Counsel for the appellant present.

He made a request for adjournment in order to prepare the brief. Adjourned. To come up for preliminary hearing on 15.08.2022 before S.B at Camp Court, Abbottabad.

(Rozina Rehman)

Member (J) Camp Court, A/Abad

17.10.2022

Nemo for appellant.

Notice be issued to appellant/counsel for 14.11.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.

(Rozina Rehman) Member (J)

Form- A

FORM OF ORDER SHEET

Court or	 <u> </u>	
	,3	

	Case No	7 304/2021
S.No.	Date of order	Order or other proceedings with signature of judge
3.140.	proceedings	Order of other proceedings with signature of judge
	\$	3
1	2	3
1-	22/12/2021	The appeal of Mr. Saeed-ur-Rehman presented today by Mr. Ubaid-
		ur-Rehman Advocate may be entered in the Institution Register and put up
-	Free Man	to the Worthy Chairman for proper order please.
-	:	
. :		www.
		REGISTRAR '
3 77 72.		
, ,		This case is entrusted to touring S. Bench at A.Abad for preliminary
2- '.	+* ++ ++	hearing to be put there on $14-03-2022$
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		Espanding to the wat desprices of the control of th
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	16.05.2022	None for the appellant present.
		Notices for prosecution of appeal be issued to the
		appellant as well as his counsel.
		appendite do trait de me ou a la companya de la com
		To come up for Preliminary hearing before S.B on
		13.06.2022 at camp court Abbottabad.
		The second of th
		\mathcal{L}
	:	(Kaleem Arshad Khan)
		Chairman
	1.	Camp Court Abbottabad
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KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

<u>S</u> <u>NO</u> 1. 2. 3.	CONTENTS This petition has been presented by: Advocate Court	<u>YES</u>	NO
1. 2.	This netition has been presented by: Advacate Court	l	
2.	This netition has been presented by:	ł	
		1	
3.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	1	
_	Whether appeal is within time?	1	
4.	Whether the enactment under which the appeal is filed mentioned?	1	
5.	Whether the enactment under which the appeal is filed is correct?	1	
6.	Whether affidavit is appended?	1	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	1	
8.	Whether appeal/annexures are properly paged?	V	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	1	
10.	Whether annexures are legible?	V	-
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	1	
13.	Whether copy of appeal is delivered to AG/DAG?	1	<u> </u>
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by	V	
	petitioner/appellant/respondents?	,	
15.	Whether numbers of referred cases given are correct?	V	-
16.	Whether appeal contains cutting/overwriting?	×	
17.	Whether list of books has been provided at the end of the appeal?	1	
18.	Whether case relate to this court?		
19.	Whether requisite number of spare copies attached?	1	
20.	Whether complete spare copy is filed in separate file cover?	√	_
21.	Whether addresses of parties given are complete?		
22.	Whether index filed?	- \	
23.	Whether index is correct?	1	
24.	Whether Security and Process Fee deposited? On		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along	7	
	with copy of appeal and annexures has been sent to respondents? On	•	
26:	Whether copies of comments/reply/rejoinder submitted? On	<u> </u>	
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On		 -
.			

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

Name:	Janlo	pa Ju	<u>om'</u>	-
Signature	e:	\ lau	• ~	
Dated:	22	12	273	

PHC Pvt Composing Canter, Peshawar High Court, Peshawar Pioneer of legal drafting & composing Cell Vo: +923028838600/+923119149544/+923159737151

Email: phe.pvtcomposing@gmail.com

SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7904 /2021

Saeed ur Rehman

V/S

Govt. of K.P.K etc

SERVICE APPEAL

INDEX

S.No	Description of Documents	Annexure	Pages
1.	Service appeal alongwith affidavit,		
	addresses of the parties		
2.	Copy of appointment letter	"A"	
3.	Copy of adjustment order No.	"B"	
	4083-86 dated 17.08.2021		-
4	Copy of promotion and transfer	"C"	
	order No. 6461-70 dated 06.11.2021		
	of appellant		
5	Copy of departmental appeal	"D"	,
	alongwith AD Card	_	
6.	Wakalat Nama	E	·

Dated 22 - 12 - 2021

Appellant Rehman

Through counsel

Ubaid ur Rehman Khan Advocate High Court At Haripur

Tayyaba Rani Advocate High Court At Haripur

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

	Appeal No	/2021
Tehsi	ed-ur-Rehman s/o Abdul Hameed resident of Village Man sil and District Haripur presently serving as SDM at GHSS h, Tehsil & District Haripur.	karai Sarai
	Арре	llant
	VERSUS	
1.	Govt. of Khyber Pakhtunkhwa, through Sec Elementary & Secondary Education Peshawar.	retary
2.	Secretary Elementary & Secondary Education, Peshawa	ar.
3.	Director Khyber Pakhtunkhwa Elementary & Seco Education Peshawar.	ndary
4.	Director Elementary & Secondary Education, Peshawar	
5.	District Education Officer (Male) Haripur.	
6.	Muhammad Riaz SDM (BPS-16) GHS Halli Khanpur Har	ripur
	Respon	dents

SERVICE APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ADJUSTMENT/TRANSFER OF RESPONDENT NO.6 VIDE ORDER NO.4083-86 DATED 17.08.2021 OF RESPONDENT NO.6 FROM GHS HALLI TO GHSS SARAI SALEH AND ADJUSTMENT/TRANSFER ORDER OF APPELLANT VIDE NO. 6461-70 DATED 06.11.2021 FROM GHSS SARAI SALEH TO GHS SARAI NIAMAT KHAN HARIPUR BE DECLARED ILLEGAL AND NULL & VOID.

PRAYER: On acceptance of the appeal, the impugned transfer/Adjustment orders No.4083-86 dated 17.08.2021 of respondent No.6 and 6461-70 dated 06.11.2021 of appellant may graciously be cancelled and appellant be retained in present duty station at GHSS Sarai Saleh. Any other relief which this Honorable Court deem proper may also be granted in the best interest of justice.

Respectfully Sheweth:-

Brief facts giving rise to the present appeal are arrayed as under:-

- That the appellant is an employee of Elementary & Secondary Education Department, KPK. Copy of appointment letter is annexed as <u>Annexure "A"</u>.
- 2. That the appellant has worked in the education department as DM for the last **31 years** and the appellant submitted complete file alongwith required documents to respondent No.5 for promotion as SDM BPS-16.
- 3. That the respondent No.5 promoted the respondent No.6 vide promotion order No. 4083-86 dated 17.08.2021 and adjusted/transfer from GHS Hali to GHSS Sarai Saleh against the vacant post. Copy of adjustment order No. 4083-86 dated 17.08.2021 is annexed as **Annexure "B"**.
- 4. That respondent No.5 promoted the appellant as SDM BPS-16 and adjusted/transfer from GHSS Sarai Saleh to

GHS Sarai Niamat Khan vide promotion order No.6461-70 dated 06.11.2021. Copy of promotion and transfer order No. 6461-70 dated 06.11.2021 is annexed as **Annexure "C".**

- 5. That the respondent No.5 after promotion instead of adjusted the appellant in the same School as SDM BPS-16, has illegally and unlawfully been transfer/adjusted GHS Sarai Niamat Khan whereas the respondent No.6 has illegally and unlawfully been transfer/adjusted in place of appellant which is against the law.
- 6. That the KPK Education Department banned transfer/
 posting throughout the province but the respondent No.5
 has illegally and unlawfully been transfer/posted/adjusted
 the respondent No.6 during the bane period.
- 7. That the appellant filed department appeal before the Secretary KPK-Education, Peshawar but in vain. Copy of departmental appeal and AD card are annexed as **Annexure "D"**
- 8. That appellant aggrieved from the illegal transfer/posting / adjustment of respondent No.6 and appellant and knock the door of this Honourable Court for reversal of transfer order on the following grounds:-

GROUNDS OF APPEAL:-

(a) That the transfer/adjustment orders during banned period issued by respondent No.5 are illegal, unlawful and against the law, hence untenable in the eye of law.

- (b) That the political influence, as is being exercised in the transfer/posting/adjustment of respondent No.6 and appellant in the case is neither warranted at law nor can be considered in the situation, where the rights of appellant is involved.
- rivalry whereas the appellant having right to adjust in the same school against the vacant post of SDM (BPS-16), the respondent No.5 has illegally and unlawfully transfer/adjusted from GHSS Sarai Saleh to GHS Sarai Niamat Khan and the respondent NO.6 has illegally been transfer in the GHSS Sarai Saleh.
- (d) That the KPK Education Department banned over transfer/posting throughout the province but the respondent No.5 during bane period have illegally and unlawfully made transfer/posting/adjustment of respondent No.6 and appellant which is against the norms of justice and against the banned notification.
- (e) That the transfer orders issued by respondent No.5 of appellant and respondent No.6 are against the principle of natural justice and arbitrary, discriminatory violation of Article 25 of the constitution and calling for interfering by this Honorable Service Tribunal.

(f) That the appellant seeks leave of this Honorable Service Tribunal to agitate additional Grounds at the time of Hearing of this Service Appeal.

In the light of above stated facts it is humbly prayed that on acceptance of the appeal, the impugned transfer/Adjustment orders No.4083-86 dated 17.08.2021 of respondent No.6 and 6461-70 dated 06.11.2021 of appellant may graciously be cancelled and appellant be retained in present duty station at GHSS Sarai Saleh. Any other relief which this Honorable Court deem proper may also be granted in the best interest of justice.

Dated 22 - 12 - 2021

Through counsel

Ubaid ur Rehman Khan Advocate High Court At Haripur

Tayyaba Rani Advocate High Court At Haripur

VERIFICATION

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

Dated 22 - 12 - 2021

Appellant

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal N	0	/2021

Saeed ur Rehman

V/S

Govt. of K.P.K etc

SERVICE APPEAL

AFFIDAVIT

I, Saeed-ur-Rehman s/o Abdul Hameed resident of Village Mankarai Tehsil and District Haripur presently serving as SDM at GHSS Sarai Saleh, Tehsil & District Haripur do hereby solemnly affirm and declare on oath that the contents of the foregoing service appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Court.

Dated: 22-12-2021

Deponent Im	
Saeed-ur-Rehman	
CNIC #	

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service	Appeal	No	2021

Saeed ur Rehman

V/S

Govt. of K.P.K etc

SERVICE APPEAL

ADDRESSES OF THE PARTIES

APPELLANT

Saeed-ur-Rehman s/o Abdul Hameed resident of Village Mankarai Tehsil and District Haripur presently serving as SDM at GHSS Sarai Saleh, Tehsil & District Haripur.

RESPONDENTS

- 1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education Peshawar.
- 2. Secretary Elementary & Secondary Education, Peshawar.
- 3. Director Khyber Pakhtunkhwa Elementary & Secondary Education Peshawar.
- 4. Director Elementary & Secondary Education, Peshawar.
- 5. District Education Officer (Male) Haripur.
- 6. Muhammad Riaz SDM (BPS-16) GHS Halli Khanpur Haripur

Dated <u>22-12 - 2021</u>

Appellant Saeed ur Rehman

Through counsel

Ubaid ur Rehman Khan Advocate High Court At Haripur

Tayyaba Rani Advocate High Court At Haripur hoffice of the divisional director of exication(schools)halara abentiabad

	OFFICE	ONDER	NO.	63	/DM
GETAG	ADBOTTAL	AD TH	·	6/6	/90

APPOINTMENT

As ordered by the Honoursbie Chief Hinistor, N. W.F. P.Mr. Saved ur Rehman 5/o Abdul Hamld, FA VIII Medarphy P.S. Mankharat (Horipur)is hereby appointed as IN in BPS No. 9 O Re. 830/-P.M(Fixed) plus usual allowances as adelecible to him under the sules at doyt High School Manil Saire(A.Abad) spainst vacuat 124 post with effect from the date of his taking over charge on the following terms conditions:-CONTITIONS!-

L'No TA/DA & TG is allowed. 2. Charge Espect about be submitted to all concerned.

- 3. The appointment is purely on bespurerly basis and liable to termination at any time without any easiging notice or reason.
- 4. We should produce his age and health costificate from the medical Supdisoncerned.
- 3.In case he wishes to reson from service/post he will have to give one month prior notice or forefield one month pay in lieu of short notice.
- 6. The Head of Institution is required to check all oxiginal Educat-tional qualification contificate before handing over charge to him.

 This appointment shall simil automatically cancelled if he fails to join the past within 15 days of laste t of this order.
- g. We should not be handedk over charge if his age exceed 25 years or below 18 years.

(HCHAMAD RAFIG KHAN JABOON) DIVINIBLECTOR OF RESCATTON(SCHOOLS) HAZARA BIVISIGN ABBOTTABAD

Endative 22/42-59 /AB-WI/Apptitithem Sated A Abad the 96/6 Copy is forwarded to the:-

Private Secreto Homographe Chief Hinteter, N.W.P.P. alongwith photo copy of the application of concerned applicant.

2.Birmenes of Shucer Loninchools N. M. F.P. Reshawer.
S District Education of ficar (Mars A. Arad.
Prosdmester Corr High School Nacit Makes (Av Abad)
S Candidate Concessed

STOFFIce Order File.

EDUCATION (SCHOOLS APPOTTABAD

Cont lection accomised A STATE OF THE STA



Ph. No. 0995-920150, 920151, 920152 Email: deomalehrp@yahoo.com

Adjustment Order:

In pursuance of E- Transfer policy, issued by Govt: of Khyber Pakhtunkhwa Elementary & Secondary Education Department vide letter No. SO(SM)E&SED 7-1/2019/posting transfer policy of teaching cadre dated 11-09-2019, sub section (ii) on the recommendation of Inquiry officers Mr. Muhammad Riaz S.DM GHS Hali is hereby adjusted at GHSS Sarai Salah against vacant post on administrative ground in the best interest of public service with immediate effect.

Note:

- 1. Principal GHSS Sara Salah is required to keep vigilant eyes on the teacher and submit his performance report on monthly basis.
- Charge Report Should be submitted to all concerned.

/F. No.22-32/ADEO/Estb:

No TA/DA is allowed.

District Education Officer (Male) Haripur

Dated: 1.7... /08/2021.

Copy for information to:

- The Senior District Account Officer Haripur 1.
- The DMO EMA Haripur.
- The Principal GHSS Sarai Salah Haripur.
- The Headmaster GHS Halli School.
- Office Record File.

District Education officer (Male)

Haripur

OFFICE OF THE PRINCIPAL GHSS SARAI SALEH HARIPUR

NO. 635

то

Dated. 07/08/2021

The District Education Officer (M) Haripur

DETAI OF VACANT POST

S No	Post	Remarks
1	SS IT BPS -17	Vacant
2	SAT BPS-16	Vacant
3	SDM BPS-16	Vacant
4	CT IT BPS-12	Vacant

PRINCHALDING Secondar.
GHSS SARATS ALEH



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

HARIPUR

Ph. No. 0995-920150, 920151, 920152 Email: <u>deomalehrp@yahoo.com</u>



Adjustment Order

In pursuance of the Notification issued by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide No.5226-32/File No.6/Promotion Senior Teachers (BPS-16) dated Peshawar the 29-10-2021, the services of the following CT, DM, PET, AT &TT (Male) are promoted to the Post of Sr. CT, Sr.DM, Sr. PET, Sr.AT & Sr. TT (PSB-16) are hereby further adjusted against the vacant Posts of SCT/SDM/SPET/SAT/STT B-16 (Rs. 18910-1520-64510) posts mentioned against their names with immediate effect in the interest of public service, subject to the terms & conditions are remained intact as mentioned in the Notification referred above.

Item No.1 Promotion of CT BPS-16 Male to SCT BPS 16 ON REGULAR BASIS

S. No.	S/List. No	Name of Teacher	Name of School	Place of New Posting	Remarks
01.	·50	Muhammad Saeed	GMS Bagla	GHSS Barkote	Against Vacant Post
02.	53	Qazi Bahram	GHS Laban Bandi	GHS Laban Bandi	Against Vacant Post
03.	54	Jahangir Ahmed	GHS TT Ship	GCMHS T.T Ship	Against Vacant Post
04.	55	Muhammad Shoukat	GMS Kohala Paeen	GHSS Bareela	Against Vacant Post
05.	59	Liaqat Ayyaz	GHS Hattar	GHSS Bareela	Against Vacant Post
06.	62	Rizwan	GHSS No-1 Haripur	GCMHSS No.1 Haripur	Against Vacant Post
07.	63	Muhammad Saleem	GMS KTS Sec 3	GCMHS T.T Ship	Against Vacant Post
08.	64	Mustafa Kamal	GHS Chhoi	GHS Tufkian	Against Vacant Post
09.	65	Iftikhar Hussain Shah	GHS Hattar	GHS Hattar	Against Vacant Post
10.	71	Mubashar Hussain Shah	GMS No.4 Haripur	GHSS Bareela	Against Vacant Post
11.	74	Javed Iqbal	GHS Jabri	GHS Jabri	Against Vacant Post
12.	75	M.Abid Shah	GHS Ghazi	GHS Tufkian	Against Vacant Post
13.	76	Fazai E Mehbood	GHS Kangra Colony	GHS No.2 Haripur	Against Vacant Post
14.	77	Mehmood Khar	GMS Nelan Bhoto	GHS Chajjian	Against Vacant Post
15.	78	Jamil Ahmad	GMS Chechian	GHS Mang	Against Vacant Post
16.	79	Muhammad Hafeez	GHSS Beer Haripur	GHSS Beer	Against Vacant Post
17.	80	Fazal Rehman	GMS KiniKot	GHSS Kakotri	Against Vacant Post
18.	82	Haroon ur Rasheed	GHS Kangra	GHSS Panian	Against Vacant Post
19.	83	Muhammad Afzal	GHS Kangra Colony	GHS Central Jail Haripur	Against Vacant Post
20.	86	Muhammad Shireen	GMS Garhan Ghazi	GHSS Jab	Against Vacant Post
21.	88	Gulnar Zeb	GMS Ziarat Bela	GHS Bait Galli	Against Vacant Post





/.						· 	Against Vacant Post
1.	$\mathcal{J}_{\mathcal{L}}$		- J. Shah	 T	GHS Pindori	GHSS Bareela	Against Vacant Post
	22.	90,	Razawal Shah		GMS Basso Maira	GHS Kariplian	Against Vacant Post
4	23.	• 91	Nazir Hussain Ibrar Hussain S		GHS Sarri	GHSS Panian	Against Vacant Post
	24.	92	Muhammad Sl		GHS Alooli	GHS M.D Maira	Against Vacant Post
	25.	93	Qasim Shah		GMS Kharoch	GHS Kariplian	Lainet Vacant Post
	26.	94	Saeed Ahmad		GHS Ghazi Hamlet	GHS Ghazi Hamlet	
	27.	96	saced Adju	stmer	nt on need base	То	Remarks

	96	Saeed Annia	\				1
27	equential adjustm	ont and Adjustm	ent on need base		Rema		4
	equential adjustin	lian.	From	To	Again	st Vacant Post	-
S. No	Name & Desig	nation	GHSS Panian	GHS Ghazi	· Calaba I Avair	ast Vacant Post]
101	Muhammad Ta	ariq Srut	GHS Laban Bar	GHS No.2	Haripur Vice	S.No.04 nst Vacant Post	\exists
02	Nasir Mehmoo Muhammad B	anaris Sr CT	GHS Dingi GHS No.2 Hari	GHS Sec#	4 KTS Again	nst Vacant Post]
03	- Dahm			ALANY LATE		1	X
04	Chah C'I		TO 16 Male to S	DM BPS 16 ON Reg	ular Basis		
100		-cnM	BPS to Mate .			•	

Azız ur K İsrar Shal	enman h CT		nps.16	S Kangra Colony Male to SDM BPS 1	ON Regular Dasis	
Item No	.2 Pron	notion of DM	Bron	Male to SDM BPS 10	Place of New Posting	Remarks
S/L		Name of Tea		Name of School		Against Vacant Post
No. N	o \			GHSS Sarai Saleh	GHS S. N Khan	Wagant Post
01 3	' -	Saeed Ur Re		GMS Kali Tarar	GHSS Kot Najibullah	
· ·	 +	Shahbaz Ahn	ned		GHSS Kot Najibullah	Against Vacant Post
0	88	Nisar Ahme	1	GHSS Jatti Pind	GCMHS T.T Ship	Against Vacant Post
03		Ahmed Nav		GMS Sec:4 KTS	GCMH3 1.1 4	Against Vacant Post
04	89			GHSS Pind Hshim	GHSS Jatti Pind	
05	90	Shams Ur R	ehman	Khan		Against Vacant Post
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		Ahm	ad	GHS Karwala	GHS Kaileg	Against Vacant Post
06	91	Nisar Ahm		GHS Nara Amazai	GHS Galli Amazai	
07	95	Ghulam A	1	- Colon		Against Vacant Post
	96	Muhamm	ad Sarfra	az GHS Kangra Colon	- Lava Dait Galli	Against Vacant Post
08		Multan Z	eb	GHS Kupri Amaza	I UHS DAIL COM	
09	97	Widitari				

(19		timetment on need base	J. William	· .	-
Conse	quential adjustment and A	djustment on need base		Remarks	_
S.	Name & Designation	From	GHS Kangra Colony	Against Vacant Post	_
No.	Khan Nawaqat DM	GMS Khoi Maira	GHSS Pind Hashim Khan	Against Vacant Post Against Vacant Post	
02.	Mazhar Shah DM	GHS Choi GMS Moonan	GHSS Sarai Salah	Against Vacant Post	
03.		GHSS S. N Khan	GHS Sirya	Against Vacant Post	_
04.	Mahmond Di	M GMS Gandian	GMS Ghari Serian		
05	. Dilawai Monini		1 10	osis	

Item No.3 Promotion of PET BPS-15 Male to SPET BPS 16 ON Regular Basis

				nn 15	Male to SPET BPS	16 ON Regular 23		
	-	Item No.3 P	romotion	of PET BPS-15	Male to SPET BPS	Place of New	Remarks	<u> </u>
Γ_	S. \			Teacher	Name of School	Posting	Against Vacant Post	
1	No.	No			GMS Hal Judal		Against viteum	<u> </u>
-	01.	61	Muham	mad Shafique	Givis Har June		J	
1	01.				-		4)	X

و ما ١٤٥٥ وري المرب المر

30-3-22/318

WSZ/11/HE/RIJJE

يش عنوني (معرو)

برقاه بذر نيدنون بذا آپ دهلو كياجا يك كى سيدارين (BPS-15) ١٨ في ايك تاويل مقرد كر عديت ك يك آپ كومندرد: يل نوش ادس كرون - ايسان ما سايد اين ايسان ما سايد اين ايسان در ايجا برويد ما اوراب كورند ث

عبارة بالمنظم كارور چندون يبطر كير مروم كالا فتريائي ريائي و بين المنوز و ارديام على من المنوز و ارديام على الم يام عبارة بين المنوز و الديام على المناوز و الديام المناوز و الديام المناوز و المناوز
امر با تعدا دو سروات دا ب سوس عبار من ب ب بند بول کے نقل نول بدائر ید کاردان کی فائلر اسون بائر مرابر بید کاردان کی فائلر سون نوش بائر دیار عمر کفوظ ہے۔
میر نے ای کردیار و می کفوظ ہے۔
میر نے ای کردیار و می کفوظ ہے۔

crisi(le Verse)

Item No.4 Promotion of AT BPS-16 Male to SAT BPS 16 on regular basis

S. No.	S/List. No	Name of Teacher		Name of School	Place of New Posting	Remarks
01	21	Syed Mozan Ali S	nah	GHSS S.N.Khan	GHS Noorpur	Against Vacant Post
02	22	Abbdul Shakoor		GHS Amgah	GHS Sarai Gadai	Against Vacant Post
03	23	Abdul Waheed		GMS Khoi Nara	GCMHS T.T Ship	Against Vacant Post
04	24	Muhammad Tany	eer	GMS Goraki	GHS Sec 4 K.T.Ship	Against Vacant Post
05	25	Muhammad Ehsa	n .	GMS Bajeeda	GHS Sec: 3 K.T.Ship	Against Vacant Post
06	26	H.Masood Ur Reh	man	GMS Garhi Serian	GHSS Srai Saleh	Against Vacant Post

Consequential adjustment and Adjustment on need base

S. No	Name & Designation	Fı	om	То	Remarks
01.	Shujhat Aslam AT	G	MS S.D Pani	GHSS S. N Khan	Against Vacant Post

Item No.5 Promotion of TT BPS-16 Male to STT BPS 16 on regular basis

S. No.	S/List. No	Name of Teacher	Name of School	Place of New Posting	Remarks
01	41	Muhammad Khalid Shah	GMS Khairoch	GHSS Sirikot	Against Vacant Post
02	42	Aamir Shah	GMS Umar Khana	GHS Bait Gali	Against Vacant Post

Terms & Conditions: -

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

------Sd/-----District Education Officer (Male)
Haripur

Endst: No. ___6461-70 __/511/G. B/Promotion/Sr. Cadre

Dated: 06 /11/2021

Copy of the above is submitted for information and necessary action to the: -

- 1- The Director E &SE Khyber Pakhtunkhwa Peshawar with reference to his No quoted above.
- The Senior District Accounts Officer, Haripur.
- 3- The Principal / Headmaster's concerned.
- 4- Teachers concerned.
- Office Record File.

District Education Officer (M)

Haripur 🙀

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م معاسب سکرس تعلی صوب خیبترختوغواه بیناور م ب عالى - من سعيد الرحان ورنتك ماسير فيهم وولم وي عصد ووسال سے زائد استے وراق انجا روم سول لورس كورنست عاد سيدع سرل سرائه عالع من تعبينات قا لوركر يورد المركا رصاعدًا مذكرية سكرً ل سند مان حان سير في واللك ماسير فقر إلى المحلف من بيل رميا و في مرحك صب على ف برومونس كلا فال عنرا مأملًى تنبى جريدان الم مين نے جمع كرادى فعى - صوبافي حكومت فس سکول ملی مخصل عَا منور سے وانسفر کے اس سے تی تالوی از کی الرك الرواع جوي ولزر بكولت ق حلات ورزى على الوائد الراسك عالم المراسكول سرائ عالى من من عنى بحنيت فروسك المراسك المراس الجعلية أرسم يولور كوموع م 30 كادر الح 31 لامدينواسين مين ميرسي عين سكر ترى ستنواي منصوى أرادر ترين با درساندري ساكل سراك ساك س كريند عادر كندري سكرل رائ معين وال بعويماج استامية فيرياض ١٨.٥٠٤ ما عنر فاذفار در مسوفي المسال ت و روز في ما كورى سكول سرائة مالح مي كور سين العيمات كا مات _ فالم عولن عدد أميو مي الله ليزية رسال 19916 5 5 5 1 455 5.0 NOT Share

AnnexD ازدفتر محمد شعیب زمان ایڈوکیٹ هائی کورٹ

ۇسٹر كىك كورنس ہرى بور موبائل نمبر 5318121 و0300

30-8-2021 315

MSZ/71/HC/2/2/15.

نونس قانونی (رجشرهٔ)

<u>دینام</u> ڈسٹرکٹِ ایجوکیشن آفیسر (مردانہ) سکینڈری سکول برگی ہور

ہرگاہ بذریعہ نوٹس ہذا آپ کومطلع کیا جاتا ہے کہ سی سعیدالرحمٰن (BPS-15) فیصلے بچھے اپناوکیل مقرر کرکے ہدایت کی ہے کہ آپ كومندرجه ذيل نونس ارسال كرول-

یہ کہ میراموکلم ایجوکیش ڈیپارٹمنٹ میں بطور DMعرصہ تقریباً 31 سال سے اپنی ڈیوٹی سرانجام دے رہا ہے اور اب گورنمنٹ

بإنسكينڈرى سكول سرائے صالح ميں اپنى ڈيوٹى احسن طريقہ سے سرانجام دے رہاہے۔ یے کے صوبائی حکومت نے DM سکیل 15 سے سکیل 16 کیلئے SDM پروموش کیلئے فائل وغیرہ ما تگی جو کہ جمع کرادی گئی ہے اور ۔ گورنمنٹ نےٹرانسفریر پابندلگار کھی ہے۔ ہائر سینڈری سکول سرائے صالح میں (15-BPS) DM میں کام کررہا ہے۔ مذکورہ سکول سے چند ماہ عارف خان SDM گریڈسولہ (16) سے ریٹائر ڈہو گئے ہیں اُن کی جگہ قانون کے مطابق میرا آرڈر ہی ہوسکتا

ے جبکہ آپ نے محمد ریاض SDM کا آرڈر چنددن پہلے کر کے میرے موکم کاحق ختم کردیا ہے۔

سے کہ آپ کو بذر بعیدوٹس بذا مطلع کیا جاتا ہے کہ محدریاض (BPS-16) SDM کا آرڈرفوری طور پر کینسل/منسوخ فر ہا کرموکلم کا پروموش آرڈر GHSSسرائے صالح ہری پور میں کیا جائے بصورت دیگر موکلم عدالت مجاز سے رجوع کرے گا جس کے تمام

اخراجات عدالتی وغیرہ وہرجانہ بھی آپ سے دصول کئے جائیں گے۔

نے ہے: 'نوٹس ہذا سنجال کررتھیں بونت طلی عدالت مجاز میں آپ بیش کرنے کے آپ پابند ہوں گے نقل نوٹس ہذا مزید کار دائی کی خاطر

میرے پاس ریکارڈ میں محفوظ ہے۔

آپ کا خراعریش

الملح المرابع ڈسٹر کٹ کورٹس ہری بور

رسد دستخط (نولس دمنده)

مده ههه هم منت مآب جناب محودخان صاحب وزیراعلی صوبه خیبر پختونخواه بشاور کی مدودخان صاحب وزیراعلی صوبه خیبر پختونخواه بشاور

جناب عالى!

گزارش ہے کہ سائل محکم تعلیم ضلع ہری پور میں عرصہ زائداز 31 سال سے بطور ڈرائنگ ماسٹر اپنے فرائض منصبی سرانجام دے رہاہوں اور سائل BPS-15 میں بطور DM گورنمنٹ ہائر سیکنڈری سکول سرائے صالح میں تعینات ہوں۔

صوبائی حکومت صوبہ خیبر پختونخواہ نے BPS-16 سے BPS-16 کی ٹیسٹ کیلئے فاکل اور سروس بک وغیرہ پروموش کیلئے مانگی ہے جو کہ سائل نے مورخہ 09.08.2021 کوڈ سٹرکٹ ایجو کیشن آفیسر ہری پور کے دفتر میں جمع کرادی ہے۔صوبائی حکومت نے ٹرانسفر پر مکمل یا بندی بھی گزشتہ کی ماہ سے لگائی ہوئی ہے تا کہ خالی پوسٹوں پر کوئی بھی تعیناتی نہ ہوسکے۔ رولز اینڈریگولیشن کےمطابق جس سکول میں گریڈ 15 کا جو بھی ٹیچر ہوتا ہے وہی پر وموٹ ہو کر BPS-16 پر تعینات ہوسکتا ہے۔ گور نمینٹ ہائر سکینڈری سکول سرائے صالح میں عارف خان SDM چند ماہ قبل ریٹائر ڈیموئے ہیں۔ مذکورہ سکول میں اب میں ہی پروموٹ ہوکر اس خالی سیٹ پر تعینات ہوسکتا ہوں ۔ لیکن ضلع ہری پورے MPA نے محدریاض سینئر DM جو کہ سابقہ دور کے وزیراورن لیگ کے قاضی اسٹر کا جمایتی تھاسے راضی نامہ کر کے سینئر DM کی سیٹ کو پر کرتے ہوئے محمد ریاض SDM کو GHS بلی سے ٹرانسفر کر کے ہائر سکینٹرری سکول سرائے صالح میں خالی پوسٹ پرتعینات کردیا ہے جبکہ ٹرانسفر پریابندی پرقرار ہے۔اس طرح میرے ساتھ ناانصافی ہوئی ہے۔قانون کی روسے اس بوسٹ كيلئے يروموشن موكرميرا أكر در مونا جا ہے تھا۔

العذا سائل پرزورا بیل کرتا ہوں کہ محدریاض SDM کا آرڈر کینسل فرما کرفت وہی کابول بالا کریں۔ آپ کی بوی مہر بانی ہوگی۔آرڈر کی کا بی لفہے

سعیدالرحن (DM(BPS-15) گورنمنٹ ہائرسکینڈری سکول سرائے صالح ہری پور رابط نمبر 03355521557

وورم اله ٥٩ - ٩٥

بخامت ذبا فيسترك المجولينن أفيس مردان سيكنارى سكران ولان درونواست. عراد منسوفي آراد رنس 38-88 مه. جنابعالى: درمواست ذیل عرض سے یہ کہ من سائل گزشتہ 31 سال سے قبار تعلیم میں مطور D.M سروس سرانجام دے رما ہے -ليركه مواتي حكومت في دى إلى سكيل بنزرة (15) سے 5.DM سكيل ١٤ كيد ينروهوشن عيد فاعل وغيرة وأملى حوكه سائل (Cin in juil & K.P.K Die 2 - 2003/162 2 رکھی ہے جید کورنینظ یا ترسیلیٹری سکول سرائے صالح ہیں عارف خان SDM کی رئیانرمنظ کے بعد تعالیٰی طور سر میر/ ار در ب وموط بورس مونا تفا حور فياب ع في درا فن M. D.M. مَلِي الْمَالِي الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْمُعَالِمُ الْم سيندي سكول سركومالي من تعبنات كرول مع جوكم غيرقالون في استدعاس عدران م 5.DM کارڈر کینسل سرک 5.DM انسل سراك مالح يوسك كوخالى فيعورا ماك تاكم مسرط بربرودوك سوكر فيدا كرفير سوسك م الرفتري كابي درخواست كر ساعولفي الم 31-81 (20)

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=	نے پر یابر در تعطیل یا کہری کے اوقات کے آگے پیچے پیش ہونے	ری کے علاقہ کمی اور جگہ ماعت ہو۔	ہوں گےاور مقد مہ کج
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ł	توصوف مثل کرده زات منظور ومقبول هوگا اور صاحب موصوف کو	نگے۔ جھ کوکل ٹماختہ پر دانتہ صاحب	بر موصوف زمه دارنه بو
	انی ایل گرانی و ہرتم درخواست پر دستخط وتصدیق کرنے کا بھی	يٰ اور درخواست اچرائے و کُری ونظر:	عرض دعویٰ یا جواب دعوا
- }	ا الرینے اور رسیدویے اور داخل کرنے اور ہرتم کے بیان دیے اور	\ \	
	۱۷ میں اختیار ہوگا اور بصورت جانے بیرونجات از کچہری صدر	<i>(~)</i>	•
,	ای پاتر تن یا گرفتاری بل از گرفتاری داجرائے ڈگری بھی صاحب		
	بصورت خرورت صاحب موصوف كويهجى اختيار موكا كه مقدمه		
Ļ	رے دکیل کواپ بچائے لی پنے افراہ مقرر کریں اور ایسے وکیل کو		
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	یی صورت میں میرا کوئی رطاب کی ترم کا اللہ بروسون کے	دگا که وه مقدمه کی پیروی نه کریں اورا	موصوف کو بورااختیار ہ
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