

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
MIAN MUHAMMAD --- MEMBER(E)

Service Appeal No.76/2022

Muhammad Noor Sultan, Sub-Divisional Education Officer, Tehsil Paharur, District D.I.Khan.

.....(**Appellant**)

Versus

1. **Government of Khyber Pakhtunkhwa**, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. **Chief Secretary** to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar. (*as written in the appeal twice*).
3. **Secretary** to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
4. **Director**, Elementary & Secondary Education Department, Peshawar.
5. **District Education Officer (M)**, Dera Ismail Khan.
6. **District Education Officer (M)**, Battagram.
7. **District Accounts Officer**, D.I.Khan.
8. **Muhammad Zareef**, Sub-Divisional Education Officer (M), Alai Battagram.

.....(**Respondents**)

Present:

Mr. Ahmad Ali,
Advocate.....For appellant.

Mr. Anwar Awan,
Advocate.....For respondent No.8

Mr. Muhammad Adeel Butt,
Additional Advocate General

Mr. Farhaj Sikandar,
District Attorney.....For official respondents.

Date of Institution.....24.01.2022

Date of Hearing.....01.07.2022

Date of Decision.....05.07.2022



APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE NOTIFICATION BEARING NO. SO(MC) E&SED/4-16/2021/POSTING/TRANSFER/MC DATED 04.01.2022 ISSUED BY THE RESPONDENT NO.3.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: The appellant is aggrieved of notification NO. SO(MC)E&SED/4-16 /2021/ Posting/ Transfer/MC dated 04.01.2022 issued by the Secretary to Government of Khyber Pakhtunkhwa E&SE Peshawar by way of which earlier notifications dated 30.12.2021 and 03.01.2022 were modified and the appellant was transferred to the post of SDEO (M) Alai Battagram.

2. Facts surrounding the appeal are that on 15.09.2021 the appellant was transferred from the post of SDEO (M) Daraban to the post of SDEO(M) Paharur. After three months, the appellant was transferred to the post of SDEO(M) Bettani Lakki Marwat from where, on 03.01.2022, he was again transferred to the post of SDEO(M) Paharpur, where he assumed the charge of his post on the same day but on the very next date i.e on 04.01.2022, his notification of transfer, issued on 03.01.2022, was modified and he was, instead, transferred and posted as SDEO(M) Alai Battagram. Aggrieved of order dated 04.01.2022 he filed departmental appeal on 05.01.2022 and awaiting ninety days statutory period, when no reply was received from the respondents, he filed the instant appeal.


25/7/22

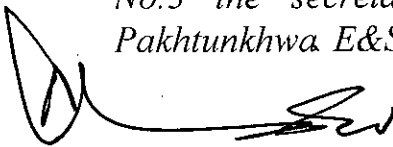
3. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who on putting appearance contested the appeal by filing written reply, raising therein numerous legal and factual objections. The defence setup was a total denial of the claim of the appellant.

4. We have heard learned counsel for the appellant, learned Additional Advocate General for the official respondents and learned counsel for private respondent No.8.

5. Learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned AAG controverted the same by supporting the impugned order(s).

6. It is in the reply of the official respondents, that on acceptance of the representation of private respondent No.8, he was transferred as SDEO (M), Ghazni Khel Lakki Marwat vide notification dated 15.11.2021 which was withdrawn because respondent No.8 had been declared as Returning Officer Allai Battagram during the Local Government Election 2021 phaase-11. It is further stated in the comments at para-6 and 7 read as under:

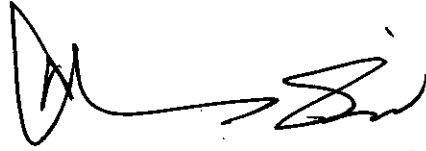
"6. Appellant filed representation before the respondent No.3 the secretary to the Government of Khyber Pakhtunkhwa E&SE Department. The worthy Secretary


25/7/22

E&SE Department was pleased to call the appellant for personal hearing on 17.01.2022 after personal hearing of appellant the respondent No.3 was pleased to dismiss the appeal of the appellant being devoid of merit. It is further added that the private respondent No.8 appeal dated 10.12.2021 regarding his restoration as SDEO(M) Ghazni Khail, District Lakki Marwat was in process but in the mean while the post of SDEO(M) Ghazni Khail was filled with new incumbent named Mr. Abdul Qadeer Shah. Therefore, the respondent No.3 was pleased to transfer the private respondent to the post of SDEO(M) Paharpur D.I.Khan vide Notification dated 04.01.2022 being Senior Management Cadre Officer of this department.

"7. The appellant got promotion to the post of SDEO BS-17 vide notification dated 30.12.2021 and he was posted as SDEO Bhetanni District Lakki Marwat but after three days appellant got transfer to the post of SDEO(M) Paharpur D.I.Khan. This transferred order of the appellant was not justified in eye of law; therefore, competent authority has been pleased to the transfer the appellant to post of SDEO(M) Allai District Battagram. The service appeal of the appellant is an exercise in futility. Further proceedings in this regard would bear no fruit. It is, therefore, requested to this Hon'ble Tribunal to dismiss the service appeal of the appellant with cost.

7. When confronted with the situation as to what prompted the official respondents or what was the public interest involved in cancellation of the order issued on 03.01.2022 just after one day, the representative of the respondents as well as the learned AAG could not explain the situation. Therefore, it is found that impugned order is in utter violation of Clause (i) and (iv) the posting/transfer policy of the provincial government wherein it is contained that a government servant would complete normal tenure at a station it is also against the interest of public service.

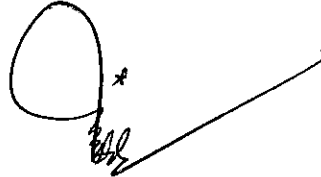

05/7/22

8. We are thus constrained to allow this appeal and as a resultant consequence, set aside the impugned order dated 04.01.2022 restoring the order dated 03.01.2022. The official respondents may, however, again transfer the appellant after completion of his normal tenure. Cost shall follow the event. As regards to private respondent No.8, the department may adjust him at a nearer station if his request is found genuine. Cost shall follow the event. Consign.

9. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 05th day of July, 2022.*



KALIM ARSHAD KHAN
Chairman
Camp court D.I.Khan



MIAN MUHAMMAD
Member Executive
Camp court D.I.Khan

ORDER

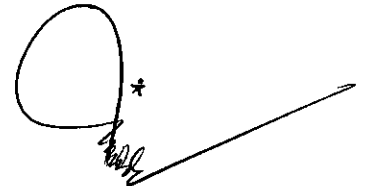
5th July, 2022 Appellant in person present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Faheem Ullah, Assistant for official respondents and private respondent No.8 in person present.

2. Vide our detailed judgement of today placed on file (containing 05 pages), we are thus constrained to allow this appeal and as a resultant consequence, set aside the impugned order dated 04.01.2022 restoring the order dated 03.01.2022. The official respondents may, however, again transfer the appellant after completion of his normal tenure. Cost shall follow the event. As regards to private respondent No.8, the department may adjust him at a nearer station if his request is found genuine. Costs shall follow the event. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 05th day of July, 2022.*



(KALIM ARSHAD KHAN)
CHAIRMAN.

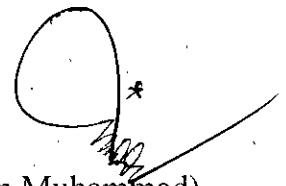


(MIAN MUHAMMAD)
MEMBER(E)

27.06.2022

Mr. Ahmad Ali Khan, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Mr. Anwar Awan, Advocate for private respondent 8 present.

Learned counsel for the appellant requested for short adjournment on the ground to submit rejoinder in response to the reply of the respondents. Request is acceded to. To come up for rejoinder and arguments before the D.B on 01.07.2022. The operation of the impugned notifications dated 04.01.2022, shall remain suspended till next date.

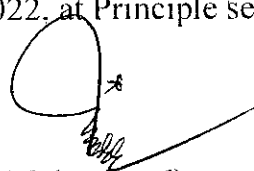


(Mian Muhammad)
Member (E)
Camp Court, D.I.Khan

01.07.2022

Mr. Ahmad Ali Khan, Advocate for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Faheem Ullah, Assistant and Dr. Khalid Saeed Akbar, Litigation Officer for official respondents present. Mr. Anwar Awan, Advocate for private respondent No. 8 present.

Arguments heard. To come up for order before the D.B on 05.07.2022, at Principle seat Peshawar.



(Mian Muhammad)
Member (E)
Camp Court, D.I.Khan

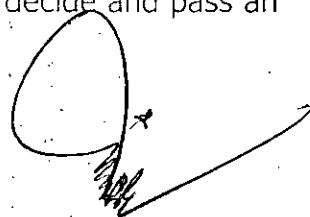


(Kalim Arshad Khan)
Chairman
Camp Court, D.I.Khan

26.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Dr. Khalid Saeed Akbar Litigation Officer for official respondents No. 1 to 6 present. Private respondent No. 8 in person present.

Written reply/comments of respondent No. 6 i.e. District Education Officer (Male) Orakzai submitted which is placed on file and copy thereof provided to learned counsel for the appellant. Learned counsel for the appellant submitted an application for transfer of the instant service ^{appeal} to Camp Court D.I Khan on the ground that all necessary parties are belonging to that area of jurisdiction. It is also evident from the order sheet dated 24.01.2022 that interim relief has been granted and the impugned Notification dated 04.01.2022 has been suspended. Being an administrative issue, it is submitted for perusal of the Honourable Chairman to decide and pass an appropriate order on the application.


(Mian Muhammad)
Member (E)

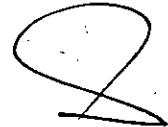
Chairman Service Tribunal

26/5/22

Be sent to D. Khan
Camp Court &
the next time

to D. Khan

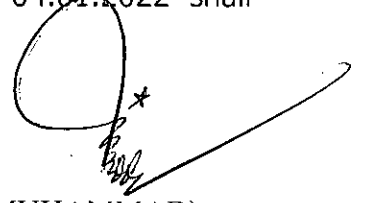
Accepted -

 27-6-22

20.04.2022

None for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Muhammad Faizan Zeb, SO (Litigation) for official respondents and Mr. Naz Ur Rehman, Advocate on behalf of private respondent No.8 present.

Written reply/comments on behalf of respondents No. 2 to 5 submitted which is placed on file. Notices be issued to respondents No. 6 and 7 for submission of written reply/comments. Notices be also issued to the appellant and his counsel. Adjourned. To come up for written reply/comments of respondents No. 6,7 and 8 on 26.05.2022 before S.B. The operation of the impugned notification dated 04.01.2022 shall remain suspended till next date.



(MIAN MUHAMMAD)
MEMBER(E)

24.01.2022

Counsel for the appellant present. Preliminary arguments have been heard.

The appellant has invoked the jurisdiction of this Tribunal through this service appeal seeking to impugn the transfer order dated 04.01.2022. According to departmental appeal available on file it was preferred to the respondent No. 2 on 05.01.2022. According to impugned order, the appellant has been transferred from the post of SDEO(M) Paharpur D.I.Khan and posted as SDEO(Male) Alai Battagram. Learned counsel contends that the transfer of the appellant is premature as far as the tenure is concerned. He was transferred to the post of SDEO(M) Paharpur vide order dated 15.09.2021 from the post of SDEO(M) Daraban D.I.Khan. From there he was transferred on promotion to the post of SDEO(M) Bhattani Lakki Marwat against the vacant post vide order dated 30.12.2021 and by corrigendum dated 03.01.2022, he was again posted as SDEO(M) Paharpur against vacant post and on the next day he was transferred from Paharpur to Alai Battagram vide impugned notification. Because of the frequent transfer orders discussed before, there are arguable points for full hearing of the appeal. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments on 24.02.2022 before S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee

24/01/22

The appeal is accompanied by an application for suspension of the operation of impugned notification dated 04.01.2022. Notice of the said application be also given to the respondents. The operation of the impugned notification dated 04.01.2022 shall remain suspended till next date.

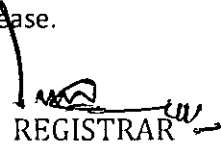

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 76 /2022

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 24/01/2022 | <p>The appeal of Mr. Muhammad Noor Sultan presented today by Mr. Khaled Mehmoed 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 at Peshawar for preliminary hearing to be put there on <u>24/01/2022</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| 2- | | |

**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Muhammad Noor Sultan vs Govt of KP Pakhtoonkwa,

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

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

Name:

Khalid Mahmood Adv

Signature:

[Handwritten Signature]

Dated:

24/11/2021

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 76 of 2022


Muhammad Noor Sultan
Versus.
Govt. of Khyber Pakhtunkhwa etc
Service Appeal

INDEX


| S# | Description of Documents | Annexure | Page Numbers |
|-----------|---|-----------------|---------------------|
| 1. | Service appeal with Civil Misc. | — | 1—8 |
| 2. | Copy of Notification No.SO (SM)E&SED/7-1/2021/PT/G/MC dated 15.09.2021 | A | 9 |
| 3. | Copy of Notification No.SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 30.12.2021 | B | 10—13 |
| 4. | Copy of corrigendum No.SO(MC)E&SED/4-16/2021/Posting/ Transfer/MC dated 03.01.2022 | C | 14 |
| 5. | Copy of the Charge Report dated 03.01.2022 of the petitioner | D | 15 |
| 6. | Copy of Notification dated 29.10.2018 about transfer of respondent No.8 as SDEO D.I.Khan (serial No.35) | E | 16—21 |
| 7. | Copy of Notification dated 07.10.2021 pertaining transfer of respondent No.8 from SDEO (M) D.I.Khan to SDEO (M) Alai Battagram (serial No.21) | F | 22—24 |
| 8. | Copy of Notification SO(MC) E&SED/ 4-16/2021/ Posting/ Transfer/ MC dated 04.01.2022 | G | 25 |
| 9. | Copy of the Review Petition/ Departmental Representation to the respondents No.2 | H | 26—27 |
| 10 | Copy of the Review Petition/ Departmental Representation to the respondents No.3 | J | 28—29 |


| | | | |
|----|-------------|---|-------|
| 11 | Vakalatnama | - | 30-31 |
|----|-------------|---|-------|

Yours Humble Appellant


(Muhammad Noor Sultan)
Through Counsel

Dt. 22.01.2022


Ahmad Ali
Advocate Supreme Court


Miss Shumaila Awan
Advocate High Court, D.I.Khan.



To be substituted for the notification bearing the same number and date

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No 091-9271988

4

Dated Peshawar the, January 03rd, 2022

CORRIGENDUM

No.SQ(MC) E&SED/4-16/2021/POSTING/TRANSFERS: In partial modification of this Department's Notification of even number dated 30-12-2021 & 31-12-2021, the Competent Authority is pleased to order the posting / transfers of the following teachers / officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

| Sr. No | Name & designation | From | To |
|--------|----------------------------------|---|---|
| 1. | Mr. Rehmat Khan (TC BS-17) | Assistant Director, E&SE Khyber Pakhtunkhwa. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-2) |
| 2. | Muhammed Ashraf (TC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa | SDEO (Male) Mirali North Waziristan (AVP) |
| 3. | Dr. Abdul Qayyum Khan (MC BS-17) | Under transfer as SDEO (Male) Miranshah North Waziristan. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-4) |
| 4. | Mr. Matiullah Khan (MC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa. | SDEO (Male) Miranshah North Waziristan (Vice No-3) |
| 5. | Muhammed Wajhuddin (TC BS-17) | Monitoring Officer, E&SE Department, KP | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (AVP) |
| 6. | Mr. Nisar Ahmad (MC BS-17) | Under transfer as SDEO (Male) Kalakot Dir Upper | SDEO (Male) Rustam, Mardan (Vice No-9) |
| 7. | Mr. Wisal Muhammad (MC BS-17) | Under transfer as SDEO (Male) Garhi Kapura Mardan. | SDEO (Male) Tangi Charasadda (AVP). |
| 8. | Muhammad Noor Sultan (MC BS-17) | Under transfer as SDEO (Male) Bettani Lakki Marwat | SDEO (Male) Pharpur Di Khan (AVP) |
| 9. | Hafiz Fazl Akbar (MC BS-17) | Under transfer as SDEO (Male) Rustam Mardan | Services placed at the disposal of Directorate of E&SE KP for further adjustment against the vacant post of AD (BS-17). |
| 10. | Mr. Sultan Muhammad (MC BS-17) | Under transfer as SDEO (Male) Orakzai Lower | SDEO (Male) Ghari Kapura Mardan (Vice No-7) |

S.No-15
S.No-12
S.No-11

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endat: of Even No & date

Copy forwarded for information to the -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

(Signature)
31/1/2022
(HAFAEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)



(Better Copy)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar
Phone No: 091-9223588

Dated Peshawar the, December 30th, 2021

NOTIFICATION

No.SO(MC)E&SED/4-16/2021/POSTING/TRANSFERS/MC: Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-6/DPC Meeting/ASDEOs (M)2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect:-

| Sr. No | Name & Designation | Place of posting |
|--------|-------------------------------------|---|
| 1. | Mr. Sikandar Hayat (MC BS-17) | SDEO Tangi Charsadda against the vacant post |
| 2. | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Bettani Lakki Marwat, Against the vacant post. |
| 3. | Mr. Wisal Muhammad (MC BS-17) | SDEO(M) Garhi Kapura Mardan against the vacant post. |
| 4. | Mr. Nisar Ahmad (MC BS-17) | SDEO (M) Kalkot Dir Upper against the vacant post. |
| 5. | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Shoringal Dir Upper |
| 6. | Mr. Zaheer-Ud-Din (MC BS-17) | SDEO (M) Khar TD Bajaur against the vacant post. |
| 7. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Darban D.I.Khan against the vacant post |
| 8. | Mr. Hafiz Fazle Akber (MC BS-17) | SDEO (M) Razarh Sawabi |
| 9. | Mr. Mir Samad Khan (MC BS-17) | SDEO (M) Battagram |
| 10. | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Sub Division Hassan Khel Peshawar against the vacant post. |
| 11. | Mr. Muhammad Naeem (MC BS-17) | SDEO (M) Takhl-e-Nusrat Karak against the vacant post. |
| 12. | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (Estb-I) Directorate, E&SE Peshawar |
| 13. | Mr. Muhammad Sharif (MC BS-17) | SDEO (M) Lower Kurram against the vacant post. |
| 14. | Mr. Abdul-Qayum Khan (MC BS-17) | SDEO (M) Miran Shah North Waziristan against the vacant post |
| 15. | Mr. Ihsan Ullah (MC BS-17) | SDEO (M) Landikotal Khyber against the vacant post |
| 16. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Jamrud Khyber against the vacant post |
| 17. | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Bara Khyber against the vacant post |
| 18. | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Orakzai Lower against the vacant post. |
| 19. | Mr. Muhammad Ishaq (MC BS-17) | SDEO (M) Charbagh Swat against the vacant post. |
| 20. | Mr. Fayaz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post. |

S.No. 14
S.No. 11
S.No. 12
S.No. 15

On promotion

(3)



(Better Copy)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar
Phone No: 091-9223588

2. Consequent upon above, the following consequential posting/ transfers are hereby ordered:-

| Sr. No | Name & Designation | From | To |
|--------|---|---|--|
| 1. | Muhammad Alam Din (MC BS-17) | SDEO (M) Primary Hangu | SDEO (M) BS-17 Sub Division Wazir Bannu newly created post |
| 2. | Amir Muhammad (MC BS-17) | SDEO (M) Lal Kila Dir Upper | SDEO (M) Martung Shangla against the vacant post |
| 3. | Muhammad Abid (MC BS-17) | SDEO (M) Razarh Swabi | SDEO (M) Rustum, Mardan |
| 4. | Mr. Sher Zada SST (G) BS-17 | ASDEO (F) Circle Pattan Kohistan Lower | SDEO (M) BS-17 Bankand Kohistan Lower in OPS against the vacant post |
| 5. | Mr. Rizwan Ullah SST General (BS-16) | ADEO (M) Central Kurram | SDEO (BS-17) Central Kurram in OPS against the newly created vacant post |

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. District EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa Peshawar.
8. Officers concerned.
9. Master file.

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

No. SO(MC) E&SED/4-16/2022/Personal hearing
Dated Peshawar the January 12th, 2022

To

1. Muhammad Zubair, Deputy DEO (Male) Mohmand.
2. Mr. Liaqat Ali, Deputy DEO (Male) Lower Kurram.
3. Syed Mir Hussain, Deputy DEO (Male) Upper Kurram.
4. Mr. Riaz Khan, SDEO (Male) Lachi, Kohat.
5. Mr. Zahidullah, Deputy DEO (Male) Orakzai.
6. Mr. Mehmood Iqbal, Deputy DEO (Male) DI Khan.
7. Mst. Shabana Bibi, SDEO (Female) Thall, District Hangu.
8. Muhammad Ashraf, Assistant Director E&SE Khyber Pakhtunkhwa.
9. Mst. Nazakat Tabassum, Assistant Directress E&SE KP
10. Muhammad Ilyas, Deputy DEO (Male) Lakki Marwat.
11. Muhammad Noor Sultan, SDEO (Male) Pharpur DI Khan.

Subject: - APPEAL REGARDING CANCELLATION / CORRIGENDUM IN TRANSFER ORDER.

I am directed to refer to your application regarding cancellation / corrigendum in the posting/transfer Notification was examined / processed; however, the competent authority has decided to give you an opportunity of personal hearing.

2- You are, therefore directed to attend office of the Additional Secretary (General/Establishment) Elementary & Secondary Education Department, Khyber Pakhtunkhwa on 14-01-2022 at 11:00 AM in his office.


(Haseeb-Ur-Rehman Shah)
SECTION OFFICER (Management Cadre)

Cc to the: -

1. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
2. PA to Additional Secretary (Gen/Estab:), E&SE Department, Khyber Pakhtunkhwa.


SECTION OFFICER (Management Cadre)

B



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223588

No. SO(MC) E&SED/4-16/2022/Personal hearing
 Dated Peshawar the January 12th, 2022

To

1. Muhammad Zubair, Deputy DEO (Male) Mohmand.
2. Mr. Liaqat Ali, Deputy DEO (Male) Lower Kurram.
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10. Muhammad Ilyas, Deputy DEO (Male) Lakki Marwat.
11. Muhammad Noor Sultan, SDEO (Male) Pharpur DI Khan.

Subject: - APPEAL REGARDING CANCELLATION / CORRIGENDUM IN TRANSFER ORDER.

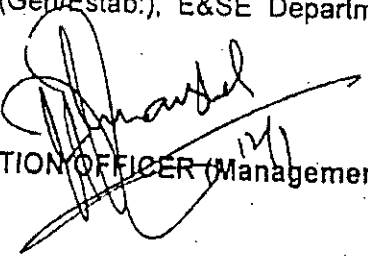
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 (Hafeez-Ur-Rehman Shah)
 SECTION OFFICER (Management Cadre)

Cc to the: -

1. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
2. PA to Additional Secretary (Gen/Estab.), E&SE Department, Khyber Pakhtunkhwa.


 SECTION OFFICER (Management Cadre)

[BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRBUNAL PESHAWAR.]

Civil Misc No. /2022 in
Service Appeal No. 76/2022

Muhammad Noor Sultan


vs

Govt of KP etc

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Yours Humble Appellant
Through Council


Mr Khalid Mahmood
Advocate DIKhan

Muhammad Noor Sultan

vs

Govt of KP etc

REJOINDER TO THE COMMENTS OF RESPONDENTS NO. 03, 04 AND 05

Respectfully Sheweth;

Appellant humbly submits the following reply to the comments of respondents.

1. Preliminary objections

1-14 Incorrect misconceived and thus denied. The denial of rights malafied, discrimination and malfeasance on the part of respondents provided a valid cause of action and locus standi and depriving from due rights has provided a cause of action to appellant to file present service appeal. Moreover all objection vehemently denied.

Para-wise Reply on Facts:

Para No.2. Incorrect / Not Admitted. The appellant was promoted to the post of SDEO BS-17 on Regular Basis by the Respondents Department vide Notification dated 30/12/2021. In the light of Notification dated 30/12/2021 appellant was posted as SDEO (M) Bhattani District Lakki Marwat (**Annexure A**).

Para No.3&4. Incorrect / Not Admitted. Strongly denied. That in the light of appeal dated 31-12-2021 (**Annexure B**) appellant was transferred from the Post of SDEO (M) Bhattani District Lakki Marwat to the Post of SDEO (M) Paharpur District DIKhan against vacant post vide Notification dated 3/1/2022. (**Annexure C**) & after One day vide impugned Notification dated 4/1/2022 was transferred from SDEO (M) Paharpur to SDEO (M) Alai Battagram and respondent No.8 Muhammad Zafreef was transferred from SDEO (M) Alai Battagram to SDEO (M) Paharpur District DIKhan (**Annexure D**) remaining para is concerned with services of respondent No.8. It is pertinent to mention that respondent No.8 has been completed the tenure as SDEO(M) DIKhan vide order dated 29/10/2018 (**Annexure E**) and transferred to SDEO (M) Alai Battagram vide order dated 7/10/2021 (**Annexure F**) and before 03 Months tenure he got transferred him from the post of SDEO(M) Alai Battagram to SDEO (M) Paharpur in place of appellant vide impugned order dated 4/1/2022.

Para No.5. Incorrect / Not Admitted. Strongly denied. The appeals of respondent No.8 was concerned with transfer order of Ghazni Khel Lakki Marwat

Para No.6. Incorrect / Not Admitted. Strongly denied. The denial of rights malafied, discrimination and malfeasance on the part of respondents provided a valid cause of action and locus standi and depriving from due rights has provided a cause of action to appellant to file present service appeal. Moreover all objection vehemently denied.

Para No.7. Incorrect / Not Admitted. Strongly denied.

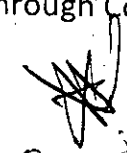
OBJECTION ON GROUND:

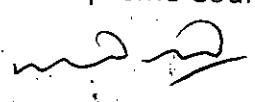
- Para No. i. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above Paras which needs not to be repeated.
- Para No. ii. Incorrect /Not Admitted. Strongly denied. Reply as in the above paras.
- Para No. iii. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above paras.
- Para No. iv. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above paras.
- Para No. v. Incorrect /Not Admitted. Strongly denied.
- Para No. vi. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above paras.
- Para No. vii. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above paras.
- Para No. viii. Incorrect /Not Admitted. Strongly denied. The mala-fide, discrimination and favoritism on the part of respondent is apparent from the facts as disclosed in the above para. Further more the case of appellant come in the domain of premature transfer/violation of judgment of superior courts and government policy, hence the transfer of appellant was not according to law rules and policies of government.
- Para No. ix. That there is no ground available to respondents to argue.

It is therefore humbly prayed that in light of above submissions, the service appeal may kindly be allowed as prayed for.

Dated: 30/6/2022

Your Humble Appellant
Through Council


Ahmad Ali Khan
Advocate Supreme Court


Mr Khalid Mahmood
Advocate Dikhan

[BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.]

Civil Misc No. _____/2022 in
Service Appeal No. 76/2022

Muhammad Noor Sultan


vs

Govt of KP etc

AFFIDAVIT

I Khalid Mehmood Advocate Counsel for the appellant, the Appellant do hereby solemnly affirm and declare on oath that all the para-wise contents of above rejoinder are true and correct to the best of my knowledge, information and belief and that nothing has been deliberately concealed from this honorable tribunal.

Dated: 30/6/2022


Deponent

(Better Copy)

Aug (A)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar

Phone No: 091-9223588

Dated Peshawar the, December 30th, 2021

NOTIFICATION

No. SO/MCJE&SED/4-16/2021/POSTING/TRANSFERS/MC: Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-6/DPC Meeting/ASDEOs (M)2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect:-

| Sr. No | Name & Designation | Place of posting |
|--------|--|---|
| 1. | Mr. Sikandar Hayat (MC BS-17) | SDEO Tangi Charzadda against the vacant post |
| 2. | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Bettani Lakki Marwat, Against the vacant post. |
| 3. | Mr. Wisal Muhammad (MC BS-17) | SDEO(M) Garhi Kapura Mardan against the vacant post. |
| 4. | Mr. Nisar Ahmad (MC BS-17) | SDEO (M) Kalkot Dir Upper against the vacant post. |
| 5. | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Shoringal Dir, Upper |
| 6. | Mr. Zaheer-Ud-Din (MC BS-17) | SDEO (M) Khar TD Bajaur against the vacant post. |
| 7. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Darban D.I.Khan against the vacant post |
| 8. | Mr. Hafiz Fazle Akber (MC BS-17) | SDEO (M) Razari Sawabi |
| 9. | Mr. Mir Samad Khan (MC BS-17) | SDEO (M) Battagram |
| 10. | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Sub Division Hassan Khej Peshawar against the vacant post. |
| 11. | Mr. Muhammad Naeem (MC BS-17) | SDEO (M) Takhl-e-Nusrat Karak against the vacant post. |
| 12. | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (Estb-I) Directorate, E&SE Peshawar |
| 13. | Mr. Muhammad Sharif (MC BS-17) | SDEO (M) Lower Kurram against the vacant post. |
| 14. | Mr. Abdul Qayum Khan (MC BS-17) | SDEO (M) Miran Shah North Waziristan against the vacant post |
| 15. | Mr. Ihsan Ullah (MC BS-17) | SDEO (M) Landikotal Khyber against the vacant post |
| 16. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Jamrud Khyber against the vacant post |
| 17. | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Bara Khyber against the vacant post |
| 18. | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Orakzai Lower against the vacant post. |
| 19. | Mr. Muhammad Ishaq (MC BS-17) | SDEO (M) Charbagh Swat against the vacant post. |
| 20. | Mr. Fayaz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post. |

5
B

(Better Copy)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar
Phone No: 091-9223588

2. Consequent upon above, the following consequential posting/ transfers are hereby ordered:-

| Sr. No. | Name & Designation | From | To |
|---------|---|---|--|
| 1. | Muhammad Alam Din (MC BS-17) | SDEO (M) Primary Hangu | SDEO (M) BS-17 Sub Division Wazir Bannu newly created post |
| 2. | Amir Muhammad (MC BS-17) | SDEO (M) Lal Kila Dir Upper | SDEO (M) Martung Shangla against the vacant post |
| 3. | Muhammad Abid (MC BS-17) | SDEO (M) Razarh Swabi | SDEO (M) Rustum, Mardan |
| 4. | Mr. Sher Zada SST (G) BS-17 | ASDEO (F) Circle Pattan Kohistan Lower | SDEO (M) BS-17 Bankand Kohistan Lower in OPS against the vacant post |
| 5. | Mr. Rizwan Ullah SST General (BS-16) | ADEO (M) Central Kurram | SDEO (BS-17) Central Kurram in OPS against the newly created vacant post |

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. District EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa Peshawar.
8. Officers concerned.
9. Master file.

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)



~~SECRET~~ 6

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hotel, Civil Secretariat Peshawar
Peshawar-25000

Dated Peshawar the, December 30th, 2021

NOTIFICATION

No. SO(MCIE&SED/4-162021/POSTING/TRANSFERS/MC) Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-4/DPC Meeting/ASDEOs (M)/2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect:

Relates copy

| S. No | Name & Designation | Place of posting |
|-------|--|---|
| 1 | Mr. Saliander Hayat (MC BS-17) | SDEO Tangi Charsada against the vacant post |
| 2 | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Emani Laki Marwat. Against the vacant post |
| 3 | Mr. Yasir Muhammad (MC BS-17) | SDEO (M) Gari Kapisa Marwat against the vacant post |
| 4 | Mr. Nasir Ahmad (MC BS-17) | SDEO (M) Kasor Dir Upper against the vacant post |
| 5 | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Shingal Dir Upper |
| 6 | Mr. Zaher-ud Din (MC BS-17) | SDEO (M) Kasor Dir Upper against the vacant post |
| 7 | Mr. Haba Usar (MC BS-17) | SDEO (M) Chaman Dir Upper against the vacant post |
| 8 | Mr. Hale Faris Akter (MC BS-17) | SDEO (M) Razan Swat |
| 9 | Mr. Mir Samad Khan (MC BS-17) | SDEO (M) Bullayan |
| 10 | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Sibi District District Khel Peshawar against the vacant post |
| 11 | Mr. Muhammad Naeem (MC BS-17) | SDEO (M) Takhi-Murahi Karak against the vacant post |
| 12 | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (E&S) Directorate, ESSE Peshawar |
| 13 | Mr. Muhammad Shant (MC BS-17) | SDEO (M) Lower Kurram against the vacant post |
| 14 | Mr. Abdul Qayyum Khan (MC BS-17) | SDEO (M) Bhera Shah North Waziristan against the vacant post |
| 15 | Mr. Iqbal Usan (MC BS-17) | SDEO (M) Lardari Khyber against the vacant post |
| 16 | Mr. Habibullah (MC BS-17) | SDEO (M) Jaranol Khyber against the vacant post |
| 17 | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Sara Khyber against the vacant post |
| 18 | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Gakka Lower against the vacant post |
| 19 | Mr. Muhammad Ishaq (MC BS-17) | SDEO (M) Chakbagh Swat against the vacant post |
| 20 | Mr. Fayoz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post |

Mr. Saliander Hayat
 Mr. Muhammad Noor Sultan
 Mr. Yasir Muhammad
 Mr. Nasir Ahmad
 Mr. Muhammad Iqbal
 Mr. Zaher-ud Din
 Mr. Haba Usar
 Mr. Hale Faris Akter
 Mr. Mir Samad Khan
 Mr. Muhammad Ishtiaq
 Mr. Muhammad Naeem
 Syed Anwar Ali Shah
 Mr. Muhammad Shant
 Mr. Abdul Qayyum Khan
 Mr. Iqbal Usan
 Mr. Habibullah
 Mr. Muhammad Hayat Khan
 Mr. Sultan Muhammad Khan
 Mr. Muhammad Ishaq
 Mr. Fayoz Uddin

7
H

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA Chinal Civil Secretariat Peshawar

2- Consequent upon above the following consequential posting transfers are hereby ordered -

| S. No | Name & Designation | From | To |
|-------|---|---|---|
| 1 | Mr. Muhammad Aram Din (MC BS-17) | SOEO (M) Hattaly Hattal | SOEO (M) BS-17 (Newly created post) Hattaly Hattal |
| 2 | Mr. Muhammad (MC BS-17) | SOEO (M) Lal Koo Doo Upper | SOEO (M) (Muslim) Shingha (newly created post) |
| 3 | Muhammad Abid (MC BS-17) | SDEO (M) Hazara Swak | SDEO (M) Hazara Swak |
| 4 | Mr. Shar Zada SST (G) BS-17 | ASDEO (F) Circle Pellan Kohistan Lower | SDEO (M) BS-17 (newly created post) Kohistan Lower in OPS against the vacant post |
| 5 | Mr. Rizwan Ullah SST General (BS-18) | ADEO (M) Central Kurram | SDEO (BS-17) Central Kurram in OPS against the newly created vacant post |

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Enlist: of Even No & date

Copy forwarded for information to the -

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Director E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male) concerned
4. District Accounts Officers concerned
5. Director (MIS), E&SE Department with the request to upload the posting/transfer notification on the official website of the department
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
8. Officers concerned
9. Master file

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)

Annex (B)
(8)

To
Secretary to the Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department Peshawar.

Subject: APPEAL FOR ADJUSTMENT AGAINST ALREADY OCCUPIED
POST OF SDEO (M) PAHARPUR DIKHAN

Respected Sir,


With profound regards and best wishes it is submitted:

1. That undersigned is working as Sub Divisional Education Officer (M) Paharpur w.e.1 September 15, 2021. (Annexure A)
2. That vide Notification dated 30.12.2021, I was adjusted/posted against the post of SDEO (M) Bhattni District Lakki Marwat. (Annexure B)
3. As the post of SDEO (M), Paharpur District DIKhan was left vacant in the above said notification while undersigned posted here recently as mentioned in para-1 (03 months and 15 days tenure as SDEO Paharpur DIKhan.

It is, therefore, requested to your kind honor that the undersigned may kindly be retained as SDEO (M) Paharpur DIKhan.

For this oblige I shall remain thankful to your good self.

Dated: 31.12.2021


(Muhammad Noor Sultan)
Sub Divisional Educational Officer
Tehsil Paharpur District DIKhan
0345-924-0885



To be substituted for the notification bearing the same number and date

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar.
Phone No. 091-9223588

9
Anet
3 days

Dated Peshawar the, January 03rd, 2022

CORRIGENDUM

No.SO(MC) E&SED/4-16/2021/POSTING/TRANSFERS: In partial modification of this Department's Notification of even number dated 30-12-2021 & 31-12-2021, the Competent Authority is pleased to order the posting / transfers of the following teachers / officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

| Sr. No | Name & designation | From | To |
|--------|----------------------------------|---|---|
| 1. | Mr. Rehmat Khan (TC BS-17) | Assistant Director, E&SE Khyber Pakhtunkhwa. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-2) |
| 2. | Muhammad Ashraf (TC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa. | SDEO (Male) Mirali North Waziristan (AVP) |
| 3. | Dr. Abdul Qayyum Khan (MC BS-17) | Under transfer as SDEO (Male) Miranshah North Waziristan. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-4) |
| 4. | Mr. Matiullah Khan (MC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa. | SDEO (Male) Miranshah North Waziristan (Vice No-3) |
| 5. | Muhammad Wajhuddin (TC BS-17) | Monitoring Officer, E&SE Department, KP. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (AVP). |
| 6. | Mr. Nisar Ahmad (MC BS-17) | Under transfer as SDEO (Male) Kalkot Dir Upper | SDEO (Male) Rustam, Mardan (Vice No-9) |
| 7. | Mr. Wisal Muhammad (MC BS-17) | Under transfer as SDEO (Male) Garhi Kapura Mardan. | SDEO (Male) Tangi Charsadda (AVP). |
| 8. | Muhammad Noor Sultan (MC BS-17) | Under transfer as SDEO (Male) Bettani Lakki Marwat | SDEO (Male) Pharpur DI Khan (AVP) |
| 9. | Hafiz Fazli Akbar (MC BS-17) | Under transfer as SDEO (Male) Rustam Mardan | Services placed at the disposal of Directorate of E&SE KP for further adjustment against the vacant post of AD (BS-17). |
| 10. | Mr. Sultan Muhammad (MC BS-17) | Under transfer as SDEO (Male) Orakzai Lower | SDEO (Male) Ghari Kapura Mardan (Vice No-7) |

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

Hafiz Akbar
21/1/2022
(HAFAEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)

FILED



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221588

Dated Peshawar the January 04th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: In partial modification of this Department's Notifications of even number dated 30-12-2021 and 03-01-2022, the Competent Authority is pleased to order the posting/transfer of the following Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest. -

| Sr. No | Name & designation | From | To |
|--------|----------------------------------|-----------------------------|-----------------------------|
| 1 | Muhammad Zareef (MC BS-17) | SDEO (Male) Alai Battagram | SDEO (Male) Pharpur DI Khan |
| 2 | Muhammad Noor Sultan. (MC BS-17) | SDEO (Male) Pharpur DI Khan | SDEO (Male) Alai Battagram |

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Battagram and DI Khan
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Battagram and DI Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.

(HAFEEZ-U-R-REHMAN SHAH)
SECTION OFFICER (Management Cadre)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Zavy - 8 Respsd (11)
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Dated Peshawar the October 29, 2018.

NOTIFICATION

NO. SO (SM) E & SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17):

Consequent upon their promotion to the post of Sub-Divisional Education Officer Male (BS-17) vide notification of even number dated 26.09.2018, the following SDEOs are hereby posted adjusted on the posts & stations as mentioned against each:

| Sr# | Name of candidate | Posted as |
|-----|--------------------------|---|
| 1 | Mr. Zia Ullah | Assistant Director (BS-17), Directorate of E&SE |
| 2 | Mr. Shah Jehan Khan | Assistant Director (BS-17), Directorate of E&SE |
| 3 | Mr. Muhammad Arshad | Assistant Director (BS-17), Directorate of E&SE |
| 4 | Mr. Irshad Khan | SDEO (BS-17) Town-IV Peshawar |
| 5 | Mr. Muhammad Zahid Khan | Assistant Director (BS-17), Directorate of E&SE |
| 6 | Mr. Muhammad Sohail Khan | Assistant Director (BS-17), Directorate of E&SE |
| 7 | Mr. Muhammad Aftab | Assistant Director (BS-17), Directorate of E&SE |
| 8 | Mr. Imtiaz Khan | SDEO (BS-17) Swat |
| 9 | Mr. Muhammad Saieem | SDEO (BS-17) Pabli Nowshera |
| 10 | Mr. Shams-ul-Islam Niaz | SDEO (BS-17) Kabal Swat |
| 11 | Mr. Muhammad Zubair | SDEO (BS-17) Takjubai Mardan |
| 12 | Mr. Hayat Khan | Assistant Director (BS-17), Directorate of E&SE |
| 13 | Mr. Ahmad Ullah | SDEO (BS-17) Shabqadar |
| 14 | Mr. Muhammad Anwar | SDEO (BS-17) Mardan |
| 15 | Mr. Fazl-e-Khuda | SDEO (BS-17) Khadokhel Buner |
| 16 | Mr. Amir Badshah | SDEO (BS-17) Mardan Buner |
| 17 | Mr. Fida Muhammad | SDEO (BS-17) Town-III Peshawar |
| 18 | Mr. Salih Muhammad | SDEO (BS-17) Daggar Buner |
| 19 | Mr. Abdul Wahab | SDEO (BS-17) Lahore Swabi |
| 20 | Mr. Muhammad Abid | SDEO (BS-17) Rajar Swabi |
| 21 | Mr. Adil Muhammad | SDEO (BS-17) Katlang Mardan |
| 22 | Mr. Niaz Wali Khan | SDEO (BS-17) Ghazi Haripur |

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Amir



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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

| | | |
|----|--------------------------|---|
| 23 | Mr. Mehboob Elahi | Assistant Director (BS-17), Directorate of E&SE |
| 24 | Mr. Shehzad Nadeem | SDEO (BS-17) Darosh Chitral |
| 25 | Mr. Muhammad Farooq | SDEO (BS-17) Karak |
| 26 | Mr. Dil Nawaz | SDEO (BS-17) Kohistan |
| 27 | Mr. Gul Faraz | SDEO (BS-17) Bahrain Swat |
| 28 | Mr. Muhammad Humayun | SDEO (BS-17) Daraban D.I. Khan |
| 29 | Mr. Abdul Qayum Khan | Assistant Director (BS-17), Directorate of E&SE |
| 30 | Mr. Iftikhar Ahmed | SDEO (BS-17) Battagram |
| 31 | Mr. Chanzeb | SDEO (BS-17) Alai Battagram |
| 32 | Mr. Sharafat Khan | SDEO (BS-17) Bisham Shangla |
| 33 | Mr. Mehmood Iqbal | SDEO (BS-17) Paharpur D.I. Khan |
| 34 | Mr. Khalid Naseem | SDEO (BS-17) Proya D.I. Khan |
| 35 | Mr. Muhammad Zarif | SDEO (BS-17) D.I. Khan |
| 36 | Mr. Muhammad Irshad | SDEO (BS-17) Tail Hangu |
| 37 | Mr. Muhammad Rehman Shah | SDEO (BS-17) Bakka Khel Bannu |
| 38 | Mr. Waheed Ullah Shah | SDEO (BS-17) Domel Bannu |
| 39 | Mr. Muhammad Tariq | Assistant Director (BS-17), Directorate of E&SE |
| 40 | Mr. Hamid Rasool | SDEO (BS-17) Bannu |
| 41 | Mr. Ali Haider | SDEO (BS-17) Samar Bagh Dir Lower |
| 42 | Mr. Muhammad Raza Shah | SDEO (BS-17) Adenzai Dir Lower |
| 43 | Mr. Muhammad Islam | SDEO (BS-17) Munda Dir Lower |
| 44 | Mr. Muhammad Ajmal | SDEO (BS-17) Ogni Mansehra |
| 45 | Mr. Shafiq Ur Rehman | SDEO (BS-17) Darban Mansehra |
| 46 | Mr. Raees Ur rehman | Assistant Director (BS-17), Directorate of E&SE |
| 47 | Mr. Abdus Samad | SDEO (BS-17) Boffa Mansehra |
| 48 | Mr. Raja Babu Jehangir | Assistant Director (BS-17), Directorate of E&SE |
| 49 | Mr. Shams Ur Rehman | SDEO (BS-17) Balakot Mansehra |
| 50 | Mr. Abdur Rehman Rashid | SDEO (BS-17) Serai Naurang Lakki Marwal |
| 51 | Mr. Qadir Shah | SDEO (BS-17) Lakki Marwat |
| 52 | Mr. Habib Ur Rehman | SDEO (BS-17) Kulachi D.I. Khan |

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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|----|--|--|
| 03 | Mr. Hameed Ur Rehman ADEO BS-16 working as Assistant Director, Directorate of E&SE | Services placed at disposal of Directorate E&SE KPK for further posting |
| 04 | Mr. Aziz Ullah SS (Maths) BS-17 working as Assistant Director, Directorate of E&SE KPK | SS (Maths) BS-17 GHSS Munga Mardan |
| 05 | Mr. Hamood Ur Rehman ADEO BS-16 working as Assistant Director BS-17, Directorate of E&SE KPK | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 06 | Mr. Azim Khan ADEO BS-16 working as Assistant Director BS-17 Directorate of E&SE KPK | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 07 | Mr. Muhammad Ilyas, SDEO BS-17 working as AD BS-17 in Directorate of E&SE. | SDEO BS-17 Lachi Kohat |
| 08 | Mr. Abdur Rehman, SDEO BS-17 Topi Swabi | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 09 | Mr. Shahid Lodan, SDEO (BS-17) Wari Dir Upper | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 10 | Mr. Amin Zada SS (BS-17) GHS Akhwargram Dir Upper | SDEO (BS-17) Wari Dir Upper |

2. No TA/DA is allowed.

Ends: of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.

2. Director, E&SE Khyber Pakhtunkhwa, Peshawar

3. District Education Officers (Male), Concerned.

4. District Account Officers, Concerned.

5. PS to Chief Secretary, Khyber Pakhtunkhwa.

6. PS to Advisor to CM for E&SE Department.

7. PS to Secretary, E&SE Department.

8. PA to Additional Secretary (Estab), E&SE Department.

9. PA to Deputy Secretary (Admin), E&SE Department.

10. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. www.kpsec.gov.pk

11. SDEOs Concerned.

12. Master file

(Signature)

(ANWAR AKBAR KHAN)
SECTION OFFICER (SCHOOLS MALE)

Handwritten notes: "A/2010" and "12/12/10"

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223531

Dated Peshawar the October, 07 2021

NOTIFICATION

NO.SO(SM&SED/7-1/2021/PT/G/MC) : The Competent Authority is pleased to order the transfer of the following Officers of Management Cadre of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name & Designation | From | To |
|----|--------------------------------------|------------------------------------|--|
| 1 | Mr. Fida Muhammad (MC) | SDEO (Male) Town-III Peshawar | SDEO (Male) Charsadda vice S.No. 03. |
| 2 | Mr. Irfad Khan (MC) | SDEO (Male) Town-IV Peshawar | SDEO (Male) Shabqadaqr, Charsadda vice S.No. 04. |
| 3 | Mr. Shamsul Islam (MC) | SDEO (Male) Charsadda | SDEO (Male) Mardan vice S.No. 07. |
| 4 | Mr. Ahmed Ullah (MC) | SDEO (Male) Shabqadaqr, Charsadda | SDEO (Male) Takht Bhai, Mardan vice S.No. 08. |
| 5 | Mr. Sajad Rasheed (MC) | ASDEO (Male) Peshawar. | SDEO (Male) Town-III Peshawar in OPS vice S.No. 01 |
| 6 | Mr. Abdul Halim (MC) | ASDEO (M) Alpur Shangla | SDEO (Male) Town-IV Peshawar in OPS vice S.No. 02 |
| 7 | Mr. Muhammad Anwar (MC) | SDEO (Male) Mardan | SDEO (Male) Dargai, Malakand vice S.No. 09. |
| 8 | Mr. Syed Ikram (MC) | SDEO (Male) Takht Bhai, Mardan | SDEO (Male) Batkheja, Malakand vice S.No. 10. |
| 9 | Mr. Keramat Shah (MC) | SDEO (Male) Dargai, Malakand | SDEO (Male) Babozai, Swat vice S.No. 11. |
| 10 | Mr. Gulam Sarwar (MC) | SDEO (Male) Baikhela, Malakand | SDEO (Male) Matta, Swat vice S. No. 14. |
| 11 | Mr. Muhammad Azam (MC) | SDEO (Male) Babozai, Swat | SDEO (Male) Mandan, Buner vice S.No. 29 |
| 12 | Mr. Muhammad Zahid SS (English) (TC) | SDEO (Male) Charbagh, Swat | SDEO (M) Alpurui Shangla against the vacant post. |
| 13 | Mr. Tariq Khan (MC) | SDEO (Male) Khal, Dir Lower | SDEO (Male) Charbagh, Swat vice S.No. 12 |
| 14 | Mr. Bakht Zada (MC) | SDEO (Male) Blambat, Dir Lower | SDEO (Male) Dir Upper vice S.No. 15 |
| 15 | Mr. Imtiaz Ahmed (MC) | SDEO (Male) Dir Upper | SDEO (Male) Khal, Dir Lower S No.13 |
| 16 | Mr. Moqadas (MC) | SDEO (Male) Turkho Mulkho Chitral | SDEO (Male) Blambat, Dir Lower vice S.No. 14 |
| 17 | Mr. Usman Hakeem (MC) | SDEO (Male) Takht e Nasrati, Karak | SDEO (Male) Kohat vice No.18. |
| 18 | Mr. Abdul Hamid (MC) | SDEO (Male) Kohat | SDEO (Male) Tall, Hangu vice S.No. 19 |
| 19 | Mr. Muhammad Tariq (MC) | SDEO (Male) Tall, Hangu. | SDEO (Male) Bannu vice S.No. 35 |
| 20 | Mr. Malik Khan (MC) | SDEO (Male) Tank | SDEO (Male) Kulachi, D.I. Khan vice S.No. 23 |

Attached
 1-1




GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9235533

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| | | | |
|----|-------------------------------|--------------------------------------|---|
| 21 | Mr. Muhammad Zarif (MC) | SDEO (Male) D.I.Khan ✓ | SDEO (Male) Alai Battagram vice S.No. 27. |
| 22 | Mr. Khalid Naeem (MC) | SDEO (Male) Prova D.I.Khan | SDEO (Male) Kohistan Lower vice S.No. 24 |
| 23 | Mr. Abdul Hafeez (MC) | SDEO (Male) Kulachi D.I.Khan | SDEO (Male) Tank vice S.No. 20. |
| 24 | Mr. Muhammad Nawab SST (TC) | SDEO (Male) Kohistan Lower | SDEO (M) Kandian Kohistan Upper in OPS against the vacant post. |
| 25 | Mr. Saleh Muhammad (MC) | SDEO (Male) Mandan, Buner | SDEO (M) Chakesar Shangla against the vacant post |
| 26 | Mr. Saeed Mehmood (MC) | SDEO (Male) Gagara, Buner | SDEO (Male) Matrung Shangla against the vacant post. |
| 27 | Mr. Chanzeb Khan (MC) | SDEO (Male) Alai Battagram | SDEO (Male) Baffa Mansehra vice S.No. 31 |
| 28 | Mr. Ameer Rehman (MC) | SDEO (Male) Mansehra | SDEO (Male) Lal Qilla District Dir Lower against the vacant post. |
| 29 | Mr. Muhammad Ajmal (MC) | SDEO (Male) Oghi Mansehra | SDEO (Male) Lora Abbottabad vice S.No. 39 |
| 30 | Mr. Shafiq Ur Rehman (MC) | SDEO (Male) Darband, Mansehra | SDEO (Male) Lower Tanawal Abbottabad vice S.No. 40. |
| 31 | Mr. Abdus Samad (MC) | SDEO (Male) Baffa, Mansehra | SDEO (Male) Havelian Abbottabad vice S.No. 38 |
| 32 | Mr. Ishtiaq Jadoon (MC) | SDEO (Male) Haripur | SDEO (Male) Mansehra vice S.No. 28. |
| 33 | Mr. Fazle Qadir (MC) | SDEO (Male) Khan Pur, Haripur | SDEO (Male) Oghi Mansehra vice S.No. 29. |
| 34 | Mr. Muhammad Rehman Shah (MC) | SDEO (Male) Bakka Khel Bannu | SDEO (Male) Lakki Marwat vice S.No. 36. |
| 35 | Mr. Muhammad Irshad (MC) | SDEO (Male) Bannu | SDEO (Male) Sarai Naurang, Lakki vice S.No. 37. |
| 36 | Mr. Qadir Shah (MC) | SDEO (Male) Lakki Marwat | SDEO (Male) Takht e Nasrati, Karak vice S.No. 17 |
| 37 | Mr. Abdur Rehman Rashid (MC) | SDEO (Male) Sarai Naurang, Lakki | SDEO (Male) Bakka Khel Bannu vice S.No. 34. |
| 38 | Mr. Sardar Abdul Qayum (MC) | SDEO (Male) Havelian Abbottabad | SDEO (Male) Haripur vice S.No. 32. |
| 39 | Mr. Naseer Ahmad (MC) | SDEO (Male) Lora Abbottabad | SDEO (Male) Khan Pur, Haripur vice S.No. 33 |
| 40 | Mr. Maroof Khan (MC) | SDEO (Male) Lower Tanawal Abbottabad | SDEO (Male) Darband, Mansehra vice S.No. 30 |
| 41 | Mr. Sardar Ali (TC BS-15) | ASDEO (M) Batara Buner. | SDEO (Male) Gagara, Buner in OPS vice S.No. 26. |
| 42 | Mr. Altaf Hussain (MC) | SDEO (M) Kabal District Swat | SDEO (M) Tehsil Thana Baizai District Malakand against the vacant post. |
| 43 | Syed Kamal Shah (MC) | ASDEO (Primary) Buner | SDEO (M) Daggar District Buner in OPS against the vacant post. |

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Abdus Samad



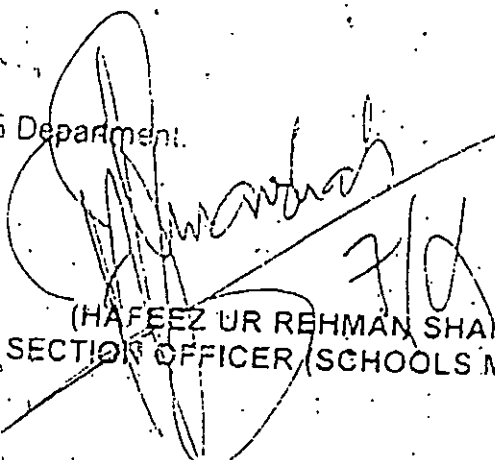
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9233333

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Encls: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department.
7. PS to Secretary/E&SE Department.
8. PA to Deputy Secretary (Admn) E&SE Department.
9. Officers concerned.
10. Office order file.


(HAFAEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 76 of 2022


Khyber Pakhtunkhwa
Service Tribunal

Diary No. 78

Dated 24/01/2022

Muhammad Noor Sultan, Sub-Divisional Education Officer, Tehsil
Paharpur, District D.I.Khan. **APPELLANT**

VERSUS

1. **Government of Khyber Pakhtunkhwa**, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. **Chief Secretary** to Govt of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
3. **Secretary** to Govt of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
4. **Director**, Elementary & Secondary Education Department, Peshawar.
5. **District Education Officer**, Dera Ismail Khan. (M)
6. **District Education Officer**, Battagram. (M)
7. **District Accounts Officer**, D.I.Khan. 
8. **Muhammad Zareef**, Sub-Divisional Education Officer (Male) Alai Battagram.

RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF THE K.P.
SERVICE TRIBUNALS ACT, 1974, AGAINST THE
NOTIFICATION BEARING NO. SO(MC) E&SED/ 4-
16/2021/ POSTING/ TRANSFER/ MC DATED
04.01.2022 ISSUED BY THE RESPONDENT NO.3.

PRAYER:

On acceptance of present Service Appeal and by
setting aside Notification bearing No. SO(MC)

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Filed to-day
Registrar
24/01/2022

E&SED/ 4-16/2021/Posting/ Transfer/MC dated 04.01.2022, the impugned transfer of appellant from the post of SDEO (Male) Paharpur to the post of SDEO (Male) Alai Battagram, may graciously be cancelled and as result thereof the posting of appellant as SDEO (Male) Paharpur, D.I.Khan, may graciously be restored.

Respectfully Sheweth,

1. That the appellant is serving in the Education Department in Management Cadre BPS-17; and addresses of parties as given above are correct & sufficient for the purpose of service.
2. That vide Notification No.SO (SM)E&SED/7-1/2021/PT/G/MC dated 15.09.2021 (**Annexure A**) the appellant was transferred from SDEO (M) Daraban to SDEO (M) Paharpur, and thereafter, vide Notification No.SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 30.12.2021 (**Annexure B**) he stood posted as SDEO (M) Betanni Lakki Marwat and his name appears at serial No.2 of the Notification.
3. That vide corrigendum No.SO(MC)E&SED/4-16/2021/Posting/Transfer/MC dated 03.01.2022 (**Annexure C**), the petitioner stood again transferred from SDEO Bettani Lakki Marwat to SDEO (M) Paharpur, D.I.Khan. Accordingly, petitioner assumed the charge of the post vide Certificate of Transfer of Charge dated 03.01.2022. Copy of the Charge Report dated 03.01.2022 of the petitioner is enclosed as **Annexure D**.

4. That the respondent No.8 who was previously posted as SDEO D.I.Khan (serial No.35) vide Notification dated 29.10.2018 (**Annexure E**) upon completion of his normal tenure stood transferred from SDEO (M) D.I.Khan to SDEO (M) Alai Battagram (serial No.21) vide Notification dated 07.10.2021 (**Annexure F**).
5. That respondent No.8 just after the transfer of appellant to SDEO (M) Paharpur, D.I.Khan, vide Notification dated 03.01.2022 (*Annex-C*) got himself transferred from Battagram to Paharpur, D.I.Khan, vide Notification SO(MC) E&SED/ 4-16/2021/ Posting/ Transfer/ MC dated 04.01.2022 (**Annexure G**) at the cost of rights of appellant and just within 24 hours of the transfer order of appellant.

In this way, the transfer of appellant was overturned within 24 hours of his arrival/charge report, just due to the fact that respondent No.8 is having blessings of the political figures and he after his transfer out from D.I.Khan on 07.10.2021 come back to D.I.Khan on 04.01.2022, and hence, a great injustice has been done to the appellant.
6. That discontented with his transfer on the basis of favouritism and nepotism vide Notification SO(MC) E&SED/ 4-16/2021/ Posting/ Transfer/ MC dated 04.01.2022, the appellant preferred a Departmental Representation/Review to the respondent No.2 and 3 on 05.01.2022. Copies of the Review Petitions/ Departmental Representations to the respondents No.2 and 3 are respectively enclosed as **Annexure H & I**.
7. That till date no response of the Departmental Review/Appeal has been received to the appellant; therefore, the appellant has been left with no option but to file present service appeal before this

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Honourable Tribunal for cancellation of his transfer dated 04.01.2022 on, inter alia, the following grounds:

GROUND:

- i. That the impugned Notification SO(MC) E&SED/ 4-16/2021/ Posting/ Transfer/ MC dated 04.01.2022 is the outcome of malafide, result of political victimization, without jurisdiction, without lawful authority and having no binding effect upon rights of appellant.
- ii. That appellant has been made a rolling stone by official respondents just because of the fact that he is not having any political backing.

Firstly, the appellant was transferred from Daraban to Paharpur vide Notification dated 15.09.2021, then **within 3½ months**, he stood transferred to Lakki Marwat vide Notification dated 30.12.2021.

Secondly, the petitioner vide Notification dated 03.01.2022 transferred from Lakki Marwat to D.I.Khan i.e. after 04 days of earlier transfer.

Thirdly, just within one day of his transfer and taking over the charge as SDEO Paharpur, D.I.Khan, once again stood transferred to Battagram.

As against this, the respondent No.8 was transferred from D.I.Khan to Battagram after about three years i.e. completion of his normal tenure, and now he has get his posting at D.I.Khan at the cost of rights of appellant. Hence, appellant cannot be made a rolling stone for the benefits of respondent No.8

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- iii. That the impugned transfer Notification is not in the public interest rather in the interest of respondent No.8 only; hence, a great, great injustice is being done to the appellant.
- iv. That the impugned office order has been issued to oblige the political figures of the area and therefore, the same is having no legal sanctity and not worth to be maintained.
- v. That public officers and public functionaries are bound to obey the law, rules, procedure and being a public servant they are required to serve the public and it is not in their duties to bow before the politicians. Impugned office is therefore nullity in the eyes of law and, rights of appellant are required to be protected from the influence of political figures.
- vi. That it has been held by the superior courts that when the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable. On this score too, the impugned transfer notification is liable to be cancelled.
- vii. That the appellant has not yet completed his ordinary tenure of the service and his transfer through the impugned notification is based on malafide and is due to the political victimization, based on favouritism and also there are no compelling circumstances for the impugned transfer of appellant before completion of his ordinary tenure.
- viii. That under the Khyber Pakhtunkhwa Posting & Transfer Policy normal tenure of service is three years and transfer in the

9/3/

violation of such policy is simply to be recalled. Reliance is placed on 2001 PLC (CS) 172.


- ix. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

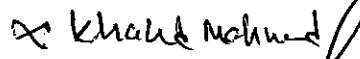
It is therefore, humbly prayed that the present service appeal may graciously be allowed as prayed for and thereby the impugned transfer of appellant may kindly be cancelled and as result thereof the posting of appellant as SDEO (M) Paharpur, D.I.Khan, may kindly be restored.

Yours Humble Appellant


(Muhammad Noor Sultan)
Through Counsel

Dt. 22.01.2022


Ahmad Ali
Advocate Supreme Court

 Advocate

Miss Shumaila Awan
Advocate High Court, D.I.Khan.

VERIFICATION: I, the appellant, on this day of January-2022, herein mentioned above, do hereby verify that all the contents of this appeal are true & correct and also that it is the first appeal on the subject matter and no such appeal has earlier been filed.


Appellant

AFFIDAVIT: I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Service Appeal** are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.


Identified by Counsel:
Ahmad Ali ASC.


Deponent



12103-1489991-7

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

Civil Misc. Petition No. _____ of 2022

In Service Appeal No. _____ of 2022

Muhammad Noor Sultan Vs. Govt. of Khyber Pakhtunkhwa etc
Service Appeal

APPLICATION FOR SUSPENSION OF THE OPERATION OF
IMPUGNED NO. SO(MC) E&SED/ 4-16/2021/ POSTING/
TRANSFER/ MC DATED 04.01.2022 ISSUED BY THE
RESPONDENT NO.3, TILL FINAL DECISION OF SERVICE
APPEAL AND IN THE MEANWHILE RESPONDENTS MAY ALSO
BE ABSTAINED FROM TAKING ANY ACTION DETRIMENTAL TO
THE SERVICE CAREER OF APPELLANT.

Respectfully Sheweth,

- 9/1
1. That a Service Appeal is being filed before this august court and the grounds of same may please be considered as an integral part of this Petition.
 2. That the petitioner/appellant has got a good prima case on law as well as on facts and there is every likelihood of the success of Service Appeal; hence, balance of convenience tilts in favour of the appellant.
 3. That the petitioner has been transferred on the basis of nepotism and favouritism; therefore, in case of non-suspension of impugned Notification of transfer, the petitioner/appellant will suffer an irreparable loss.

Moreover, the appellant is still at the role of District Education Officer, D.I.Khan, and is taking salaries from here.

It is, therefore, humbly prayed that on acceptance of the present Civil Misc. Petition, the operation of impugned Notification may please be suspended and respondents may please be desisted from taking any action detrimental to service career of appellant, till decision of Service Appeal, and in the meanwhile, status quo may graciously be ordered to be maintained.

Yours Humble Appellant

Muhammad Noor Sultan

(Muhammad Noor Sultan)
Through Counsel

Ahmad Ali

Ahmad Ali
Advocate Supreme Court

Dt. 22.01.2022

Shumaila Awan

Miss Shumaila Awan
Advocate High Court, D.I.Khan.

Khaliq Mahmood Arif

AFFIDAVIT I, the appellant; do hereby solemnly affirm and declare on oath that all the Para-wise contents of above **Misc. Application** are true & correct to the best of my knowledge, belief and information; and that, nothing has been deliberately concealed from this Honourable Tribunal.

Ahmad Ali

Identified by Counsel:
Ahmad Ali ASC

Muhammad Noor Sultan

Deponent

12103-1489991-7



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

(11)



GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

(Phone No 701-4221111)

(A)

(9)

Dated Peshawar the September 15, 2021

NOTIFICATION

NO. SOCSME&SED/7-1/2021/PT/G/MC The Competent Authority is pleased to order the transfer of the following Officers of Management Cadre of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name of officer & designation | From | To |
|----|------------------------------------|---|--|
| 1. | Mr Ghulam Muhammad SST (BS-17) | GMS Kuza Sub Division Darazinda District D.I.Khan | SDEO (M) Sub Division Jandola District Tank against the vacant post. |
| 2. | Muhammad Ishfaq SDEO (MC BS-17) | SDEO (M) BS-17 Derasu District Kohistan Upper | SDEO (M) Dour Mera District Torghar against the vacant post |
| 3. | Mr. Noor Sultan SDEO (MC BS-17) | SDEO (M) Daraban District D.I Khan | SDEO (M) Pahrpur District D.I Khan vice S No.04. |
| 4. | Muhammad Hamayun SDEO (MC BS-17) | SDEO (M) Pahrpur District D.I.Khan | SDEO (M) Daraban District D.I.Khan vice S No 03. |
| 5. | Mr. Irikhar Ahmad SDEO (MC BS-17) | SDEO (M) Ghazi District Haripur. | SDEO (M) Pura District Shangla vice S No. 08. |
| 6. | Mr. Niaz Wali Khan SDEO (MC BS-17) | SDEO (M) Pura District Shangla | SDEO (M) Ghazi District Haripur vice S No. 05. |
| 7. | Mr. Shareef Khan ADEO (MC BS-16) | ADEO (P&D) O/O DEO (M) Kohat | SDEO (M) Gumbat Kohat in OPS against the vacant post. |

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Ends: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers. Concerned
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department
7. PS to Secretary E&SE Department
8. PA to Additional Secretary (Estab) E&SE Department.
9. Officers concerned
10. Office order file.

(HAFEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Date No. 02/2021/100

(B)
(10)

Dated Peshawar the, December 30th, 2021

NOTIFICATION

No. SO(MC)E&SED/4-16/2021 UPOSTING/TRANSFERS/MC: Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-F/DPC Meeting/ASDEOs (M)/2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect: -

| S. No | Name & Designation | Place of posting |
|-------|-------------------------------------|---|
| 1 | Mr. Saadul Hayat (MC BS-17) | SDEO Tangi Charsada against the vacant post |
| 2 | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Eshan Luki Marwat. Against the vacant post. |
| 3 | Mr. Yasir Muhammad (MC BS-17) | SDEO (M) Gali Kapra Mardan against the vacant post. |
| 4 | Mr. Nasir Ahmad (MC BS-17) | SDEO (M) Kallar Dir Upper against the vacant post. |
| 5 | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Shoragal Dir Upper. |
| 6 | Mr. Zahoor Ud Din (MC BS-17) | SDEO (M) Kallar Dir Upper against the vacant post. |
| 7 | Mr. Habib Ullah (MC BS-17) | SDEO (M) Dahan Di Khan against the vacant post. |
| 8 | Mr. Haseeb Faraz Akhbar (MC BS-17) | SDEO (M) Razan Swat |
| 9 | Mr. Mr. Samad Khan (MC BS-17) | SDEO (M) Ballagram |
| 10 | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Sialkot Division Hassan Khel Peshawar against the vacant post. |
| 11 | Mr. Muhammad Naem (MC BS-17) | SDEO (M) Takh-e-Nuzhat Karak against the vacant post. |
| 12 | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (Estt.) Directorate ESSE Peshawar |
| 13 | Mr. Muhammad Shah (MC BS-17) | SDEO (M) Lower Kuram against the vacant post. |
| 14 | Mr. Abdul Qayyum Khan (MC BS-17) | SDEO (M) Miran Shah North Waziristan against the vacant post. |
| 15 | Mr. Usman Ullah (MC BS-17) | SDEO (M) Lardana Khyber against the vacant post. |
| 16 | Mr. Habib Ullah (MC BS-17) | SDEO (M) Jambud Khyber against the vacant post. |
| 17 | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Sara Khyber against the vacant post. |
| 18 | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Orakzai Lower against the vacant post. |
| 19 | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Charsada Swat against the vacant post. |
| 20 | Mr. Fayoz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post. |

Handwritten signature and initials on the left margin.

(11)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar

2- Consequent upon above, the following consequential posting / transfers are hereby ordered -

| S. No | Name & Designation | From | To |
|-------|---|---|--|
| 1 | Muhammad Alam Din (MC BS-17) | SDEO (M) Primary District | SDEO (M) BS-17 Sub Division Wazir (newly created post) |
| 2 | Amy Muhammad (MC BS-17) | SDEO (M) Lal Koo (D) Upper | SDEO (M) Mardan Division (newly created post) |
| 3 | Muhammad Abid (MC BS-17) | SDEO (M) Hazara Swabi | SDEO (M) Mardan |
| 4 | Mr. Shah Zada SST (G) BS-17 | ASDEO (F) Circle Pailan Kohistan Lower | BDEO (M) BS-17 (newly created post) in UPS Kohistan Lower |
| 5 | Mr. Rizwan Ullah SST General (BS-16) | ADEO (M) Central Kottem | SDEO (BS-17) Central Kottem in UPS (newly created vacant post) |

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the -

1. Accountant General Khyber Pakhtunkhwa, Peshawar
2. Director E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Male) concerned
4. District Accounts Officers concerned
5. Director EMIS, E&SE Department with the request to upload the (posting) transfer notification on the official website of the department
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa
8. Officers concerned
9. Master file

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)

(Better Copy)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's/Hostel Civil Secretariat Peshawar
Phone No: 091-9223588

12
Area B

Dated Peshawar the, December 30th, 2021

NOTIFICATION

No.SO(MC)E&SED/4-16/2021/POSTING/TRANSFERS/MC: Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-6/DPC Meeting/ASDEOs (M)2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect:-

| Sr. No | Name & Designation | Place of posting |
|--------|--|---|
| 1. | Mr. Sikandar Hayat (MC BS-17) | SDEO Tangi Charsadda against the vacant post |
| 2. | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Bettani Lakki Marwat, Against the vacant post. |
| 3. | Mr. Wisal Muhammad (MC BS-17) | SDEO(M) Garhi Kapura Mardan against the vacant post. |
| 4. | Mr. Nisar Ahmad (MC BS-17) | SDEO (M) Kalkot Dir Upper against the vacant post. |
| 5. | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Shoringal Dir Upper |
| 6. | Mr. Zaheer-Ud-Din (MC BS-17) | SDEO (M) Khar TD Bajaur against the vacant post. |
| 7. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Darban D.I.Khan against the vacant post |
| 8. | Mr. Hafiz Fazle Akber (MC BS-17) | SDEO (M) Razarh Sawabi |
| 9. | Mr. Mir Samad Khan (MC BS-17) | SDEO (M) Battagram |
| 10. | Mr. Muhammad Ishtiaq (MC BS-17) | SDEO (M) Sub Division Hassan Khel Peshawar against the vacant post. |
| 11. | Mr. Muhammad Naeem (MC BS-17) | SDEO (M) Takhl-e-Nusrat Karak against the vacant post. |
| 12. | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (Estb-I) Directorate, E&SE Peshawar |
| 13. | Mr. Muhammad Sharif (MC BS-17) | SDEO (M) Lower Kurram against the vacant post. |
| 14. | Mr. Abdul Qayum Khan (MC BS-17) | SDEO (M) Miran Shah North Waziristan against the vacant post |
| 15. | Mr. Ihsan Ullah (MC BS-17) | SDEO (M) Landikotal Khyber against the vacant post |
| 16. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Jamrud Khyber against the vacant post |
| 17. | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Bara Khyber against the vacant post |
| 18. | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Orakzai Lower against the vacant post. |
| 19. | Mr. Muhammad Ishaq (MC BS-17) | SDEO (M) Charbagh Swat against the vacant post. |
| 20. | Mr. Fayaz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post. |

Amir

(Better Copy)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel Civil Secretariat Peshawar
Phone No: 091-9223588

2. Consequent upon above, the following consequential posting/ transfers are hereby ordered:-

| Sr. No | Name & Designation | From | To |
|--------|--------------------------------------|--|--|
| 1. | Muhammad Alam Din (MC BS-17) | SDEO (M) Primary Hangu | SDEO (M) BS-17 Sub Division Wazir Bannu newly created post |
| 2. | Amir Muhammad (MC BS-17) | SDEO (M) Lal Kila Dir Upper | SDEO (M) Martung Shangla against the vacant post |
| 3. | Muhammad Abid (MC BS-17) | SDEO (M) Razarh Swabi | SDEO (M) Rustum, Mardan |
| 4. | Mr. Sher Zada SST (G) BS-17 | ASDEO (F) Circle Pattan Kohistan Lower | SDEO (M) BS-17 Bankand Kohistan Lower in OPS against the vacant post |
| 5. | Mr. Rizwan Ullah SST General (BS-16) | ADEO (M) Central Kurram | SDEO (BS-17) Central Kurram in OPS against the newly created vacant post |

Handwritten initials/signature

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. District EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa Peshawar.
8. Officers concerned.
9. Master file.

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)



To be substituted for the notification bearing the same number and date

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

Dist (C)
14

Dated Peshawar the, January 03rd, 2022

CORRIGENDUM

No.SO(MC) E&SED/4-16/2021/POSTING/TRANSFERS: In partial modification of this Department's Notification of even number dated 30-12-2021 & 31-12-2021, the Competent Authority is pleased to order the posting / transfers of the following teachers / officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

| Sr. No | Name & designation | From | To |
|--------|-------------------------------------|---|---|
| 1. | Mr. Rehmat Khan (TC BS-17) | Assistant Director, E&SE Khyber Pakhtunkhwa. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-2) |
| 2. | Muhammad Ashraf (TC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa | SDEO (Male) Mirali North Waziristan (AVP) |
| 3. | Dr. Abdul Qayyum Khan (MC BS-17) | Under transfer as SDEO (Male) Miranshah North Waziristan. | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-4) |
| 4. | Mr. Matiullah Khan (MC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa. | SDEO (Male) Miranshah North Waziristan (Vice No-3) |
| 5. | Muhammad Wajhuddin (TC BS-17) | Monitoring Officer, E&SE Department, KP | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (AVP). |
| 6. | Mr. Nisar Ahmad (MC BS-17) | Under transfer as SDEO (Male) Kalkot Dir Upper | SDEO (Male) Rustam, Mardan (Vice No-9) |
| 7. | Mr. Wisal Muhammad (MC BS-17) | Under transfer as SDEO (Male) Garhi Kapura Mardan. | SDEO (Male) Tangi Charsadda (AVP). |
| 8. | Muhammad Noor Sultan (MC BS-17) | Under transfer as SDEO (Male) Bettani Lakki Marwat | SDEO (Male) Pharpur DI Khan (AVP) |
| 9. | Hafiz Fazli Akbar (MC BS-17) | Under transfer as SDEO (Male) Rustam Mardan | Services placed at the disposal of Directorate of E&SE KP for further adjustment against the vacant post of AD (BS-17). |
| 10. | Mr. Sultan Muhammad (MC BS-17) | Under transfer as SDEO (Male) Orakzai Lower | SDEO (Male) Ghari Kapura Mardan (Vice No-7) |

Alleged
W.D

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of Even No & date

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.


(Signature)
31/1/2022
(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)


CERTIFICATE OF TRANSFER OF CHARGE

(D)
15

(1) Certified that we have on the forenoon/afternoon of this day 03/01/2022 respectively made over & received charge as Sub-Divisional Education Officer (Male) Paharpur in the office of the Sub Divisional Education Office (Male) Paharpur vide Notification No.SO(MC)E&SED/4-16/2021/POSTING/TRANSFERS: Dated Peshawar the January 03, 2022.

(2) Particulars cash important secret and confidential documents handed over are noted on the reverse.


District Education Officer
(Male) Dera Ismail Khan
03/1/2022
Signature of relived Already Occupied
Government Servant Mr. Muhammad Noor Sultan
Designation Sub-Divisional Education Officer
(Male) Paharpur
Station Paharpur

Signature of relieving, 
Government Servant Mr. Muhammad Noor Sultan
Designation Sub-Divisional Education Officer
(Male) Paharpur

Dated : 03.01.2022

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (MALE) PAHARPUR

Endst No. 01-09

Dated DIKhan the 03/01/2022

Copy of the above is forwarded to:

1. Accountant General Khyber Pakhtunkhwa Peshawar
2. Director, E&SE Department Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commissioner, D.I.Khan.
4. District Education Officer (M) D.I.Khan
5. District Accounts Officer, DIKhan.
6. Director EMIS E&SE Department Khyber Pakhtunkhwa
7. PS to Minister for E&SE Department Khyber Pakhtunkhwa
8. PS to Secretary to E&SED Khyber Pakhtunkhwa,.
9. PA to Additional Secretary (Estab) E&SE Department


Sub Divisional Education Officer
(Male) Tehsil Paharpur



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the October 29, 2018.

E
16

NOTIFICATION

NO.SO(SM)E&SED/3-2/2018/Promotion of ASDEOs (BS-16) to SDEOs (BS-17):
Consequent upon their promotion to the post of Sub-Divisional Education Officer Male
(BS-17) vide notification of even number dated 26.09.2018, the following SDEOs are hereby
posted adjusted on the posts & stations as mentioned against each:

| S# | Name of candidate | Posted as |
|----|--------------------------|---|
| 1 | Mr. Zia Ullah | Assistant Director (BS-17), Directorate of E&SE |
| 2 | Mr. Shah Jehan Khan | Assistant Director (BS-17), Directorate of E&SE |
| 3 | Mr. Muhammad Arshad | Assistant Director (BS-17), Directorate of E&SE |
| 4 | Mr. Irshad Khan | SDEO (BS-17) Town-IV Peshawar |
| 5 | Mr. Muhammad Zahid Khan | Assistant Director (BS-17), Directorate of E&SE |
| 6 | Mr. Muhammad Sohail Khan | Assistant Director (BS-17), Directorate of E&SE |
| 7 | Mr. Muhammad Aftab | Assistant Director (BS-17), Directorate of E&SE |
| 8 | Mr. Imtiaz Khan | SDEO (BS-17) Swat |
| 9 | Mr. Muhammad Saleem | SDEO (BS-17) Pabbi Nowshera |
| 10 | Mr. Shams-ul-Islam Niaz | SDEO (BS-17) Kabal Swat |
| 11 | Mr. Muhammad Zubair | SDEO (BS-17) Takhtbai Mardan |
| 12 | Mr. Hayat Khan | Assistant Director (BS-17), Directorate of E&SE |
| 13 | Mr. Ahmad Ullah | SDEO (BS-17) Shabqadar |
| 14 | Mr. Muhammad Anwar | SDEO (BS-17) Mardan |
| 15 | Mr. Fazl-e-Khuda | SDEO (BS-17) Khado Khel Buner |
| 16 | Mr. Amir Badshah | SDEO (BS-17) Mandan Buncer |
| 17 | Mr. Fida Muhammad | SDEO (BS-17) Town-III Peshawar |
| 18 | Mr. Salih Muhammad | SDEO (BS-17) Daggar Buner |
| 19 | Mr. Abdul Wahab | SDEO (BS-17) Lahore Swabi |
| 20 | Mr. Muhammad Abid | SDEO (BS-17) Rajjar Swabi |
| 21 | Mr. Adil Muhammad | SDEO (BS-17) Kallang Mardan |
| 22 | Mr. Niaz Wali Khan | SDEO (BS-17) Ghazi Haripur |

Algeria

Amir



(17)

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

| | | |
|----|--------------------------|---|
| 23 | Mr. Mehboob Elahi | Assistant Director (BS-17), Directorate of E&SE |
| 24 | Mr. Shehzad Nadeem | SDEO (BS-17) Darosh Chitral |
| 25 | Mr. Muhammad Farooq | SDEO (BS-17) Karak |
| 26 | Mr. Dil Nawaz | SDEO (BS-17) Kohistan |
| 27 | Mr. Gul Faraz | SDEO (BS-17) Bahrain Swat |
| 28 | Mr. Muhammad Humayun | SDEO (BS-17) Daraban D.I. Khan |
| 29 | Mr. Abdul Qayum Khan | Assistant Director (BS-17), Directorate of E&SE |
| 30 | Mr. Ifikhar Ahmed | SDEO (BS-17) Battagram |
| 31 | Mr. Chanzeb | SDEO (BS-17) Alai Battagram |
| 32 | Mr. Sharafat Khan | SDEO (BS-17) Bisham Shangla |
| 33 | Mr. Mehmood Iqbal | SDEO (BS-17) Paharpur D.I. Khan |
| 34 | Mr. Khalid Naseem | SDEO (BS-17) Prova D.I. Khan |
| 35 | Mr. Muhammad Zarif | SDEO (BS-17) D.I. Khan |
| 36 | Mr. Muhammad Irshad | SDEO (BS-17) Tall Hangu |
| 37 | Mr. Muhammad Rehman Shah | SDEO (BS-17) Bakka Khel Bannu |
| 38 | Mr. Waheed Ullah Shah | SDEO (BS-17) Domel Bannu |
| 39 | Mr. Muhammad Tariq | Assistant Director (BS-17), Directorate of E&SE |
| 40 | Mr. Hamid Rasool | SDEO (BS-17) Bannu |
| 41 | Mr. Ali Haider | SDEO (BS-17) Samar Bagh Dir Lower |
| 42 | Mr. Muhammad Raza Shah | SDEO (BS-17) Adenzai Dir Lower |
| 43 | Mr. Muhammad Islam | SDEO (BS-17) Munda Dir Lower |
| 44 | Mr. Muhammad Ajmal | SDEO (BS-17) Oghi Manshara |
| 45 | Mr. Shafiq Ur Rehman | SDEO (BS-17) Darban Manshara |
| 46 | Mr. Raees Ur rehman | Assistant Director (BS-17), Directorate of E&SE |
| 47 | Mr. Abdus Samad | SDEO (BS-17) Baffa Manshara |
| 48 | Mr. Raja Babu Jehangir | Assistant Director (BS-17), Directorate of E&SE |
| 49 | Mr. Shams Ur Rehman | SDEO (BS-17) Balakot Manshara |
| 50 | Mr. Abdur Rehman Rashid | SDEO (BS-17) Serai Naurangil Larki Marwat |
| 51 | Mr. Qadir Shah | SDEO (BS-17) Larki Marwat |
| 52 | Mr. Habib Ur Rehman | SDEO (BS-17) Kulachi D.I. Khan |

AMBA
3/1

AMBA



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

18

| | | |
|----|----------------------|---|
| 53 | Mr. Harrood Ullah | SDEO (BS-17) Pataas Kohistan |
| 54 | Mr. Muhammad Azam | SDEO (BS-17) Sedu Sharif Swat |
| 55 | Mr. Ghulam Sarwar | SDEO (BS-17) Balambat Dir Lower |
| 56 | Mr. Ghulam Habib | SDEO (BS-17) Dir Lower |
| 57 | Syed Atta Ullah Shah | Assistant Director (BS-17), Directorate of E&SE |
| 58 | Mr. Raees Khan | SDEO (BS-17) Matta Swat |
| 59 | Mr. Love Dan | SDEO (BS-17) Sheringal Dir Upper |

CONSEQUENTIAL TRANSFER

| S.No | Name of candidate | Posted as |
|------|--|---|
| 60 | Mr. Muhammad Arif, SS (Economics) BS-17 working as SDEO (M) Town-IV | SS (Economics) BS-17 GHSS Nizampur, Nowshera |
| 61 | Mr. Ghazi Bacha SS (Maths) BS-17 working as SDEO (M), Lahore Swabi | SS (Maths) BS-17 GHSS Kabganj, Swabi |
| 62 | Mr. Wisal Muhammad HM BS-17 working as SDEO (M) Katlang Mardan | HM BS-17 GHS Sohbat Abad, Mardan |
| 63 | Mr. Abdul Haleem SS (Islamiyat) BS-17 working as SDEO (M) Mardan | SS (Islamiyat) BS-17 GHSS Gujar Garhi, Mardan |
| 64 | Syed Arshad Hussain Shah SS (English) BS-17 working as SDEO (M) Takht Bhai, Mardan | Instructor (BS-17) RITE (Male) Mardan |
| 65 | Mr. Fazle Khaliq SS (English) BS-17 working as SDEO (M) Saidu Sharif, Swat | SS (English) BS-17 GHSS Miandam, Swat |
| 66 | Mr. Inyat Ullah HM BS-17 working as SDEO (M) Matta Swat | HM BS-17 GHS Sambat, Swat |
| 67 | Mr. Inyat Ullah HM BS-17 working as SDEO (M) Charbagh Swat | HM BS-17 GHS Manpata, Swat |
| 68 | Mr. Liaqat Ali HM BS-17 working as SDEO (M) Khawaza Khela Swat | HM BS-17 GHS Laikot, Swat |
| 69 | Mr. Majeed Ullah HM BS-17 working as SDEO (M) Kabal Swat | HM BS-17 GHS Ghilooch, Swat |
| 70 | Mr. Muhammad Zahid SS (Statistics) BS-17 working as SDEO (M) Pura Shingla | SS (Statistics) BS-17 GHSS Butyal, Shingla |

ALBORA

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

| | | |
|----|--|---|
| 71 | Mr. Muhammad, Pervéz DPE BS-17 working as SDEO (M) Shangla | DPE BS-17 GHSS Olandar Shangla |
| 72 | Mr. Akhtar Naeem SS (Urdu) BS-17 working as SDEO (M) Basham, Shangla | SS (Urdu) BS-17 GHSS Shahpur Shangla |
| 73 | Mr. Rehman Ul Mulk SS (Pak-Study) BS-17 working as SDEO (M) Lal Qilla, Dir Lower | SS (Pak-Study) BS-17 GHSS Akhagaram Dir Upper |
| 74 | Mr. Sadiq Jan SS (Urdu) BS-17 working as SDEO (M) Balambat Dir Lower | SS (Urdu) BS-17 GHSS Pachakalay Dir Upper |
| 75 | Mr. Hameed Ur Rehman HM BS-17 working as SDEO (M) Samar Bagh Dir Lower | HM BS-17 GHS Kumber Dir Lower |
| 76 | Mr. Raza Shah ADEO BS-16 working as SDEO (M) Munda Dir Lower | Services placed at the disposal of Directorate E&SE KPK |
| 77 | Mr. Muhammad Zafar HM BS-17 working as SDEO (M) Temergrah Dir | HM BS-17 GHS Badin Dir Lower |
| 78 | Mr. Mehboob Ur Rab SST BS-16 working as SDEO (M) Sheringal Dir Upper | Services placed at the disposal of DEO (M) Dir Upper |
| 79 | Mr. Habib Ullah, HM BS-17 working as SDEO (M) Laachi Kohat | HM BS-17 GHS Pakka Topi, Kohat |
| 80 | Mr. Muhammad Naeem Shah HM BS-17 working as SDEO (M) Tall Hangu | HM BS-17 GHS Sarozai Hangu |
| 81 | Mr. Tariq Javed SS (Chemistry) BS-17 working as SDEO (M) D.I. Khan | SS (Chemistry) BS-17 GHSS Darban Kalan, D.I. Khan |
| 82 | Mr. Mirza Khan SS (English) BS-17 working as SDEO (M) Phar Pur D.I. Khan | SS (English) BS-17 GHSS Abdul Kkhel D.I. Khan |
| 83 | Mr. Zain Ullah Khan SS (Chemistry) BS-17 working as SDEO (M) Prova D.I. Khan | SS (Chemistry) BS-17 GHSS No.2 D.I. Khan |
| 84 | Mr. Muhammad Khalid HM BS-17 working as SDEO (M) Kulachi D.I. Khan | HM BS-17 GHS Budd D.I. Khan |
| 85 | Mr. Saif Ul Malook HM BS-17 working as SDEO (M) Palas Kohistan | HM BS-17 GHS Shore Kot Kohistan |
| 86 | Mr. Muhammad Nawab SST BS-16 working as SDEO (M) Pattan, Kohistan | Services placed at disposal of DEO (M) Kohistan |

Attache

J. Khan



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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| 87 | Mr. Fazal Qayum SS (Pashto) BS-17 working as SDEO (M) Kohistan | SS (Pashto) BS-17 GHSS Sakhara, Swat |
| 88 | Mr. Abdur Rauf SS (Urdu) BS-17 working as SDEO (M) Khudo Khail, Buner | SS(Urdu) BS-17 GHSS Nogram, Buner |
| 89 | Mr. Ikhtiyar Ahmed SS (English) BS-17 working as SDEO (M) Mandan Buner | SS (English) BS-17 GHSS Agarai, Buner |
| 90 | Mr. Bakht Sher Hussain HM BS-17 working as SDEO (M) Gagara Buner | HM BS-17 GHS Rega Buner |
| 91 | Mr. Ayub Khan HM BS-17 working as SDEO (M) Dagar Buner | HM BS-17 GHS Anar Baig Mardan |
| 92 | Mr. Mir Samad ASDEO BS-16 working as SDEO (M) Batagaram | Services placed at disposal of Directorate of E&SE KPK |
| 93 | Mr. Sherferoz SST BS-16 working as SDEO (M) Alai Batagaram | Services placed at the disposal of DEO(M) Batagaram |
| 94 | Mr. Shabir Ahmed HM BS-17 working as SDEO (M) Baffa Manshara | HM BS-17 GHS Darband (New) Manshara |
| 95 | Mr. Abid Hussain, HM BS-17 working as SDEO (M) Ghazi Haripur | HM BS-17 GHS Chintari Haripur |
| 96 | Mr. Aman Ullah HM BS-17 working as SDEO (M) Bannu | HM BS-17 GHS Bilawar Khan Bannu |
| 97 | Mr. Akhtar Zaman HM BS-17 working as SDEO (M) Lakki Marwat | HM BS-17 GHS Shukrullah Hussain, Bannu |
| 98 | Mr. Muhammad Shafiq HM BS-17 working as SDEO (M) Sarai Naurang, Lakki Marwat | HM BS-17 GHS Nowar Khel Lakki Marwat |
| 99 | Mr. Raja Sheraz Ahmed HM BS-17 working as SDEO (M) Torghar | HM BS-17 GHS Judba Torghar |
| 100 | Mr. Sanaullah SS (Maths) BS-17 working as assistant Director | SS (Maths) BS-17 GHSS No.1 Peshawar City |
| 101 | Mr. Iqbal Hussain SS (Pashtu) BS-17 working as Assistant Director | SS (Pashto) BS-17GHSS No.1 Peshawar City |
| 102 | Mr. Abdul Qayyum ADEO BS-16 working as Assistant Director Directorate of E&SE | Services placed at disposal of Director E&SE KPK for further posting |

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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| 103 | Mr. Hameed Ur Rehman ADEO BS-16 working as Assistant Director, Directorate of E&SE | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 104 | Mr. Aziz Ul-Haq SS (Maths) BS-17 working as Assistant Director, Directorate of E&SE KPK | SS (Maths) BS-17 GHS Manga Mardan |
| 105 | Mr. Hamood Ur Rehman ADEO BS-16 working as Assistant Director BS-17, Directorate of E&SE KPK | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 106 | Mr. Azim Khan ADEO BS-16 working as Assistant Director BS-17 Directorate of E&SE KPK | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 107 | Mr. Muhammad Hyas, SDEO BS-17 working as AD BS-17 at Directorate of E&SE. | SDEO BS-17 Lachi Kohat |
| 108 | Mr. Abdur Rehman, SDEO BS-17 Topi Swabi | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 109 | Mr. Shahid Lodan, SDEO (BS-17) Wari Dir Upper | Services placed at disposal of Directorate E&SE KPK for further posting. |
| 110 | Mr. Amin Zada, SS (BS-17) GHS Akhwagram Dir Upper | SDEO (BS-17) Wari Dir Upper |

2. No TA/DA is allowed.

SECRETARY

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers.(Male). Concerned.
4. District Account Officers, Concerned.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Advisor to CM for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab), E&SE Department.
9. PA to Deputy Secretary (Admn), E&SE Department.
10. In-charge EMIS E&SE Department with the request to upload it on the website of the Department i.e. www.kpese.gov.pk
11. SDEOs Concerned.
12. Master file.

(ANWAR AKBAR KHAN)
SECTION OFFICER (SCHOOLS MALE)

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29/11/15

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

F
22

Dated Peshawar the October, 07 2021

NOTIFICATION

NO.SO(SM)E&SED/7-1/2021/PT/G/MC : The Competent Authority is pleased to order the transfer of the following Officers of Management Cadre of Elementary & Secondary Education Department, in the best public interest, with immediate effect:-

| S# | Name & Designation | From | To |
|-----|--------------------------------------|------------------------------------|--|
| 1. | Mr. Fida Muhammad (MC) | SDEO (Male) Town-III Peshawar | SDEO (Male) Charsadda vice S.No. 03. |
| 2. | Mr. Irshad Khan (MC) | SDEO (Male) Town-IV Peshawar | SDEO (Male) Shabqadaqr, Charsadda vice S.No. 04. |
| 3. | Mr. Shamsul Islam (MC) | SDEO (Male) Charsadda | SDEO (Male) Mardan vice S.No. 07. |
| 4. | Mr. Ahmed Ullah (MC) | SDEO (Male) Shabqadaqr, Charsadda | SDEO (Male) Takht Bhai, Mardan vice S.No. 08. |
| 5. | Mr. Sajad Rasheed (MC) | ASDEO (Male) Peshawar. | SDEO (Male) Town-III Peshawar in OPS vice S.No. 01 |
| 6. | Mr. Abdul Halim (MC) | ASDEO(M) Alpuri Shangla | SDEO (Male) Town-IV Peshawar in OPS vice S.No. 02 |
| 7. | Mr. Muhammad Anwar (MC) | SDEO (Male) Mardan | SDEO (Male) Dargai, Malakand vice S.No. 09. |
| 8. | Mr. Syed Ikram (MC) | SDEO (Male) Takht Bhai, Mardan | SDEO (Male) Batkhela, Malakand vice S.No. 10. |
| 9. | Mr. Keramat Shah (MC) | SDEO (Male) Dargai, Malakand | SDEO (Male) Babozai, Swat vice S.No. 11. |
| 10. | Mr. Ghulam Sarwar (MC) | SDEO (Male) Batkhela, Malakand | SDEO (Male) Matta, Swat vice S. No. 14. |
| 11. | Mr. Muhammad Azam (MC) | SDEO (Male) Babozai, Swat | SDEO (Male) Mandan, Buner vice S.No. 29 |
| 12. | Mr. Muhammad Zahid SS (English) (TC) | SDEO (Male) Charbagh, Swat | SDEO (M) Alpuri Shangla against the vacant post. |
| 13. | Mr. Tahir Khan (MC) | SDEO (Male) Khal, Dir Lower | SDEO (Male) Charbagh, Swat vice S.No. 12 |
| 14. | Mr. Bakht Zada (MC) | SDEO (Male) Blambat, Dir Lower | SDEO (Male) Dir Upper vice S.No. 15. |
| 15. | Mr. Imtiaz Ahmed (MC) | SDEO (Male) Dir Upper | SDEO (Male) Khal, Dir Lower S.No.13 |
| 16. | Mr. Muqadas (MC) | SDEO (Male) Turkho Mulkho Chitral | SDEO (Male) Blambat, Dir Lower vice S.No. 14 |
| 17. | Mr. Luqman Hakeem (MC) | SDEO (Male) Takht e Nasrati, Karak | SDEO (Male) Kohat vice No.18. |
| 18. | Mr. Abdul Hamid (MC) | SDEO (Male) Kohat | SDEO (Male) Tall, Hangu vice S.No. 19 |
| 19. | Mr. Muhammad Tariq (MC) | SDEO (Male) Tall, Hangu | SDEO (Male) Bannu vice S.No. 35 |
| 20. | Mr. Malik Khan (MC) | SDEO (Male) Tank | SDEO (Male) Kulachi D.I.Khan vice S.No. 23 |

Attested



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

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| | | | |
|----|-------------------------------|--------------------------------------|---|
| 21 | Mr. Muhammad Zarif (MC) | SDEO (Male) D.I.Khan | SDEO (Male) Alai Battagram vice S.No. 27. |
| 22 | Mr. Khalid Naeem (MC) | SDEO (Male) Prova D.I.Khan | SDEO (Male) Kohistan Lower vice S.No. 24 |
| 23 | Mr. Abdul Hafeez (MC) | SDEO (Male) Kulachi D.I.Khan | SDEO (Male) Tank vice S.No. 20. |
| 24 | Mr. Muhammad Nawab SST (TC) | SDEO (Male) Kohistan Lower | SDEO (M) Kandian Kohistan Upper in OPS against the vacant post. |
| 25 | Mr. Saleh Muhammad (MC) | SDEO (Male) Mandan, Buner | SDEO (M) Chakesar Shangla against the vacant post |
| 26 | Mr. Saeed Mehmood (MC) | SDEO (Male) Gagara, Buner | SDEO (Male) Matrung Shangla against the vacant post. |
| 27 | Mr. Chanzeb Khan (MC) | SDEO (Male) Alai Battagram | SDEO (Male) Baffa Mansehra vice S.No. 31 |
| 28 | Mr. Ameer Rehman (MC) | SDEO (Male) Mansehra | SDEO (Male) Lal Qilla District Dir Lower against the vacant post. |
| 29 | Mr. Muhammad Ajmal (MC) | SDEO (Male) Oghi Mansehra | SDEO (Male) Lora Abbottabad vice S.No. 39 |
| 30 | Mr. Shafiq Ur Rehman (MC) | SDEO (Male) Darband, Mansehra | SDEO (Male) Lower Tanawal Abbottabad vice S.No. 40. |
| 31 | Mr. Abdus Samad (MC) | SDEO (Male) Baffa, Mansehra | SDEO (Male) Havelian Abbottabad vice S.No. 38 |
| 32 | Mr. Ishtiaq Jadoon (MC) | SDEO (Male) Haripur | SDEO (Male) Mansehra vice S.NO.28. |
| 33 | Mr. Fazle Qadir (MC) | SDEO (Male) Khan Pur, Haripur | SDEO (Male) Oghi Mansehra vice S.No. 29. |
| 34 | Mr. Muhammad Rehman Shah (MC) | SDEO (Male) Bakka Khel Bannu | SDEO (Male) Lakki Marwat vice S.No. 36. |
| 35 | Mr. Muhammad Irshad (MC) | SDEO (Male) Bannu | SDEO (Male) Sarai Naurang, Lakki vice S.No. 37. |
| 36 | Mr. Qadir Shah (MC) | SDEO (Male) Lakki Marwat | SDEO (Male) Takht e Nasratl, Karak vice S.No. 17 |
| 37 | Mr. Abdur Rehman Rashid (MC) | SDEO (Male) Sarai Naurang, Lakki | SDEO (Male) Bakka Khel Bannu vice S.No.34. |
| 38 | Mr. Sardar Abdul Qayum (MC) | SDEO (Male) Havelian Abbottabad | SDEO (Male) Haripur vice S.No. 32. |
| 39 | Mr. Naseer Ahmad (MC) | SDEO (Male) Lora Abbottabad | SDEO (Male) Khan Pur, Haripur vice S.No. 33 |
| 40 | Mr. Maroof Khan (MC) | SDEO (Male) Lower Tanawal Abbottabad | SDEO (Male) Darband, Mansehra vice S.No. 30 |
| 41 | Mr. Sardar Ali (TC BS-16) | ASDEO (M) Batara Buner. | SDEO (Male) Gagara. Buner in OPS vice S.No.26. |
| 42 | Mr. Allaf Hussain (MC) | SDEO (M) Kabal District Swat | SDEO (M) Tehsil Thana Baizai District Malakand against the vacant post. |
| 43 | Syed Kamal Shah (MC) | ASDEO (Primary) Buner | SDEO (M) Daggar District Buner In OPS against the vacant post. |

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT



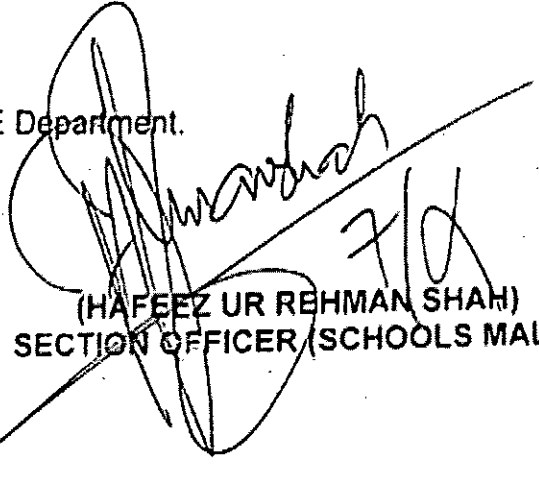
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

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Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Deputy Secretary (Admn) E&SE Department.
9. Officers concerned.
10. Office order file.


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

Attested
W.D.

(G)
(25)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

Dated Peshawar the January 04th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: In partial modification of this Department's Notifications of even number dated 30-12-2021 and 03-01-2022, the Competent Authority is pleased to order the posting/transfer of the following Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

| Sr. No | Name & designation | From | To |
|--------|---------------------------------|-----------------------------|-----------------------------|
| 1. | Muhammad Zareef (MC BS-17) | SDEO (Male) Alai Battagram | SDEO (Male) Pharpur Di Khan |
| 2. | Muhammad Noor Sultan (MC BS-17) | SDEO (Male) Pharpur Di Khan | SDEO (Male) Alai Battagram |

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Battagram and Di Khan
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Battagram and Di Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.

(Signature)
4/1/2022
(HARVEZ-UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)

H
28

To

The Chief Secretary,
Government of Khyber Pakhtunkhwa Peshawar.

Subject: **APPEAL AGAINST THE TRANSFER ORDER DATED 04.01.2022**

Respected Sir,


With profound regards and best wishes it is submitted;

1. That under signed is a permanent resident of Tehsil Paharpur District Dera Ismail Khan and I am working as SDEO Management Cadre BS-17 in the E&SE Department Khyber Pakhtunkhwa Peshawar.
2. That on September 15, 2021, I was transferred from the post of SDEO (M) Tehsil Draban Kalan to SDEO (M) Paharpur District DIKhan. (Annexure A)
3. That vide Notification dated 30.12.2021, I was adjusted / posted against the post of SDEO (M) Bhettni District Lakki Marwat. (Annexure B)
4. That the department made a partial modification in the above-cited Notification and the worthy Secretary E&SE Department was pleased to adjust the under signed at my previous station, SDEO(M) Paharpur District DIKhan on 03.01.2022 and I have assumed the charge of the said post. (Annexure C)
5. That just after the next day of above cited Notification, the verses transfer of under signed with SDEO (M) Alai District Battagram was made on 04.01.2022, without any reason and the District Battagram is nearly 700Km away from District DIKhan. (Annexure D)
6. This transfer Order / Notification was issued just after 03 months and 18 days which is illegal, unlawful and against the tenure/ merit policy. It is further added that as per Government Policy the tenure must be honour as I have 03 months and 18 days tenure as SDEO Paharpur DIKhan.

In view of above submission it is, therefore, requested to your kind honour that kindly set aside the E&SE Department transfer Notification dated 04.01.2022 and the appellatant may kindly be retained as SDEO(M) Paharpur DIKhan in the best interest of justice.

For this oblige I shall remain thankful to your good self.

Dated: 05.01.2022


Muhammad Noor Sultan SDEO
Tehsil Paharpur District DIKhan
0345-924-0885

Attested
w/s

To

Secretary to the Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department Peshawar.

Subject: **APPEAL AGAINST THE TRANSFER ORDER DATED 04.01.2022**

Respected Sir,

With profound regards and best wishes it is submitted;

1. That under signed is a permanent resident of Tehsil Paharpur District Dera Ismail Khan and I am working as SDEO Management Cadre BS-17 in the E&SE Department Khyber Pakhtunkhwa Peshawar.
2. That on September 15, 2021, I was transferred from the post of SDEO (M) Tehsil Draban Kalan to SDEO (M) Paharpur District DIKhan. (Annexure A)
3. That vide Notification dated 30.12.2021, I was adjusted / posted against the post of SDEO (M) Bhattani District Lakki Marwat. (Annexure B)
4. That the department made a partial modification in the above-cited Notification and your good office was pleased to adjust the under signed at my previous station, SDEO(M) Paharpur District DIKhan on 03.01.2022 and I have assumed the charge of the said post. (Annexure C)
5. That just after the next day of above cited Notification, the verses transfer of under signed with SDEO (M) Alai District Battagram was made on 04.01.2022, without any reason and the District Battagram is nearly 700Km away from District DIKhan. (Annexure D)
6. This transfer Order / Notification was issued just after 03 months and 18 days which is illegal, unlawful and against the tenure/ merit policy. It is further added that as per Government Policy the tenure must be honour as I have 03 months and 18 days tenure as SDEO Paharpur DIKhan.

In view of above submission it is, therefore, requested to your kind honour that the appellant may kindly be retained as SDEO(M) Paharpur DIKhan in the best interest of justice.

For this oblige I shall remain thankful to your good self.

Dated: 05.01.2022.



Muhammad Noor Sultan SDEO
Tehsil Paharpur District DIKhan
0345-924-0885

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Amir
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SCIA Pakistan
 H.C. 12101-5155327-9
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 Tel: 0305-3240005
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 If found, please mail to the above following address:
 Supreme Court Bar Association, Pakistan
 Constitution Avenue, Islamabad, Tel: 051/9215185, 042/9210970

30
 SUPREME COURT
 BAR ASSOCIATION
 PAKISTAN
 Attorney
 Advocate
 President
 Secretary

وکالت نامہ

ایک روپیہ
 کورٹ فیس

بعدالت جناب جسٹس نواز سرسری نیشنل ایسوسی ایشن
 منجانب ایسٹریٹ
 نام گورنمنٹ ہاؤس
 دعویٰ یا جرم
 جسٹس نواز سرسری
 تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں لڑتی طرف سے واسطے پیروی و جملہ دہی برائے پیشی یا تقدیر مقدمہ بمقام
 کورٹ میں شریک ہو کر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر اور تاروں کا کارہ برداشت کیا گیا ہے۔ مقدمہ ایک صاحب
 موصوف کو اطلاع دیکر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف
 اگلے کسی طرح ذمہ دار نہ ہوں گے۔ نیز ایک صاحب موصوف مقدمہ مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا کچہری یا بروز قیام بیروی کرنے کے
 امداد نہ ہوں گے۔ نیز ایک صاحب موصوف مقدمہ مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا کچہری یا بروز قیام بیروی کرنے کے ذمہ دار نہ
 ہوں گے۔ اور مقدمہ مقام کچہری کے علاوہ اور جگہ ہامت ہونے یا بروز قیام بیروی کے اوقات کے آگے کچہری پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
 دار یا اس کے واسطے کسی معائنہ کے ادا کرنے یا جمانہ واپس کرنے کے کسی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل معائنہ پر داخل صاحب موصوف مثل کروہ
 ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذمہ دار نظر ثانی اپیل گرائی و ہر قسم درخواست پر دستخط تصدیق کرنے کا
 بھی اختیار ہوگا۔ اور کسی قسم یا اگر کسی کرانے اور ہر قسم کا روپیہ اصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے میان دینے اور اس پر تالی یا راضی نہ ہو اپنے
 حلف کرنے، انہال کوئی کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از کچہری مقدمہ بیروی مقدمہ مذکورہ نظر ثانی اپیل گرائی اور آمد کی
 مقدمہ یا مستثنیٰ ذمہ دار یا طرف یا درخواست حکم انتہائی یا قریبی یا گرفتاری قبل از فیصلہ اجراء کے ذمہ دار بھی صاحب موصوف کو بشرط ادا تکلیف علیہ و مقتضات بیروی کا اختیار ہوں
 اور تمام سادت پر داخل صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اس کے جزی
 کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرائی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے ایک یا بیرون کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور اپنے مشیر قانون کو
 بھی ہر امر میں دینی اور اپنے اختیارات حاصل ہوں گے۔ جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کوہر جائے اختیار ہوگا۔ اور صاحب
 موصوف کا حق ہوگا۔ کہ صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور اپنی
 صورت میں ہر کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

سورہ 22 جولائی 2022ء

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

العبد العبد العبد

Accepted

[Handwritten signature]

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KHALID MEHMOOD

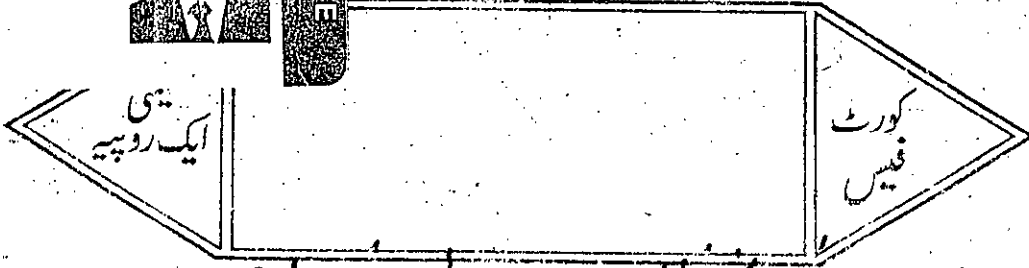
Advocate
bc-15-5415
Date of issue: October 2020
Valid upto: October 2023



ADVOCATE

وکالت نامہ

Secretary
KP Bar Council



مخبرہ جسیر محمد خواجہ سرور
مخبرہ ایملہ پٹیل
مخبرہ گلبرگیا رحمان
مخبرہ سروس ویل

عوی یا جرم
تفصیل دعوی یا جرم

باعث تحریر آئندہ
خالک جوہر ایملہ پٹیل

کو حسب ذیل شرائط پر پیکل مقرر کیا ہے کہ میں پیشی پر خود یا ذرا بڑی رو برو عدالت حاضر ہونا رہوں گا اور ہر وقت نکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر منظر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صحت مقام پگھری کے علاوہ یا پگھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پگھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پگھری کے اوقات کے آگے یا پیچھے پیش ہونے پر منظر کوئی قدم اٹھانے سے پہلے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عمت نہ دلائل کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو جس ساختہ پر وادخت صاحب موصوف نقل کر رہے ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرض ذوقی یا جواب دہی یا درخواست اجراء اجازت ڈگری نظر ثانی اپیل تکراری و ہر قسم درخواست ہر قسم کے بیان دینے اور پر تاملی یا راضی نامہ و فیصلہ بظرف کرنے اقبال دعوی کا بھی اختیار ہوگا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مزکور بیرون از پگھری صدر بیرونی مقدمہ مزکور نظر ثانی اپیل و تکراری و ہر قسم مقدمہ یا مشوقی ڈگری یک طرفہ یا درخواست حکم اتمام یا قرتی یا گرفتاری نقل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا شدگی طبعہ محتاج دہی کا اختیار ہوگا اور تمام ساختہ پراخت صاحب موصوف نقل کر رہے از خود منظور و قبول ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مزکورہ یا اس کے کسی جزو کی تازہ دہی یا بصورت درخواست نظر ثانی اپیل تکراری یا دیگر معاملہ و قدمہ مذکورہ کسی درجہ وکیل یا جیٹر کو اپنے بھانجے یا اپنے ہمراہ مقرر کریں اور اپنے مشیر قانون کو بھی ہر امر میں دہی اور دے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں نہ کچھ ہر جائز التزام پڑے گا وہ صاحب موصوف کا حق ہوگا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور اپنی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

ایمان وکالت نامہ لکھ دیا ہے تاکہ مسترد نہ ہو
تاریخ 22 جنوری 2022

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

Accepted

ایملہ پٹیل

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/20_____

In case No. 76 -p/2022

Muhammad Noor Sultan vs Gort. of KP

Presented by M. Anwar Awan Adv. on behalf of M. Zaseef Entered
in the relevant register. Res. No. 8

Put up alongwith main case

REGISTRAR

| | |
|--|---------------------------------|
| Last date fixed | <u>24/02/2022</u> |
| Reason(S) for last adjournment, if any by the Branch Incharge. | <u>Service Tribunal Defunct</u> |
| Date(s) fixed in the similar matter by the Branch Incharge | <u>mi</u> |
| Available dates Readers/Assistant Registrar branch | <u>20/04/2022 at pesh</u> |

mi
11/04/22
Assistant Registrar

REGISTRAR

Approved

Reader

11/04/2022

Sir,

PUC is an application submitted by Mr. *Mohd Anwar Awan* Vs. *M Noor Sultan* in
Appeal No: *76/22*, wherein he has requested for early fixation/hearing of
appeal. *M Noor Sultan*

It is submitted that huge pendency of cases are lying in this tribunal however, the
appellant can be accommodated on the following dates as per diary.

S.No: Dates on which such appeal can be fixed.

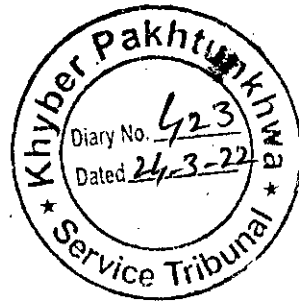
Sir The instant case pertain to *S-I-U-Lan* can
be fixed soon after march next tour.
ie-23-5-2022

Submitted for appropriate order, Please.

[Signature]
Registrar *25/3/22*

Hon'ble Chairman

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR



CM No- 2022.
Appeal No 76 of 2022.

Muhammad Noor Sultan VERSUS Govt Of Khyber Pakhtunkhwa & Others.

*Put up to the worthy Chairman
with relevant appeal.* **APPEAL**

APPLICATION FOR EARLY FIXATION OF APPEAL

Reader
24/3/2022
That the brief facts of the case are as under:

1. That the appeal is fixed for preliminary hearing at Principal Seat Peshawar at 24-01-2022. The appeal is admitted for regular hearing and operation of impugned notification dated 04-01-2022 is suspended and appeal is fixed for hearing on 24-02-2022.
2. That on 24-02-2022, the Hon,ble Court is not functional so no proceeding is conducted on date fixed. The matter pertain to urgency due to suspension order, should be heard early.

It is, therefore, most respectfully prayed that on acceptance this application, the service appeal may kindly be heard urgently for disposal.

YOUR HUMBLE APPELLANT

[Signature]
Muhammad Zareef
Respondent No-8
Through Counsel

Dated; 24-03-2022.

[Signature]
Mohammad Anwar Awan
Advocate Supreme Court :

AFFIDAVIT

Muhammad Zareef do hereby solemnly affirm and declare on OATH that the contents of the same are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable court:

[Signature]
Identified by counsel
Mohammad Anwar Awan ASC

[Signature]
DEPONENT
12103-1502382-3

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

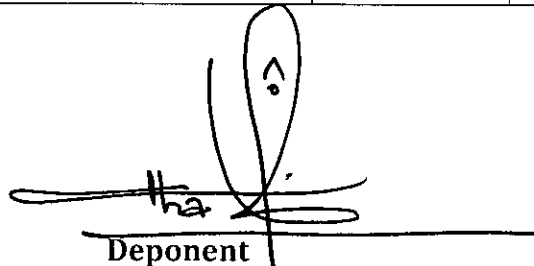
Muhammad Noor Sultan

VS

Government of KPK

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Deponent

Dr. Khalid Saeed Akbar

Divisional Litigation Officer

Secretariat & Directorate of E&SE KP Peshawar

0343-903-3399

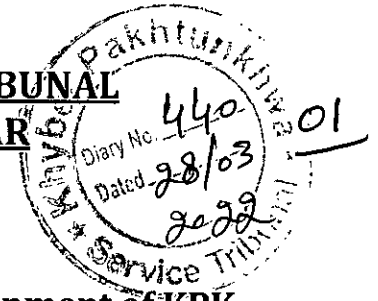
BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

Muhammad Noor Sultan

VS

Government of KPK



PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary objections

- 1) That the appeal is not maintainable and incompetent in the eyes of Law in the present form.
- 2) That the appellant is estopped due to his own conduct to file this appeal.
- 3) That the appellant has got no cause of action and locus standi to file instant appeal.
- 4) That the appellant has not come to the Tribunal with clean hands and has suppressed all relevant facts.
- 5) That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- 6) That the appeal filed by the Appellant is pre mature and the appellant has concealed the material facts from Honourable Tribunal.
- 7) That the Honourable Service Tribunal has no jurisdiction to entertain the instant appeal in its present form.
- 8) That the appeal has been mis-oriented, mis-constructed and mistakenly drawn and is incompetent in its present form and context, and is liable for Rejection.
- 9) That the appeal is weak having no force, fabricated, fictitious, based on ill will, malafide and having no footings in the eyes of law.
- 10) That as per Section 10 of Civil Servants Act, 1973, every Civil Servant shall be liable to serve anywhere within or outside the province.
- 11) That the Order Impugned has been acted upon and compliance has been made, therefore, the instant appeal is infructuous.
- 12) The Private Respondent has already assumed charge at the new place of duty within the stipulated time and his pay has been active from the new station of duty.
- 13) That proceeding with the instant appeal would be a futile exercise and just wastage of the precious time of this Honourable Tribunal.

- 14) That as stated in the objections supra, the appeal is bereft of cause of action and is liable for dismissal.

Respectfully Sheweth

- 1) This para pertains to the address of parties and services of appellant as SDEO(M) BS-17 Management Cadre in the respondent department.
- 2) That the appellant was selected by KP Public Service Commission as ADEO/ASDEO BS-16 in the year 2011. Since 2011 to 2021 appellant had work as ADEO/ASDEO BS-16, but in August 7th, 2020 appellant was assigned charge of SDEO (M) Tehsil Draban Kalan District DIKhan in OPS. The appellant worked as SDEO (M) Tehsil Draban kalan for period of 13 months. In the month of September 15th 2021 appellant was transferred from the post of SDEO (M) Tehsil Draban Kalan to the SDEO (M) Tehsil Paharpur DIKhan at his home town. It is further added that in September 2021 appellant assumed the charge of post of SDEO BS-17 (Acting Charge Basis). It is worth mentioned that the appellant was promoted to the post of SDEO BS-17 on regular basis by the respondents Department vide Notification dated 30.12.2021. In the light of Notification dated 30.12.2021 appellant was posted as SDEO (M) Bhetanni District Lakki Merwat. **(Annexure A)**
- 3) Incorrect / not admitted. This para is related to the Notification of E&SE Department Dated **03.01.2022** regarding transfer posting of Management Cadre Officers of the respondents department. In the light of Notification Dated **03.01.2022** the appellant was transferred from the post of SDEO (M) Tehsil Bhetanni District Lakki Merwat to the post of SDEO (M) Paharpur District DIKhan, whereas the private respondent No. 08 was transferred from the post of SDEO (M) Alai District Batagram to the post of SDEO (M) Paharpur District DIKhan. The private respondent No. 08 and appellant were transferred / adjusted on the basis of tenure; hence no discrimination had been made with present appellant. It is further added that the private respondent No. 08 had file departmental representation before the respondents department against his transfer Notification Dated **07.10.2021**. In the light of said representation the worthy Secretary E & S E Department had been pleased to call the private respondent No. 08 for personal hearing on **21.10.2021** and adjusted him as SDEO(M) Ghazni Khail vide Notification Dated **15.11.2021**. The Appellant is a Civil Servant and as per Section 10 of Civil Servants Act, 1973, "Any Civil Servant shall be liable to serve anywhere within or outside the province in any post under the Federal Government or any Provincial Government". **(Annexure B)**

- 4) This para is correct. The private respondent No. 08 filed appeal before the respondent No. 3 against his office Notification dated 07.10.2021 and appellant was called for personal hearing. The appellant appeared before the respondent No. 3, appellant was heard personally and the respondent No. 3 was pleased to accept the appeal of respondent No. 8 and transferred him as SDEO(M) Ghazni Khail District Lakki Marwat vide Notification dated 15.11.2021. It is further added that the transferred Notification dated 15.11.2021 was withdrawn / cancelled to the extent of private respondent No. 8 vide Notification Dated 01.12.2021, as he was **Returning Officer at Allai Battagram Local Government Election 2021 Phase II**. It is further added that the private respondent No. 08 had filed another representation dated 10.12.2021 before the office of the respondent No. 3 for restoration of cancelled order dated 01.12.2021. **(Annexure C)**
- 5) Incorrect / not admitted and strongly denied. The appellant is working as SDEO BS-17 and will be transfer to the any Sub Division being provincial cadre post. It is further added that the appellant served as SDEO (M) Draban Kalan District DIKhan for a period of 13 months on OPS/AC basis and SDEO (M) Paharpur DIKhan for period of about 04 months. After 17 months he got promotion to the post of SDEO BS-17 vide Notification Dated 30.12.2022 and posted as SDEO BS-17 Bhetanni District Lakki Marwat and just after 03 days of said Notification appellant got adjustment / transfer to the post of SDEO Paharpur DIKhan. Hence appellant is not an aggrieved person and service appeal of appellant is liable to be dismissed with heavy cost. It is further added that the respondent department is working under the law, there is no political interference in the respondent department.
- 6) Incorrect / not admitted. Appellant filed representation before the respondent No. 3 the Secretary to the Government of Khyber Pakhtunkhwa E&SE Department. The worthy Secretary E&SE Department was pleased to the call the appellant on personal hearing on 17.01.2022 after personal hearing of appellant the respondent No. 3 was pleased to dismiss the appeal of the appellant being devoid of merit. It is further added that the private respondent No. 8 appeal dated 10.12.2021 regarding his restoration as SDEO (M) GHazni Khail District Lakki Mawat was in process but in the mean while the post of SDEO (M) Ghazni Khail was filled with new incumbent named Mr. Abdul Qadeer Shah. Therefore, the respondent No. 3 was pleased to transfer the private respondent to the post of SDEO(M) Paharpur DIKhan vide Notification dated 04.01.2022 being Senior Management Cadre Officer of this department.

7) Incorrect / not admitted. The appellant got promotion to the post of SDEO BS-17 vide Notification dated 30.12.2021 and he was posted as SDEO Bhetanni District Lakki Merwat but after 03 days appellant got transfer to the post of SDEO (M) Paharpur DIKhan. This transfer order of the appellant was not justified in eye of law; therefore, competent authority has been pleased to the transfer the appellant to the post of SDEO (M) Alai District Batagram. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. It is, therefore, requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant with cost.

Objections on Grounds

- i. Incorrect / not admitted. The act of the respondents was according to law, based upon the natural principle of justice. No discrimination had been made with the present appellant. The Notification dated 04.01.2022 was according to law and policies of the government. The appellant was adjusted against the post of SDEO BS-17 (MC). It is further added that the appeal of the private respondent No. 08 was accepted by the worthy Secretary E&SE Department KP Peshawar and he was transferred to the District DIKhan as his wife died in 2017.
- ii. Incorrect and not admitted. Strongly denied. The appellant did not have any right of posting at DIKhan. The appellant is guzzetted officer of Class-I and may be posted / transferred anywhere in the Khyber Pakhtunkhwa hence the claim of the appellant to post him as SDEO DIKhan is against the law. The private respondent No. 08 assumed the charge of post as per order / Notification dated 04.01.2022 of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department (**Annexure D**)
- iii. Incorrect / not admitted. Strongly denied. The respondents department issued transfer Notification dated 04.01.2022 is in the public interest, the respondent No. 8 was adjusted to due to his seniority, furthermore the wife of respondent No. 08 was died in the year 2017 and he had five daughters, being widower he is facing severe domestic problems. Therefore, private respondent No. 8 was transferred to district DIKhan.
- iv. Incorrect / not admitted. The appellant was transferred to the post of SDEO (MC) Allai Batagram, the transfer of an officer is not discrimination with him. Therefore, no discrimination had been made with the present appellant. Transfer is the part of job, therefore, appellant should not have any objection on

his transfer such like he was transferred from Sub-Division Draban Kalan to Sub-Division Paharpur and he did not have any objection. Hence the claim of the appellant is against the law and did not sustainable in the eye of law.

- v. Incorrect, hence denied. The stance of the appellant is having no truth and is totally false and fictitious. This act of the respondents cannot be declared against the law on any ground whatsoever but the straight away rejection of present Service Appeal.
- vi. Incorrect, strong denied. The impugned order was issued in best public interest and no one was compensated rather, the appellant is interested to prolong his tenure at his choice station in spite of past and closed transaction after assumption of charge.
- vii. Incorrect, and denied. The Appellant was transferred in the public interest by the Competent Authority after fulfilling all legal and codal formalities; therefore, the appellant has got no cause of action or locus standi to file the present service appeal for his grievances before this Honourable Tribunal.
- viii. Incorrect / not admitted. The maximum tenure is three year, it is further added that any officer can be transferred to the any post within the province or outside the province.
- ix. The counsel for respondents may kindly be allowed to raise additional grounds at the time of arguments.

Pray

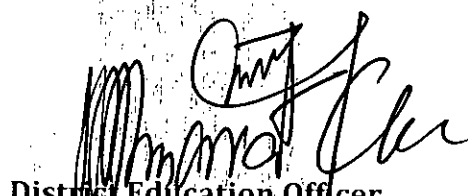
It is further requested to this Honourable Tribunal to dismiss the Service Appeal of the appellant because the Service Appeal of the appellants is only an exercise in futility as the appellant was transfer to the post of SDEO (MC) in the best public interest.


Secretary

Elementary & Secondary Education Department
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2&3)


Director

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar


District Education Officer
(M) Dera Ismail Khan

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

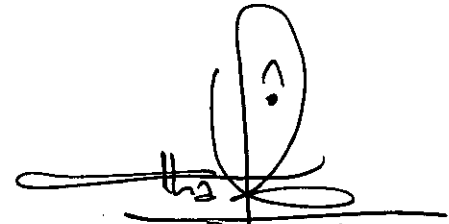
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Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar Divisional Litigation Officer for Secretariat and Directorate of Elementary & Secondary Education Department KPK Peshawar do hereby solemnly affirm and declared on oath that the contents of above mentioned service appeal are correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent

Dr. Khalid Saeed Akbar

12101-0899674-5

0343-903-3399

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

Muhammad Noor Sultan

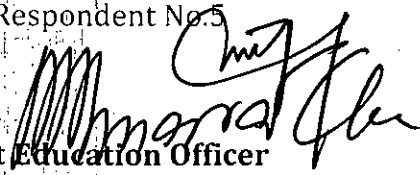
VS

Government of KPK

Authority

I, District Education Officer (M) Dera Ismail Khan Respondent No. 5 do hereby authorized Dr. Khalid Saeed Akbar Divisional Litigation Officer for Directorate and Secretrate of E & S E KPK Peshawar to attend this Honourable Service Tribunal KPK Peshawar on behalf of respondents in connection with submission of para wise comments and till the decision of the service appeal.

Respondent No.5


District Education Officer
(Male) Dera Ismail Khan



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

①
A
8

Dated Peshawar the August 07, 2020

NOTIFICATION

NO.SO(SMJE&SED)/7-1/2020/Posting/Transfer/MC:- The Competent Authority is pleased to transfer Mr. Muhammad Noor Sultan ASDEO BS-16 (Male) Circle Dhaki, DIKhan (Management Cadre) and post him as SDEO BS-17 (Male) Daraban Kalan DIKhan against vacant post in OPS, in the public interest, with immediate effect.

2. No TA/DA is allowed.

Enclt. of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), D. I. Khan.
4. District Accounts Officers, (Male), D. I. Khan.
5. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
8. PA to Additional Secretary (Estab) E&SE Department.
9. PA to Deputy Secretary (Admin) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.
12. Master file.

(MUHAMMAD ARIF)

SECTION OFFICER (SCHOOLS MALE)

District Education Officer
(M) Dera Ismail Khan

091

PROVISIONS OF APPOINTMENT: SHALL BE IN ACCORD TO THE RULES OF THE ASSISTANT DIRECTOR (S) (S) ON REGULAR BASIS.

| SR | Name of officer/ Qualification | Recommendations of the SFC |
|----|--|---|
| 6 | Abul Hasnat M.B. M.S. | Recommended for Promotion from ADEP (M) (S) (S) to the post of SDEP Assistant Director (S) (S) on regular basis. |
| 7 | Muhammad Akbar Das M.A. B.L. | Recommended for Promotion from ADEP (M) (S) (S) to the post of SDEP Assistant Director (S) (S) on regular basis. |
| 8 | Khalid Haid Shah M.S. P.H. | Recommended for Promotion from ADEP (M) (S) (S) to the post of SDEP Assistant Director (S) (S) on regular basis. |
| 9 | Abdur Ghani M.A. M.F. | Recommended for Promotion from ADEP (M) (S) (S) to the post of SDEP Assistant Director (S) (S) on regular basis. |
| 10 | Muhammad Anwar Khan, M.A. M.F.S. Shahzad (S) (S) M.A. M.F. | Recommended for Promotion from ADEP (M) (S) (S) to the post of SDEP Assistant Director (S) (S) on regular basis. Mr. Ghani Muhammad Appointed as Principal-in-Charge (S) (S) and he retained his against the post of SDEP (M) (S) (S) for a period of two (02) years. Therefore, the committee recommended appointment in SDEP (S) (S) or acting charge basis against his available post in light of FR-11(C). If original appointment returned to the post of SDEP (M), the acting charge appointment shall be reverted back to the original post. |
| 11 | Muhammad Saif M.A. M.F. | Mr. Saif has appointed as Principal-in-Charge (S) (S) and he retained his against the post of SDEP (M) (S) (S) for a period of two (02) years. Therefore, the committee recommended him for appointment in SDEP (S) (S) on acting charge basis against his available post in light of FR-11(C). If original appointment returned to the post of SDEP (M), the acting charge appointment shall be reverted back to the original post. |
| 12 | Wahid Muhammad M.C. M.S. | Mr. Muhammad Wahid appointed as Principal-in-Charge (S) (S) and he retained his against the post of SDEP (M) (S) (S) for a period of two (02) years. Therefore, the committee recommended him for appointment in SDEP (S) (S) on acting charge basis against his available post in light of FR-11(C). If original appointment returned to the post of SDEP (M), the acting charge appointment shall be reverted back to the original post. |
| 13 | Iqbal Ahmad M.A. M.F. | Mr. Iqbal Ahmad appointed as Principal-in-Charge (S) (S) and he retained his against the post of SDEP (M) (S) (S) for a period of two (02) years. Therefore, the committee recommended him for appointment in SDEP (S) (S) on acting charge basis against his available post in light of FR-11(C). If original appointment returned to the post of SDEP (M), the acting charge appointment shall be reverted back to the original post. |

On their promotion the concerned will be in probation for a period of one year as specified in Rule-13 of Higher Posts (General) Rules, 1954.

dated - 4-2-21

SECRETARY

Encl. No. 1/1/2021
Copy forwarded to

PTO.

1. The Assistant General, Higher Posts, Hyderabad.
2. The Secretary to Govt. of Higher Posts, Finance Department.
3. The Secretary to Govt. of Higher Posts, Hyderabad.
4. The Director, Hyderabad.
5. The Director, Hyderabad.
6. The Director, Hyderabad.

SECRETARY

Clear Copy

PROMOTION OF ADEOs/ASDEOs (MALE) BPS-16 (MC) TO THE POST OF SDEOs/ASSISTANT DIRECTOR (MALE) BS-17 (MC) ON REGULAR BASIS.

| S# | SL# | Name of officer/ Qualification | Recommendation of the DPC |
|----|-----|-------------------------------------|--|
| 1 | 4 | | |
| 2 | 5 | | |
| 3 | 6 | | |
| 4 | 7 | | |
| 5 | 8 | | |
| 6 | 9 | | |
| 7 | 10 | Muhammad Noor Sultan M.A,M.Ed | Mr Saleem Khan appointed as principal/Voice Principal BS-18 and he retained lien against the post of SDEO (M) E&SED for a period of two (02) Years therefore, the committee recommended him for appointment as SDEO BS-17 on acting Charge basis against the lien retainable post in light of FR-12(C). If original incumbent renewed the post of SDEO (M), the acting charge appointee shall be reverted back to the original post. |
| 8 | 11 | | |
| 9 | 12 | | |



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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10

Dated Peshawar the March 12, 2021

NOTIFICATION

NO.SO(SME&SED)/7-1/2020/Posting/Transfer/MC: Posting/transfer of the following officers of Elementary & Secondary Education is hereby ordered as mentioned against each, in the best public interest, with immediate effect:

| Sr | Name, designation & present place of duty | Posted as | Remarks |
|----|--|--|--|
| 1 | Mr. Aurangzeb BS-17 (MC) SDEO (M) Bisham, Shongla | Deputy DEO (M) BS-18 Swat in OPS | AVP |
| 2 | Raja Jehangir SDEO (Male) Abbottabad, (MC BS-17) | DDEO (Male) BS-18 Manselra in OPS | AVP |
| 3 | Mr. Raees Ur Rehman SDEO (MC BS-17) SDEO (Male) Judha Torghar | DDEO (M) Torghar BS- 18 in OPS. | AVP |
| 4 | Mr. Saif Muhammad SS HC Civics (BS-17) CHSS Sorath Garhi Onkral (TC BS-17) | DDEO (M) Miranshah North Waziristan TD BS- 18 in OPS | AVP |
| 5 | Mr. Ali Haider SDEO (BS-17) MC SDEO (M) Timergara Dir Lower | DDEO (M) BS-18 Dir Lower in OPS. | AVP |
| 6 | Mr. Mehboob Ehsan SDEO (BS- 17) MC SDEO (M) Chitral Lower | DDEO (M) BS-18 Chitral Lower in OPS | AVP |
| 7 | Muhammad Zubair, BS-17, (MC) Deputy DEO (M) Charsadda in OPS | Deputy DEO (M) BS-18 Mohmand TD in OPS | AVP |
| 8 | Mr. Abdul Haleem BS-16 (MC) ASDEO, O/O DEO (M), Shongla | SDEO (M) BS-17 Bisham, Shongla in OPS | V.S#1 |
| 9 | Muhammad Zafar BS-17 (MC) Assistant Director, Directorate of E&SE, KP | SDEO (M) BS-17 Kabal Swat | AVP |
| 10 | Mr. Saleh Badshah ASDEO BS-16 (MC) ASDEO (M) Serai Naurang Lakki Marwat | Assistant Director (BS-17) , Directorate of E&SE, KP. | V.S# 9 Promoted to BS-17 MC vide Notification No.SO(PE)/2- 6/OPC Meeting/2020 dated: 04.02.2021 |

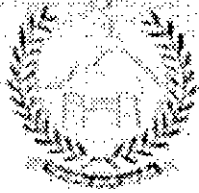
GOVERNMENT OF KHAYR PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT



| | | | |
|-----|---|--|---|
| 11. | Mr. Nisar Ahmad AEO BS-16 (M) SDO (M) Darsana D.I. Khan in OPS | Mr. Nisar Ahmad AEO BS-16 (M) ADO (Esab Primary) O/O DDO (M) Mardan | Already Occupied Promoted to BS-17 MC side Notification No. SOP/E/2- G/DPC Meeting/2020 dated: 04.02.2021 |
| 12. | Wazir Muhammad AEO (BS-16) SDO (M) Tangi Charsada in OPS | Mr. Sikkandar Hayat ASDO BS-16 (MC) ASDO (M) Tangi Kowal Swabi OPS | Already Occupied Promoted to BS-17 MC side Notification No. SOP/E/2- G/DPC Meeting/2020 dated: 04.02.2021 |
| 13. | Mr. Nisar Ahmad ASDO BS-16 (MC) ASDO Chate Kotla Muhammad Khan Darsana | Mr. Sikkandar Hayat ASDO BS-16 (MC) ASDO (M) Tangi Kowal Swabi OPS | Already Occupied Promoted to BS-17 MC side Notification No. SOP/E/2- G/DPC Meeting/2020 dated: 04.02.2021 |
| 14. | Mr. Nisar Ahmad ASDO BS-16 (MC) ASDO (M) Tangi Kowal Swabi OPS | Mr. Nisar Ahmad AEO BS-16 (M) ADO (Esab Primary) O/O DDO (M) Mardan | Already Occupied Promoted to BS-17 MC side Notification No. SOP/E/2- G/DPC Meeting/2020 dated: 04.02.2021 |
| 15. | Mr. Nisar Ahmad AEO BS-16 (M) ADO (Esab Primary) O/O DDO (M) Mardan | Mr. Nisar Ahmad AEO BS-16 (M) ADO (Esab Primary) O/O DDO (M) Mardan | Already Occupied Promoted to BS-17 MC side Notification No. SOP/E/2- G/DPC Meeting/2020 dated: 04.02.2021 |

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

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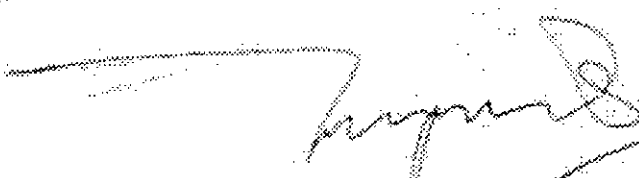
| | | | |
|----|--|---------------------------|---------|
| 36 | Mr. Ashraf Rehman (MC BS-18) DEFO Nowshera | DDSD (M) BS-18 Dir Khyber | V.S.038 |
|----|--|---------------------------|---------|

Encl. of even No. & Date

SECRETARY

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male), Concerned.
4. District Accounts Officers, Concerned.
5. PS to Minister E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
7. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
8. PA to Additional Secretary (Estab) E&SE Department.
9. PA to Deputy Secretary (Admin) E&SE Department.
10. Director, EMIS E&SE Department.
11. Officers concerned.
12. Master file.


(MUJEEB UR REHMAN)

SECTION OFFICER (SCHOOLS MALE)

12/03/21



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
(Phone No. 92111)

A
13

Dated Peshawar the September 15, 2021

NOTIFICATION

NO. SO/SME&SED/7-12021/PA/MC: The Competent Authority is pleased to order the transfer of the following Officers of Management Cadre of Elementary & Secondary Education Department, in the best public interest, with immediate effect.

| S# | Name of officer & designation | From | To |
|----|------------------------------------|--|--|
| 1. | Mr. Ghulam Muhammad SST (BS-17) | GMS Kuza Sub Division Darazinda District D.I. Khan | SDEO (M) Sub Division Jandola District Tank against the vacant post. |
| 2. | Muhammad Ishtiaq SDEO (MC BS-17) | SDEO (M) BS-17 Dasso District Kohistan Upper | SDEO (M) Dour Mera District Torghar against the vacant post. |
| 3. | Mr. Noor Sultan SDEO (MC BS-17) | SDEO (M) Daraban District D.I. Khan | SDEO (M) Panarpur District D.I. Khan vice S No 04 |
| 4. | Muhammad Hamayun SDEO (MC BS-17) | SDEO (M) Panarpur District D.I. Khan | SDEO (M) Daraban District D.I. Khan vice S No 03 |
| 5. | Mr. Iqbal Ahmad SDEO (MC BS-17) | SDEO (M) Ghazi District Haripur. | SDEO (M) Pura District Shangla vice S No 06. |
| 6. | Mr. Niaz Wali Khan SDEO (MC BS-17) | SDEO (M) Pura District Shangla | SDEO (M) Ghazi District Haripur vice S No. 05 |
| 7. | Mr. Shareef Khan ADEO (MC BS-10) | ADEO (P&D) O/O DEO (M) Kohat | SDEO (M) Gumbat Kohat in OPS against the vacant post. |

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst. of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, Concerned.
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (Estab) E&SE Department.
9. Officers concerned.
10. Office order file.

District Education Officer (Male) Beta Ismail Khan

(HAFEEZUR REHMAN SHAHI)
SECTION OFFICER (SCHOOLS MALE)

5/4
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14



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223388

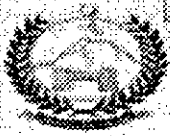
Dated Peshawar the, December 30th, 2021

NOTIFICATION

No.SO(MC)E&SED/4-16/2021/POSTING/TRANSFERS(MC): Consequent upon their promotion to the post of Sub Divisional Education Officers (Male BS-17) in Elementary & Education Department, Khyber Pakhtunkhwa as notified vide Notification No. SO(PE)/2-6/DPC Meeting/ASDEOs (M)/2021 dated 28-10-2021, the Competent Authority is pleased to order the following posting / adjustment, in the public interest, with immediate effect -

| S. No | Name & Designation | Place of posting |
|-------|-------------------------------------|---|
| 1. | Mr. Sikandar Hayat (MC BS-17) | SDEO Tangi Charsadda against the vacant post. |
| 2. | Mr. Muhammad Noor Sultan (MC BS-17) | SDEO (M) Bettani Lakki Marwat. Against the vacant post. |
| 3. | Mr. Wisal Muhammad (MC BS-17) | SDEO(M) Garhi Kapura Mardan against the vacant post. |
| 4. | Mr. Nisar Ahmad (MC BS-17) | SDEO (M) Kalkot Dir Upper against the vacant post. |
| 5. | Mr. Muhammad Iqbal (MC BS-17) | SDEO (M) Sheringal Dir Upper. |
| 6. | Mr. Zohoor-ud-Din (MC BS-17) | SDEO (M) Khar TD Bajaur against the vacant post. |
| 7. | Mr. Habib Ullah (MC BS-17) | SDEO (M) Darban DI Khan against the vacant post |
| 8. | Mr. Habib Fazle Akber (MC BS-17) | SDEO (M) Razarn Swabi |
| 9. | Mr. Mir Samad Khan (MC BS-17) | SDEO (M) Battagram. |
| 10. | Mr. Muhammad Ishiaq (MC BS-17) | SDEO (M) Sub Division Hassan Khel Peshawar against the vacant post. |
| 11. | Mr. Muhammad Naeem (MC BS-17) | SDEO (M) Takht-e-Nusrati Karak against the vacant post. |
| 12. | Syed Anwar Ali Shah (MC BS-17) | Assistant Director, (Estb:) Directorate E&SE Peshawar |
| 13. | Mr. Muhammad Sharif (MC BS-17) | SDEO (M) Lower Kurram against the vacant post. |
| 14. | Mr. Abdul Qayum Khan (MC BS-17) | SDEO (M) Miran Shah North Waziristan against the vacant post. |
| 15. | Mr. Ihsan Ullah (MC BS-17) | SDEO (M) Landikotal Khyber against the vacant post |
| 16. | Mr. Habib Ullah (MC BS-17) | SDEO (M), Janrud Khyber against the vacant post |
| 17. | Mr. Muhammad Hayat Khan (MC BS-17) | SDEO (M) Bara Khyber against the vacant post. |
| 18. | Mr. Sultan Muhammad Khan (MC BS-17) | SDEO (M) Orakzai Lower against the vacant post. |
| 19. | Mr. Muhammad Ishaq (MC BS-17) | SDEO (M) Charbagh Swat against the vacant post. |
| 20. | Mr. Fayaz Uddin (MC BS-17) | SDEO (M) Lal Killa Dir Upper against the vacant post. |

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To be substituted for the notification bearing the same number and date

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 011-3551199

B
17

Dated Peshawar the January 03rd, 2022

CORRIGENDUM

No. 50 (MC) E&SE/D-16/2021/POSTING/TRANSFERS, in partial modification of this Department's Notification of even number dated 30-12-2021 & 31-12-2021 the Competent Authority is pleased to order the posting / transfers of the following teachers / officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest:-

| Sr. No | Name & designation | From | To |
|--------|-------------------------------------|--|--|
| 1 | Mr. Rahmat Khan (TC BS-17) | Assistant Director, E&SE Khyber Pakhtunkhwa | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-2) |
| 2 | Muhammad Ashraf (TC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa | SDEO (Male) Mirali, North Waziristan (AVP) |
| 3 | Dr. Abdul Gaiyum Khan (MC BS-17) | Under transfer as SDEO (Male) Miranshah North Waziristan | Assistant Director, MAs E&SE Khyber Pakhtunkhwa (Vice No-4) |
| 4 | Mr. Matullah Khan (MC BS-17) | Assistant Director, MAs E&SE Khyber Pakhtunkhwa | SDEO (Male) Miranshah North Waziristan (Vice No-3) |
| 5 | Muhammad Wajhuddin (TC BS-17) | Monitoring Officer, E&SE Department, KP | Assistant Director MAs E&SE Khyber Pakhtunkhwa (AVP) |
| 6 | Mr. Nisar Ahmad (MC BS-17) | Under transfer as SDEO (Male) Karkot Dir Upper | SDEO (Male) Rustam Mardan (Vice No-9) |
| 7 | Mr. Visaal Muhammad (MC BS-17) | Under transfer as SDEO (Male) Garhi Kapura Mardan | SDEO (Male) Tangi Charsadda (AVP) |
| 8 | Muhammad Noor Sultan (MC BS-17) | Under transfer as SDEO (Male) Bettani Laki Marwal | SDEO (Male) Pharpur Di Khan (AVP) |
| 9 | Haftz Fazil Akbar (MC BS-17) | Under transfer as SDEO (Male) Rustam Mardan | Services placed at the disposal of Directorate of E&SE KP for further adjustment against the vacant post of AD (BS-17) |
| 10 | Mr. Sultan Muhammad (MC BS-17) | Under transfer as SDEO (Male) Orakzai Lower | SDEO (Male) Ghan Kapura Mardan (Vice No-7) |

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of Even No & date

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Male) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

(Signature)
23/1/2022
(NAFEEZ UR REHMAN SHAH)
SECTION OFFICER (Management Cadre)

B
18

بخدمت جناب سیکرٹری ایلیمنٹری اینڈ سیکنڈری ایجوکیشن

خیبر پختونخواہ پشاور

عنوان:- اپیل برائے تعیناتی

جناب عالی!

گزارش ہے کہ سائل کا تبادلہ نوٹیفیکیشن نمبر: SO(SM)E&SED/7-1/PT/G/MC مورخہ: 07-10-2021

کے تحت ضلع ڈیرہ اسماعیل خان سے بگلرام تحصیل الائی میں ہو گیا ہے۔ (سیریل نمبر 21)

سائل تحصیل پہاڑپور ضلع ڈیرہ اسماعیل خان کارہائشی ہے اور مذکورہ تحصیل سائل کے گھر سے تقریباً 15 گھنٹے کی

مسافت پر ہے۔ مزید برآں یہ کہ فروری 2017 میں سائل کی بیوی کا کینسر کیوجہ سے انتقال ہو چکا ہے۔ سائل کی پانچ بیٹیاں

اور ایک بیٹا ہے۔ دیکھ بھال سائل کے ذمہ ہے سائل نے دوسری شادی بھی نہ کی ہے۔

مذکورہ بالا مجبوری اور پریشانی کو مد نظر رکھتے ہوئے انسانی ہمدردی کی بنیاد پر ضلع کی کسی بھی دوسری سب ڈویژن

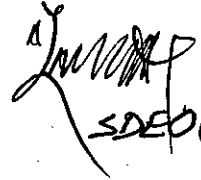
پر ٹرانسفر کر کے مشکور فرمائیں۔

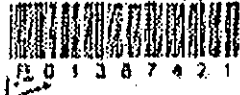
سب ڈویژن پروا اور سب ڈویژن ڈیرہ اسماعیل خان بھی Vacant ہیں۔

مورخہ: 12-10-2021

العارض

محمد ظریف SDEO (مردانہ) الائی بگلرام


SDEO (M)



01387421

حکومت پاکستان

نیشنل ایٹمی اینڈ ریسیورچ سائنس اتھارٹی (وزارت داخلہ)

اتحادہ سال سے کم عمر بچوں کا سرٹیفکیٹ

CRC No 7065932

درخواست دہندہ کا شناختی کارڈ نمبر: 12103-1502382-3 عمر تقریباً درخواست دہندہ کا نام

| نمبر شمارہ | نیشنل ایٹمی اینڈ ریسیورچ سائنس اتھارٹی | والدہ کا نام اور شناختی کارڈ نمبر | بچہ کا نام اور شناختی کارڈ نمبر | پیدائش کی تاریخ | مقام پیدائش |
|------------|--|-----------------------------------|---------------------------------|-----------------|----------------|
| 1 | 12103-0267341-0 | عمر تقریباً | عمر تقریباً | 12103-1502382-3 | پنجاب، پاکستان |
| 2 | 12103-9832243-9 | عمر تقریباً | عمر تقریباً | 12103-1502382-3 | پنجاب، پاکستان |

- 1- اس شناختی کارڈ پر ایٹمی اینڈ ریسیورچ سائنس اتھارٹی کے ایجنٹوں کا تدارک ہے۔
- 2- اس شناختی کارڈ پر ایٹمی اینڈ ریسیورچ سائنس اتھارٹی کے ایجنٹوں کا تدارک ہے۔
- 3- اس شناختی کارڈ پر ایٹمی اینڈ ریسیورچ سائنس اتھارٹی کے ایجنٹوں کا تدارک ہے۔
- 4- اس شناختی کارڈ پر ایٹمی اینڈ ریسیورچ سائنس اتھارٹی کے ایجنٹوں کا تدارک ہے۔
- 5- اس شناختی کارڈ پر ایٹمی اینڈ ریسیورچ سائنس اتھارٹی کے ایجنٹوں کا تدارک ہے۔

عثمان یوسف حسین

رہنما ڈائریکٹر جنرل

2015-07-16

ملکہ سائید گھوڑ پھار پور، نیشنل ایٹمی اینڈ ریسیورچ سائنس اتھارٹی



1210315023823

درخواست دہندہ کا شناختی کارڈ نمبر: 12103-1502382-3

Registered



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

B
21

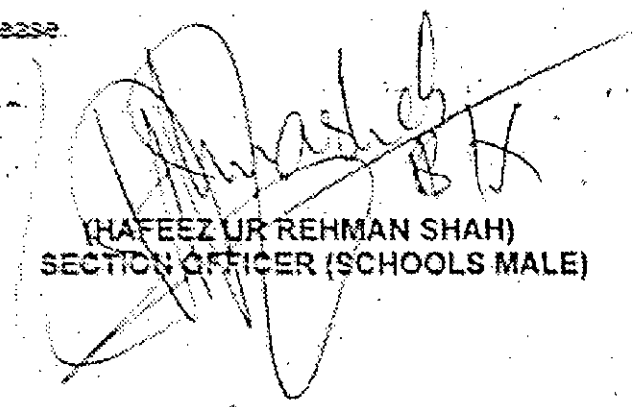
No.SO(SM)E&SED/7-1/2021/Sherin Zada

Dated Peshawar the October 18, 2021

- To
1. Mr. Muhammad Tahir, SDEO,
Sub-Division Charbagh Swat
 2. Mr. Fida Muhammad, SDEO (M),
Sub-Division Charsadda.
 3. Mr. Muhammad Zareef SDEO,
Sub-Division Abul Battagram.
 4. Mr. Maroof Khan SDEO,
Sub-Division Daraband Manshera.
 5. Mr. Muhammad Ajmal SDEO,
Sub-Division Lora Abbottabad.

Subject - PERSONAL HEARING.

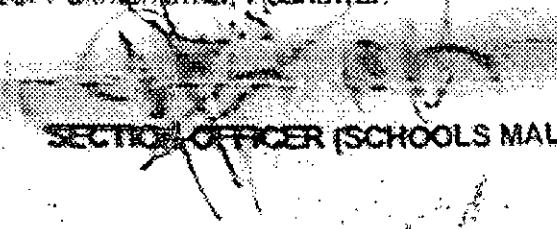
I am directed to refer to your appeal on the subject noted above and to inform you to attend office of the Additional Secretary (General), Elementary & Secondary Education Department, Civil Secretariat, Peshawar on 21.10.2021 at 12:00Am for personal hearing before the said officer, please.


(HAFAEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE)

Encls: Even No. & Date:

Copy of the above is forwarded to the:-

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer Swat/Charsadda/Battagram/Manshera/Abbottabad, with the request to inform the incumbent officer.
3. P.A to Additional Secretary (G) E&SED Khyber Pakhtunkhwa, Peshawar.
4. PS to Secretary, E&SE Department Khyber Pakhtunkhwa, Peshawar.


SECTION OFFICER (SCHOOLS MALE)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223533

B
22

Dated Peshawar the November, 15 2021

CORRIGENDUM

NO.SO(SME&SED/7-1/2021/PT/MC/SDEOs : In partial modification of this Department notification of even number dated 07.10.2021, the following place of posting may be read as under in best public interest with immediate effect:->

| S# | Name & Designation | From | To |
|----|-----------------------------------|---|--|
| 1. | Mr. Muhammad Tahir MC (BS-17) | SDEO (M) Sub Division Charbagh District Swat | SDEO (M) Blambat District Dir Lower vice S.No.02. |
| 2. | Mr. Muqadas MC (BS-17) | SDEO (Male) Blambat, District Dir Lower. | SDEO (Male) Turkho Mulkho District Chitral Upper against the vacant post. |
| 3. | Mr. Muhammad Zareef MC (BS-17) | SDEO (Male) Alai District Baltagram | SDEO (M) Ghazni Khel District Lakki Marwat against the newly created vacant post. |
| 4. | Mr. Abdul Hafeez MC (BS-17) | SDEO (Male) District Tank | SDEO (M) D.I.Khan against the vacant post. |
| 5. | Mr. Khalid Naeem MC (BS-17) | SDEO (Male) District Kohistan Lower | SDEO (Male) District Tank vice S.No. 04. |

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & Date

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) concerned.
4. District Account Officers, concerned
5. Director, EMIS E&SE Department.
6. PS to Minister for E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Deputy Secretary (Admin) E&SE Department.
9. Officers concerned.
10. Office order file.

(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS MALE),

To

The Secretary
Govt. of Khyber Pakhtunkhawa
E&SE Department Peshawar

C
24.

Subject: Appeal for Restoration of Cancelled order dated 01/12/2021

Respected sir

It is submitted that I was notified as returning officer at SNo.82 in District DIKhan vide ECP Notification No. F.7 (2)/2020-LGE-KP Dated 25/06/2021 for Phase-I, but I was transferred to the Office of SDEO (M) Allai Battagram vide Notification No. SO (SM) E&SED/7-1/2021/PT/G/MC Date 07/10/2021 at SNo.21 during ban imposed by ECP and I complied the order.

I pleaded my appeal and got relief by your kind honor and was adjusted as SDEO (M) Ghazni Khel Lakki Marwat vide Corrigendum No. SO (SM) E&SED/7 1/2021/PT/MC/ SDEOs Date 15/11/2021 at SNo.03.

It is pertinent to explain that the ECP replaced my name by substitute RO in DIKhan for Phase-I, Now the fresh proposal of my substitute Mr. Javed Ali Shah DFO Pashto, Allai at SNo.10 has been sent vide DEC Battagram No.F.3 (79)/2020-LGE/DEC-B dated 18/11/2021 for Phase-II as per standard procedure and practice.

It is therefore, requested that may please be restored my corrigendum as SDEO (M) Ghazni Khel Lakki Marwat and obliged.

Dated: 10/12/2021

Your's Obediently



Muhammad Zarif
SDEO (M) Ghazi Khel

C
25

**ELECTION COMMISSION OF PAKISTAN
NOTIFICATION**

Islamabad, the 25th June, 2021

Subject:- **APPOINTMENT OF DISTRICT RETURNING OFFICERS, RETURNING OFFICERS & ASSISTANT RETURNING OFFICERS IN CONNECTION WITH THE CONDUCT OF LOCAL GOVERNMENT ELECTIONS IN KHYBER PAKHTUNKHWA PROVINCE.**

No.F.7(2)/2021-LGE-KP:- In exercise of powers conferred upon it under Articles 140A (2) and 219(d) of the Constitution of the Islamic Republic of Pakistan, Sections 50, 51 & 224 of the Elections Act, 2017, Rules 46 & 47 of the Elections Rules, 2017, Sections 75 & 86 of the Khyber Pakhtunkhwa Local Government Act, 2013, read with Rule-10 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2021 and all other powers enabling it in that behalf, the Election Commission of Pakistan publishes herewith for general information a list of District Returning Officers, Returning Officers & Assistant Returning Officers appointed in connection with the conduct of Local Government Elections of each category of seats in City / Tehsil Councils and Village/ Neighbourhood Councils of (6) Districts i.e. Mardan, Kohat, Bannu, D.I.Khan, Abbottabad & Swat of Khyber Pakhtunkhwa Province as shown against each:-

| S# | District Returning Officer | S# | Returning Officer | S# | Assistant Returning Officer | Jurisdiction |
|----------------|--|----|---|----|--|---------------------------------|
| MARDAN | | | | | | |
| 1 | Mr. Habib Ullah Arif, Deputy Commissioner, Mardan | 1 | Mr.Mujeeb ur Rehman, Addl: Deputy Commissioner (G) Mardan, | 1 | Mr.Anwar Khan, SDEO (M), Mardan. | Tehsil Mardan |
| | | | | 2 | Tehsildar, Mardan, | |
| | | 2 | Mr.Muhammad Yar, Addl: Assistant Commissioner-V, Mardan, | 3 | Mr. Anjum Khalid, SST (IT), GHS Garghi Kapoora | Tehsil Gari Kapoora |
| | | | | 4 | Tehsildar, Gari Kapoora, | |
| | | 3 | Mr.Gulnawaz Khan, Addl: Assistant Commissioner-I, Mardan | 5 | Mr.Imtiaz Ahmad, SDEO(M), Rustam, | Tehsil Rustam |
| | | | | 6 | Mr. Afsar Khan, Tehsildar, Rustam | |
| | | 4 | Mr.Muhammad Kamran Khan, Addl: Assistant Commissioner, Katlang | 7 | Mr.Fazli Khuda, SDEO,(M),Katlang, | Tehsil Katlang |
| | | | | 8 | Mr. Bashir Muhammad, Tehsildar, Katlang, | |
| | | 5 | Miss. Aneela Fahim, Assistant Commissioner, Takht Bhai. | 9 | Mr.Said Ikram,SDEO.(M), Takht Bhai. | Tehsil Takht Bhai |
| | | | | 10 | Mr. Fazal Karim, Tehsildar, Takht Bhai. | |
| | | 6 | Miss. Saman Abbas, Assistant Commissioner, Mardan, | 11 | Mr.Tahir Shah, A.S.D.E.O (Male),Mardan | NC Purdil Abad (Sikandari-1) |
| NC Sikandari-2 | | | | | | |
| NC Sikandari-3 | | | | | | |
| NC Par Hoti-1 | | | | | | |

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26.

| S# | District Returning Officer | S# | Returning Officer | S# | Assistant Returning Officer | Jurisdiction |
|----|--|----|--|-----|--|--|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 4 | Arifullah Awan, Deputy Commissioner, D.I.Khan | 79 | Mr.Nawab Sameer Hussain Laghari, Assistant Commissioner, D.I.Khan | 100 | Mr.Muhammad Saleem, ASDEO (M/C), City Circle, D.I.Khan | NC Islamia Colony NC Eidgah Kalan NC Awan Abad NC Baran Abad NC Thoya Fazil NC Thoya Siyal NC Moh Jumma Shah NC Garrhi Sadozai |
| | | 80 | Mr.Mehmood Iqbal, Deputy District Education Officer (Male), D.I.Khan | 101 | Mr.Muhammad Aslam, Tehsildar, Paroa | VC Ejaz Abad VC Muryali VC Jhok Qureshi VC Kotla Saidan-I VC Kotla Saidan-II VC Kotla Saidan-III VC Nawab VC Arra VC Khutti VC Kotla Habib VC Fateh VC Haji Mora-I VC Haji Mora-II |
| | | 81 | Mr.Rehamdad Ullah, Assistant Commissioner, Revenue | 102 | Mr.Rozi Khan, Tehsildar (Settlement), D.I.Khan. | VC Chehkan VC Pota VC Haindan VC Shero Nau VC Shero Kohna VC Korai VC Hayat Korai VC Lachra VC Zafar Abad-I VC Zafar Abad-II |
| | | 82 | Mr.Muhammad Zarif, Sub Divisional Education Officer, D.I.Khan | 103 | Mr.Ikram Ullah, Tehsildar, D.I.Khan | VC Giloti VC Bahadari VC Chunda VC Yarik VC Budh VC Kech VC Muqem Shah VC Girsal VC Hissam VC Saggu Janubi |
| | | 83 | Mr.Farakh Jalees, Chief Statistical Officer, D.I.Khan Region. | 104 | Mr.Sikandar Irfan, ASDEO (M/C), Mandhran Circle, D.I.Khan | VC Ratta Kulachi-I VC Ratta Kulachi-II VC Mandhra VC Kokar VC Rakh Mangan VC Kachi Paind Khan VC Shorkot VC Singhar VC Gomal VC Himmat |

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| S# | District Returning Officer | S# | Returning Officer | S# | Assistant Returning Officer | Jurisdiction |
|----|--|-----|---|-----|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 6 | Junaid Khan, Deputy Commissioner, Swat | 153 | Miss. Haya Uddin, Additional Assistant Commissioner, Charbagh, Swat | 186 | Ayub Khan, ADEO (P & D), o/o DEO (Male), Swat | Charbagh III VC Shinkad VC Taligram VC Ganajeer VC Kishawra VC Malamjabba VC |

2. To ensure that elections to the Local Government are conducted honestly, justly, fairly in accordance with law and to ensure that the corrupt practices are guarded against, the Election Commission of Pakistan directs that no transfers / postings of the Government Officers and Officials including Autonomous Bodies/ Authorities, appointed as DROs, ROs and AROs shall be made without prior approval of the Commission till further orders.

By the order of the Election Commission of Pakistan


(Abdul Hafeez)
Director (LGE)

To
The Manager,
Printing Corporation of Pakistan Press,
Islamabad.

[For publication in the Gazette of Pakistan,
Extraordinary (Part-III) of today's date].

4/2

I. Copy forwarded for Information to the:-

1. Secretary to the President, Aiwan-e-Sadar, Islamabad.
2. Secretary to the Prime Minister, Prime Minister, Secretariat, Islamabad.
3. Secretary, Cabinet Division, Islamabad.
4. Secretary, Ministry of Interior Government of Pakistan, Islamabad.
5. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
6. The Secretary, Local Government Department, Pakhtunkhwa, Peshawar.
7. The I.G Police Khyber Pakhtunkhwa.

II. Copy also forwarded for information and necessary action to the:-

- i. The Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar
- ii. All District Returning Officers
- iii. All Returning Officers
- iv. All Regional Election Commissioner
- v. All District Election Commissioner

Through PEC, Khyber Pakhtunkhwa,
Peshawar.

III. Copy forwarded to the:-

- vi. Director to the Hon'ble CEC.
- vii. PSs / PAs to the Hon'ble MEC-I, II, III & IV.
- viii. Staff Officer to the Secretary
- ix. Additional Secretary (Admn).
- x. DG (Law).
- xi. ADG (Budget / Political Finance).
- xii. ADG (Elec-I & II)
- xiii. Director (LGE)
- xiv. Director (Political Finance).
- xv. Director (MIS)
- xvi. Director (Coordination) & Director (Admn), FEA
- xvii. Director (Electoral Rolls)
- xviii. Director (Public Relations)
- xix. Deputy Director (Training) for necessary action.
- xx. Deputy Director (GS)
- xxi. Deputy Director (Budget)
- xxii. Deputy Director (Monitoring)
- xxiii. Deputy Director (LGE-P)
- xxiv. Deputy Director (LGE-B/ICT)
- xxv. Deputy Director (LGE-S)
- xxvi. Deputy Director (Web) for uploading the same on ECP's website.

M. T. Qadir
(Muhammad Tauseef Qadir)
Deputy Director (LGE-KP)



NO.F.3 (79)/2020-LGE/DEC-B
OFFICE OF THE
DISTRICT ELECTION COMMISSIONER
BATTAGRAM

C
29

BATTAGRAM
18th November.2021

To: The Provincial Election Commissioner,
Khyber Pakhtunkhwa
PESHAWAR

Subject: PROPOSAL FOR APPOINTMENT OF DISTRICT RETURNING OFFICERS, RETURNING OFFICERS AND ASSISTANT RETURNING OFFICERS IN CONNECTION WITH 2ND PHASE OF CONDUCT OF CONDUCT OF LOCAL GOVERNMENT ELECTIONS IN KHYBER PAKHTUNKHWA

Dear Sir,

I have the honour to refer to your office letter No. F.6(4)/2020-LGE(PEC) dated 8th November 2021 and this office letter of even No. dated 11th November 2021 on the subject cited above and to state that Mr. Muhammad Zarif, SDEO Allai, Returning Officer at S.no 402 has been transferred vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Corrigendum No. SO.(SM)E&SED/7-1/2021/PT/MC/SDEO dated 15th November 2021 (Copy enclosed).

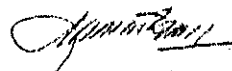
Therefore, fresh proposal for appointment of Returning Officer is hereby sent for further necessary action please.

Yours faithfully

(MUHAMMAD ASLAM)
District Election Commissioner
Battagram

Copy forwarded for information to Regional Election Commissioner,
Hazara Division, Abbottabad.

| | | | | |
|----|--|----|--|---|
| 7 | Mr. Fida Muhammad Principal Government Centennial Model High School Battagram | 9 | Mr. Bakht Nawaz SST General Government Centennial model High School battagram | Peshora Kotgala Aughaz Banda Shingli Payeen Hutal Deeshan Chanjal Barsar Blshkot Paimal Sharif Dabri Shamurad Rangeenabad |
| 8 | Mr. Muhammad Saqib Principal, GHSS Talloos | 10 | Mr. Ihsan Ul Haq SST General, Government High School Talloos | Banna Talloos Kass Hutal Batkul Qallah Kanai Aban Bab Surgal Jambera Kund Cheeran Koshgram Barray Asharban Biari Pokal Karg Rabat Rashang Gangwal Gantar Nehr Bateela Bojri Nogram Bandi Roopkanl |
| 9 | Mr. Uzair Ullah Khan Assistant Sub Divisional Education Officer, Allal | 11 | Mr. Muhammad Irshad SST Government High School Bateela | Pashto Batangl Null Pakka Balg Sakargah Bala Sakargah Payeen Pazang Tandool Bala Tandool Payeen Laghral |
| 10 | Mr. Javed Ali Shah Sub Divisional Forest Officer Pashto, Allal | 12 | Mr. Zia Ur Rehman SST General Government High School Banna | |
| 11 | Mr. Abid Hussain Tehsil Municipal Officer Allal | 13 | Mr. Rahat Ullah SST, Government High School Cheeran | |


 (Muhammad Aslam)
 District Election Commissioner
 Battagram

ELECTION COMMISSION OF PAKISTAN

NOTIFICATION

Islamabad, the 14th December, 2021

Subject:- CORRIGENDUM IN RESPECT OF RETURNING OFFICERS AND ASSISTANT RETURNING OFFICERS APPOINTED FOR THE CONDUCT OF LOCAL GOVERNMENT ELECTIONS IN KHYBER PAKHTUNKHWA.

No.F.7(2)/2021-LGE-KP(Vol-II):- In partial modification of this Commission's notification No.F.7(2)/2020-LGE-KP(Vol-II) dated 23rd November, 2021 containing appointment of District Returning Officers, Returning Officers and Assistant Returning Officers for the conduct of 2nd Phase Local Government Elections in Khyber Pakhtunkhwa and in exercise of powers conferred upon it under Articles 140A (2) and 219(d) of the Constitution of the Islamic Republic of Pakistan, Sections 51 & 224 of the Elections Act, 2017, Rules 47 of the Elections Rules, 2017, Sections 75 of the Khyber Pakhtunkhwa Local Government Act, 2013 read with Rule 10 of the Khyber Pakhtunkhwa Local Councils (Conduct of Elections) Rules, 2021 and all other powers enabling it in that behalf, the Election Commission of Pakistan is pleased to issue corrigendum in the above stated notification as per detail given below, however, the jurisdiction will remain the same.

| RETURNING OFFICERS | | | ASSISTANT RETURNING OFFICERS | | |
|-------------------------|--|--|------------------------------|---|---|
| S# | Already Notified ROs | Substituted ROs | S# | Already Notified AROs | Substituted AROs |
| BATTAGRAM | | | | | |
| 217 | Mr. Muhammad Zarif, Sub Divisional Education Officer (M) Allai | Mr. Javed Ali Shah, SDFO, Pashto Allai | - | - | - |
| NORTH WAZIRISTAN | | | | | |
| - | - | - | 28 | Mr. Kamal Khan, Principal GAAPS, Razmak | Mr. Naseem Khan, ASDEO Shewa |
| - | - | - | 32 | Mr. Rasool Ghulam, Principal GHS, Hurmaz, Mirali | Mr. Rasool Ghulam, Head Master, GHS, Razmak |
| - | - | - | 33 | Mr. Sadiq Ali, Head Master, GHS, Khazan Gul Kot | Mr. Sadiq Ali, Head Master, GHS, Ghazlma |
| - | - | - | 34 | Mr. Fida Khan, Assistant District Education Officer, Mirali | Mr. Fida Khan, Senior Science Teacher, GHS, Sahib Jan Kot |
| - | - | - | 36 | Mr. Anwar Maqsood, Assistant Education Officer, Razmak | Mr. Anwar Maqsood, Senior Science Teacher, Govt. Elementary College of Teaching Miarali |
| - | - | - | 39 | Mr. Roshan Khan, Assistant Education Officer, Spinwam/Shewa | Mr. Roshan Khan, Senior Science Teacher, Govt. Elementary College of Teaching Miarali |

| RETURNING OFFICERS | | | ASSISTANT RETURNING OFFICERS | | |
|--------------------|---|--|------------------------------|---|---|
| S# | Already Notified ROs | Substituted ROs | S# | Already Notified AROs | Substituted AROs |
| LOWER DIR | | | | | |
| 104 | Mr. Salim Zada, Social Welfare Officer, Adenzai | Mr. Rizwan Ullah, TMO, Adenzai | 137 | Mr. Muhammad Islam, Sub Divisional Education Officer, Timergara | Mr. Niaz Ahmed, SST, GHS, Shamsi Khan |
| 109 | Mr. Zia Ullah Khan, District Officer, Social Welfare, Lower Dir | Mr. Muhammad Zeb, Principal, School for Deaf Children, Timergara | 139 | Mr. Muqaddas, Sub Divisional Education Officer, Balambat | Mr. Muhammad Tahir, Sub Divisional Education Officer, Balarnbat |
| 119 | Mr. Muhammad Ishaq, Principal GDC, Sadbar Kali, Samarbagh | Mr. Sher Rehman, AAC, Samarbagh | - | - | - |
| 124 | Mr. Kifayat Ullah, Principal GDC, Lal Qilla | Mr. Sajjad Ali, SDO, C & W, Timergara | - | - | - |
| ABBOTTABAD | | | | | |
| - | - | - | 220 | Mr. Mubarak Abbasi, ADEO, Sports, O/O DEO (Male), Abbottabad. | Mr. Mubarak Abbasi, Head Master, GMS, Deedal, Abbottabad |
| ORAKZAI | | | | | |
| 3 | Mr. Wajid Aman, Assistant Director (Industries), District Orakzai | Mr. Zahid Usman, Kakakhail, Additional Deputy Commissioner, Finance & Planning, District Orakzai | - | - | - |

By the order of the Election Commission of Pakistan

To

The Manager,
Printing Corporation of Pakistan Press,
Islamabad.

[For publication in the Gazette of Pakistan,
Extraordinary (part-III) of today's date]

(NAVEED UR REHMAN)
Deputy Director (LGE-KP)

I. Copy forwarded for information to the:-

1. Secretary to the President, Aiwan-e-Sadar, Islamabad
2. Secretary to the Prime Minister, Prime Minister, Secretariat, Islamabad
3. Secretary, Establishment Division, Islamabad
4. Secretary, Cabinet Division, Islamabad
5. Secretary, Ministry of Interior Government.
6. The Chief Secretary, Government of Khyber Pakhtunkhwa, Peshawar.
7. Secretary, Local Government Department, Government of Khyber Pakhtunkhwa, Peshawar.
8. The I.G. Police, Khyber Pakhtunkhwa.

II. Copy also forwarded for information and necessary action to the:-

1. The Provincial Election Commissioner Khyber Pakhtunkhwa, Peshawar
2. District Returning Officers / Deputy Commissioners, Battagram, North Waziristan, Lower Dir, Abbottabad and Orakzai.
3. Regional Election Commissioners concerned.
4. District Election Commissioners concerned.

Through PEC, Khyber
Pakhtunkhwa, Peshawar.

III. Copy forwarded to the:-

1. PSO to the Hon'ble CEC.
2. Director to the Hon'ble CEC.
3. PSs / PAs to the Hon'ble MEC-I & II.
4. Staff Officer to the Secretary
5. Staff Officer to the Special Secretary.
6. Additional Secretary (Admn).
7. Director General (Law).
8. Director General (LGE).
9. Additional Director General (Budget).
10. Additional Director General (Electoral Rolls).
11. Additional Director General (TR&E).
12. Additional Director General (PR).
13. Deputy Director (Web) for uploading the same on ECP's website.


(NAVEED-UR-REHMAN)
Deputy Director (LGE-KP)

C/32/1



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone No. 091-9223588

Dated Peshawar the January 04th, 2022

NOTIFICATION

NO. SO(MC)E&SED/4-16/2021/POSTING/TRANSFER/MC: In partial modification of this Department's Notifications of even number dated 30-12-2021 and 03-01-2022, the Competent Authority is pleased to order the posting/transfer of the following Officers of Elementary & Secondary Education, Khyber Pakhtunkhwa with immediate effect, in the public interest: -

| Sr. No | Name & designation | From | To |
|--------|---------------------------------|-----------------------------|-----------------------------|
| 1. | Muhammad Zareef (MC BS-17) | SDEO (Male) Alai Battagram | SDEO (Male) Pharpur DI Khan |
| 2. | Muhammad Noor Sultan (MC BS-17) | SDEO (Male) Pharpur DI Khan | SDEO (Male) Alai Battagram |

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Offices (Female) Battagram and DI Khan
4. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
5. District Accounts Officers Battagram and DI Khan.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
7. Officers concerned.
8. Master file.


(HAFEEZ UR-REHMAN SHAH)
SECTION OFFICER (Management Cadre)

C/34

District Education Officer (Male) Dikhan

Subject: Arrival Report

In pursuance of Govt. of Khyber Pakhtunkhwa E&S Education department civil secretariat Peshawar notification No.SO(MC) E&SED/4-16/2021/POSTING/TANSFER/MC. Dated Peshawar the January 4, 2022, I have joined the post of SDEO (M) Paharpur Dikhan today on 06/01/2022 Forenoon. The charge report is also enclosed.

Arrival accepted
today on 06/01/22
Coff
maulana
District Education Officer
(Male), Dara Ismail Khan

Your's faithfully



Muhammad Zarif
SDEO (M) Paharpur Dikhan
(0346-7861895)

C
35

CERTIFICATE OF TRANSFER OF CHARGE

- (1) Certified that we have on the forenoon/afternoon of this day 06/01/2022 respectively made over & received charge as Sub-Divisional Education officer Male Paharpur in this office of the Sub-Divisional Education Officer (Male) Paharpur vide notification No.SO(MC)E&SED/4-16/2021/POSTING /TRANSFER/MC: Dated: Peshawar the January,04,2022.
- (2) Particulars cash important secret & confidential documents handed over are noted on the reverse.

Station Paharpur

Signature of Relived in Absentia
Government Servant Mr. Muhammad Noor Sultan
Designation Sub-Divisional Education Officer
(Male) Paharpur

Signature of Relieving Mr. Muhammad Zareef
Government Servant Mr. Muhammad Zareef
Designation Sub-Divisional Education Officer
(Male) Paharpur

Dated: 06/01/2022

OFFICE OF THE SUB DIVISIONAL EDUCATION (MALE) PAHARPUR

Endst No. 10-18

Dated Paharpur the 06/01/2022

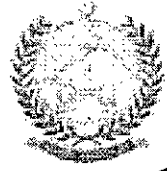
Copy of the above is forwarded to:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Department Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commissioner, D.I. Khan.
4. District Education Officer (M) D.I. Khan.
5. District Accounts Officer, D.I. Khan.
6. Director EMIS E&SE Department Khyber Pakhtunkhwa.
7. PS to Minister for E&SE Department Khyber Pakhtunkhwa.
8. PS to Secretary to E&SED Khyber Pakhtunkhwa.
9. PS to Additional Secretary (Estab) E&SE Department.

as
District Education Officer
(Male), Dera Ismail Khan

Sub Divisional Education Officer
(Male) Tehsil Paharpur
Sub Divisional Education Officer
(Male) Tehsil Paharpur

Dist. Govt. NWFP-Provincial
District Accounts Office D.I.Khan
Monthly Salary Statement (January-2022)



C
36

Personal Information of Mr MUHAMMAD ZARIF 9/17 d/w/s of NAWAZ ALI

Personnel Number: 00190831 CNIC: 1210315023823 NTN: 4111147-8
 Date of Birth: 25.07.1969 Entry into Govt. Service: 28.05.1999 Length of Service: 22 Years 08 Months 005 Days

Employment Category: Vocational Temporary

Designation: 80001693-DISTRICT GOVERNMENT KHYBE

DDO Code: DI6217-DDO (M) ADMN PAHARPUR DISTT DIKHAN

Payroll Section: 002 GPF Section: 001 Cash Center:

GPF A/C No: C1DK000852 Interest Applied: Yes **GPF Balance:** 318,649.00

Vendor Number: 30283824 - MUHAMMAD ZARIF SDEO (M) D.I.KHAN

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 17 Pay Stage: 19

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|---------------------------|----------|
| 0001 | Basic Pay | 74,070.00 | 1001 | House Rent Allowance 45% | 6,650.00 |
| 1947 | Medical Allow 15% (16-22) | 2,541.00 | 2148 | 15% Adhoc Relief All-2013 | 1,400.00 |
| 2199 | Adhoc Relief Allow @10% | 945.00 | 2211 | Adhoc Relief All 2016 10% | 4,860.00 |
| 2224 | Adhoc Relief All 2017 10% | 7,407.00 | 2247 | Adhoc Relief All 2018 10% | 7,407.00 |
| 2265 | Adhoc Relief All 2019 05% | 3,703.00 | 2309 | Adhoc Relief All 2021 10% | 7,407.00 |
| 2315 | Special Allowance 2021 | 6,074.00 | | | 0.00 |

Deductions - General

| Wage type | | Amount | Wage type | | Amount |
|-----------|---------------------------|-----------|-----------|-------------------|-----------|
| 3017 | GPF Subscription | -4,270.00 | 3501 | Benevolent Fund | -1,500.00 |
| 3609 | Income Tax | -5,019.00 | 3990 | Emp.Edu. Fund KPK | -250.00 |
| 4004 | R. Benefits & Death Comp: | -900.00 | | | 0.00 |

Deductions - Loans and Advances

| Loan | Description | Principal amount | Deduction | Balance |
|------|-------------|------------------|-----------|---------|
| | | | | |

Deductions - Income Tax

Payable: 57,233.37 Recovered till January-2022: 32,143.00 Exempted: 0.78 Recoverable: 25,091.15

Gross Pay (Rs.): 122,464.00 Deductions: (Rs.): -11,939.00 Net Pay: (Rs.): 110,525.00

Payee Name: MUHAMMAD ZARIF 9/17

Account Number: 4165130403

Bank Details: NATIONAL BANK OF PAKISTAN, 230327 MAIN BRANCH D.I.KHAN MAIN BRANCH, D.I.KHAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DIKHAN

City: D.I.KHAN

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

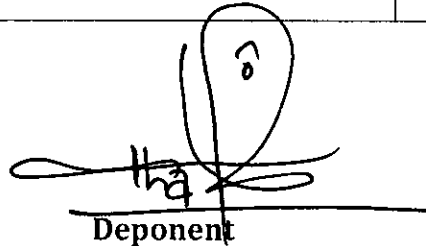
BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

CM No. _____
Service Appeal No. 76/2022

Muhammad Noor Sultan **VS** **Government of KPK**

Index

| SNo | Description of documents | Page No |
|------------|---------------------------------|----------------|
| 01 | Stay vacate application / CM | 01 |
| 02 | Affidavit | 02 |
| 03 | Authority | 03 |



Deponent

Dr. Khalid Saeed Akbar
Divisional Litigation Officer
Secretariat & Directorate of E&SE KP Peshawar
0343-903-3399

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR



Put up to the court with
relevant app. no.

CM No. _____

Service Appeal No. 76/2022

Muhammad Noor Sultan

VS

Government of KPK

28/3/2022

Stay Vacate Application

Respectfully Sheweth

- 1) That the appellant filed present appeal before this Honorable Tribunal on 22.01.2022.
- 2) That this Honourable Tribunal was pleased to order status quo vide order dated 24.01.2022.
- 3) That the respondent department issued transfer Notification dated 04.01.2022, the private respondent assumed the charge of his new place of posting as SDEO Paharpur DIKhan, the order dated 04.01.2022 has been implemented.

It is, therefore, humbly submitted that the instant CM may please be accepted and status quo order dated 24.01.2022 may kindly be withdrawn and respondent No. 8 may kindly be allowed to work as SDEO Paharpur DIKhan in the interest of justice.

Secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Reader

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

02

CM No. _____

Service Appeal No. 76/2022

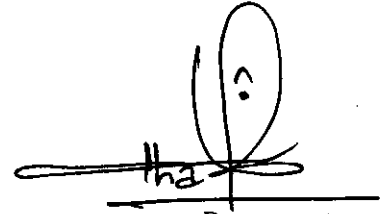
Muhammad Noor Sultan

VS

Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar Litigation Officer DIKhan Division do hereby solemnly affirm and declared on oath that the contents of above mentioned CM are correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Deponent

Dr. Khalid Saeed Akbar
Litigation Officer DIKhan
12101-0899674-5
0343-903-3399

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

CM No. _____

Service Appeal No. 76/2022 .


Muhammad Noor Sultan

VS

Government of KPK

Authority

I, Secretary Elementary & Secondary Education KPK Peshawar (Respondent) do hereby authorize Dr. Khalid Saeed Akbar Litigation Officer DIKhan to attend Honourable Peshawar High Court DIKhan Bench on my behalf in connection with submission of record/CM.



Secretary
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

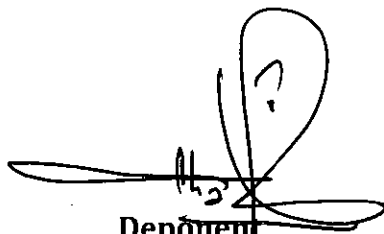
Muhammad Noor Sultan

VS

Government of KPK

Index

| SNo | Description of documents | Annexure | Page No |
|-----|------------------------------|----------|---------|
| 01 | Comments of respondent No. 6 | | 01 |
| 02 | Affidavit | | 02 |
| 03 | Authority | | 03 |



Depoñent

Dr. Khalid Saeed Akbar
Divisional Litigation Officer
Secretariat & Directorate of E&SE KP Peshawar
0343-903-3399

01

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 76/2022

Muhammad Noor Sultan

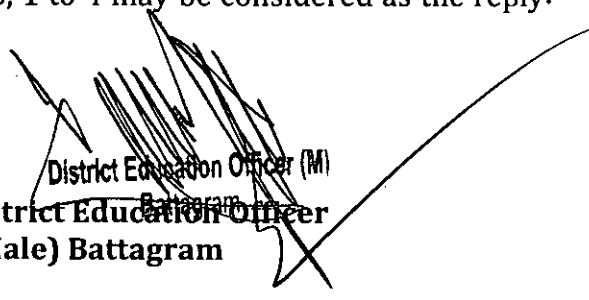
VS

Government of KPK

COMMENTS ON BEHALF OF RESPONDENT NO. 6

Respectfully Sheweth

- 1) That Mr. Muhammad Noor Sultan SDEO (BS-17) was transferred from the post of SDEO (M) Paharpur DIKhan to the post of SDEO (M) Allai Battagram vide Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification Dated 04.01.2022. Mr. Muhammad Noor Sultan (MC) did not attend/report this office. The appellant did not take charge the post of SDEO (M) Alai Battagram. **(Notification is already annexed with service appeal as Annexure G)**
- 2) That this Honourable Tribunal was pleased to grant status quo vide order dated 24.01.2022, thus the private respondent No. 08 Mr. Muhammad Zareef is working as SDEO(M)Alai Battagram again.
- 3) That the transfer matter of Management Cadre Officers (BS-17) is authority of the office of the Worthy Secretary E&SE Department Khyber Pakhtunkhwa Peshawar, so reply of the respondent no, 1 to 4 may be considered as the reply. of this office.


District Education Officer (M)
District Education Officer
(Male) Battagram

BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

02

Service Appeal No. 76/2022

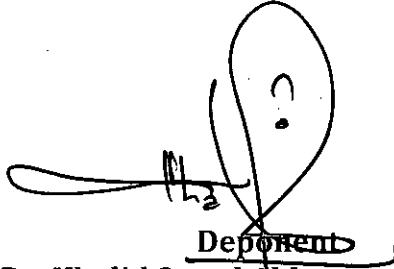
Muhammad Noor Sultan

VS

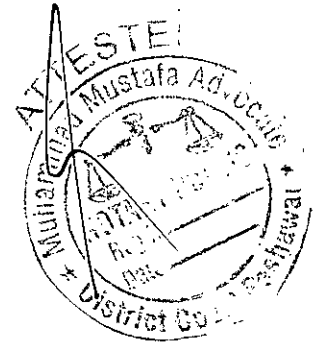
Government of KPK

Affidavit

I, Dr. Khalid Saeed Akbar Divisional Litigation Officer for Secretariat and Directorate of Elementary & Secondary Education Department KPK Peshawar do hereby solemnly affirm and declared on oath that the contents of above mentioned service appeal are correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.



Dr. Khalid Saeed Akbar
12101-0899674-5
0343-903-3399



BEFORE THE HONOURABLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

03

Service Appeal No. 76/2022

Muhammad Noor Sultan

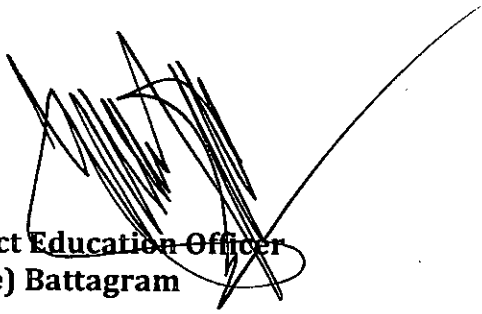
VS

Government of KPK

Authority

I, District Education Officer (M) Battagram Respondent No. 6 do hereby authorized Dr. Khalid Saeed Akbar Divisional Litigation Officer for Directorate and Secretrate of E&SE KPK Peshawar to attend this Honourable Service Tribunal KPK Peshawar on my behalf in connection with submission of para wise comments and till the decision of the service appeal.

Respondent No.6


District Education Officer
(Male) Battagram

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

Service Appeal No. 76 of 2022

Muhammad Noor Sultan

Vs

**Government of Khyber Pakhtunkhwa
Through Secretary Education and others**

APPLICATION FOR TRANSFER OF SERVICE APPEAL TITLED CAPTIONED ABOVE
FROM SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR
TO SERVICE TRIBUNAL, CAMP AT DERA ISMAIL KHAN

Respectfully sheweth,

1. Above noted service appeal is pending adjudication before this Hon'ble Tribunal and is fixed for tomorrow, i.e. 26.5.2022 at Service tribunal Khyber Pakhtunkhwa Peshawar.
2. That the parties belong to district Dera Ismail Khan and it is rather impossible for the appellant to pursue his case at Peshawar and as service career of appellant is at stake, therefore, the same cannot be left in vacuum but at the same time the case cannot be pursued by the appellant freely.
3. That in the interest of justice this Honourable Tribunal has got vast powers under the law to meet the ends of justice, as there are so many reported judgments, wherein the case have been transferred from one District to another because of the peculiar circumstances.
4. That the law requires a peaceful opportunity to every litigant to pursue his case, even otherwise the appellant of the service appeal pending before this Honourable Tribunal and the private respondent are also permanent resident of the


area which do fall within the territorial jurisdiction of Dera Ismail Khan.

5. That in the interest of justice and for the purpose of ease of the parties, the service appeal captioned above needs to be decided by service tribunal camp at Dera Ismail Khan than that of this Hon'ble Tribunal at Peshawar.

It is, therefore, humbly prayed that keeping in view the above facts and circumstances, this Honourable Tribunal may very graciously be pleased to order the transfer the ibid Service Appeal from this Honourable Tribunal, Peshawar to camp at Dera Ismail Khan in the interest of justice.

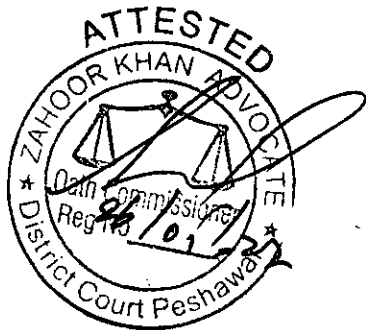
Your Humble appellant


Dated: 28/5/2022


(Muhammad Noor Sultan)
SDEO (Male),
Education Department, D.I.Khan

AFFIDAVIT

I, Muhammad Noor Sultan Sub-Divisional Education Officer, Tehsil Paharpur, Dera Ismail Khan the appellant, do hereby solemnly on oath that the contents of this petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.




(Muhammad Noor Sultan)
SDEO (Male),
Education Department, D.I.Khan



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No: _____/ST Dated: ____/____/2022

To

Secretary Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Subject:- **JUDGMENT IN APPEAL NO. 76/2022 CASE TITLED Mr. MUHAMMAD NOOR SULTAN VS EDUCATION**

I am directed to forward herewith a certified copy of judgment dated 05-07-2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

No: _____/ST Dated: ____/____/2022

To

Secretary Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar.

Subject:- **JUDGMENT IN APPEAL NO. 76/2022 CASE TITLED Mr. MUHAMMAD NOOR SULTAN VS EDUCATION**

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**REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.**