDAVIT

I, Saleem Khan S/O Noor Ali, Lab Attendant (BPS-02), R/O Miangaan Ghallanai District Mohmand, do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Identified by



Fazal Shah Mohmand

Advocate Peshawar.

DEPONENT



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number	407/17		
Case Title	Saleem Khan vs DFO etc		
Date of Institution			
Bench	SB		DB <input checked="" type="checkbox"/>
Case Status	Fresh		Pending <input checked="" type="checkbox"/>
Stage	Notice		Reply <input checked="" type="checkbox"/> Argument <input checked="" type="checkbox"/>
Urgency to clearly stated.	As respondents are going to fill the vacant posts of Junior Clerk		
Nature of the relief sought.	Request Restraint respondents from filling one post of Junior Clerk		
Next date of hearing	18-10-22		
Alleged Target Date	21-9-2022		
Counsel for	Petitioner	Respondent	In person

Fazal Shah Mahmood
Adv

Signature of counsel/party

N.F.A MB
27/9/2022

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/2022

In case No. 407 -p/2017

Saleem Khan vs DEO of Okh

Presented by Fazal Sheh ^{Adv} Mohamud on behalf of appellant. Entered in the relevant register.

Put up alongwith main case _____

Last date fixed	<u>12-9-2022</u>
Reason(S) for last adjournment, if any by the Branch Incharge.	<u>Incomplete Bench</u>
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

It is, therefore, most humbly prayed that the Application, the titled case may kindly be fixed at an early date, in the best interest of justice.



Applicant

Through

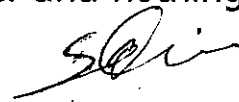
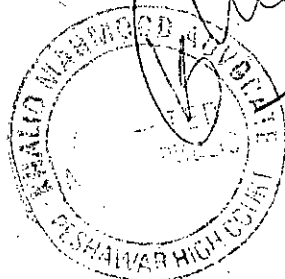


Date: 26/07/2022

Fazal Shah Mohmand
Advocate
Supreme Court of Pakistan.

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application for Early Hearing are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT